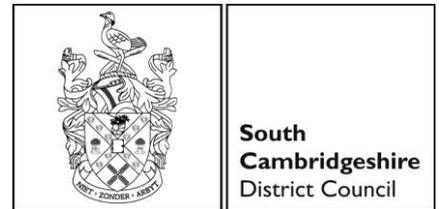


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4 February 2020

To: Chairman – Councillor Anna Bradnam  
Vice-Chairman – Councillor Eileen Wilson  
Members of the Licensing Committee – Councillors Dr. Shrobona Bhattacharya,  
Nigel Cathcart, Graham Cone, Clare Delderfield, Peter Fane, Jose Hales,  
Geoff Harvey, Steve Hunt, Alex Malyon, Peter McDonald, Deborah Roberts and  
Mark Howell

Quorum: 4

Dear Councillor

This is a supplement to the previously-published agenda for the meeting of **LICENSING COMMITTEE** on **MONDAY, 10 FEBRUARY 2020**, containing the appendices to the report which had not been received by the original publication deadline.

Yours faithfully  
**Liz Watts**  
Chief Executive

Requests for a large print agenda must be received at least 48 hours before the meeting.

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## AGENDA

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# Consultation Comments December 2019

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1. Overall Proposed Policy	
A. Resident	I welcome those new proposals. Public safety should not be compromised.
B. Driver	Totally ridiculous and unnecessary, if implicated, South Cam won't get any taxi renewal instead majority will get licenced via the City or other councils and work via the Cross boarder rules.  You need to listen seriously to the trade, otherwise no one would bother getting their vehicles licensed via SCDC
C. Driver	I am pleased to learn SCDC are now taking public and driver's safety seriously. New proposal will significantly improve.
D. Driver	Firstly, we do realise that the licence conditions have to be laid out in a manner to cover most eventualities for most cases but from what we have read there does not seem to be very much flexibility to accommodate different business models.  To this point I refer to the fact that in our case, being a local family business of just 2 cars and 25 years experience with SCDC, some of the conditions would be detrimental to our business and more importantly disliked by our customers.
E. Vehicle Owner	I support the proposals.
F. Resident	Hello, I wish to express a concern. I frequently use multi seater taxis. Ones licensed by Cambridge usually have a conference sitting. But South Cambs licensed vehicles are without conference sitting. It's very uncomfortable getting in. Seats have to be pushed forward to allow access and in an event of accident customers could be trapped.
G. Driver	I would like to make couple of general points before going onto specific Changes to Policy.  The government is introducing new National Standards for our industry next year so I find it strange that SCDC is introducing a raft of new policies before then. Would it not be expedient to await the new standards? Operators and drivers face the prospect of yet further changes to policy in less than a year together with the additional costs.  The additional costs for all drivers as the proposals stand. CCTV - £350. 2nd CoC/year - £80. Safe Guarding Courses – Price TBA. Exterior Signage - ???. Age of Vehicle – could potentially cost some drivers some £1000s.
H. Operator	The policy has been devised for large operators in an urban environment and in many ways is not suitable to apply to all size operators in all areas of the region.

	<p>A "one size fits all" approach is entirely inappropriate and has not been sufficiently thought through.</p> <p>It will have an extremely detrimental effect on small operators in rural parts of South Cambridgeshire and potentially disadvantage many residents, who rely on these smaller operators in the absence of public transport. SCDC should be supporting small rural businesses and trying to ensure that all its residents are provided with the transport options they need - not just concentrating on the large urban areas of the district.</p> <p>Many parts of the proposed policy will mean that operators (particularly smaller ones) will have to put their costs up, this will mean that customers look for cheaper alternatives - including unlicensed operators, which could put residents of South Cambridgeshire at risk</p>
I. Driver	Many private hire drivers in Cambridge area are constantly on the road for many working hours. Could there be a limit of for example no more than 10 hours for each driver on the road which is safer for everyone?
J. Resident	I am so please to see SCDC taking these necessary steps to ensure driver and public safety is up to speed locally and nationally. I am also thankful to learn environmental consideration is given.
K. Operator	I found the consultation on Monday the 29th July very interesting.
L. Cllr	<p>Section 1.2 .xi sets out the basic objectives as:</p> <ul style="list-style-type: none"> <li>• The safety and protection of the public</li> <li>• Vehicle safety, comfort and access</li> <li>• The prevention of crime and disorder</li> <li>• The promotion of environmental sustainability</li> <li>• Protection of children and adults at risk from harm.</li> </ul> <p>These are all important aims. However it is not clear how much of the policy fits into this framework; there seems to be a good deal of mission creep in the development of the document; there are policies which do not further any of these goals, and there are attempts to fulfil some of them which I think are misplaced.</p> <p>This section needs to take into consideration the GDPR, eg 'where appropriate' needs refining as to precisely what kinds of information may be shared. If CCTV is to be installed this becomes particularly critical.</p>
M. Cambridge City Council	<p>I would like to thank you for the opportunity to respond to South Cambridgeshire District Council proposed Hackney Carriage and Private Hire Licensing Policy.</p> <p>During discussions with licensing team members, there has been consensus support for the proposed policy. The proposed changes fall in line with many of Cambridge City Councils current Hackney Carriage and Private Hire policies. With the two neighbouring authorities working at harmonising their policies, it provides a transparent Hackney Carriage and Private Hire service within Cambridge City, an area</p>

	<p>where many of those licensed with South Cambridgeshire District Council frequent.</p> <p>Cambridge City Council seeks to promote the following objectives that impact on the Hackney Carriage and Private Hire trades:</p> <ul style="list-style-type: none"> <li>• The protection of the public;</li> <li>• The establishment of professional and respected hackney carriage and private hire trades;</li> <li>• Access to an efficient and effective public transport service; and</li> <li>• The protection of the environment</li> </ul> <p>The above Cambridge City Council objectives are similar to those of South Cambridgeshire District Council, who promote the following objectives:</p> <ul style="list-style-type: none"> <li>• The safety and protection of the public</li> <li>• Vehicle safety, comfort and access</li> <li>• The prevention of crime and disorder</li> <li>• The promotion of environmental sustainability</li> <li>• Protection of children and adults at risk from harm</li> </ul> <p>The proposed policy demonstrates South Cambridgeshire District Council aim to promote the above objectives</p>
N. Driver	I agree with all three proposals.
O. Driver	The cost to drivers over the last few years is rapidly escalating, will the council agree to a price freeze when these new regulations are in force? Costs are stated as recovery, I can't see that all I've paid you so far this year is 0% profit.
P. Driver	In favour of the majority of the proposals within the policy
Q. Drivers	<p>Dear Licensing Team</p> <p>I am writing to you in response to your consultation on proposed changes to Taxi licencing on behalf of The South Cambridgeshire Executive Operators Group.</p> <p>We are a newly formed group representing operators in the executive and chauffeur profession and our aim is to promote better communication and understanding between the licencing team and our members. Currently we represent 18 executive/chauffeur operators utilising over 150 licenced vehicles and drivers which places the group as a majority voice in this sector. We are affiliated to the LPCHA to assist with legal and procedural advice, the group is open to any operator that</p> <ol style="list-style-type: none"> <li>1. Holds a SCDC operator's licence,</li> <li>2. Operates a fleet of only plate exempt vehicles with no street hire,</li> </ol>

	<p>3. Is a member of the LPHCA.</p> <p>Our current members are:          Airport Lynx          Blue Rose Cars          Business Drive          Cambridge Business Chauffeurs          Cambridge Chauffeurs          Cambridge Premier Chauffeurs          Cambridge City Cars          Cambridge Connections          Carlton Executive Cars          Executive Car Service          Grafton Executive Cars          Kenway Chauffeur Services          Merlin Executive Cars          Milton Executive Cars          RJM Cars          SilverStar Chauffeur Service          Voyager Executive Cars          Windrush Executive</p> <p>To begin with we would like to reassure the licensing team that the group is fully behind having sensible regulations of a high standard that are correctly and fairly enforced.</p> <p>We don't want to have rogue operators competing against us without being accountable to a standard that their passengers should expect, public safety is an important issue and by working together to improve the standard of private hire in the area will only increase public confidence in the trade and increase our business in turn.</p> <p>There are many things in the new consultation which we wholeheartedly support such as more frequent safety checks on licenced vehicles, the drive towards lower emission vehicles and sensible safeguarding and awareness training, in reality our concerns are reasonably limited.</p> <p>We found it difficult to form a full opinion on the consultation as the handbook that was referenced on many occasions is not yet available to view; as a result it is only the broad issues we can comment upon.</p>
<p>R. Drivers</p>	<p>South Cambridgeshire District Council (SCDC) has produced a decent consultation and endeavoured to engage with the trade in an open and transparent manner.</p> <p>The documentation is well indexed and easy to follow however there are some considerable problems therein, which for potential</p>

responders are confusing at best and quite perplexing if you are not very familiar with previous policy.

#### Timing of the policy review

A key point to make at the outset is regarding the timing of the policy review and the potential policy introduction date. With government ministers considering National Standards, CCTV and consulting on replacing existing Department for Transport (DfT) Best Practice Guidance with Statutory Guidance, alongside your policy having been updated in 2018, it seems very odd to be proposing to introduce new policy in December 2019, especially as December is the busiest time for the industry and passenger trips.

#### Reference to a handbook not yet finished

Your proposal document well-over 40 times refers to the Hackney Carriage and Private Hire Handbook for details, without actually saying what the handbook is or how or where it can be obtained. As many, including the LPHCA, are looking at the online documentation, this renders it impossible to form a considered opinion on many matters in the consultation proposals without sight of this handbook.

At your Taxi Policy Consultation Event, I sought a copy of the handbook, only to be advised it was not ready prior to the consultation, which of course renders swathes of the consultation impossible to comment on in a 'learned' manner.

I mentioned that I had been given a copy of policy dated 2017 and referred to my not seeing or being able to access the referenced Handbook. Jane Jackson your Resource Team Leader subsequently kindly sent me the most current policy document in a series of PDFs, dated 2018 and advised that 'This policy replaces all previous Handbooks'.

This of course, with the timing issues referenced previously, makes bringing in major new policy, completely inappropriate as the consultation is undermined without the handbook it refers to throughout.

Notwithstanding the aforementioned, I have read the existing (2018) policy, which appears to be fairly sound and this could be a basis to work from but the consultation process without the handbook it refers to, is with respect, flawed.

In light of this alone I do not believe SCDC has consulted effectively enough to bring in serious policy changes in December 2019, without further consultation and trade discussion.

#### Proposed way forward

As mentioned in the overview we will be forthright with our responses as well as constructively critical and our response is sent in the spirit of being helpful and collaborative. To this end, I have responded on the primary matters of concern, that I have identified from the proposals and feedback from the trade, alongside my own knowledge of what has worked well elsewhere. These are set out below and were forwarded then discussed as part of our meeting with SCDC on 4th September.

- Signage in/on Private Hire Vehicles
- CCTV

	<ul style="list-style-type: none"> <li>• Vehicle Ages</li> <li>• Emission requirements</li> <li>• Exemptions</li> <li>• The Wider Consultation (Covered above)</li> </ul>
<h2>2. Environmental Issues</h2>	
A. Resident	<p>I strongly support this proposed policy change. The health of residents of South Cambridgeshire, and especially children, is currently being adversely affected by air pollution and this policy will help to tackle it. It is also a sensible step to take in meeting the council's commitment to achieve zero net emissions, which for a low lying community seeking to take a lead in tackling this pressing issue is also of vital importance.</p> <p>I believe that setting standards that are consistent with Cambridge City Council is an obvious step to take given the increasing level of integration of these communities and the cooperation between councils that is needed to facilitate this. I hope that the council will use this as an opportunity not only to meet the higher standards of Cambridge City Council but to push them to increase their own standards.</p> <p>I am a frequent taxi user as I have a visual impairment and I understand that these proposals may increase the cost of this for me and other residents. For the reasons I outline above, I believe that this is a cost worth paying. However basing this policy around regulatory alignment between South Cambridgeshire and Cambridge City will also have benefits that could help to defray this cost, such as making it easier for operators to move between the two councils.</p> <p>Investment in the infrastructure of charging points will also be very helpful in this respect and I am glad to see the council taking this long term approach</p>
B. Driver	<p>We agree that the move towards lower emissions and electric cars is the way forward but at the moment electric vehicles that are available are not really suitable for type of work we do, mainly due to recharge times. We are hopeful this is evolving during the next couple of years</p>
C. Operator	<p>I think it is very unwise for a nation to solely rely on one source of energy for it transportation.</p> <p>And, there should be far more charging points available NOW. I do not see any new construction tacking place around the M25 for these sites. There should be 1000's now, en-route to the airports to accommodate the business sector.</p> <p>Dear licencing,</p> <p>Please read the link below as it indicates the actual real issues with current EV's. And this car had 300 mile capacity. EV's at the moment are only good for the taxi trade doing short trips around town!</p>

	<p>But...the driver will be loosing money when the car is being charged and not working.</p> <p>Also, should the public not be subject to the same requirements?</p> <p>Also is attached are letters of concern from some of my corporate clients. These proposed policies will have a massive effect on local industry with EV's and CCTV.</p> <p>Kind regards Colin Odell PINSTRIPE CORPORATE TRAVEL <a href="https://www.independent.co.uk/life-style/electric-car-volkswagen-e-golf-london-cornwall-drive-a9056226.html">https://www.independent.co.uk/life-style/electric-car-volkswagen-e-golf-london-cornwall-drive-a9056226.html</a></p>
D. Driver	<p>Not agree with the policy to be changed</p> <p>If you want to reduce pollution don't give any more license and give at least 3 -4 years notice for changing the cars etc.</p>
E. Driver	<p>Environmental Conditions – Whilst not objecting to this policy in theory worried as to how drivers are to move to Zero emission vehicle with the distances to major airports and ports?</p>
F. Cllr	<p>3.25: Environment. As I understand it ULEV definitions refer solely to CO2 emissions.</p> <p>Why do we not work on a more general requirement for all emissions, since the ULEV definition anyway looks pretty unworkable (there are virtually no such vehicles on the market, and it is not clear what their NOx and PM emissions are). In a rural District like South Cambridgeshire the lack of charging points makes ZEVs unfeasible in the middle-distant future (beyond the life of this document?).</p> <p>Or are we really committed to ensure that there is a network of rapid charging points which adequately covers the whole District by December 2021, so that a driver is able to make multiple trips from, say, Gamlingay to Bartlow or indeed to other rural parts of Cambridgeshire?</p>
G. Driver	<p>"I am very concerned about the proposal for electric vehicles. I have been a taxi driver for approximately 25 years, but I live in a first floor flat so would be unable to charge a vehicle.</p> <p>Unless there was an appropriate amount of charging points available that I could charge a vehicle overnight, and within distance of my home, I could no longer do the job"</p>
H. Operator	<p>This section does NOT distinguish between taxi/private hire and Chauffeur vehicles who do NOT operate in Cambridge - EV's for the Executive Chauffeur business will not work!</p> <p>There are no equivalent electric vehicles available. We need a 500 mile capacity battery with a very fast charge 1, 2 hours at the most. As it stands now we would have to have 2 cars for every driver which means appx. 4-500% rise in prices to our clients. This policy would put</p>

	our business in serious jeopardy !!! Please see letters of protest from my clients on separate email.
I. Driver	<p>I'm in agreement that low emissions is a good thing, but such a fast unthinking change will be very harmful to the drivers jobs and financial future.</p> <p>Will the council be publishing its proposals for environmental savings at Camborne?</p>
J. Driver	Will all bin trucks and council works vehicles be electric/hybrid in the same time frame?
K. Drivers	<p>To promote the use of electric vehicles, drivers should be able to licence electric vehicles up to the age of 7 and or perhaps only accept 3 years on petrol/Diesel cars, as this will be more cost effective and a greater number of drivers will purchase a 2 / 3 year old vehicle in 2025</p> <p>Giro emission vehicles are too expensive at the moment at the cost of around 40K SCDC will be putting drivers into hardship and out of work.</p> <p>From 2021 around 72 electric cars will be produced however all of these will be brand new and will simply price the drivers out of the market, this is why it needs to be postponed until at least 2025with an age of 7 years.</p> <p>It is too early for electric cars they do not have the range this is why it needs to be postponed</p> <p>Infrastructure is not there, there are not enough charging points, and the council owned charging double price for electricity of those who are owned by garages such as service stations. It may be free for the council to install these by outsourcing but drivers will have to pay double for electricity that they charge.</p>
L. Drivers	<p>If the reason is for lower emissions then there is already a well used and researched European standard for this. We would recommend that all vehicles should comply with Euro 6 emissions standards at first test and for renewals by a date to be determined to allow for owners that have entered into financial commitments on the strength of existing policy.</p> <p>If the reason is for safety or structural integrity then again a more efficient European standard is available in the form on NCAP ratings, we would recommend only 5 star be permitted.</p> <p>The two parameters above would make a much clearer and understandable policy.</p> <p>We also have concerns regarding ULEV &amp; Ultra Low emission vehicles. While there is certainly a need to try to reduce carbon emissions, two things are clear</p> <p>Firstly there are not enough charging points in the South Cambridgeshire area to cope with the proposed rise in PH vehicles.</p> <p>Secondly some studies have shown that when taking into account the style of electric production in the UK and the production of the</p>

	batteries that a modern blue efficiency diesel car could be less harmful to the environment overall.
M. Operator	Smaller operators should be able to source the appropriate vehicle at the right price for their business. The discounts being offered to purchase low carbon/electric vehicles are not lucrative enough to enable small operators to benefit.
N. Operator	Setting a date for the implementation of all zero carbon or ultra low vehicles prior to the installation and proven effectiveness of sufficient charging points throughout the district is "putting the cart before the horse."
O. Driver	<p>Is the authority planning on installing taxi only fast charge stations?</p> <p>With my current work rate I would be unable to spend hours of the day on charge, if only 50% of the taxis switched to electric there wouldn't be enough points in the city and surrounding areas, i think you are pushing us into a technology where the current infrastructure is not fit for our needs.</p> <p>A range of 300 miles is not good enough, will the authority ignore complaints about late cars/no shows due to lack of electric?</p>
P. Driver	<p>Make all licensed cars electric and hybrid only from 2021!</p> <p>Create a car loan scheme for private hire and hackney drivers so we can change our cars easily because it's hard to get 5 years hire purchase on toyota cars for example and monthly payments very high £500! and not everybody could afford a hybrid for 20 grand or to part exchange diesel cars with good offer!</p> <p>With the council help we could change our cars easily within a year! That would be a massive improvement on cambridge roads!</p>
Q. Driver	Support the transition from petrol,/diesel car with a viable scheme and support us with a lot of places to charge the new electric cars
R. Driver	It's a great idea about green cars etc and ultra low emissions. I'm pleased about that.
S. Cambridge City Council	We are in support of the introduction of Zero and Ultra Low Emission vehicles. Air quality and climate change are high priorities for Cambridge City Council. The Harmonising of the two councils in respect to environmental considerations, will further support a more environmentally sustainable future for the city.
T. Operator	We support the Council's timeframes for requiring new licensed vehicles (end of 2021) and previously licensed vehicles (2028) to be ULEV or zero-emission. We think this is a fair period of time for drivers to transition and will also allow for the infrastructure to be put in place to support charging of vehicles. It is encouraging to see a Council be progressive and ambitious in this regard and align its licensing conditions with broader sustainability goals.
U. Operator	<p>There is a very, very limited market place of vehicles ULEV/Electric vehicles that meet the current specification to be a taxi. Many are not large enough and simply do not meet current taxi criteria. Batteries take up much space meaning luggage/shopping conveyance is difficult or impossible (and therefore airport transfer service cannot be provided).</p> <p>ULEV/Electric vehicles still do not have the mileage range to successfully act as taxis and cover all facets of service provision expected by public.</p>

	<p>ULEV/Electric vehicles are generally cost prohibitive (even taking fuel saving into account) and there is – as yet – no particular viable second-hand market for such vehicles. This may change after 2021 (so in 2022 onwards) when several manufacturers are due to enter the market with new ULEVs/Electrics for the first time. Even then, we will not know the true effect of market forces – they are not easy to predict.</p> <p>There are currently nowhere near enough charging points in Cambs (and the wider country) to make this viable yet. So infrastructure is missing.</p> <p>The charging points that do exist locally are governed by an agreement between a supplier and the joint SCDC /City partnership which has somehow transpired to mean that the company involved have a ‘monopoly’ on pricing for charging and these are currently set very high compared to the wider market. Panther Taxis have questioned this in the past and continue to do so – our drivers with ULEVs are finding these charging points expensive and ‘shying away’ from using them. Charging is currently unregulated by Govt – this needs to change. Many drivers live in flats and some in sheltered housing arrangements and do not therefore have the option/facility to charge at home.</p> <p>City council are currently reviewing their own plan &amp; time span for sensible implementation to ULEVs/Electrics due to feedback from their sector of the trade and they are likely to push back implementation dates for the reasons outlined above.</p> <p>CRUCIAL: there are no electric WAV vehicles available at market except the London style TX1 which – besides being very expensive - is obviously a Hack and so cannot be used in the private hire sector. Current proposed rules will mean that the current.</p> <p>Panther Taxis are fully in favour of a move towards Ulev/Electric vehicles and have embraced the environmental plans for the area as well as investing time and money into being a responsible Operator in this arena – HOWEVER: expectations about what can be achieved and how quickly have to be weighed sensibly against what is available in the market place and how quickly the technology is really advancing so that implementation is practical; cost effective and NOT to the detriment of service provision or the ability of individual drivers and Operators to provide that service inclusively.</p>
<p>V. Drivers</p>	<p>Environmental considerations</p> <p>Understandably Local Authorities are rightly looking at all possible ways to improve ‘Air Quality’ as soon as possible. The LPHCA has regularly been attending the Joint Air Quality Unit (JAQU) sessions with the Department for Transport and DEFRA.</p> <p>As part of JAQU’s strategy a national database is being created by government to help Local Authorities determine whether taxis and PHVs meet the particular emission standard for their vehicle type in Clean Air Zones (CAZs) in major cities in England &amp; Wales.</p> <p>To complicate matters, some cities are opting in and others opting out, furthermore the government has delayed the introduction of the database until at least July 2020.</p> <p>The principle of improving Air Quality by Euro Standards and Fuel Type and the associated harmful particulates is sound and in London</p>

this has trumped determination by age.

Manchester like SCDC, also sought to tie in standards policy with air quality requirements but has now postponed doing so and the following statement was issued by John Garforth, JP, MIOL Chair – GM Licensing Network.

*In 2018, Greater Manchester's 10 local authorities agreed to collectively develop, finalise and implement a common set of minimum standards for Taxi and Private Hire services licensed in Greater Manchester. The proposed standards have four areas of focus: driver standards, vehicles standards, operator standards and local authority standards.*

*Greater Manchester Leaders have consistently stated that these standards must align with the Greater Manchester Clean Air Plan proposals and support the requirements to tackle air pollution across the region.*

*The 10 local authorities are awaiting feedback from government on some elements of those proposals, most notably the funding available to support vehicle upgrades – including taxis and private hire vehicles (PHVs).*

*With this uncertainty, and the lack of clarity around the Government's intention to legislate for national minimum licensing standards for taxis and PHVs in the future, there will be no consultation on the proposed Greater Manchester common minimum standards this autumn, however we will continue to engage with the trade on the development of both Clean Air Plan and common minimum standards.*

What is clear is that many regional and Local Authorities are determining their standards for taxi & Private Hire via Euro Standards and Fuel Type and not by age. This in our view is not only sensible but Best Practice.

With National Standards now being discussed by Ministers and cited as a priority Post-Brexit at DfT meetings I have recently attended and with Low Emissions Standards coming into place, it would seem sensible to make taxi & PHV licensing policy going forward based on defined standards rather than criteria like age of vehicles.

The taxi and PHV industries will need to transition into more environmentally friendly vehicles in a cost effective and achievable manner, especially for specialist vehicles as used by Chauffeurs and Executives, as well as accessible / special needs vehicles, which as previously mentioned are far more expensive.

Infrastructure, vehicle availability, scrappage schemes and grant money, all needs to be determined to enable a smooth transition and the avoidance of supply shortages.

In summary, it is not in our view timely to introduce age limits or be too prescriptive with new regulations at local level until government has determined new national standards, which we believe in most cases should be 'absolute' and not minimum.

3. Drivers	
A. Operator	<p>2.14 Service Expectations i. The Council and the travelling public expect licensed drivers to provide good customer service and behave in a civilised and courteous manner.</p> <p>This is a very sensible principle, and an example as to why we have very clear Community Guidelines that both riders (customers) and drivers agree to when joining the app.</p>
B. Cllr	Drivers. 2.1.iii states that the qualifications for both categories are similar 'unless otherwise indicated'. i cannot see any such indication in this section, and the differences should be clearly spelled out here at 2.1.iii
C. Drivers	To many drives need a limit
D. Operator	This section does NOT distinguish between taxi/private hire and Chauffeur drivers who do NOT operate in Cambridge
E. Driver	<p>Most if not all SCDC PHV and HCV predominantly work in Cambridge compromising cities safety measures.</p> <p>I would suggest an English test to add.</p>
F. Driver	Rules about license are ok. But there should be mandatory English test for new drivers. For the safety of public
G. Driver	References – To what end? Suggest leaving as is
H. Driver	If I knew better english then I would have a better job
I. Drivers	<p>New private hire drivers and operators licences are being restricted to one year as a blanket policy.</p> <p>The LPHCA has advised us that this is contrary to the requirements of the 2015 Deregulation Act. This seems unfair to new applicants that they be penalised for no reason other than they are starting out, we should be encouraging entry to the trade not discouraging.</p> <p>We believe clauses should be added to some regulations to allow the licensing officer discretion in exceptional circumstances, this could include vehicle accidents or family bereavements.</p>
J. Driver	Probation period is good. Some bad men want to be taxi drivers.
K. Driver	Probation Periods – No issues
L. Operator	2.9Viii – Could this be amended to accidents 'where injury to a person and/or damage to a vehicle has been caused' – just to avoid over-

	<p>burdensome admin. We are led to believe that an Accident reporting form will be available on SCDC website – if this is the case, it is welcomed.</p> <p>NB – this same point could be applied to section 3.12i (Accidents) where injury could be added to the term ‘causes damage that materially affects the safety, etc. etc’ This would then make accident reporting efficient and ‘uniform’ under both sections in the policy and the same form could be used.</p> <p>Note: no mention of how to report or a form in the 3.12 section but assume handbook would/could point to the same form.....</p>
<b>3.1 DBS</b>	
A. Drivers	<p>DBS update service, if you have not renewed each year you will lose your licence if you change your debit or credit card you must go online to do this.</p> <p>The council will be checking your DBS each year We are proposing to council, if there any driver failed to update his/her DBS on time or laps, notice them to subscribe this service within reasonable time period</p>
B. Driver	<p>Having a update service is good but there is a chance of missing the annual payment due to change in card detail as they use credit or debit card for direct debit instead of using bank details. Card replacement can effect it and loosing the licence won't be helpful in feeding the family</p>
<b>3.2 Safeguarding</b>	
A. Drivers	<p>drivers who have poor written English be able to take the safeguarding test verbally like CCC allow their drivers to do?</p> <p>Will this test be every three years and what is involved?</p> <p>We are suggesting to this proposal- instead of doing exam/ Test, it may be benefit to implement 2-3 hour work shop. If needed any to support council, Cambridge Driver Association we will be available to support. Each driver should be attending the test/ workshop once, if they require more information can be done as an update workshop knowledge test</p> <p>This should not include existing drivers, existing drivers should be exempt</p>
B. Driver	<p>Safeguarding. There should be regulations to ensure that when a PHV is booked the client is urged to ensure, before entering the vehicle, that the driver knows both the client's name and the destination; and that the driver will give this information unasked when meeting the client.</p>

	This is far better safeguarding than any amount of livery, CCTV or other external devices.
C. Driver	In favour of safeguarding training - need a clear way of reporting for drivers.  Make provision in training for those with limited English and/or those with poor written skills.
D. Driver	I do not know english, so an exam will be very difficult for me.
E. Operator	We commend South Cambridgeshire for making safeguarding training mandatory for drivers, operators and proprietors.  We believe that safeguarding is everyone's responsibility. It is the action we take to promote the welfare of vulnerable individuals and protect them from harm. Drivers are in a good position to spot the signs that someone might need help.  We recognise that not all councils offer mandatory safeguarding training, which is why we have partnered with Barnardo's and created a bespoke training that all drivers choosing to join the Uber platform across the UK watch: <a href="https://www.uber.com/en-GB/drive/resources/safeguarding-tips/">https://www.uber.com/en-GB/drive/resources/safeguarding-tips/</a>  We also have additional safeguarding training that drivers can voluntarily undertake once they have completed 60 trips. Drivers have a unique view of the areas in which they work, and might see and hear things that others do not. That is why we have worked with the Salvation Army and Unseen to raise awareness of modern day slavery, helping drivers understand the signs to spot and how they can report concerns: <a href="https://www.uber.com/en-GB/drive/resources/modern-day-slavery/">https://www.uber.com/en-GB/drive/resources/modern-day-slavery/</a>  Asides from safeguarding training, we also regularly provide information and insight to drivers on other safety topics. For example, we recently produced a podcast on County Lines with the National County Lines Coordination Centre. We have posters from the Home Office about County Lines in many of our offices. And the Daily Mail wrote favourably about our work "smashing" county lines in an article in February of this year.
F. Operator	Panther are fully in favour of implementing training for both current and new drivers and operators etc. on the basis that awareness is vital in the modern era and there is always something to learn from such training.  Based on previous experience, it is vital that the training is not too cryptic and completely unambiguous in order to serve non-English drivers and that more than anything - the reporting process is clear/easy/effective NOT burdensome and can be anonymous.  Reporting is an area where we would like to see an across trade process (so city and SCDC have same procedure) as this would aid understanding and make it simpler for drivers who are licensed with both authorities and cross over from time to time.  Please make provision on the test part for drivers who struggle with written English/dyslexia etc. – there are more of them out there than is

	<p>sometimes realised. Finally on this, Panther would be happy to try and work with council to help/facilitate/contribute towards provision of facilities for getting our substantial fleet through this training in larger groups if required.</p>
<b>3.3 Competency Test</b>	
A. Drivers	This should not include existing drivers, existing drivers should be exempt.
B. Driver	Knowledge test should not include existing drivers who are already serving the community.
C. Drivers	The content of the competency test should be made available to operators and drivers so training can be given Executive Private Hire Service.
D. Resident	Drivers need to have a good geographical knowledge and cannot be sat nav dependent. Unfortunately i see many who are reliant on sat nav. I suggest a robust knowledge test.
<b>4. Operator</b>	
A. Operator	<p>Panther agree that Operators should take some responsibility and that they should have relevant complaints policy/s.</p> <p>Panther further advocate that there should be a clear, unobstructed path for complainants to utilise and that each operator must be able to facilitate written; electronic; telephone and in-person verbal complaints at all times of operation – so 24/7 in most cases; and that the ability to (and necessary information) to facilitate this should be made clear to the travelling and wider public as much as possible, certainly within vehicles and on websites</p>
B. Driver	Not agree.
C. Operator	<p>Uber recommends that the following information be mandatory for an operator to provide upon a pre-booked journey;</p> <ul style="list-style-type: none"> <li>● Vehicle make/model</li> <li>● Vehicle registration mark (VRM)</li> <li>● Driver's name</li> <li>● A way to contact the driver allocated to the booking</li> </ul> <p>4.16 Operator's Complaint Policy</p> <p>i. Customers have a right to complain if the service provided by the operator fails to meet expectations. It is the responsibility of operators</p>

	<p>to attempt to find an amicable resolution to the complaint, without any unnecessary regulatory burden or intervention by this Local Authority.</p> <p>li. Complainants must be dealt with in a respectful, timely manner in an open and transparent way. To ensure this is achieved, operators are required to have a formal complaints policy and procedure which is made freely available to all customers, and to maintain a record of complaints received.</p> <p>We fully agree with the proposed Operator's Complaint Policy. For help and support there are a number of ways that customers can contact us. Typically, customers will reach out to us via the in-app help functionality. However customers are able to send emails or call us 24/7. All of this information can be found here: <a href="https://www.uber.com/en-GB/legal/policies/feedback-policy/en/">t.uber.com/uksupport</a> We have a number of policies covering many and various issues, these can be found here <a href="https://www.uber.com/en-GB/legal/policies/feedback-policy/en/">https://www.uber.com/en-GB/legal/policies/feedback-policy/en/</a></p> <p>Asides from our feedback policy, other specific policies include:</p> <ul style="list-style-type: none"> <li>● Refund policy</li> <li>● Zero tolerance policy</li> </ul> <p>We have looked at the data submitted by customers in relation to trips undertaken in South Cambridgeshire licensed vehicles in the last three months. Across all trips undertaken by South Cambridgeshire licensed drivers in the last three months, 97% were rated 5 stars (the highest possible rating) . Only 0.001% of trips were not rated at all by customers.</p> <p>Customers reached out to Uber across 1.25% of all trips undertaken by South Cambridgeshire licensed drivers over the last three months; all of these inbound requests were handled by our customer services team without any unnecessary burden on the Local Authority, unless where required to pass on information as set out in licensing conditions.</p>
D. Driver	Uber will take over, stop sucking up the Panther.
E. Driver	Operators need to enforce more and take responsibility. Cambridge is flooded with SCDC PHVs. And now SCDC HCV are driving with hire sign on
F. Vehicle Owner	Operators need to take more responsibility in managing and enforcing.
G. Resident	<p>Over 90% of all SCDC phv drivers seem to work in Cambridge.</p> <p>Not here to cover work but to prodomently work in Cambridge, undermining cities stringent policies and clogging up the streets.</p>

	Operators need to play an active role in enforcing and keeping hire cars out of city.
H. Driver	Operated need make sure drive have enough work before taking more drivers.
I. Cllr	<p>One thing I miss is any understanding of the difference between, say, Panther and my local firms with 1 and 2 persons.</p> <p>I suggest we think about a different r'egime for companies with fewer than 5 employees allowing them to specialise and freeing them from burdensome and useless requirements.</p>
J. Operator	This section does NOT distinguish between taxi/private hire and exempt Chauffeur Operators
K. Enforcement Officer	<p>Section 4.10.iv Operator premises This allows operator premises licensed with SCDC before 1 October 2017, to be up to ten miles outside of the district.</p> <p>This can cause issues with enforcing outside of the district and therefore needs to be addressed.</p> <p>This is also the opinion of James Button who provides licensing training and legal advice to local authorities, usually via the Institute of Licensing. Since 1 October 2017 the authority has refused all operator applications whereby the premises is outside of the district. However, we still have a number of operators who have a licence, and are in general located within the Cambridge City boundary.</p> <p>In order to address this issue, I suggest it is proposed that all operators who fall into this category are advised at the next operator licence renewal they have 12 months to ensure they have an operator premises that is within the district.</p> <p>If at the next renewal this has not happened, the licence renewal is refused. In the interests of fairness and to ensure that the trade is able to offer their opinion, I also propose that a further consultation takes place, so that members will be able to make an informed decision on the response.</p> <p>Operator Licence Fee Currently the council charges an operator a fee dependent upon the number of vehicles it intends to use and pass out work to.</p> <p>This is illegal, and although may have been introduced some time ago, can only assume that the person involved in its approval was not totally aware of the legislation or was poorly advised.</p> <p>So that the council is acting correctly I propose as soon as possible we introduce a single fee charge for all operators, regardless of how many they vehicles they have, or pass work out to. I think it also prudent that we anticipate a response from the trade, particularly from so called, "One man bands" who only operate a single vehicle and will be charged the same as a large multi-vehicle operator.</p>
L. Driver	<p>Note you require Operators to be inclusive and offer WAV service</p> <p>YOU MUST CHANGE PROPOSED VEHICLE RULES ER, who again - have not undertaken a WAV job since been in Cambridge and never have any available on their APP - ONE rule for them and different rules for others - needs addressing.</p>

M. Driver	More should be done to check Fit & proper status of some Operators.
<b>5. Vehicles</b>	
<b>5.1 Age of Vehicle</b>	
A. Operator	<p>We really welcome this proposed change to licensing conditions as it is likely to help drivers to better manage the current more limited availability, and higher capital cost, of zero and ultra-low emissions vehicles.</p> <p>This policy helps drivers recover the increased cost of these vehicles over a longer period.</p> <p>Additionally, due to having fewer moving parts than petrol and diesel vehicles, zero emission vehicles experience less wear and tear and can therefore be expected to have longer operational lives than fossil fuel powered alternatives. In theory the lifetime of a zero emission car should be ten years or more (as Nissan for example have a battery guarantee for ten years).</p>
B. Drivers	<p>We do not believe that excluding vehicles by age is necessary.</p> <p>If a vehicle is safe and fit for purpose then it should be allowed to be licenced, if the reasoning is for roadworthiness then there is already a compliance test in place to ascertain that.</p>
C. Driver	Remove the 7 years renewal
D. Driver	I don't think its fare to change the duration of an existing vehicle already registered with south cambs to 7years . as a driver we purchased the vehicle by accepting the old rules and regulations. i believe all vehicles which are already registered should be allowed to be used thorough out its life span. and new rules and regulations should only be applied to new vehicles.
E. Cambridge City Council	<p><i>3.6 Age of Vehicle</i></p> <p><i>i. As an incentive for the uptake of zero and ultra-low vehicles within the Hackney Carriage and Private Hire Licensing Policy and to comply with the South Cambridgeshire District Council's recognition of the global climate and health emergency action plan to deliver a zero-carbon future for South Cambridgeshire, it is required that:-</i></p> <ul style="list-style-type: none"> <li><i>• A new vehicle licence will not be granted in respect of a vehicle unless it is less than 4 years old.</i></li> </ul>

	<p>• <i>A vehicle licence will not be renewed for a petrol or diesel vehicle unless the vehicle is less than 7 years old.</i></p> <p><i>ii. To incentivise investment in ULEV and Zero Emission Vehicles, this rule will be extended as follows</i></p> <p><i>iii. A vehicle licence will not be renewed for an Ultra-low emissions vehicle unless the vehicle is less than 12 years old.</i></p> <p><i>iv. A vehicle licence will not be renewed for a zero emissions vehicle unless the vehicle is less than 15 years old. “</i></p> <p>Cambridge City Council Licensing team are in support of having a maximum age for newly licensed vehicles. It is known that many older model vehicles emit higher emission levels as compared to newer vehicles.</p> <p>A limit on the age for new Petrol and Diesel vehicles supports in reducing the amount of harmful emissions being disbursed by the South Cambridgeshire District Council taxi fleet.</p> <p>In regards to Ultra-Low and Zero emission vehicles, Cambridge City Council recently went out for consultation regarding removing the 4 year max for newly licensed Ultra-Low and Zero emission vehicles. Officers will be attending the Licensing Committee on 30 September 2019 with this recommendation.</p> <p>One of the defining factors of the maximum 4 year age limit for newly licensed vehicles was emission levels, however this is no longer relevant for Zero and Ultra-low emission vehicles. We hope South Cambridgeshire District Council will take this into consideration when finalising their policy.</p> <p>Licensing team members also support the age limits for petrol and diesel vehicles, to be renewed up to the age 7 years old.</p> <p>We currently have a 9 year age limit but understand South Cambridgeshire District Council may consider this approach to support the take up of Ultra-low and Zero emission vehicles.</p> <p>Older vehicles are harder to maintain and are known to produce more harmful emissions as compared to their younger equivalents. In the long run this will promote the use of newer and more environmentally cleaner vehicles amongst the South Cambridgeshire District Council taxi fleet.</p> <p>Furthermore, we are in support of the Ultra-low vehicles being renewed up to the age of 12 years and 15 years for zero emission vehicles. These vehicles contain less moving parts which require maintenance and should be less prone to wear and tear as compared to conventional vehicles, for this reason.</p>
<p>F. Driver</p>	<p>The proposed 7 years age limit for vehicle renewal will place untold hardship on drivers. I will implore between 8 – 10</p> <p>Kindly rethink the proposed 7 year maximum age for vehicles. I will plea 8 - 10 years for vehicle licence renewal.</p>

G. Driver	Remove the 7 years at renewal and increase years to all other conditions.
H. Driver	<p>The age limits on the vehicles are also questionable and although we understand the general reasoning behind the rules, I think there are other things to consider. For example to have a condition that a newly licensed vehicle can only be up to 4 years old, but then (assuming it is a low emission type) can be used for up to 12 years or longer if fully electric,</p> <p>In our opinion is not a very accurate method of assessing its safety and suitability. For example, if I buy and licence a brand new car, after 5 years it has maybe covered over 250,000 miles. The vehicle can, in theory carry on for another 7 years and maybe another 200,000+ miles in use, assuming it passes it council safety checks.</p> <p>However if at the 5 years point I want to replace that vehicle with an identical one that is already 5 years old but has only driven 15-30,000 miles, I would not be allowed to, because it is too old at 5 years old! NOT because it is more worn out.</p> <p>Perhaps a mileage limit would be more appropriate which then gives licence holders the benefit of being able to buy a 5,6 or 7 year old 'good' car at a better price, as long as it meets emission requirements etc and it is still within an overall age limit of 12 years.</p> <p>We think it also important a vehicle has no history of major accident damage. Accident damage can be found and is MORE likely on a newer second hand vehicle due to it's perceived market value.</p>
I. Driver	<p>Age of Vehicle – No issue as I change my vehicle every 2/3 years and pay cash.</p> <p>Could be an issue to those many drivers who have loans/ finance/ HP agreements on their vehicles.</p>
J. Driver	No consideration for drive who are struggling can't afford buy new car. Cambridgeshire standard already very high.
K. Driver	<p>But to change a rules about vehicle age that's bit dangerous.</p> <p>As the the moment there is no vehicle max age and now to change it so significantly it's bit too much.</p> <p>What about people who have cars on lease/bank loan for say period of 4-5 years and their cars and after new rules they will have 3 years left on loan but they won't be able to continue to work due to a new restrictions</p>
L. Cllr	<p>Surely the state of the engine is much more important than the chronological age in establishing the appropriateness of the vehicle.</p> <p>Specify some emission test results (and not just CO2) instead</p>
M. Driver	Will there be a period to allow for those not in a position to immediately replace a vehicle that is already 7 years old or not?
N. Driver	<p>Vehicle Age - I have recently invested a significant amount of money in an (Euro 6) executive 8 seater vehicle.</p> <p>I anticipated this new vehicle would last up to nine years until I plan to retire.</p> <p>If this new policy comes in (maximum age 7 years) then I am likely to have to retire earlier than anticipated.</p>

	<p>I would suggest that the new policy should be for newly licensed vehicles and that existing licensed vehicles were allowed up to 9 years old</p>
O. Driver	<p>Strongly disagree with 7 yr rule being proposed - especially for current vehicles - drivers have purchased and financed with current no upper age limit rule in place - it would be wrong to change this and will cause hardship if adopted.</p> <p>Finance plans are often 4 years long - this does not work hand-in-hand practically with 4 year age rule which I think should still be 5 years anyway.</p> <p>Agree with extended upper age limits for ULEVs and Electrics but there are very few of these vehicles - that can be practical as a taxi - on the market at the moment and some are very cost prohibitive.</p> <p>I am in favour of trade having a plan for cleaner air etc BUT much longer integration period is required. 7 years must be replaced with at least 9 or 10 in line with city and maybe then decrease as time moves on BUT this rule in its current proposed form will severely adversely affect drivers currently - some will be forced to leave trade - also WAV service will be severely reduced as there are no electric WAVs on market that meet PHV criteria.</p> <p>THIS RULE NEEDS REVISING BADLY - 7 years must be removed. Further: not enough charging points yet and those that are out there in Cams are expensive.</p>
P. Drivers	<p>Vehicle age 7 years Unacceptable for drivers who have recently purchased 4 year old vehicles would not have paid off the finance prior to the vehicle being too old.</p> <p>So therefore we would like put proposal no vehicle age limit just extra compliance test is acceptable and keep the old policy as long vehicle is safe and road worthy the car should be allowed to licensed.</p>
Q. Drivers	<p>Don't need vehicle age limit extra compliance test is acceptable keep the old policy as long vehicle is safe and road worthy the car should be allowed to licensed .</p>
R. Driver	<p>AGE LIMIT OF THE CAR: As you are aware that the private hire trade is not as good as it used to be and by giving the age limit we will need to change it even though the car is healthy and passing MOT.</p> <p>Buying a new car on finance is another burden on the weak shoulders of the driver, who is already suffering from the low income due to multiple reasons.</p> <p>Most of us can not afford a new car and for the very reason Extra compliance test is acceptable.</p>
S. Operator	<p>Vehicle age - proposed to be under 4 years old for a new licence.</p> <p>This means smaller operators are forced to source more expensive cars. Vehicles can be far more than 4 years old and still be in pristine</p>

	<p>condition.</p> <p>It is likewise wrong to refuse to renew licences on diesel cars older than 7 years.</p>
T. Driver	<p>I have bought a car and plated it with you just this month, it is under 4 years old to comply with the current regulations, it will be over 7 years old before I have paid it off.</p> <p>It can't be right that after agreeing to financial contracts drivers are now expected to break these for new regulations, surely an exception of a grace period of 2 years should be applied to all renewals who are still paying off cars unless the authority is planning grants or a buy back scheme to help people who will be forced to default on payments such as myself</p>
U. Operator	<p>Section 3.6 Age of Vehicle:</p> <p>It is our opinion that this is the one sections proposed in the policy that demands a rethink as it is unfair and unworkable in its current proposed form. It is not too dramatic to say, using our experience as a large operator and knowledge of drivers economical and personal circumstances that this policy - if adopted in its current form - would lead to a significant number of drivers leaving SCDC and probably the trade and would definitely have a detrimental effect on service provision across areas such everyday rush hours/schools transport AND would wipe-out our Wheelchair access service very quickly.</p> <p>It is no exaggeration to say that this policy needs re-thinking immediately and if adopted, would be disastrous.</p> <p>Panther Taxis would be more than happy to contribute to any further debate/consultation/working party that might be convened to discuss this matter. In the meantime, please try to take account of the following:</p> <ul style="list-style-type: none"> <li>• Current lower age limit of less than 4 years at first point of licensing actually makes little environmental sense and never has – Panther was not in favour of the previous move from 5 years to 4 years.</li> <li>• Proposed upper age limit to 7 years for petrol/diesels is disastrous for many reasons:</li> <li>• It is grossly unfair on current drivers who have based their business plans on the current rules – nearly all will be adversely economically affected, many to the point of leaving the trade.</li> <li>• Many drivers have taken out 4 year finance plans on vehicles and will now get little or even no period of paying no finance which - over the course of a vehicle life/taxi economic cycle - such a break in finance is vital to them making a success of the trade.</li> <li>• Many drivers are now looking to buy cars (due to affordability) just prior to them being 4 yrs old (since the introduction of that rule) meaning that a vehicle would have to be delicensed before the end of an affordable finance plan lasting 4 years – this clearly/obviously won't work.</li> <li>• If adopted in current proposed form drivers who would have been looking to change their vehicle in three/four years' time will now need to change – in too many cases – in the next 1-2 years or so ( and possibly as early as four/five months' time). NOR FAIR On DRIVERS</li> <li>• This will ultimately and definitely lead to a reduced service (through diminished taxi numbers) in all areas of service provision including Education transport and Social services work at a time when the demand is at an all-time high as is growth in this region.</li> </ul>

	<ul style="list-style-type: none"> <li>• WAV service will be wiped out within a year or two under these age rules – this is not scaremongering.</li> <li>• Given the above, 7 year rule should clearly go and current rule be kept or 10 year upper age limit be implemented. This needs to the case to avoid severe driver backlash over unfairness (effect on their livelihoods) and in order to maintain service levels for all.</li> <li>• If councillors insist on reducing upper age limit this should NOT unfairly effect current drivers/their plans and should be phased in over time, although 7 years is still too short a time for economically viable financial planning for drivers.</li> <li>• In any event Panther would propose that ULEV/ELECTIRC vehicles should be allowed to be licensed for first time up to 7 years old and that both types should have an upper age limit of 15 years (although not many will go for this long). This affords the driver flexibility when first entering the ULEV/ELECTRIC market and also provides the incentive the policy is trying to promote.</li> <li>• Apart from being grossly unfair on current drivers in its proposed form, the move towards ULEVs and Electrics is also currently flawed:             <ul style="list-style-type: none"> <li>• <i>There is a very, very limited market place of vehicles ULEV/Electric vehicles that meet the current specification to be a taxi. Many are not large enough and simply do not meet current taxi criteria. Batteries take up much space meaning luggage/shopping conveyance is difficult or impossible (and therefore airport transfer service cannot be provided).</i></li> <li>• <i>ULEV/Electric vehicles still do not have the mileage range to successfully act as taxis and cover all facets of service provision expected by public.</i></li> <li>• <i>ULEV/Electric vehicles are generally cost prohibitive (even taking fuel saving into account) and there is – as yet – no particular viable second-hand market for such vehicles. This may change after 2021(so in 2022 onwards) when several manufacturers are due to enter the market with new ULEVs/Electrics for the first time. Even then, we will not know the true effect of market forces – they are not easy to predict.</i></li> <li>• <i>There are currently nowhere near enough charging points in Cambs (and the wider country) to make this viable yet. So infrastructure is missing.</i></li> <li>• <i>The charging points that do exist locally are governed by an agreement between a supplier and the joint SCDC /City partnership which has somehow transpired to mean that the company involved have a ‘monopoly’ on pricing for charging and these are currently set very high compared to the wider market. Panther Taxis have questioned this in the past and continue to do so – our drivers with ULEVs are finding these charging points expensive and ‘shying away’ from using them. Charging is currently unregulated by Govt – this needs to change. Many drivers live in flats and some in sheltered housing arrangements and do not therefore have the option/facility to charge at home.</i></li> <li>• <i>City council are currently reviewing their own plan &amp; time span for sensible implementation to ULEVs/Electrics due to feedback from their sector of the trade and they are likely to push back implementation dates for the reasons outlines above.</i></li> <li>• <i>CRUCIAL: there are no electric WAV vehicles available at market except the London style TX1 which – besides being very expensive - is obviously a Hack and so cannot be used in the private hire sector. Current proposed rules will mean that the current.</i></li> </ul> </li> </ul> <p>THE ABOVE POINTS IN ITALICS CAN ALSO BE APPLIED AS A RESPONSE TO POLICY PROPOSAL POINT 3.25: ENVIRONMENTAL CONSIDERATIONS.</p>
V. Drivers	<p>In section 3.6 Age of Vehicle you state:</p> <p><i>i. As an incentive for the uptake of zero and ultra-low vehicles within the Hackney Carriage and Private Hire Licensing Policy and to</i></p>

comply with the South Cambridgeshire District Council's recognition of the global climate and health emergency action plan to deliver a zero-carbon future for South Cambridgeshire, it is required that:-

- A new vehicle licence will not be granted in respect of a vehicle unless it is less than 4 years old.
- A vehicle licence will not be renewed for a petrol or diesel vehicle unless the vehicle is less than 7 years old.

ii. To incentivise investment in ULEV and Zero Emission Vehicles, this rule will be extended as follows

iii. A vehicle licence will not be renewed for an Ultra-low emissions vehicle unless the vehicle is less than 12 years old.

iv. A vehicle licence will not be renewed for a zero emissions vehicle unless the vehicle is less than 15 years old.

This policy proposal, whilst well intended I do not believe will achieve the objectives you seek in i. above.

The regulatory impact will in my view be extremely disproportionate on different companies and different drivers in several ways for many reasons. The proposal presumes that 'age of', is better than 'condition of' and / or 'specification of' vehicles as the way forward.

I do not believe this will achieve the objectives you seek to achieve in i, as there are in my view many unforeseen consequences that a thorough regulatory impact assessment will highlight.

Age requirements

Age is a flawed method of determining the suitability and condition of a vehicle, so we are surprised that this method is being utilised, especially as SCDC already has in place, as set out in section 3.10 Vehicle Testing the following:

- i. The vehicle must have an MOT certificate and a Certificate of Compliance that is no older than 1 month at the date of application for both new and renewal.
- ii. The Certificate of Compliance will be issued for six months and a second test must be carried out 6 months minus 1 day from the last test.

As a former qualified mechanical engineer and operator of thousands of vehicles I can assure SCDC that the above policy is the right way to determine fitness and suitability of a vehicle, not age. It is the condition of a vehicle, not the age of the vehicle that is important and your Certificate of Compliance (COC) system that you already have, is in our view the correct measure.

A well-maintained older vehicle will mechanically almost certainly be in far better shape than a poorly maintained newer vehicle. Your COC deals with this aspect fully, without needing tick-box 'age-based' criteria.

You will be aware that primary regulation already permits more frequent testing for older vehicles, which is a far better option than a

	<p>blanket age policy that could refuse or fail a perfectly suitable vehicle. Importantly, specialist vehicles as used by Chauffeurs and Executives, as well as accessible / special needs vehicles are far more expensive.</p> <p>Some will have been purchased for a lengthy lifetime of work, often at great cost, in some instances over a long ‘payback’ period for the operator or the driver.</p> <p>To enable owners of such vehicles to transition into their next vehicle they will need to repay outstanding payments and earn the money to do that, so they can move into the next generation of environmentally friendlier vehicles, which we will cover below.</p> <p>SCDC is not alone in believing that integrating taxi and Private Hire licensing into it’s Air Quality Improvement strategy is prudent. There are however considerable issues in transitioning for both taxis and PHVs. If age limits are brought into the equation this is further complicated and we assert that Air Quality standards are a far more reliable basis for taxi and PHV than age limits.</p>
<b>5.2 Wheelchair Accessible Vehicles</b>	
A. Operator	<p>3.14 Accessibility/WAVs</p> <p>i. The council has expectations that Panther agree with fully. Panther has always, and continues to provide a flexible and inclusive WAV service which we are very proud of.</p> <p>However, we are also aware that we are pretty much the only such providers in this area. In particular, despite Uber being granted a long-term license by SCDC it is our belief (and we have extensive evidence) that they do not provide any WAV provision in the area.</p> <p>To be blunt, Panther hope that SCDC officers will be good to the policy word and will check this out to see whether such provision is made by Uber without discrimination – a good starting point would be to try and book such a vehicle on the Uber App- good luck! Maybe Uber could be asked how many WAV jobs their system shows they have completed since the grant of their license some 2-4 years ago.</p> <p>Panther are keen and happy to continue to provide a WAV service BUT please see our comments in italics, under Section 3.6 of this response as we will not be able to provide such a service for much longer if 3.6 is adopted in its current form.</p>
<b>5.3 Private Hire Plate Exemption</b>	
A. Operator	<p>Panther is only in favour of Exemptions being offered to vehicles/operations where it is determined beyond doubt that the work is ‘speciality or executive’ and that this can be verified by the fact that bookings can/are only accepted with at least 48 hours advanced notice – unless this can be proved/verified and in all other instances, exemptions should be forbidden.</p>

	<p>For clarity and fairness, companies need to decide whether they are solely providers of such work only ( pre-booked executive) and NOT traditional taxi work (ASAP bookings and small journey pre-books with 24 hours, ) or whether they are in fact a traditional private hire company providing these services (in which case they have a plate like the rest of us – they cannot be both and should NOT be taking straight away phone bookings or providing an App for such bookings.</p> <p>Panther would expect SCDC officers to be regulating this effectively, not least to negate current issues in this area where Exemption companies can somehow reap the benefit of both worlds.</p>
B. Vehicle Owner	<p>There is a gap for clients who wish to travel in a Chauffeur driven cars for one off occasions such as a special events e.g airport for a wedding anniversary. Clients shouldn't have to have a contract for a one off journey. Some clients want to go places driven in luxury without plates. Don't make it hard for them. Sometimes, clients want to be driven to the airport in unmarked cars otherwise they wouldn't ask.</p> <p>Plate exempt drivers shouldn't need to display their A4 plate exemption certificate and the other document within the vehicle. It goes against displaying signage and looks unprofessional in a chauffeur driven car.</p>
C. Driver	<p>PH Vehicle Exemptions – Why are the law abiding many who have been operating for some years being penalised because of the actions of the few who you wish to prevent “abuse of the policy by drivers who do not want signage”.</p> <p>Why are these cowboys not weeded out at time of application?</p>
D. Driver	<p>Some of my passengers are still travelling with me !</p> <p>And some have gone back to there birth country and some has sadly died</p> <p>But things move on and new passenger have replaced the ones I have lost ! and that's how it revolves !</p> <p>And to get new passengers they need to get to know you ! and to get to know you (driver) they have to get them in the car ! and refusing people don't pay the bills and put food on my table and have speacial family times !</p> <p>I try to cater for all who want my style of work !</p> <p>In fact I feel you are discriminating customers and dictating to me to choose who's worthy to travelling in a particular style Most importantly REFUSING people my type of service will be restricting my trade and this will eventually CEASE my employment !</p> <p>There is so much more Executive drivers do for his or her customers and I could go on writing for ever to explain the difference between Executive and Taxi but like I said at the beginning of my letter that maybe you have no NDERSTANDING or you CHOOSE to ignore the great efforts we do for the public BUT you do have a choice to learn and recognise the difference !</p>

	<p>Like customers ! They also have a choice too between a Taxi or a Executive style of travel</p> <p>My feeling inside is I am a bit upset at this whole situation but very passionate about the service I bring to people and it feels like I am not being taken seriously by the South Council considering the awkward hours I put in conquering all kinds of weather conditions and traffic issues !</p> <p>There's one word that is used a lot and that's CHOICE and after all thats what we all try to give to the public Maybe to cut out false operators it maybe a good idea to go to the larger taxi companies in Cambridge i.e Panther or A1Cabco and see how many operators drivers are also employed as a standard taxi driver !</p> <p>From what I understand is that a taxi company i.e Panther or A1Cabco will not employ a driver who works for Uber YET will employ someone who holds a operators license and mixes his very few private jobs with they're Employees work !!!</p> <p>What's the difference I would love to know ???If the operators has enough work to keep himself employed then why is he still working for a larger taxi company i.e Panther or A1Cabco If he hasn't enough work to go it alone then he needs to be employed with a larger taxi company i.e Panther or A1Cabco to become SOLEY a taxi driver ! You can't do both because these guys do possibly 15/20% private work for which they'd say it's vip but really it isn't And possibly 80% Taxi company work from who they are employed by i.e Panther or Cabco that there's a hidden agenda here for Cambridge's larger Taxi companies)</p> <p>I apologies for my grammar as it probably isn't the best but my Executive Service I give is ! Kind regards</p>
E. Operator	I Think there is a need for Private hire drivers that only carry out company work should have an executive Licence (exemption certificate, no signage ,No cctv and the coc test every 12 months after the first year on new vehicles,)
F. Cllr	<p>3.17: Exemptions. I could not believe this section when first I read it. It is surely and manifestly discriminatory to use terms such as 'senior personnel', and 'stars', and to allow any organisation to determine that junior staff must travel in inferior vehicles. I hope that to all PHV operators every customer is special, and deserves 'prestige' service.</p> <p>Therefore all PHVs should be regarded as exempt vehicles, and their drivers instructed accordingly.</p>
G. Operator	<p>The proposal to remove the word "primarily" from private hire vehicle exemption work will have a very serious impact on options for travel for many residents in very rural areas - many of them among the most isolated and vulnerable.</p> <p>Currently, some small operators such as ourselves, have an exemption on some/all of our vehicles.</p>

	<p>This means we have cars without signage, as desired by our mainly corporate clients. As a small business, we are currently able to supplement our income and make our business viable by offering some local journeys for residents who have very few other transport options in rural areas.</p> <p>Many of these residents are isolated and vulnerable. For example, we transport a lady with early stage Alzheimers to a community coffee morning and other activities, which she would not otherwise be able to access. She would not be able to phone for a taxi each time - she recognises the car and the driver and she and her family highly value the service we can currently provide.</p> <p>As a small business, it would not be viable for us to restrict one of our cars for "local" badged service - we need the flexibility that we have at the moment, of our vehicles being completely interchangeable in case of breakdown, servicing etc.</p> <p>We are not abusing the policy because we do not want signage, we are maximising our asset use and providing a local service at the same time.</p> <p>If you implement this restriction, it is extremely likely that we will move to executive travel only and this will disadvantage the many local rural customers for whom we provide a valuable service.</p>
H. Driver	<p>Policy is great for a normal taxi or private hire but for plate exempt drivers, this policy is discriminatory!!</p> <p>You are discriminating against those passengers who want to be driven in plate exempt cars like my clients but are not CEO's, Directors etc.</p> <p>It's also discriminatory to small businesses like mine where I don't have a majority of senior clients</p>
I. Driver	<p>Executive Car Operators and Drivers should not be lumped in with Taxis and general PH Vehicles</p> <p>The policy in general feels like an attack on Plate Exempt companies and an attempt to deny Plate Exemption wherever possible.</p>
<b>5.4 MOT/ Certificate of Compliance (COC)</b>	
A. Driver	Remove the 2 MOT
B. Cambridge City Council	<p>We are in agreement with the requirement that all licensed vehicles requiring two yearly Certificates of Compliances. Hackney Carriage and Private hire vehicles are used regularly and are likely to experience greater levels of wear and tear, as compared to family or company vehicles.</p> <p>These vehicles are on the road for several hours throughout the day and can be driven by different drivers. Requiring two yearly Certificates of Compliances, promotes public safety, as vehicles are ensured to be maintained to high levels.</p> <p>Cambridge City Council employ a two yearly Certificate of Compliance, and have found this beneficial in ensuring our licenced vehicles</p>

	are fit for purpose.
C. Vehicle Owner	<p>Two MOT a year will enable mine and public safety.</p> <p>On average a member of public may do about 10k a year.</p> <p>A taxi may do 50k a year. Two mot is necessary and I support it.</p>
D. Driver	<p>CoC – Why twice yearly?</p> <p>How will this improve safety for clients? Executive Car operators maintain their vehicle to a much higher standard than the general taxi industry.</p>
E. Resident	Two mot a year is absolutely a must. Drivers work excessive hours and do a lot of mileage- what can be more important than driver and public safety.
F. Driver	<p>Garages; testing- you should keep more than one garage available for testing - this is best practice - would NOT want Page 4 of 7 to see you follow City model of one (their own) garage monopolizing.</p> <p>However, those accredited garages need training/regulating in order that testing is consistent AND things like door sign failures are failed. Still see too many Ubers without correct door signage providing that testing is currently inconsistent.</p>
G. Operator	CoC testing already exists to ensure that vehicles are fit for purpose. It is proposed to make COC testing 6 monthly. We consider that this is another completely unnecessary additional expense that will impact most on smaller businesses.
	<p>Panther would like more information on how 6 monthly COC's are to be 'produced' to council before commenting further in detail but we are OK with the notion of 6 monthly testing whilst not being especially in favour for any particular reason.</p> <p>Again, not least for best practice purposes, we would not want to see a monopoly on vehicle testing being restricted to one garage/provider but would hope SCDC retain the use of outsourcers for this with a number of approved testing garages.</p> <p>Within this, Panther would like to SCDC have a strategy for better education of testers (maybe be annual workshops or the like) so that standards are uniform and rules are applied consistently.</p> <p>Bearing in mind 6 monthly testing and the date on certs/MOT's/plates Etc. that get affected by this, that SCDC will be able to provide a quicker turnaround on physical plate provision as this has got to nearly 2 weeks in the recent past and will not be acceptable in a twice yearly regime.</p>

<b>5.5 Safety Equipment</b>	
A. Operator	<p>Safety Equipment.</p> <p>ii. Fire Extinguisher:</p> <p>Need to specify what counts as 'efficient' otherwise there will be confusion among drivers and testers.</p> <p>Follow city council with minimum 1KG ?</p>
<b>5.6 Door Signage/ Licence Plate</b>	
A. Drivers	<p>Signage in/on Private Hire Vehicles (including branding)</p> <p>The LPHCA has a long-standing belief and much evidence that there should be very little signage on Private Hire Vehicles for proven safety reasoning, including the confusion of the travelling public.</p> <p>Furthermore, the fact that Private Hire Vehicles (PHVs) are just that - Privately Hired Vehicles, is often lost on many.</p> <p>It is a fact that the more signage you put on a PHV, the more it looks like a taxi and the more the public are confused, especially in licensed areas where traditional London style taxis are not utilised and the same vehicle can be licensed for taxi or PHV usage.</p> <p>For this reason, regulatory signage on PHVs should be discreet, and the number plate should be the primary thing that a passenger looks for, not a licensing plate, door stickers, branding or other identifiers.</p> <p>As the London Private Hire Car Association, we worked very hard with the Public Carriage Office in London on appropriate signage on PHVs, prior to licensing in 1998. We spent 2 years with other trade bodies agreeing to 'hologrammed' screen discs front and back that contain all the licence details, which very importantly can be seen from the outside of the vehicle.</p> <p>With government currently constructing a taxi and PHV database that will carry that information in real time there will be even less reliance on such a disc.</p> <p>We know that horrendous sexual attacks, robberies and assaults have taken place when unsuspecting members of the public have been lured into danger by false signage on vehicles that are not-purpose built like London taxis.</p> <p>Branding</p>

After many years of success with the screen disc system in London the question of what branding as opposed to regulatory signage could be allowed on PHVs was asked. It was resolved that almost no company branding would be permitted other than on the rear of vehicles, to ensure that PHVs were not hailed and mistaken as publicly hireable taxis.

Rear windscreen signage that meets light and opacity regulations was agreed upon, alongside MOGO number plate type attachments and approved sign-written company branding (all rearward facing). This has worked very well and there is no evidence to suggest otherwise, most importantly PHVs are far less likely to be mistaken as being taxis and members of the public are not likely to be confused

Disc System and even greater safety

The disc system has been in place for over 15 years now in London and we estimate that well over 1 million have been issued (at the vehicle licensing point).

In addition to the fact that new government vehicle database is coming online, Transport for London (TfL) have regulated that Private hire operators must provide a booking confirmation to a passenger before their journey starts.

The operator is expected to request passenger contact information and offer to provide a booking confirmation for all bookings.

All operators must (at a minimum) be able to provide a booking confirmation to passengers via email, text (SMS and MMS) message and phone (regardless of what booking channels the operator offers).

The booking confirmation must contain, as a minimum:

- The vehicle registration mark
- The first name of the driver
- The driver's private hire licence number, as shown on the ID the driver is wearing
- Where the passenger can receive it, a photo of driver

Where the customer books in person or by landline phone, a photo must be provided if the customer requests confirmation through a communications channel that can provide an image, for example an email or smart phone.

All this negates the need for confusing and in some cases very dangerous signage on vehicles that we know can be copied and used to confuse unsuspecting members of the public.

From the Chauffeur and Executive perspective many corporates do not wish to have the company their staff are travelling with identified for  
aesthetical and security reasons.

#### Prosecution for false signage and badges

LPHCA research has revealed that in April this year (2019) a bogus cab driver used stickers to trick potential customers into thinking he was in a legitimate private hire vehicle. He also stuck no-smoking signs in the front windows of a dark-blue Vauxhall Zafira.

Fortunately, he was caught by council licensing officers and prosecuted by Southampton Magistrates' Court.

In 2017 'fake' South Cambridgeshire taxi drivers' badges were seized in an investigation which involved police in Buckinghamshire following the discovery of a fake taxi drivers badge purporting to be issued by you - South Cambridgeshire District Council. This prompted a police investigation into fraudulent taxi licences and a South Cambridgeshire vehicle plate was also seized.

False signage and badges have often been used to aid and abet criminal activity and with modern technology, police and enforcement teams can now check in real-time, as they do with road tax nowadays.

With the DfT & DEFRA taxi & PHV database being constructed, which will identify the registered keeper, the licensing they authority, date of licensing, etc., alongside the customers ability to check in real time with the company booked with, anything other than basic signage is unnecessary.

We know that the more you put on a PHV the more likelihood there is of illegal activity, including touting, bogus cabs and far worse. Some naively believe that putting 'pre-booked only' on doors helps but this does not help tourists or others who don't understand written English, it only serves to confuse. Council crests can be copied, as can branding and magnetic door signs, which can easily be removed by a criminal for potentially very sinister use.

#### Executive & Chauffeur Vehicles Signage

The case for discreet signage on executive vehicles is even more compelling because such vehicles are not corporate work or executive business that may have emanated by recommendation or website promotion.

Street bookings are a rarity for Executive & Chauffeur Vehicles and in some cases never happens. The more discerning customers that utilise such specialist services in nearly 100% of cases book such vehicles well in advance.

If SCDC adopted the successful London signage model it could also be utilised by the wider Private Hire Vehicles you licence that has been so effective in the capital. Executive & Chauffeur Vehicles in London and in general all PHVs have accepted the Screen Disc option alongside the new operator requirements as the norm and it works well because it is discreet.

With government constructing the new Private Hire and taxi vehicle database, not only will safety improve because passengers with smart devices will be able to check in real-time, alongside the police, licensing & compliance officers, who will also have access to all the required details too.

	<p>Our response to signage and branding is that 'less is more', so please seriously consider the London Screen Disc and branding model not only for Executive Vehicles but for all PHVs that you licence. The public will be less easily confused and much safer.</p> <p>All the Executive drivers I have spoken to in SCDC have said that the plate exemption you currently utilise should not be radically changed unless a screen disc option comes into place.</p> <p>Finally, I think it useful to point out that vehicles especially for executive use, nowadays for very good business and environmental reasons, work for multiple companies. It is therefore not a good idea to tie vehicles or drivers to companies, especially as this can compromise their self-employed status. Working for multiple companies, increases the earnings potential and has considerable environmental benefits as drivers that are available to multiple operators have reduced dead mileage.</p> <p>Executive &amp; Chauffeur Vehicles Signage Position – Improve what you already have for Chauffeur &amp; Executive, consider screen discs and far less signage more widely on PHVs, so they are not confused as taxis.</p>
<p>B. Operator</p>	<p>3.5.2 Private Hire Vehicles</p> <p>iii. The vehicle must display permanently on the driver and front passenger door in a prominent position the name and telephone number of the Operator fulfilling the booking, except where a plate exemption certificate has been issued.</p> <p>Based on discussions with the licensing team, our understanding is that this part of the policy has been set in an effort to ensure that members of the public are able to make complaints directly to an operator.</p> <p>Where local authorities require external door signs with an operator's name and contact information, this information is often used as a means of contacting the operator for a number of different reasons: most commonly to make a booking, very rarely to make a complaint.</p> <p>It would therefore be very confusing to customers to be pointed to a phone number from which they are unable to book a vehicle.</p> <p>As is noted in Section 4.1.iii of your revised policy that is currently out for consultation:</p> <p>The acceptance of bookings may be provided for by a variety of methods, such as, in person, by telephone, text, email, internet, smart phone app, in writing, or by any other communication means.</p> <p>We hope that the policy on door signs could also reflect this sensible and future-proofed section of your policy—or indeed that the Council might choose to review fully its operator signage policy.</p> <p>Uber Britannia Limited holds a large number of operator licences in England and Wales. Many councils choose not to have operator</p>

signage for a number of reasons outlined below.

There are other councils with similar policies to South Cambridgeshire in relation to door signs, however they have all either formally or informally granted Uber, as an app-based operator, an exemption to this condition—reflecting the same position as yours in Section 4.1.iii, namely that there are different ways of accepting bookings.

As Uber's bookings are taken via the app, these councils take the reasonable view to allow us to put the URL (website address) in lieu of a telephone number.

You can see this on door signs we have for Bolton, Bristol, Sefton and Southampton among others

Moreover, many other councils have actually taken their policy in the opposite direction, removing the requirement for a telephone number from their livery requirements.

As described by a senior licensing manager at Southampton City Council (in an email to me on 5 August 2019, which he has given permission for me to share):

"In 2015 we decided to alter our conditions on the display of a telephone number. When we examined the policy we realised that it was an unfair condition to force the display of a number as not all vehicles are booked this way. Additionally there is no way we could enforce the fact that the number would be answered. Therefore if we were ever challenged by an applicant on this there would be a high risk of the policy being overturned as the justification was weak."

"Instead we require the phone number or web domain (that could be an email address). This has proved successful and we have had no complaints from the public regarding not being able to contact an operator in the event they wish to complain."  
[Emphasis added]

Brighton and Hove City Council removed the requirement for operators to have a telephone numbers on the external livery in 2018, allowing instead for an operator name and/or phone number:

"[Permitted door signs]...should be 30cms by 46cms in size with white lettering, containing only the words "PRIVATE HIRE" and "PRIOR BOOKING ONLY" and a single telephone number or; company name of the operator (as approved by the Director)... If door signs are displayed a roof sign must also be displayed showing the same single telephone number or; company name/logo matching the door sign on the vehicle on the front and back of the roof sign."  
[Emphasis added]

(Section 150.5

[https://phantom.brighton-hove.gov.uk/Published/C00000116/M00009219/AI00070116/\\$20181120101423\\_017981\\_0061188\\_BlueBook5thEdition3.docxA.ps](https://phantom.brighton-hove.gov.uk/Published/C00000116/M00009219/AI00070116/$20181120101423_017981_0061188_BlueBook5thEdition3.docxA.ps).

pdf ).

And New Forest District Council explicitly state the exact opposite of that which is set out by South Cambridgeshire:

The operator shall not cause or knowingly permit there to be displayed:-

3.1 In and from his premises or on or from any Private Hire Vehicle operated by him or on any advertising material provided by him or on his behalf the word "Taxi" or "Cab" whether in the singular or plural, or any word of similar meaning or appearance whether alone or as part of another word, unless that operator is also the proprietor of a Hackney Carriage licensed by the Council, or;

3.2 In respect of any Private Hire Vehicle operated by him the words "For Hire" or any words of similar meaning or appearance or any telephone number or address, or any numbers or words which appear to be or resemble a telephone number or address.

[Emphasis added] (PART J Licence Conditions Relating to Private Hire Operators p27:

<http://www.newforest.gov.uk/CHttpHandler.ashx?id=12542&p=0> )

Uber's view is that it is possible for passengers to be able to identify Private Hire vehicles without additional livery. At Uber, we have shown how technology can raise public safety standards. We also believe that technology has in many respects usurped the safety benefits of traditional elements of signage and that some of these elements can be revised to better serve and protect both passengers and drivers. The requirement for high visibility signage on vehicles can also act as a deterrent for new drivers entering the industry, especially those that are looking to work on a part-time or infrequent basis.

It is worth noting that following Northern Ireland's Department of Infrastructure change of their conditions on vehicle signage (moving from high visibility operator signage to more discreet signage), Uber observed a drop in the number of passengers attempting to get into the wrong vehicle.

Signage abets plying-for-hire

Plying-for-hire is a challenge to the industry that negatively impacts drivers, passengers, operators and enforcement officers. Not only does it create friction between the hackney and private hire trades, it represents a safety risk to vulnerable passengers.

Highly visible signs on private hire vehicles, which identify them as such may have the unintentional effect of increasing the incidence of plying-for-hire, in that passengers may assume that the trip is legal and legitimate due to the presence of the signage.

If passengers have been provided with the aforementioned driver/vehicle details, there should be no reason to require operator-branded signage to assist with the identification of the vehicle.

Furthermore, it is much harder for a bad actor to reproduce a car's make/model or vehicle registration mark than it is to have an operator's door sign fraudulently printed.

Uber would recommend that the consultation consider the signage requirements for Transport for London's Private Hire vehicle conditions

	<p>. TfL’s more discreet signage requirements appear to correlate with a reduction of plying-for-hire cases.</p> <p>Liaising with enforcement</p> <p>There are clear reasons why enforcement agencies need to readily identify whether a vehicle is a licensed Private Hire vehicle. Technology is making this process more efficient and comprehensive. Today, many agencies are using apps themselves to allow both officers and members of the public to check this data for themselves in real time. For example the Dublin driver check app allows anyone to check whether a vehicle and driver are appropriately licensed.</p> <p>A similar online licence checker has been launched for TfL-licensed drivers, vehicles, and operators. Importantly, the unique identifiers for these databases and systems are: the vehicle registration mark, plate number, and if known, the driver’s badge number. It is the vehicle registration mark, which is most useful to differing agencies and provides greater access to information for officers – as opposed to the driver call sign which is currently a requirement for signage, and delegated by each operator.</p> <p>As is covered in Section 5.4 of your policy (Complaints, Compliments and Comments), members of the public are able to leave feedback with the council. In Section 4.16 (Operator’s Complaints Policy) it is duly set that operators should process feedback from customers “without unnecessary regulatory burden or intervention by this Local Authority.”</p> <p>To this end, we propose that should the council still require a telephone number for complaints made by members of the public to be put on door signs, it could be the council telephone number and incorporated into the South Cambridgeshire door signs, not that of an operator.</p> <p>We therefore recommend that the Council review its livery policy. If operator signage is still considered important, we strongly recommend that it should be rephrased to require ‘contact information’ on operator door signs, such as a telephone number or website URL or email address.</p>
C. Driver	<p>Remove the extra stickers all over the vehicle.</p> <p>A round small one works very well in London, maybe adopt that style.</p>
D. Driver	<p>For example I refer to all signs required for the vehicles, many of our customers find them very intrusive and unnecessary for the private trips they want to make.</p> <p>A Private hire car that fits our business model, which is providing a private and discreet service, without any signs, is cherished by our clients! A typical ‘Mrs Jones’ who may be going to the hospital or doctor discreetly or visiting friends and does not want public knowledge of it and to state that ‘Executives, managing directors, and pop stars can be taken in privacy is elitist and discriminatory</p>
E. Driver	<p>Door Signage – Has exactly the opposite effect to the argument for justification you are putting forward.</p>
F. Driver	<p>If possible at all to make the yellow magnetic signs smaller.</p>

	Could the stickers be similar to the London area taxis - i.e. small sign on the rear big window?
G. Driver	Door stickers important for safety.
H. Driver	I do not reject company door sign.
I. Driver	<p>I don't agree personally with the amount of signs that we have to show on our cars. I've got nothing against displaying a plate underneath my reg plate on the back of the car.</p> <p>We also display our company logo with "clearly visible PREBOOKED ONLY"</p> <p>I don't agree with that new half moon crest yellow sign as it's bit pointless as it's copied info from back of the car.</p> <p>And that new internal signage is also bit too much. It's same over and over.</p>
J. Cllr	<p>3.5: Livery. The easiest way to ensure that 'the public are able to easily identify between a Hackney Carriage and a Private Hire vehicle' is to remove all livery from the latter category.</p> <p>It serves no useful purpose (see 1.2.xi).</p> <p>The livery demands for Hackneys should not go beyond what is necessary to ensure the goals of 1.2.xii.</p>
K. Cllr	<p>It is appropriate that a PHV should be identifiable as such both by passengers and the public but it is not clear that a Licence Plate is the best option.</p> <p>However the requirements of 3.5.2.iii and iv serve no useful purpose</p>
L. Driver	<p>Signage - I do not like the idea of signage. I do a variety of contract work plus some executive work for SCDC Licenced chauffeur companies who hold plate exemption.</p> <p>When doing this work it would be preferable not to display all the door signs and internal signs. Could this signage NOT be required when working for a plate exempt company?</p>
M. Driver	<p>Strongly in favour of having internal signage and phone number on external door sign.</p> <p>This is a safety &amp; Safeguarding necessity and I not Uber are able to flout this currently.</p> <p>SCDC crests should be allowed to be removable for Private Hires who wish to do occasional Exec work through their operator where the</p>

	<p>customer requires the vehicle to look less like a taxi.</p> <p>Otherwise in favour of rule that states signage should be in place at all times.</p>
N. Driver	Operators should have office and phone number available 24/7 for customers to utilize to take complaints - again, one rule for Uber, different current rule for everyone else
O. Drivers	Door sign are affecting our income, and the biggest reason it was not consulted by driver only the taxi licensing authority went back of the drivers and got agreed with private hire operators as far we aware just one big company who dictates the drivers not to work with other company even though legally you can .and taxi licensing authority have helped this company to achieve this.
P. Drivers	<p>It is our opinion that signage on Private Hire vehicles overall is unnecessary and only confuses the public when trying to identify a public hire vehicle such as a hackney carriage, it therefore increases the risk of criminal activity by impersonation.</p> <p>However the SCEOG is exclusively made up of operators who use vehicles that have been afforded an exemption from displaying this signage.</p>
Q. Cambridge City Council	<p>We support the requirement of operators name and contact telephone numbers to be displayed on the front passenger and driver doors.</p> <p>Cambridge City Council have also recently considered this and are in support of operator name and telephone number being a requirement within the policy. Cambridge City held a consultation from 1 August to 31 August 2019 and will be taking the recommendation to Licensing Committee on 30 September 2019 for final decision.</p> <p>We understand that our objectives include the protection of public and understand that council offices are only open Monday to Friday during core hours, and are closed on weekends and bank holidays. If an issue is to rise regarding a driver or vehicle during this time, it leads to a delay in complaints/ concerns being addressed.</p> <p>However, if members of the public are able to make contact with an operator, a service which works 24 hours 7 days a week, concerns and complaints may be addressed sooner, promoting public safety.</p>
R. Operator	<p>Section 3. Hackney Carriage &amp; Private Hire Vehicles:</p> <p>3.5.1iii &amp; 3.5.2ii. Panther would like to see different size plates and brackets routinely/properly offered to SCDC drivers at the point of application if possible in order that they can make informed decisions about how best to fix the plate to their vehicle.</p> <p>There is an increased regularity of drivers having difficulty properly fixing the plate on whilst maintaining proper/safe access to the boot area and/or without covering nullifying the reverse/parking sensors. Maybe plate 'style/size' options could be added to the vehicle application form.</p>

	<p>Panther are vehemently in favour of signs being on display permanently and -crucially - with the operator's phone number clearly displayed. In our opinion this is a major safeguarding point as it enables (again crucially) non-passengers to instantly report any safeguarding/perceived safeguarding issues as sometimes these are time critical.</p> <p>At Panther we have more than several examples of issues being averted due to the ability of non-passengers to report them quickly via an operator door sign with phone number. It is also the case that the police have regularly utilised the phone number being on the doorsign in issues where instantaneous action required. Within this, and to further aid safeguarding and safety (including driver safety) it is our strong belief that all operators should also be in a position to 'man' the advertised phone number 24/7 365 days a year or at least during all hours of their operation</p>
<p><b>5.7 Internal Vehicle Notice</b></p>	
<p>A. Operator</p>	<p>Providing information to passengers</p> <p>One of the most evident ways we have improved safety is via the information we provide passengers in their app. Before their vehicle arrives, the passenger has access to the make, model, colour and vehicle registration mark of the car; the driver's name, picture and the parties' anonymised contact details are exchanged. Furthermore, the passenger has the ability to see where their vehicle is in real time via the map on their phone.</p> <p>These features allow a passenger to more accurately identify and connect with their driver than by relying on recognising the branding from the vehicle's signage.</p> <p>Our technology also includes features for passengers and drivers with additional needs—from VoiceOver iOS to easy ways of sharing trip details with others:  <a href="https://accessibility.uber.com/">https://accessibility.uber.com/</a> . This means that those with limited vision or hearing are still able to receive this information.</p> <p>Given that every private hire journey is pre-booked, all operators should be able to provide these specific driver/vehicle details (via phone, text, email, app) before every journey (with the potential exception of driver picture and live map). As a requirement, this would enhance the information provided to passengers and improve public safety</p> <p>3.18 Required Information for Passengers</p>

	<p>i. Members of the public who have cause for concern, or who wish to complain about a journey in a licensed vehicle, will need some information about the driver or vehicle they used in order to progress their complaint or report their concern.</p> <p>It is noted that this section is focused on required information for passengers , however the first point focuses on members of the public. It would be helpful if the final policy (and wording) could align to make it clear what is required information for passengers, and what (if anything) is required information for members of the public.</p> <p>Through Uber, passengers are given up-front information about the driver (his or her name and accompanying photograph, badge number and licensing authority) as well as the vehicle (registration number, make and model) as soon as the driver has agreed to provide transportation services for the passenger via the app.</p> <p>In the interests of promoting public safety, passengers are able to share trip details with loved ones even before the trip has started. Passengers are able to provide feedback about the trip before, during or after the trip has ended, with the details of the driver and vehicle tagged so that it is straightforward for our teams to process.</p> <p>This feedback can be both positive and negative. The driver’s licence number and licensing authority is available to be seen in the receipt after the trip has been completed.</p>
<p>B. Vehicle owner</p>	<p>What you MUST remember is clients are sent emails AND texts of all drivers details should they require them, unlike a normal taxi.</p>
<p>C.</p>	<p>What is new to us is the inclusion of an internal notice (previously these details were allowed to be given electronically). Most drivers are self-employed and often work for several operators, the internal notice contains the information of the operator as well as the vehicle so it can be misleading to passengers. It would not be practical to keep swapping multiple notices throughout the day, the potential for error is enormous and these notices could get lost or stolen.</p> <p>It is our opinion that this notice should be changed for plate exempt vehicles to a tamperproof disc similar to that used by Transport for London that would permanently be affixed to the windscreen.</p> <p>The notice would contain the licence number, vehicle details and the address of the licencing office, we believe it is important that the operator details are not given here as they are not permanent to the vehicle.</p> <p>It is really important that complaints are directed to the council, operators may try to hide the complaint and protect a driver from repercussions which is not in the interests of public safety. Situations where a passenger in a private hire vehicle does not know the operator are generally very rare and even rarer in an executive vehicle.</p> <p>In any event, the notice would contain the licence number, the proprietor of that vehicle is duty bound to keep records of the driver at the time and operators are bound to keep details of the journey so tracing a complaint would not be difficult</p>

D. Driver	We private hire work as pre booking service for which the passenger is already aware of the service provider and private hire company have the details of the driver then why it is mandatory to have internal sign, external signs should be enough.
E. Driver	Plus people booking journeys have my contact details confirmed (ie landline, mobile phone, email, and website) when the booking was made and I can be contacted if needed.
F. Cllr	I trust the information mentioned in 3.18.iv will be visible from all seats but kept discreet
G. Operator	Panther are in favour of the internal signage for the intended reasons and believe this should include plate exempt vehicles too.  Internal signage MUST in our opinion, include information on the operating company under which the vehicle is conducting the job/its services.
H. Drivers	Internal signage in PHVs is also a bad idea, as it can be fraudulently copied and used to entice a passenger into a vehicle and a potentially dangerous situation.  With 'self-destruct on removal' screen discs, the practice of issuing things like a licensing information card, that can easily be replicated, removed by passengers and I understand, in the main gets stored in the glove box anyway, is negated
<b>5.8 CCTV</b>	
A. Driver	The proposed CCTV regulations are regarded in a similar way and would be seen as intrusive to customer privacy.  We do not operate a service type that is involved with bookings late at night from people we don't know coming back from night clubs or similar.
B. Driver	CCTV – the proposed introduction for all vehicle is completely inappropriate for Executive Car Operators and drivers. We are not Taxis or "Mini Cabs".
C. Operator	CCTV, my concern is that my cars are private hire only and my clients know me and my drivers for the last 20+ years on repeat business contracts.  My car is under a BMW lease agreement for a 3 year contract with a full warranty and no modifications are permitted.  I can understand the need for cctv in taxis.
D. Operator	Uber supports the ICO guidelines and, where councils require CCTV in licensed vehicles, takes the view that this is a matter with which only vehicle proprietors must be compliant (and therefore it is the responsibility of the proprietor to notify the council that the equipment

	<p>has been installed).</p> <p>There is no need for an operator to play a role in this, other than to ensure that current and prospective drivers are aware of the requirement for their vehicle. This will reduce additional administrative steps for both the council and operators.</p>
E. Driver	<p>About CCTV it's fantastic idea but...</p> <p>First of all it's a breach of data protection rules.</p> <p>Second of all what would be the cost?</p> <p>And will council cover the costs of installation as we know it won't be cheap. Also cost of maintenance etc.</p> <p>Another thing we've heard about "panic button" and that's bit weird idea.</p> <p>Are you gonna have to damage some of our car interior?</p> <p>And as we know some cars installation will cost more then the others. How that's gonna work?</p> <p>The whole installation of CCTV might be interfering with car manufacturer warranty - it might void it. Also some recording device must be installed which will take some of our space out.</p> <p>Another thing some feedback from customers have been collected and all business customers said that they're discussing business matters and don't want to be recorded.</p> <p>So CCTV has to be decided very very careful.</p>
F. Drivers	<p>3.9: CCTV. I do not see that CCTV meets the objectives of 3.9..ii.</p> <p>GDPR further restricts its usefulness, as attempts by cyclists to use CCTV footage from Stagecoach demonstrate.</p> <p>It would be worth consulting the Cycling Campaign here. Internal CCTV will be extremely unpopular with the travelling public who are likely to want to have confidential conversations in the car.</p>
G. Driver	<p>CCTV - I have concerns about the use of CCTV within a vehicle and would like to know more information on the proposed system before it becomes a requirement.</p> <p>Plus I have concerns on the cost of fitting a secure system</p>

	I do like the idea of having a dash cam fitted for recording outside the vehicle as a protection and an aid for my Insurance company .
H. Operator	<p>CCTV in Chauffeur Exempt vehicles are totally unnecessary, it will not add to any public safety as</p> <p>WE DO NOT DRIVE ANY OF THE PUBLIC only business account customers who will find this intrusive into their privacy. Please see letters of objection from some of my clients sent separately by email to licencing.</p>
I. Enforcement Officer	<p>CCTV - As an officer for the authority I'm aware of the increasing number of driver's who have fitted or intend to fit, dashcams to their vehicles.</p> <p>Due to the number of hours licensed drivers spend on the road it is quite understandable that they wish to protect themselves against false allegations if their vehicle is involved in an accident.</p> <p>Some of the cameras fitted view from the front outward, another may be fitted at the rear of the vehicle viewing outward. However, some of the cameras are also viewing inwards from the front and recording passengers during the journey and as they enter and exit the vehicle.</p> <p>This recorded footage may be of children, or vulnerable persons which may include inebriated female passengers who may be economically dressed. The cameras may be situated in such a position that captured footage would reveal more of the passengers than they would feel comfortable with.</p> <p>I believe that some drivers are fitting these systems to be used as internal vehicle CCTV, and that having their system of choice fitted will preclude them from having the council approved system fitted later. What the drivers are not aware of is that these systems are also recording audio which is specifically not allowed by ICO (Information Commissioners Office) unless it is attached to some form of "Panic button", which of course these systems do not support.</p> <p>Although a driver can go into the settings manual and turn off the audio, in some systems it is reactivated when the camera is turned off and then back on again. Drivers also seem unaware that they should register the use of any such system with ICO to ensure compliance.</p> <p>There is also a question on the security of any captured footage, which are generally held on removable and rewritable media such as a USB flashcard. This means that there are no control measures in place to stop footage being viewed by the driver and distributed on social media.</p> <p>I would therefore suggest that the council make it as part of the policy that we do not allow dashcams to be fitted to any of our licensed vehicles. If drivers/proprietors wish to have a system that records the external journey, either front and/or rear, it should be incorporated into the council approved CCTV system as and when a system or systems have been approved as meeting the requirements.</p>
J. Driver	<p>In favour of CCTV but drivers will find it difficult to joining ICO and will not understand it.</p> <p>It must be cost effective for driver though £ 400 max.</p>

K. Drivers	<p>CCTV is good things and as far we are aware this is going to be enforced by central government and every taxi or private hire vehicle need to have one by law regardless local council taxi policies .</p> <p>To have CCTV 2020 is a very short time to spend so much money and so far it is not clear that :</p> <p>What will happen if the CCTV brakes down ?</p> <p>Who is responsible for the maintenance of the CCTV</p> <p>Who will compensate drivers time when the council need to extract CCTV footage from the camera and the locations where driver need to go if the footage is required.</p> <p>Our own privacy: we use our car for our personal use so what plans council have to protect our personal and private life privacy while those CCTV in use 24/7.</p>
L. Driver	<p>Having a CCTV is good thing. To have it by 2020 is a very short notice. Authorities need to understand that we are already struggling to meet our needs.</p> <p>I use my car for personal use and by giving all the access and control to third person is a breach of my private life.</p> <p>Few questions.</p> <p>who is responsible for the maintenance ,</p> <p>and who will be covering the loss of earning if council need to extract the footage ?</p>
M. Drivers	<p>We strongly oppose the introduction of compulsory CCTV in executive (exempt) vehicles and there are a number of reasons for this:</p> <p>Our passengers value privacy and this is why they hire a private car. Customers have reported that they would seek operators from other areas who do not have to have CCTV, this is the crux of the problem, it would be wholly unfair to impose a significant financial cost and negative customer experience on South Cambridgeshire Executive Operators when our competitors (that can and do operate in our area) are not burdened by these conditions.</p> <p>This should be a decision made at national level or given as a subsidised option for drivers &amp; operators.</p> <p>Current licensing policy states that exempt vehicles are excluded from needing CCTV, this was after a similar consultation a few years ago where a few of our members put forward the need for privacy rights and that the violent disputes do not occur in executive vehicles.</p>

	<p>We are not aware of any increase in complaints involving exempted vehicles over the last two years, in fact no member of the group can recall any complaint that would have benefitted from CCTV footage.</p> <p>As operators, drivers and vehicle owners we do not feel any benefit from mandatory CCTV and this is also the view of our passengers. There has been no consideration made for the passengers right to privacy in their privately hired vehicle, this is something our trade hold very dear, discretion, reliability and professionalism are at the very front of our passengers wishes. At our meeting earlier this month you kindly asked us to provide evidence from our customers, this has been collected by our members and forwarded to the LPHCA (for confidentiality), to date the LPHCA has only received objections in writing and more are expected.</p> <p>On the subject of CCTV itself there are a number of things also not very clear in the consultation:</p> <ol style="list-style-type: none"> <li>1. The data is controlled by licensing and can only be accessed by them, what steps would be taken to ensure the data is managed in a proper way and compliant to GDPR and other data protection regulations?</li> <li>2. What allowances would be made for temporary vehicles in the case of breakdowns and accidents?</li> <li>3. What allowances would be made for system breakdowns, how will it be monitored that the system is even working at all?</li> <li>4. It is understood that the system can be turned off when the vehicle is being used privately, what steps are being made to ensure that the driver cannot accidentally turn it off?</li> </ol>
N. Driver	<p>What are the full requirements of the CCTV systems? Are we able to choose system and where fitted?</p> <p>Will it only have to be on when working?</p>
O. Cllr	<p>3.9: CCTV. I do not see that CCTV meets the objectives[ of 3.9.ii. GDPR further restricts its usefulness, as attempts by cyclists to use CCTV footage from Stagecoach demonstrate. It would be worth consulting the Cycling Campaign here. Internal CCTV will be extremely unpopular</p>
P. Operator	<p>Hello I have a problem with your proposed change to your rules regarding CCTV in my private hire vehicles with exemption certificates.</p> <p>Private hire means private hire, my customers want privacy in my cars.</p> <p>My understanding is the Recordings on CCTV is stored in my car for 28 days. If my car gets stolen and my customers confidential information is accessed this could be used for any number of things. So will South Cambs council be held responsible for the breach in the data protection act.</p> <p>.It states in my contract with my leasing company for my car that no modifications must be made to it as this will invalidate the warranty. <b>BWM STRESS THAT IF YOU TAMPER WITH MY CAR IT WILL INVALIDATE MY WARRENTY AND YOU WILL HAVE TO COVER IT INSTEAD AND PUT RIGHT ANY DAMAGE LEFT BEHIND WHEN CCTV IS REMOVED.</b></p>

	<p>My self and my customers do not want any CCTV in my cars I have been trading as a private hire driver since 1983 for Chauffeur/Private Hire work for blue chip companies and never once needed CCTV. All my work is repeat business and if you impose CCTV on us I will be out of business.</p> <p>Have you ever had a complaint of any kind regarding Malcolm Bonnett or Grafton Executive cars.</p>
Q. Operator	<p>Panther are in favour of provision of CCTV in all vehicles including plate exempt vehicles for all the stated reasons/objectives – there is no reason why plate exempt should mean CCTV exempt too!</p> <p>However, any provision needs to be carefully thought out with regard to the law and driver protection and not cost prohibitive or burdensome for the driver.</p> <p>In Panthers opinion, cost to driver of £300 - £400 is agreeable/sensible – anything above £500 is definitely cost prohibitive.</p> <p>Under point v of your proposal we are not sure that drivers would need to sign up with ICO in the event that CCTV data is only accessible to police and/or SCDC and we have called ICO office to clarify this – they are unsure!! One thing is for sure – if drivers are required to sign up individually there will be a severe lack of comprehension among drivers regarding this and this could be very administratively time-consuming for council officers and/or operators.</p> <p>Ultimately, the specification needs to be reasonable and so does the implementation period. Panther would advocate that there needs to be a period of full consultation on this matter alone after any adoption of it in principal in December 2019 (as the devil is the detail on this one) and that when specification is agreed, a further period of at least 1 year to allow a vehicle to install and prove installation/provide certification – in other words, to adopt, consult and then implement at next testing would be unfair on some drivers whose next test would be ‘upcoming’.</p> <p>The date given in the proposed policy under iii is therefore not that reasonable in our opinion.</p> <p>Panther would also expect that supply provision wasn’t monopolised and that - in accordance with best practices – drivers will have options for suppliers and installers.</p>
R. Drivers	<p>The case for CCTV in Executive &amp; Chauffeur Vehicles in particular and more widely in Private Hire Vehicles is controversial, unproven and subjective. Whilst there is slightly more of a case for publicly hired taxis as no independent record (unlike under PHV regulations) or tracking is assured, the Surveillance Camera Commissioner’s response to the Department for Transport consultation on statutory guidance for taxi and private hire vehicles for licensing authorities makes significant points.</p> <p>I have put our comments in bold below the Surveillance Camera Commissioner consultation response and I have put the full link at the bottom of this section in italics.</p> <p>Surveillance Camera Commissioner consultation response to the Department for Transport consultation on statutory guidance for taxi and private hire vehicles licensing authorities.</p> <p>1. <i>The Surveillance Camera Commissioner welcomes the opportunity to provide input into this consultation on statutory guidance for</i></p>

licensing authorities with regard to taxis. He has worked with the Department for Transport in development of the draft guidance that was issued for consultation.

2. *The Commissioner recognises that it refers local authorities to the Surveillance Camera Code of Practice. The Protection of Freedoms Act 2012 (PoFA) s.33(5) sets out that they must pay due regard to the code. It is also encouraging that the guidance refers to a number of the tools the Commissioner has issued to help organisations comply with the 12 guiding principles in the code. As relevant authorities under PoFA, local authorities must be made aware that if they do not pay due regard to the code this is admissible as evidence in court. The Crown Prosecution Service revised their Disclosure Manual in December 2018 to reflect this.*
3. *That said blanket licencing may be disproportionate and should only be used where there is a strong justification as set out in paragraph 1.15 of the code: When a relevant authority has licensing functions and considers the use of surveillance camera systems as part of the conditions attached to a licence or certificate, it must in particular have regard to guiding principle one in this code. Any proposed imposition of a blanket requirement to attach surveillance camera conditions as part of the conditions attached to a licence or certificate is likely to give rise to concerns about the proportionality of such an approach and will require an appropriately strong justification and must be kept under regular review.*

LPHCA COMMENT - In section 3.9 CCTV you state:

- i. The installation of CCTV in licensed vehicles can be both a deterrent to would-be troublemakers and a source of evidence in the case of disputes between drivers and passengers, other incidents and accidents.

We question whether a lot of this is accurate and ask what evidence, especially for Chauffeur & Executive and basic pre-booked and often tracked PHVs do you have for SCDC?

Recent media footage has shown CCTV has not acted as a deterrent on busses, tube stations and main line railway, where murders and serious assaults have occurred. As PHVs are pre-booked we are not convinced that the cost of installation, maintenance and overheads a) are necessary, b) proportionate and can therefore be reasonably justified.

As well as this we would like to know if you conducted a formal regulatory impact assessment to cover costs to drivers, operators, SCDC and ultimately to the fare paying passengers.

In addition, what have you done to directly engage with businesses and passengers, who may well object?

At our recent meeting on 4th September we were asked by your goodselves to evidence how Chauffeur & Executive passengers would regard CCTV and we are now compiling the responses from Cambridgeshire businesses and expect to have them within 28 days of your request. Evidence gathered to date shows total resistance to CCTV being in place in a Private Hired Chauffeured or Executive Vehicle.

- ii. The key objects are:

- The protection of licensed drivers.
- The protection of the travelling public.
- To ensure that licensed drivers continue to be 'fit and proper' in line with licence conditions.
- To enable investigations to be fully supported with evidence in a secure and retrievable form.

To understand the necessity for the protection of licensed drivers and the travelling public in SCDC are you able to provide statistical information on previous problems in PHVs please?

We have grave concerns regarding the bullet point that licensed drivers continue to be 'fit and proper' in line with licence conditions via CCTV surveillance as being reasonable and proportionate.

- ii. All Hackney Carriage and Private Hire vehicles must be fitted with an approved CCTV system no later than 30th November 2020.

This seems to be a blanket policy and as stated above should only be used where there is a strong justification.

*4. The Commissioner is aware of the blanket requirement for taxis in Rotherham to have CCTV installed. This was one of a number of measures implemented following the child abuse issues in the Town where taxis were used to transport a number of the victims. Here there was persuasive evidence to argue sufficient justification but the Commissioner would not expect widespread installation of CCTV in taxis without well evidenced justifications. The local authority's Senior Responsible Officer for compliance with PoFA and the code will be able to advise on justification requirements for CCTV.*

In Rotherham, we understand there were major failings at Council Licensing & Enforcement level.

*5. Furthermore, CCTV in taxis typically also records audio (as well as video). The recording of conversations is extremely intrusive and requires strong justification as set out in paragraph 3.3.2 of the code: Any proposed deployment that includes audio recording in a public place is likely to require a strong justification of necessity to establish its proportionality. There is a strong presumption that a surveillance camera system must not be used to record conversations as this is highly intrusive and unlikely to be justified.*

It is clear that customers do not want to be voice recorded

*6. A key part in the process for justifying a surveillance camera system is consultation. The Commissioner would expect to see clear evidence of public consultation before any final decision about installation is made. This consultation should involve members of the public, taxi drivers, police and any relevant regulators.*

Whilst you have clearly consulted via the proposal document, what direct level of engagement has been done with passengers and businesses by you on CCTV?

	<p><i>7. Local authorities must also have completed a data protection impact assessment prior to installation and have consulted their data protection officer and legal teams. There is a surveillance camera specific DPIA template on the Commissioner's website which was developed in conjunction with the Information Commissioner's Office.</i></p> <p>Has this been done and if so is it available?</p> <p><i>8. Where it is the case that taxi drivers use the vehicle for their own private use the Commissioner would expect there to be a facility to switch off recording. In addition, there must be clear policies and procedures in place regarding how the CCTV system is used and who can access the footage it records and where CCTV systems are IP enabled (connected to the internet) then they must be cyber secure.</i></p> <p>Is this in place and applicable – the consultation does not appear to have covered this?</p> <p><i>9. The Commissioner would recommend that installation of any system should include a full operational requirement which can be achieved by using the Commissioner's Buyers' Toolkit and/or Passport to Compliance documents. This will ensure that a system is installed that is fit for purpose and actually delivers footage that can be used in court if required. Whilst the Commissioner appreciates the austere times that local authorities are working in, he would not expect that substandard systems are installed to save money particularly if the justification of the system is passenger and driver safety.</i></p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/798087/SCC-taxi-consultation-response-DfT.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/798087/SCC-taxi-consultation-response-DfT.pdf</a></p>
<p><b>5.9 Hackney Carriage Vehicles</b></p>	
<p>A. Driver</p>	<p>With regard to the necessity to have all Hackney carriages white, there is some logic in that as they can then be easily recognised,</p> <p>However there are no Taxi ranks where they can wait and be recognised and very few areas where they are likely to be hailed. In addition having a condition that ALL Hackney carriages need to be wheelchair accessible is also inappropriate when just a percentage would be more fitting. Otherwise why not have the same conditions for Private Hire cars?</p> <p>A good proportion of our work is involved with taking people to and from the hospital and with a good number of them confined to, or using wheelchairs, it is extremely unusual for people not to be able to stand up out of the wheelchair and have it put in the back of the car while they sit on the front seat and we always understand this situation before we go to meet them.</p> <p>Therefore we do not understand therefore why ALL cars need to accommodate a very tiny fraction of the travelling public when they have to be booked almost exclusively by telephone. It is like making a butchers shop have a counter to accommodate vegetarian customers just</p>

	in case some come in!
B. Cllr	Why are new Hackneys to be white? Which of the goals of 1.2.xi is this supposed to relate to?  It is appropriate that a PHV should be identifiable as such both by passengers and the public
C. Cllr	3.14: Accessibility. In my village there are wheelchair users who much prefer travelling in the who much prefer travelling in the comfort of a saloon than stuck in the chair, and a Hackney carriage which never plies for hire but uses its status only to be able to use London bus lanes. Why should these be penalised?
<b>5.10 Transfer of Ownership of Vehicle</b>	
A. Operator	Transfer of ownership of vehicle It is assumed SCDC will provide a transfer form for this purpose for the first time and that it will be available on your website. If so, this would be welcome as there has long been a lack of clarity about how to go about transfers with SCDC and the use of the current vehicle application form is not effective and confuses.  Panther would also expect there to be reasonable charge for such a transfer and re-issue of a license etc.  Regarding non-driver Proprietors, Panther would like to see such owners be forced to sign up to the DBS update service like other owners as it would save said proprietor having to re-do a basic check every year – would save money for the proprietor in the long run .
<b>6. Enforcement</b>	
A. Driver	No need.
B. Driver	Cambridge desperately needs enforcement.
C. Vehicle Owner	Enforcement from the authority is absolutely necessary. Without active enforcement these measures could be compromised.
D. Resident	I have never heard of any SCDC enforcement.  Please enforce, it will raise standards
E. Driver	Need more enforcement.
F. Driver	Drivers should immediately loose their badge/license if they're caught picking up customers without pre-booking If they're not hackney

	<p>Carriage.</p> <p>Also there should be more enforcement officers checking vehicles on the road and checking drivers.</p>
G. Cllr	In general too diffuse and terribly repetitive.
H. Operator	Enforcement should be made where necessary, especially where operators want exempt certificates but do mostly taxi work.
I. Driver	More on street enforcement needed.
J. Drivers	<p>Currently there is no right of appeal other than going before committee.</p> <p>We are proposing to Authority allow drivers fair chance of explanation if points are given maybe he has genuine reason that he may not need to be issued with points.</p> <p>So this need to be looked into giving driver chance to clear his name against the complain and get penalty point reversed</p>
K. Driver	Penalty Point System is good but the way Taxi Licensing are using those point system to punish drivers and drivers have no right of appeals. So this need to be looked into giving driver chance to clear the name against the complain and get penalty point reversed.
L. Driver	<p>PENALTY POINTS:</p> <p>Please give driver the fair chance to explain by giving them right to appeal against the decision.</p>
M. Driver	Point system isn't the right way, as you have jealous Hackney drivers unnecessary taking photos and sending them to you guys, without any wrong doing etc
N. Operator	<p>Page 52 – Section 3.9 Penalty Point System or Scheme.</p> <p>We note you call you this two different things (system in the contents section &amp; scheme in the main body) and that this may not be section 3.9 in the final policy as the numbering of sections seems to go a bit wrong on page 51 so we hope you will correct this.</p> <p>However, Panther would like to be able to comment on the content of such a policy but are disappointed we cannot do so due to it being a Handbook item.</p> <p>We are aware this part of policy is being scrutinised and possibly re-written/re-evaluated and therefore may work differently to how it has in the past therefore - given that this is a vital part of driver licensing/monitoring – we are disappointed not to have the tools to comment/contribute and would like to request that a short separate consultation on this takes place – at the very least, with license holders only</p>
O. Complaints	
P. Operator	5.4 Complaints, Compliments and Comments

Members of the public who wish to submit complaints, compliments or comments about licensed drivers and operators can do so via the Licensing and Enforcement Team. All complaints will be dealt with in accordance with the process as described in the Hackney Carriage and Private Hire Handbook.

It is encouraging to see that South Cambridgeshire District Council set out within the policy their willingness to process complaints made by members of the public. Like many other councils (including councils in urban areas and those supporting more rural areas), unless it is a matter for the police, it is often the council to whom members of the public turn in order to lodge a complaint.

An example from Guildford Council clearly lays out when members of the public should direct their concerns to the council to whom members of the public turn in order to lodge a complaint.

An example from Guildford Council clearly lays out when members of the public should direct their concerns to the council and when to complain to the police, and when to complain to British Transport Police

Licensed hackney carriages and private hire vehicles provide a valuable service to the public. While the majority of our drivers provide a good service, please let us know if you have a complaint about a driver's conduct or the condition of a vehicle.

You can make a complaint about a hackney carriage (taxi) or its driver, as well as a private hire driver, vehicle or operator licensed by us using our Complain about a taxi driver or taxi company online form .

Please provide as much detail as possible, including the date and time of the incident. It is important that you include the licence number (available from the rear plate) or registration number of the vehicle involved, or licence number of the driver (available on the badge worn by the driver).

When to complain to the police

If your complaint is in relation to an alleged offence, such as reckless driving or sounding of a horn, you should complain to Surrey Police by calling 101.

If the alleged offence takes place within the confines of Guildford Railway Station, you should contact the British Transport Police on 0800 405040.

It is Uber's view that one core aspect of the Council's role in promoting public safety is to provide a service to process complaints about licensed vehicles from members of the public, while operators process the vast majority of feedback from both drivers and customers. As you can see from our complaints policies and resources, there are many ways that customers (and drivers) can share their feedback with us or raise an issue. As an operator, Uber follows the conditions set upon it to report serious complaints from members of the public is that of the Council.

<b>7. Relevance of Convictions</b>	
A. Driver	Agree with current proposals.
B. Resident	A firm stance is necessary.
C. Cllr	In general too diffuse and terribly repetitive.
<b>8. Any other Comments</b>	
A. Operator	<p>We have no objection, of course, to genuine and well thought out policy proposals to ensure that operators and drivers are fit and proper and that vehicles are as safe and environmentally friendly as possible.</p> <p>However, as set out, we consider that the proposals are not suitable as they stand. A "one size fits all" approach is not appropriate and will discriminate against smaller operators, create a financial burden and disadvantage many of South Cambridgeshire's more rural residents.</p>
B. Driver	PLEASE MAKE THE LIFE EASY .THANKS
C. Drivers	<p>Finally we would like thank you for recognising that there is a strong market for executive private hire services (often referred to as chauffeur services), it is always the subject of much debate as to what defines that, some would believe it is only reserved for pop stars, royalty and ceo's!</p> <p>We would like to offer in the future to consult with the licensing team to establish a clear understanding of the market and help shape the definition.</p>
D. Cambridge City Council	<p>Further to the current proposed policy, we would like South Cambridgeshire District Council to consider what is below as part of their policy changes.</p> <p>Certificate of Compliance - Cambridge City Council employ the strategy of one garage testing vehicles licensed with Cambridge City Council.</p> <p>This method has proven to be highly effective in monitoring vehicle two yearly Certificate of Compliance tests. In addition, having one specified garage completing these tests ensures that many of the council specific vehicle standards are checked by testers and if issues arise, they can contact council officers directly.</p>

	<p>We would like South Cambridgeshire District Council to consider this approach, to further support in vehicle management.</p> <p>Ability for Hackney Carriages and Private Hire vehicles to take non- cash payments.</p> <p>In July 2019, Cambridge City Council made it mandatory for both Hackney Carriages and Private Hire vehicles to provide a device that can be used to accept card payments from customers.</p> <p>Following the licensing committee in July 2019, it was identified that the wording used in the policy did not capture all means in which customers are able to pay for journey e.g app based bookings.</p> <p>To amend this we will be requesting a slight word amendment, during our next Licensing Committee dated 30 September 2019, which will capture the use of such app based operators.</p> <p>We request that South Cambridgeshire District Council look into making it mandatory for their drivers to provide customers a means of paying for a booking, with their credit, or debit card, whether it be chip and pin, or via an app.</p> <p>This provision is hoped to reduce the need for members of the public to walk to cashpoints, which could take them through undesired locations. In addition, the option of a cashless payment method, helps prevents the need for the driver to stop during a journey to facilitate customers requiring a cash point.</p> <p>Furthermore, society is moving quickly into a more cashless society with fewer members of the public carrying cash and opting to use card payments and services such as Apple Pay and Samsun Pay.</p>
E. Drivers	<p>I have been privileged to work with safety groups, trade bodies, politicians, ministers and government officials at local and national levels on taxi &amp; PHV licensing. I have also been fortunate to work with the Law Commission on its wide-ranging review of taxi &amp; private hire, as well as being on the government's recent task and finish group.</p> <p>Along the way, I have learnt that all good regulations are considered thoroughly, but most importantly have within them the ability to empower regulators to make exemptions and have flexibility for officials to have discretion to make alternative arrangements where sensible.</p> <p>I wish to thank SCDC for the courtesy, consideration and assistance shown in this consultation exercise</p>

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# Consultation Comments 2020

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1. Overall Proposed Policy	
A. Driver	No more private hire taxi licence No more hackney
B. Driver	Against
C. Driver	It's not fair to impose new laws on drivers and make their living hard no door mandatory and in vehicle sign don't make any sense
D. Operator	These "proposed" new policy regulations will have a detrimental effect on the sustainability and growth of the EXECUTIVE CHAUFFEUR SERVICES in Cambridge. It is already impossible to attract new people due to the overregulation of this service and being treating as a taxi service. It therefore will reduce the options and competition for local commerce and industry, which is contrary to the recommendations of the MCA.
E. Operator	Good afternoon, I think the new proposal is valid to protect and put good professionals to work and serve the community, but is getting too expensive to drive and run a business in Cambridge
F. Operator	Policy is restricting trade and inhibiting business viability. It contradicts itself in several places and sets out timescales and regulations which are unrealistic and in some cases seemingly arbitrary.
G. Driver	The new proposed rules are not fit for every 1
H. Driver	It is all rubbish and you people have nothing els to do other than just trying add more stress and more money and more headache on us YOU ALL work for us so find better things to do and save us money and time, it is all for a big WOW when you want to talk about it later to others thanks
I. Driver	Not happy with all policy
J. Driver	Putting drivers into financial difficulties by trying to introduce new rules shouldn't be the aim of the council. All of these new rules have costs involved which would be the drivers responsibility. I find it unfair and irresponsible.
K. Driver	Absolutely support all proposals
L. Resident	I agreed with all proposals
M. Driver	Dear sir.i am as a private hire taxi driver not agree with your new policy cause it's going to be so much burden for the driver as you know the taxi business going down day by day.its because so many new drivers coming from different places and working in Cambridge also new companies coming here.thanks
N. Business	I dont want them.coz they shoukd stay where ever they take liecence.its not fair who give lots of think over here
O. Resident	I agree with all proposals
P. Business	I strongly support all proposalsJ,
Q. Driver	Changing policy with out any reason that effective negatively for thus people providing services for the customer in Cambridge, this is unfair if you compare with other cities like London, for example Uber driver in London, they haven't use a pleat and other staff like . They use just a badge. And you every short time make new policy, please go to another problem to solve. I'm thinking to live this job if you do this new policy.
R. Driver	So basically with all these new regulations you trying to make people's lives more difficult? or you just trying to make money? Maybe some of you can afford to get a brand new car every year but in real life taxi drivers are not swimming in the money!
S. Driver	All below changes will help investor who gives car on rent, as difficult for new or poorer driver to buy any car, it will force driver to get on rent either from or somewhere else , speically from Cambcab which they used Wolverhampton council taxi which have very low required

	for taxi licensing i strongly disagree all of them
T. Operator	<p>So there is certain proof written above that there are 3 Drivers in the travelling market because there are 3 specifications needed to apply for And that's not all ! As an Executive Driver I am more obliged to give not only my driving experience and comfortable travelling services but anything else to within reason my passengers ask of me, I am always on time for them and when I am unable to drive myself, I always get cover from a source of Executive drivers who can rely on and give my passengers exactly what I give and my passengers are so grateful the lengths I go too to get them the best drivers available and they trust my judgment rather than a taxi driver And if my passenger are running slightly late themselves I do not have a metre running or charging them extra LIKE A TAXI DRIVER DO! And I do not even Charge a percentage fees like other companies I am so lucky to have the best helping me I am just grateful of this and my bonus is that my passengers always come back to me because I have given the best service.</p> <p>Please forgive me if my grammar is not correct BUT in all the jobs I have done in my time not one of them has wanted as many emails and correspondence as you guys request and to be honest I'm not that clever with this kind of correspondence but what I say comes from my feelings</p> <p>But what I do know is that S.cambs are slowly demoralising me from doing the thing I love to do well and it is only my customers friendship I have made along the years I have been driving them and their companies and their families and friends and strong relationship I have built up that keep me going driving in the rain,snow and heavy motorway queues ! I will always be there for my passengers in trousers and shirt and tie if required that is.</p> <p>My customers have chosen me because of who I am and how well I drive and what good service I bring to them,So if they want me to turn up one day in jeans and to give them some help with personal stuff when I get them safely home or to the office then I will turn up in Jeans so if I am reported wearing jeans look out for the backlash. And again I repeat myself again and again YOU DO NOT UNDERSTAND THE EXTRA MILE I/WE EXECUTIVE DRIVERS GIVE to our to our wonderful passengers AND that's just not the taxi driver way. In January 2020 a passenger I collected from Peterborough Railway Station to drive to Stevenage (who I'd never met before in my life) to join the company I drive for on a regular basis said she was worried about her short travel and having to get a taxi at the station but then all her fears had disappeared because Eppendorf said that we'll have a word with Wayne will be there for you ! That's the service I give to my passengers and the companies that employ me! And taxis don't do that! They don't give the confidence I give! I am also making people at ease more the talking in confidence with me and how they felt when I explained that the council want us to install cctv in the car and as I said very mixed views indeed .</p>
U. Operator	<p>But there is so much i still dont undertsand in you drafts, even when i read it, it gets more confusing for me like d)</p> <p>c) All new Hackney Carriage and Private Hire vehicles must be fitted with a Council approved CCTV system at application no later than 31st March 2021. Please see the Hackney Carriage and Private Hire Handbook for details.</p> <p>d) Drivers, proprietors and operators must notify this Licensing Authority prior to installation. They must be registered with the ICO (Information Commissioners Office) if required and comply with all aspects of data protection and CCTV codes of practice, including clear signage that the vehicle uses CCTV. Further information can be found on the following link <a href="https://ico.org.uk/">https://ico.org.uk/</a>. Does d) also apply to ALL Private Hire Taxi drivers ref obtaining a ICO yes or no and if no why ?</p> <p>Can you please explain Yes or No to the questions below because call me Mr Thicky but no matter how I read it I do not understand still what it means?</p> <p>I can understand your point about the safety factor for CCTV but i believe there is a thin line and i am struggling here I do hoever belive a town taxi car should have one installed from my experience of friving as a taxi But my work now is so so much different.</p>

	<p>It seems to me that people that make the rules do not have the same connection with people like i do, And i strongly believe that the there is an alternative motive here and that is to make Cambridge a 1 or 2 taxi comapny town  YOU NEED TO SEE THE DIFFERENCE BETWEEN ME AND PANTHER CABCO and CAMCABS  I AM HIRED BECAUSE I AM SPECIAL AND I UNDERSTAND WHAT PEOPLE WANT IN THERE TRAVEL AND I AM HERE AS A CHOICE AND NOT FORCED UPON THEM  If people want a taxi they will book a taxi If people want a multiseated vehicle they'll book a multi seat taxi  If people want a professional long haul executive driver they will book me or another executive driver !  It seems to me that the council have not listened to one word what executive drivers have been saying and only make your deals with the Cambridge taxi companies I'm totally fed up to the back teeth with what you council and send letters for this and that ! let me do my work please 25 years i have been driving for members of public and executive clients DO know what my passengers want and search for in privacy and professionalism</p>
V. Driver	Not happy with all policy
W. Driver	Totally unfair and disagree.
X. Resident	<p>Just two things you need to add to this consultation is ensuring all drivers are disability aware and know how to help. I've had one superb Cambridge driver and one from Suffolk up to date and know how to help. Although are some who aren't and some have poor grip of basic English.  The problem also is almost all new vehicles at ranks are low height mini vans which I struggle getting in and out so I prefer a car.  When I book with Panther using the app in Cambridge under the type of vehicle to car and put VP in the comments box.  What I also would like is the taxi card come out to Linton / Balsham. From say Mill Road it can be £21-£25. It would be nice and more fair if someone like myself on esa and pip get a taxi say for that distance say £15-£20.  Basically more consideration for disabled but a better fare (fixed) for disabled and get more cars back into the ranks. This is not helpful for me almost specifying nearly all taxis have to be that van type vehicle which I've struggled with myself.</p>
Y. Driver	<p>I would to inform you that, I approve all of the proposed changes in Taxi consultation apart from CCTV.  With in my personal view I would like to mentioned that CCTV should be on voluntarily basis rather then mandatory.</p>

2. Environmental Issues	
A. Resident	As a resident of central Cambridge I am concerned about the impact of diesel taxis on air pollution. Your policy does not seem to propose any measures to tackle this until December 2021. I feel that this is unacceptably slow.
B. Resident	Licence fees for electric and petrol/electric taxis should be reduced and fees for diesel vehicles should be increased, to begin the process of cleaning up the air in Cambridge.
C. Resident	Many diesel taxis in Cambridge are emitting considerable levels of NOx and particulates. Diesel taxis should be tested yearly and dirty vehicles banned.
D. Driver	I have another EV car on order but if this silly ruling goes through I shall have to think again. is there anything the council is going to assist me with on my purchase of another EV, my first I ran for three years had no perks from you as the council, Cambridge City Council offer free licences. Excessive regulation will see a diminished fleet of taxis!
E. Operator	ULEVs..There has to be a reasonable transition period for the exempt chauffeur market to reach the required level of emissions as there are NOT the vehicles available on the market suitable for our level of service. But, our service does not include driving around town, so has very little effect on pollution in Cambridge. WE ARE NOT A TAXI SERVICE.
F. Driver	I have an EV on order and now you have new rules on types of vehicles are you going to match the free licences given by the City Council for all new EV's licenseFs? You mention installing new chargers but it's being covered by government grants, what is the SCDC putting in the pot or is it once again you want all these changes without you paying for anything just put it on low paid self employed people. Have you informed the costs to us to the councilors who will be voting on this?
G. Operator	Has an accurate assesment been made of the environmental impact of the manufacture and delivery of new vehicles and the disposal of old ones against the retention of older (but well maintained) ones? Has the impact of the disposal of lithium batteries been considered (currently no known method of disposal)
H. Operator	Electric or hybrid cars cost more money
I. DRIVER	In regards of zero emissions it still be the drivers choice to have it as of 78%. Vehicles are euro 6 to compliance road and traffics act not really harming the environment
J. Business	Absolutely support your proposal measures for environment.
K. Drivers	Environmental Issues This a National Issue and we think the Taxi Trade is being discriminated.
L. Driver	If the council requires new vehicles, how much the council subsidise the drivers towards the cost of buying fully electric cars?
M. Driver	NOT AGREE• With effect from 1 October 2021: all first time Hackney Carriage and Private Hire vehicle licence applications to be Zero or Ultra-Low Emission.
N. Driver	Ultralow emission car requirements is useless too. The number of cabs compaired to all traffic is very low. Also, PHDs spend most of the working time outside towns. Such policy will impose an extra cost for drivers with no effect on air pollution at all. The proposed policy changes will have no effect for air pollution or the customer happiness. They will only make our business more costly and many drivers force to give up with the job. Then they will need a help from you.
O. Driver	Electric car too expensive to buy and do not have enough charging facilities in the country and they do not give sufficient mileage at per charge also not enough option for electric car.

P. Driver	<p>Environmental Issues and Vehicle Age</p> <p>This is a global Issue and I understand that every business has to take responsibility for less emissions (I personally drive a hybrid for 2 years now) , but please consider the fact that we are self-employed and not all of us drive in town were you can drive Nissan leaf with 80 miles range, but some of us do longer journeys such us Gatwick Airport which is over 90 miles from Cambridge. Not to mention I've had trips to York, Leeds, Manchester and so on. The only electric vehicle capable of such range is tesla and a 4 year old one cost average £40000. I'm doing my best but I don't think I can make profit out of such investment I suggest focus on big companies not the self-employed (whether we're talking about drivers on other business)</p>
<b>3. Drivers</b>	
A. Resident	My feeling is all drivers need compulsory disability training and awareness. There's only a few really geared up drivers. This is even happening when I put VP in the booking notes and from where I normally use them. I give them warning it'll take a couple of minutes to get out but they often park a distance from where I can't see them easily. This is not helpful and a serious area which needs improving as it doesn't help me.
B. Driver	please don't give taxi licence to people out of county
C. Resident	Drivers need better disability training to help recognise the needs of the disabled / elderly more clearly.
D. Operator	<p>Policy states that taxis (and PH vehicles) are used most frequently by vulnerable groups and the policy has been formulated with that basic presumption. Where is the statistical evidence behind this assertion? It certainly does not reflect our customer base or that of other similar PH operators.</p> <p>2.1 h states that renewal of licence should be applied for 8 weeks in advance</p> <p>2.24 states that if you apply for renewal before expiry date of old licence, then your existing licence expires and you cannot drive until a new one is issued. This means that drivers may not be able to drive if SCDC is not able to issue a renewal promptly.</p>
E. Driver	As a driver and proprietor i have had cause to complete your new vehicle application form on more than one occasion and note that this requires extensive information about person convictions/records - surely you have already had this information via the driver application forma and do not need to confuse driver by asking for it on a vehicle application.
F. Operator	Probational period is a good idea Reference for NEW taxi licences is a good idea
G. Driver	Why don't you introduce anything that is protection of drivers? We are not protected if a customer decide not to pay for the service, or we get not enough protection if we get attacked. Police doesn't help at all. Where abouts our safety and wellbeing? Don't forget you make money from us, not from public.
H. Driver	STOP giving licence to people from other locations, outside of Cambridge. We have enough competition and decreased customer demand and increased fees that doesn't help at all. Stop trying to make money by issuing licence to everyone otherwise you will destroy the whole taxi business in Cambridge.
I. Driver	Fit and proper person I find this category completely insulting. I lost my City License due to speeding about 5 years ago. I can acknowledge I needed to be more careful and I have been. But the person interviewing me at City, during the time of that ordeal, mentioned in passing that they had had a speeding ticket too ha ha ha. I understand that they were not a taxi driver. But I am honestly shocked how does one decide what a fit and proper person is? This feels like a completely subjective and spurious category. Of course I want the public/passengers to feel safe and secure in my car. Every human deserves this right. I should know I had to leave

	<p>my own country due to my Kurdishness. However I would also like to see South Cambridge District Council put equal amounts of effort into the safety and security of their drivers. And to make them feel like they are a valued part of the community doing a public service that is of equal value to the employees at the Council and the passengers. To acknowledge that they can also be vulnerable and deserve to be treated with respect.</p> <p>I am a taxi driver trying to support my family. I try my best and am a respectful person as much as the next person. Your rules feel like an insult to my integrity and all the years that I have worked as a trusted driver to so many of my loyal customers which does not seem to amount to much.</p>
J. Driver	<p>I am so sorry but I have read some of the Council drafting that I felt appeals to me but I am more confused now than I was last year with the councils first proposals and to be honest I can't make out much or even if there has at all been any changes that applies to Private Hire Taxi Driver or me. In fact one thing I didn't see was a separation from a Private Hire Taxi Driver and a Private Executive Driver like there is from a Hackney Driver to a Private Hire Taxi Driver.</p> <p>2-2.1(d) This Licensing Authority issues two types of licences for drivers, a Hackney Carriage Driver licence and a Private Hire Driver Licence. These are two separate licences and therefore if any person wishes to hold both a Hackney Carriage and Private Hire driver licence, they are required to submit two separate applications.</p> <p>I have done all my DBS forms which is required by all drivers,</p>
<b>3.1 DBS</b>	
A. Driver	If DBS expire driver should be given chance to apply new one not to cancel the taxi badge as this is their earning becoming job less just because db's system don't Allow direct debit it's not fair on drivers
<b>3.2 Safeguarding</b>	
A. Operator	<p>SAFEGUARDING...As an EXEMPT operator/driver who by definition in our licence can ONLY do "Executive style, Chauffeur work" Therefore we do not pick up or get pre-booked work from the public. SO WHY MUST WE UNDERGO TAXI REGULATION? It has no bearing on our work whatsoever.</p>
B. Operator	<p>Now like i have said,I have paid £60.00 for a Safeguard course which actually I do support and hopefully I will pass this test because I do not want again to lose another £200.00 like I am going to on the 7th by getting my work covered on top of the £60.00 I have paid you</p> <p>Not only that but i feel i am constantly being bombarded with letters from your department but verbal correspondence I have had lately for appointments has been atrocious!</p> <p>I cannot remember exact date approximately September/October i spoke to girl on the phone who told me she had arranged for me to visit the council for 6th of January for a Safeguard appointment but I explained this had already been booked by Brooke for the 7th of February but she said no it is the 6th of January</p> <p>But after speaking to XXXXXX she said the girl had and shouldn't not of told me the 6th and just keep the appointment with XXXXXXXX on 7th</p>

	<p>The 7th January I have just received a letter from the council about my Safeguarding Workshop appointment for the 29th of January I had to ring feeling confused and a bit anxious to say I can't do the 29th and had already arranged with the 7th and Brooke confirmed this But I spoke with XXXXXXXX again and I feel gutted that I was talking to her in a negative manner mainly because I keep getting frustrated with letters and dates that are just confusing me and all I want to do is get on with my work !</p>
<p>C. Driver</p>	<p>The £60 for safe guarding should be waived especially for drivers who have already done it with CCC Not fair. Really does seem like money making making scheme by SCDC</p>
<p><b>3.3 Competency Test</b></p>	
<p>A. Operator</p>	<p>COMPETENCY TEST...Yes for a Taxi driver, common knowledge that a taxi must know his local area! An exempt "Executive Style/Chauffeur does not operate within the SCDC area NO TAXI WORK as outlined in our "EXEMPT" licence conditions. So why do we have to undergo TAXI tests/regulations? Completely unnecessary, we drive around the country, all work is booked days/weeks/months in advance, and no monetary transactions, all payments are made by BACs on invoice. So again, WHY DO WE TO BE REGULATED AS A TAXI? This is having a detrimental effect on our business, that is, in getting new individuals to enter our industry, therefore reducing choice for local industry!</p>

4. Operator	
A. Resident	You should move more quickly to mandating that taxi operators must use hybrid and electric vehicles only. The taxi operators are dragging their feet over introducing cleaner vehicles. They are currently having a huge negative impact on air quality in Cambridge. You must force them to adopt hybrid and electric vehicles in order to protect the health of the residents of central Cambridge.
B. Resident	Some operators are using very basically very poorly understanding the different kind of customer. Also some have poor English and or bad driving.
C. Driver	Operators should be penalised for drivers who illegally pick passenger as private hire because those drivers are tricked by operators come work we will give you work and they can't as they are greedy and they have lots of cars then some drivers are doing illegal fares which is wrong companies shouldn't employ more drivers then their clients and if they do and drivers found illegally taking fare then should fine the company
D. Driver	Not happy with all policy
E. Driver	Operators must take full responsibility of all drivers. Too many SCDC drivers are prodomently working in Cambridge with SCDC plate. Loophole permits a job to be covered but its illegal to predominantly work in another borough.
F. Driver	The charges for the operators are unfair. Small operators pay from £100 to £369 , where big operators pay only £510. The council chooses to charge more from the little bussineses .An operator with over 200 vehicles makes millions per year from the drivers, also from every contract they have they charge additionaly.
G. Operator	<p>And I have paid and registered with ICO data protection WHICH I understand does not apply to a Hackney Driver neither does an operating Licence so if he does not need a operating licence then he will not have to apply for a ICO like I do so now we have 3 type of drivers</p> <p>a)A Hackney driver who only need a Hackney Licence and No Operating licence and No ICO registration  b)A Private Hire who need only a Private Hire Licence and No Operating Licence and No ICO registration (yet receives private data from the Taxi Company he's employed from to his/hers machine in car BUT to me I believe that the driver is getting data the same as me i.e. name address and there for is warranted to have to pay and register with ICO as I have to)  c)Then me, an Executive drive, who needs an Operating Licence and an ICO registration because I receive my information via my email or phone  (much the same as his/her as a Private Hire driver machine get via the Taxi Operator)</p> <p>My point here is that although I am an operator, I have to pay the ICO registration for having information of passengers on my system But a taxi driver can obtain the private information about passengers via the Operator given on his or her hand held machine which is mobile with them and quite possible one day can lose and end up in the hands of a complete stranger  Whereas my pc is at my home and less likely to end up in the hands of stranger so therefor if we are not being separated from a Private Hire Taxi Driver then a I suggest not only do Operators need to register to the ICO to hold peoples information then the PHTD should also register the same as a Executive Driver because they both hold private data i.e. Addresses and names and contact numbers.</p>
H. Driver	Local operators are the real trouble makers here! I really do believe the council takes a favourable views towards them. If only the council knew and hurtful and cunning these local operators are, then you would support the drivers.

<b>5. Vehicles</b>	
<b>5.1 Age of Vehicle</b>	
A. Driver	If a vehicle is over 5 years old then maybe but a lot of us are driving round in new or nearly new cars and two tests a year is not fair on us.
B. Driver	Private hire vehicle should be private not put sign like hacks now a days you can't tell difference between private and hackney.
C. Driver	Vehicle age shouldn't be a problem as cars are not cheap putting age limit on the car means making lots of drivers job less as it's not easy to get credit as self employed so taxi drivers needs to invest in the car and at latest run the car 15 years to make return the investment and plus drivers are very keen when they find car is giving problem after 7 to 10 years they change you don't policy for this as repairs are not cheap so drivers just get rid of the car and get new question how many old cars you see on the system not a lot that is a proof
D. Operator	AGE OF VEHICLE..clarification needed on maximum age for a new vehicle purchase for an exempt chauffeur service.
E. Operator	3.7 Renewal will only be given to vehicles less than 9 years old (longer for low/ultra low emission vehicles). This drive towards environmentally friendly technologies is premature, damaging to the financial viability of businesses and based on insufficient/incomplete research and evidence. There will not be sufficient charging points for electric vehicles for many years to come, taxi and PH vehicles cannot be sitting idle whilst charging - this is not financially viable. Operators are likely to choose hybrid vehicles and use fuel - the weight of the batteries will mean higher fuel costs and emissions. Current fleet vehicles may be in pristine condition and business cases have been on them being in service for far longer than 9 years - having to withdraw them and purchase newer vehicles may not be an option for many operators. They may go out of business. A well maintained vehicle, whatever its age, as long as it can pass the COC, which in itself is a quality standard of SCDC, is preferable to purchasing a new low emission vehicle. Far better to maintain current vehicles to a high standard than to invest in new technology for which the lifetime infrastructure (charging points) and eventual disposal (batteries) have not yet been worked out.
F. Driver	Section 3.7 refers to vehicle age rules and i am very concerned that under part A, there is not an implementation notice period for the application of the 9 year old rule on petrol/diesel vehicles i.e. if the policy is adopted on say 28th Feb 2020, without an implementation notice period, a driver could be forced to change his vehicle within a matter of 1-7 days (or similarly short in practical period) as suddenly it will be deemed too old to be re-licensed. i am not against the 9 year rule itself but think it is grossly unfair on drivers with older vehicles who could suddenly be faced with this possibility 'overnight'. This would be both a grossly unfair economic penalty for a individual driver which could cause serious hardship and the driver would be further punished by unexpected loss of earnings caused by the impossibility of buying a new vehicle and getting it tested and licensed in a day or two - this process will always take 7-14 days minimum and even this assumes a sensible turn around by SCDC licensing staff. I believe there needs to be a period of 'grace' before this rule is applied in order that all drivers can become properly aware and i would suggest that this period be 1 year or 6 months (being the new period between testing of vehicles under the new policy). To implement this rule the day after the policy is passed is, as stated very unfair on a driver with a vehicle coming up to its 9 <sup>th</sup> birthday and not least because the previous policy regarding upper age limit was open ended. am in agreement with a general push towards making the taxi fleet more environmentally friendly. However, there will be a severe issue with the vital provision of wheelchair accessible vehicles on all operators fleets unless WAV vehicles I are excluded from the zero or UL emission

	set date of December 2021 and this is because there are simply no WAV vehicles sensibly available that fit the zero/UL criteria there are currently only 2 on the whole market and 1 is the London style TX1 which obviously cannot be used as a PHV as it is and looks like a hackney carriage. The other is the Nissan ENV200 which is cost prohibitive for nearly all drivers at circa £60k to buy. Wheelchair access jobs are currently being carried out by Peugeot Partner/Horizon style vehicles and this works very well, however there are not immediate plans to provide electric or UL versions of these. Therefore to adopt the policy in its current form is stupid on the basis that wheelchair bound customers will be severely disadvantaged
G. Driver	As it says change your vehicle if its 9 years old. How can i afford to buy new vehicle. I living hand to mouth and these rules just making my life more difficult.
H. Driver	I think it to late your trying to change the policy now after giving out lincence. Cars should be 5 years old. Your a joke now!!!!
I. Driver	I feel that with cars being built to better standards that cars should be able to be no older than 5 years for new license and 10 years for renewels as oppose the the 4 and 9 years proposed.
J. Driver	Taxi age. I believe we should relax the age of the first registration of a vehicle up to 6 years. Reason being 1. Price, we are all self employed drivers, cars are expensive imagine being forced to spend 15k plus to go to work. 2. The age a car has to come off road should be 10 years. 3. Most importantly we should be looking at the condition of the cars.
K. Driver	Not happy with all policy
L. Driver	Is we are are leaving European Union taxi job in Cambridge especially people from European countries has been less and less income is gradually going down so so this proposal about 9 years old vehicle cannot be used as a taxi is the very costly move on drivers buy South cambs District council
M. Driver	I strongly disagree with reducing the vehicle age to 4 years instead of the 5 years it used to be for petrol and diesel cars and 9 years renewal window. There are a lot of cars that are more than 4 years and less than 5 years but have very low mileage and in very good condition. My car was registered in 2015, I bought it last year March with a mileage of 5000 and is still in perfect condition.
N. Driver	I would like to take this opportunity and object to few point of upcoming changes you would like to introduce. First of all age of vehicles not to exceed 9 years. There's no reason for you to change the age and I'm strongly against this change. This would affect how many more years I can drive my vehicle. I have a BMW 7 series. And I'm still paying finance on the car. This will greatly affect me personally, having to buy a new car again in few years. I would like to stick with previous 10 years for a vehicle. Thank you.
O. Driver	6 Months COC. There is again no reason to do MOT/COC every 6 months. This would cost every single driver another £7085 per year as well as inability to plan any other work which will cost driver anotemher unpaid day off, another cost and compliance to think of. Vehicle condition is checked yearly. MOT is a yearly test. There are poeople out there like for example area managers for shop chains, etc.. who are driving similar miles per year, are those required to do 2 MOT's? No. So why we should? I understand the reason behind to have road worthy vehicles out there. But they already are. We take pride of looking after our cars. And if if a condition of a single vehicle is not up to standard, this should be reported by clients to the Operators.
P. Driver	Already changing vehicle age from 5 year to to under 4 years. Makes it very expensive adding at least extra £2000 on price of the car. You cant expect drivers who cars coming upto 9 years at short notice buy a new cars. You need at least £12000 buy suitable car. Uber taken a lot of the student business we already struggling. Radio fee £130 week Fuel £100 - £120 weekly cost fuel so high town driving poor mpg. Insurance. 50 week

	<p>Car finance. 60-100 week  Or renting Repairs etc Badge and plate. £25 week At least minimum £375 week expense Average daily talkings £100 - £120 x 5 = £600 -375 £225 week wage 40 hours week earning less then minimum wage.  Taxi the are Long waits and no job customer cancelled. We have to work 7 days week to make a living. Yes some driver make more if the company looks after them but majority Don't have school runs or fix regular work.</p>
Q. Business	Vehicle age must be 9 or less. Old vehicles are unsafe and polluting.
R. Driver	<p>Vehicle Age  We think its not fair to introduce age limit and Zero or Ultra-Low Emission the trade is very slow and vehicles cost a lot and as self employed loans on the new cars are hard so the age limit should be scrapped and keep 2 MOT a year and as long car is fit to drive stays Zero or Ultra-Low Emission. This Age limit will put 347 vehicles out of the business in just year 2020</p>
S. Driver	I beleive the 9 year rule for vehicle age is unfair to be brought into force staright away. This would cause alot of drivers problems. I think the best way would be to set a date for this for examoke no cars will be re licenced if there 9 years or older after May 2022. This would be a fairer way in my opinion
T. Operator	<p>I am writing in response to the 'Hackney Carriage and Private Hire Licensing Policy Consultation 2019'. Firstly, I would like to address the proposal to reduce the age of existing taxis operating within South Cambridgeshire. I believe that this decision is based on emissions, with the intention of the county ultimately committing to a zero carbon pledge by 2050. This is something that I wholeheartedly support and am instrumental to achieve for my business. However, being a relatively new company that has recently been affected by extensive mechanical costs in the form of new engine and clutch replacement for two of my four vehicles, I would like to express my concerns regarding the new policy that has been proposed. While two of my vehicles are older than the requirements of the new guidelines, I would like to emphasise that these vehicles have been meticulously maintained to very high standards, both mechanically and cosmetically. Although I fully understand the environmental impact that older vehicles may have on the environment, I am also a believer that to repair, conserve, and make use of items that are fit for purpose should also be viewed as a form of environmental friendliness. In the unfortunate event that I am forced to remove these two cars from taxi service will result in the unemployment of two drivers, as financially I am unable to replace the vehicles for newer or low emission versions at this present time due to the recent costs that have incurred regarding the pre-mentioned maintenance issues. When I fulfilled the repairs, I was unaware that the intended policy would be implemented immediately and therefore feel quite insecure in my position as both an operator and a driver and am seriously concerned about the profitability of this industry.</p>
U. Driver	The Council should review the age of the cars - in my opinion cars should be no more than 5 years old. A taxi easily makes about 30,000 miles per year and after 5 years is not safe or reliable to carry passengers.
V. Drivers	<p>Vehicle Age  We think its not fair to introduce age limit and Zero or Ultra-Low Emission the trade is very slow and vehicles cost a lot and as self employed loans on the new cars are hard so the age limit should be scrapped and keep 2 MOT a year and as long car is fit to drive stays Zero or Ultra-Low Emission. This Age limit will put 347 vehicles out of the business in just year 2020</p>
W. Driver	<p>NEED TO GIVE SOME RELAXATION A new vehicle licence will not be granted in respect of a vehicle unless it is less than 4 years old.  NOT AGREE• A vehicle licence will not be renewed for a petrol or diesel vehicle unless the vehicle is less than 9 years old and complies with at least the Euro 5 emission standards limiting CO, NOX and particle matter emissions.  NOT AGREE• A vehicle licence will not be renewed for an Ultralow emissions vehicle unless the vehicle is less than 12 years old.  CAN BE IMPLIMENT • A vehicle licence will not be renewed for a zero emissions vehicle unless the vehicle is less than</p>

	15 years old.
X. Driver	To whom this may concern, this new proposal sounds very expensive!. To have to replace your vehicle after 9years because if u buy a taxi which is 4 years old u can only have it for 5 years in that time u may need to have spent a lot of money services it and fixing it when owning the taxi ie gear box clutch engine suspension etc will be like a new vehicle then you will have to replace when buying a vehicle 4 years old or under you might have problems with it if u kept the existing car to u know what has been changed. It seems ridiculous that I need to spend more money on a newer taxi when I have one that is immaculate and has been well maintained.-the taxi I have well maintained kept in good condition you would need to get rid of it and you take the chance on a new or second hand one which you don't know how well it has been maintained or how long it will last also having cctv sounds another expense buying + installing it the thing is there can normally more taxi than customers + with Uber being in Cambrigde it making the trade impossible to earn a good wage considering how much expensive there are just try to understand what I have said please make the right decision thank you
Y. Driver	CCTV will protect public and driver.
Z. Driver	<p>TOPIC – IMPLEMENTATION OF VEHICLE AGE OF 9 YEARS</p> <p>I honestly believe this rule of a vehicle being older than 9 years to be implemented straight away is UTTER CRAZINESS due to its unfairness. I'll explain why I think it's unfair. As of today I can re licence my vehicle which is 10 years old for another whole year but as soon as your policy is implemented another driver whose car is say 9 and half years old will be refused..... how can that be fair???</p> <p>Moreover what would his options be at that point, not everyone can just go and buy a newer vehicle. In my opinion it would be fairer for a date in the future to be set like by Feb 2021 no vehicle over 9 years old will be re licenced, so that drivers have time to buy another vehicle. This surely has to be the right thing to do.... PLEASE PLEASE PLEASE consider this.</p>
AA. Driver	I am very concerned about the 9 year upper age rule for Diesel/petrol PHV's coming in as immediately as this policy is passed. This gives no notice to some drivers who will be expecting to be able to renew in late Feb/March/April of this year and will cause considerable hardship to them and may even cause them to have to leave the trade. I am not against a 9 year rule - just think it should be applied after some notice is afforded to drivers/proprietors subsequent to the policy being passed - somewhere between 1 and 2 years after adoption of policy would seem sensible although it could also be a consideration to align it with Dec 21 date for electric/low emission as this could in fact encourage/speed up the taking on of these vehicles as drivers will be allowed to keep current vehicles until then rather than changing them to another petrol/diesel shortly in order to 'buy' extra years before Dec 21. Surely 4 year rule for new Ultra Low/Electric vehicles should be abandoned now. The only reason given that this was ever in place was 'environmental' and this this is now an argument with these vehicles. If SCDC are serious about encouraging uptake of the these vehicles as soon as possible then this rule must surely and obviously be dropped – not for petrol/diesels, but just the ULEV's and electric ones.
BB. Operator	We are pleased you have moved the formerly proposed 7 year upper age limit for diesels/petrol's out to 9 years. However, we are extremely concerned that applying this as soon/or soon after the policy is adopted is grossly unfair on those drivers whose vehicles are currently 9 year or more or are about to be as this will mean that they instantly have to source and buy a new vehicle - this could cause severe financial hardship and could even lead to some having to leave the trade - either way, it must be unfair to implement without notice and we therefore think a notice period before implementation is vital and practical and reasonable. We would suggest at least a 6 month period (keeping in line with expected new testing regime) but preferably a year more. A further, arguably even better suggestion would be to bring the implementation of the 9 year rule into line with the December 21 rule/move to ULEV/Electric vehicles as we believe there will be quite a few drivers with current vehicles that they will then keep until then/post then because they have been given decent notice and will then buy a ULEV/Electric as opposed to being forced into changing their vehicles prior to then in which case they will almost definitely buy another petrol/diesel and keep renewing it well beyond the Dec 21 date - in other words, we believe that delaying implementation of

	the nine year rule and putting it in line with the ULEV/Electric rule will actually encourage and accelerate the move to the cleaner vehicles and this is the stated aim of SCDC.
<b>5.2 Wheelchair Accessible Vehicles</b>	
A. Resident	Dear sir/madam - I am related to a wheelchair bound person from time to time relies on Panther Taxis to convey him to appointment/visits to aid his quality of life. i am therefore disturbed to hear that your proposed SCDC taxi policy will lead to many less wheelchair taxis being available in the future. I believe this is because there are no wheelchair adapted electric/hybrid options for the drivers to buy and that the only one available is very very expensive. Can councillors please look at this part of the new policy with a view to exempting wheelchair vehicles for the time being. I believe the City council have done this, probably not least because one of the main councillors is wheelchair bound.
B. Driver	Think wheelchair access (WAV) vehicles should be excluded from proposed timeline for ULEV/Electric implementation as there are no signs of a sensible/cost effective Electric WAV vehicle coming to market or on market currently – there is a real danger that SCDC operators will not be able to provide a WAV service and this cant be right. In future, rules could be brought in, but not until the technology/infrastructure and most of all, the market place move on - and no one knows how long this will take.
C. Operator	Wheelchair bound customers will likely have no service: As the main provider of a comprehensive and inclusive Wheelchair access service we are obliged to suggest that unless WAV vehicles are exempted from the intended Dec 21 move to being Electric that there will quite quickly cease to be a wheelchair service available to customers and this is a grave concern and cannot be the aim of SCDC. This will be the case because simply, there are no suitable electric/Ulev WAV vehicles on the market at the moment except two. One of these (the London TX1) cannot be used a private hire vehicle and the other (Nissan ENV200) is circa £60k to buy and is cost prohibitive for the usual economics of a driver in this (and most other) areas; additionally the Nissan is so new there is not yet a second hand market. It is not yet known when/if more practical and cost effective WAV vehicles will be coming to market and also whether the infrastructure to charge then will be available and until they do - and are tested and second hand markets are created - there will be deterioration in the wheelchair service we can provide UNLESS petrol/diesel versions are exempted for the foreseeable - the exemption could be revisited in the future when more is known. Obviously we know the current makeup of our WAV fleet and it is conceivable that our wheelchair service will cease quite quickly if current and future WANS arent exempted and this could be an Equalities Act issue for both Operators and SCDC. Elsewhere in your own policy doc you (SCDC) encourage the provision of a WAV service - the current proposals contradict this.
<b>5.3 Private Hire Plate Exemption</b>	
A. Drivers	How chauffeur cars are exempt from sign so what happen to the public safety I this matter it's like they get special treatment.
B. Operator	The policy, again, does not make clear or differentiate the requirements for The Exempt, Chauffeur Style service, this all refers to taxis. So much confusion, where do we stand. For instance..the strap on the top of your policy site states "All New Drivers to undertake "Safeguarding " by Jan 2020..your draft policy docs states ALL drivers, new and renewal!! So which is it? And does it include Exempt chauffeur services.
C. Operator	3.19 exemption. Why is there a requirement fo PH contracts to be signed 10 days in advance? Why 10 days - is this an arbitrary figure or is there some rationale behind it? PH is of course always advance booking already. Is this point designed as protectionism for local taxi

	<p>firms? Is this legal? Customers should have the right to choose which company they use for any of their journeys, not just executive travel. Many of our "executive" customers tell us that they prefer to use our company for all their journeys (personal as well as business) as they know we only use top quality vehicles and provide a premium service. Many also say they much prefer to travel in an unmarked (exempt) vehicle. The policy is restricting operators from building their business and will disadvantage customers in many rural communities who do not have a wide variety of transport options, as perhaps city dwellers do. Under the new policy, If a new customer attempted to book an airport transfer for a personal(rather than business) trip tomorrow (for example), the operator (with exemption on vehicle) would have to decline as there is no contract in place, the booking may not be "prestige" in nature and the customer is not "regular". However, by declining, the operator would be turning down valuable business which may have developed into a regular pattern, affecting business viability. The customer would also be disadvantaged as there may well not be any other local operators/transport options in the rural area.</p>
D. Driver	<p>Private Hire vehicle exemptions Why exemption for chauffeur and contract Private Hire Vehicle when normal Private Hire Vehicle have to use signage all over the car .</p>
E. Driver	<p>I an an executive chauffeur who is plate exempt. On 11th July last year submitted a FOI request to ascertain of all the complaints received over the last 3 years how many were against hackney carriage and regular private hire and how many were against plate exempt executive chauffeurs. I was looking to get this information to prove, or other wise, the type of work we do means we deal with a very different clientele and would not have same issues as say hackney carriage drivers. Understandably with your the current system you were unable to provide this information as I was told all complaints come in the same way. Going forward I would like to suggest that plate exempt drivers have a plate number for example starting PE so as to differentiate when a complaint come in between us and drivers that are not plate exempt, this would also help to distinguish the difference I believe between the roles and assist everyone.</p>
F. Drivers	<p>We welcome the broad scope of the Exemption privilege but we would question why the figure of 10 days has been included? 3.19 Private Hire Vehicle Notice of Exemption a) This Licensing Authority recognises that there is a specialist market for the use of unmarked hire and reward vehicles in the following circumstances: <input type="checkbox"/> Chauffeur / prestige-type services <input type="checkbox"/> Fulfilling a pre-existing, written contract (pre-existing meaning signed at least 10 working days in advance of the hire) <input type="checkbox"/> Providing a regular service (whether to an individual or to a business) Modern business contracts are often done electronically and sometimes can start very quickly. We feel the purpose of this statement is to exclude immediate 'street hires' (which we support) but would suggest this is reduced to 4 hours. This would enable companies or individuals to engage services quickly but also prevent exempt cars acting as general taxis.  Finally we would reiterate our objection to the blanket policy regarding CCTV, thought and consideration should be given to the needs of all types of vehicles and while we can understand the investigative benefits in the processing of complaints we would suggest that the likelihood of dispute is considerably less in an exempt car and should be balanced against the rights of privacy for our passengers. This has been reinforced by the dozens of objections received from our collective customers and forwarded to you. Vehicle licences could be endorsed as for exempt use only, this would prevent a minicab operator from engaging the vehicle for street hires. Ideally this would be</p>

	backed up with an online register.
G. Operator	<p>3.18 Speciality Vehicles and Limousines</p> <p>a) Limousine and speciality vehicles are generally used for special occasions such as anniversaries, stag and hen parties, prom nights, etc. and may be specialist, or stretched vehicles.</p> <p>b) Limousine and speciality vehicles used for the purpose of hire and reward are required to be licensed as Private Hire vehicles, with a seating capacity for 8 passengers or fewer, and all bookings must be made via a licensed operator. So, the above I am right in thinking that I can do this type of work for my customers Yes? Also the 3) below what it actually means please</p> <p>e) Proprietors of prestige type vehicles licensed as Private Hire vehicles or Private Hire vehicles used in special circumstances may seek the permission of this Licensing Authority to waive the conditions of their licence relating to the display of licence plates and door signage Ref to e) above What this means above please ? Because to me it is saying that Panther and other Taxi companies in Cambridge can ask you the Council to waiver a car of its door signs to do a particular Executive job ? Am I right in thinking this ??? yes or no and yes how come</p> <p>Because if e) above is yes then how on earth can you let a plated taxi car become Exempt to do Executive work without a ICO registration and yet Excmpt Executive drivers has to abide by 3.19 below</p> <p>3.19 Private Hire Vehicle Notice of Exemption</p> <p>a) This Licensing Authority recognises that there is a specialist market for the use of unmarked hire and reward vehicles in the following circumstances: • Chauffeur / prestige-type services Fulfilling a pre-existing, written contract (pre-existing meaning signed at least 10 working days in advance of the hire) Providing a regular service (whether to an individual or to a business)</p> <p>i) A certificate of exemption and internal vehicle notice will also be issued by this Authority and must displayed in a prominent place, visible to all passengers.</p> <p>j) Vehicles which have been issued with an exemption certificate will solely undertake executive chauffeur work</p> <p>k) Exempted vehicles found to be carrying out standard private hire work will be subject to enforcement action and the exemption certificate may be revoked.</p> <p>l) Exempted vehicles must not display any advertisements, signage, logos, or insignias advertising the operating company inside or outside the vehicle.</p> <p>m) Operators and proprietors who wish to apply for an exemption certificate must complete the application form, pay the required fee and provide sufficient supporting documentation to establish that the vehicle will be solely used for executive bookings.</p> <p>n) There are extra conditions applicable to exempted vehicles, in addition to the standard conditions. Where there is any inconsistency between the standard conditions and these extra conditions, then these extra conditions must prevail. The extra conditions can be found in Appendix E.</p> <p>o) If an exemption certificate has been issued but the vehicle will no longer be utilised solely for executive type bookings, the exemption plate and certificate must be surrendered and returned to this Licensing Authority. If the vehicle is still licensed, it must then display the plate and door stickers as required by the conditions for private hire vehicles. There will be a fee for the replacement plate and door stickers.</p> <p>p) The types of work that will not be considered for the grant of an exemption include but is not limited to: -</p> <ul style="list-style-type: none"> <li>• Council 'school contract' work;</li> <li>• Journeys to airports, seaports or railway stations, unless part of a journey covered by an exemption</li> </ul>

	<ul style="list-style-type: none"> <li>• Theatre journeys or sporting events unless stipulated on the exemption</li> <li>• ‘Hen’ and ‘Stag’ nights. q) Each application for exempt status will be considered on its own merits and there is no right of appeal against a decision by the Local Authority to refuse to grant under s75(3) Local Government (Miscellaneous provisions Act) and the only direct means of challenge would be judicial review. Full details of the process for</li> </ul> <p>So how or who makes the decision to decide which work comes under what ? Surly the paying passenges has this choice by booking what they require and for who they value as VIP or Executive and NOT the S.Cambs to tell the paying passengers what the council will dictate them to do or who to book</p> <p>There is a market outside the taxi world that people want and that is the 3rd Option an Executive Driver.</p> <p>Also the above work, My work consists of many airport travel work ! And as I said before and will repeat again Most of my work is repeated business from certain companies. From time to time people ring or email me because they want a Executive Driver with Airport and motorway experience which they don’t have the confidence with Taxi Companies so they seek those that do !</p> <p>Not a Hackney which is 1 Option Not a Taxi Company which is the 2nd Option but a 3rd Option and that’s Executive Drivers which is why I said at the beginning of my letter that have not really recognised</p> <p>Lots of my work is also through word and mouth which is fantastic so if people do its is because they want to pay extra for the best and want more that a Hackney Option 1 or Private Hire Taxi Option 2</p> <p>Last year I was asked to send you a letter to describe the work I do and proof of my earnings which I did and I have even printed out my calendar to show how much work I cover ! Last year you also asked me to contact my customers to send you an emails to confirm I drive for them and what my driving meant for them which I also did ! Also last year I was asked to register with ICO for the data protection requirements to safeguard my passengers information which I did ? What is the point of me doing all the above like ICO forms and the above if you’re letting Bigger Taxi Companies give data information to drivers who don’t have and don’t pay for ICO You say that being an Uber driver you cannot work for another taxi company AND YET if you’re a Private Hire Taxi Drivers working for a Taxi company such as Panther you can apply for an Operating License to do individual work ?!?! You’re not making sense! To me if you’re working for a Taxi company such as Panther then you should not be applying for a operating license and doing both ! To me that’s no different from working for Uber and Panther at the same time</p> <p>Even people these days are asking people to remove Alexa’s from there homes when people visit them because don’t feel they are in private !</p>
<p>H. Drivers</p>	<p>Exemptions (Proposals 3.17-3.20)</p> <p>The LPHCA maintains concern on the application and administration of the exemptions for private hire vehicles. In substantiating this position, the LPHCA offers the below comments:</p> <p>(a) The proposals appear to create, at Proposals 3.19(a) and 3.19(j), a conflict with statute by imposing a “sole use” restriction which could limit use of a private hire vehicle under the superseding 24-hour contract exemption (pursuant to <i>section 75(1)(d) Local Government (Miscellaneous Provisions) Act 1976</i>).</p> <p>(b) The proposals do not broadly appear to have considered general CMA guidance on licensing conditions which “...may restrict or distort competition, potentially resulting in...higher fares or...lower quality of service...” (as recommended in ‘<i>Guidance on the Impact of Taxi &amp; Private Hire Licensing on Competition &amp; Consumer Welfare</i>’, CMA, June 2017).</p> <p>c) The proposals do not appear to have considered specific CMA concern on licence conditions which, as at Proposal 3.19(a), over-regulate on the minimum number of days for advance bookings (as found at “<i>Examples of Conditions That May Harm The Interest of Passengers</i>’, <i>Regulation of Taxis &amp; Private Hire Vehicles</i>):</p>

	<p><i>Understanding the Impact on Competition</i>, CMA, April 2017).</p> <p>(d) The proposals do not appear to have been subject to a Competition Impact Assessment (as recommended in <i>'Regulation of Taxis &amp; Private Hire Vehicles: Understanding the Impact on Competition</i>', CMA, April 2017).</p> <p>(e) The proposals reference, and place reliance upon, the <i>'Hackney Carriage &amp; Private Hire Handbook</i>' which is a policy document not open to public consultation, scrutiny or challenge (as found, for example, at Proposals 3.18(q) and 3.20(d)).</p> <p>We accept the attribution of such exemptions, with the exception of <i>section 75(1)(d) Local Government (Miscellaneous Provisions) Act 1976</i>, is a discretionary matter for licensing authorities (pursuant to <i>section 75(3) Local Government (Miscellaneous Provisions) Act 1976</i>). We, accordingly, recommend additional clarification be given on the administration of these exemptions and seek further stakeholder discussions, prior to any ratification, with SCDC on this matter.</p>
<b>5.4 MOT/ Certificate of Compliance (COC)</b>	
A. Driver	There is no need to do 6 monthly testing just another money spinning regime from the council you will kill the level of service far to much buraucy and red tape, we only just make it pay at the moment
B. Driver	A certificate of compliance every 6 months is too much and just means more time off the road and more expense.
C. Driver	Also with the additional testing means more payout.
D. Driver	also I object to two tests per year.
E. Operator	I am totally against the Mot compliance be twice a year, that cost double and the time that the car will be at the service shop, if you are requiring new cars and we already have a very new fleet in Cambridge, I dont see any reason to do that
F. Driver	I am against the idea of testing the vehicle twice a year as i already spend substantial time and money on car servicing and maintenance throughout the year.
G. Operator	Regarding; Vehicle Testing – Certificate of Compliance <ul style="list-style-type: none"> <li>All vehicles will be required to be tested twice a year. The Certificate of Compliance will be issued for six months and a second test must be carried out 6 months minus 1 day from the last test. For part time taxi drivers I think it is unnecessary and costly to test the vehicle twice a year. A certificate of compliance once a year should be enough.</li> </ul>
H. Operator	Testing every 6 months is too excessive. Means more outlay for the driver as usual
I. Driver	Not happy with all policy
J. Operator	6 monthly tests cost more money
K. Driver	also so to have to MOT test year ear it is not fair especially for pre-booked taxis. The Certificate of Compliance: I strongly oppose the proposal of testing taxi vehicles twice in a year to obtain this certificate, one of the reasons being cost and time wasted at the garage. Since taxi vehicles, considering the mileage accumulated in a year, do general servicing twice in a year. I expect these services to keep the vehicle in good running condition and thereby fit for business and all other things like internal stickers, fire extinguisher and 1st Aid box are already in place and always in the car, so I don't really see any need doing the test twice in a year.
	Testing for Certificate of Compliance twice in a year is putting additional stress on drivers that are already calculating how to get new tyres,

	save for the next service, pay monthly for the car and insurance and also provide for the family. There are unforeseen contingencies to take into consideration, so saving for these is sensible. Creating more expenses for drivers is putting more pressure on them and their performances
L. Driver	With regards to the new South Cambridgeshire policies over the twice a year service and Mot and taxi plates to be change twice a year I, I would like to bring whom ever it may be concern 's attention to the this decision , which I am hopeful they reverse As it I found it hard to make the end meet. As you might have notice Uber cars have take lots of jobs away from us, Service the car twice a year and pay for licensing twice a year make a earning harder to cover all expenses. I wonder if you would like to take that into consideration, that my car pass every year with the very little need to be done and I don't see why I have to pay twice to council when I know it is pointless practice My question Is if we need to service car twice a year why do have to pay for licence again if the car has passed , why not only charge, if the car had not passed Second MOT
M. Driver	In terms of mot test twice a year wouldn't as in Hackney and private hires cars already less than ten years old and well looked after.
N. Driver	I like that council is thinking about age and condition of cars. But I don't think that doing MOT and Certificate of Complacency twice a year is good option. It will increase costs of running business and waste a lot of time. I do like take care of my car, I can not imagine driving faulty or even dirty car.
O. Driver	Regarding 2 vehicle check ups- once a year is enough for already licensed vehicles as you already set up an age limit. If you think it should be 2, then you or the company should pay for the second check-up. Every single procesdure you introduce costs to taxi driver while you making money out of it.
P. Driver	Now 2 mot year south Cambs don't care about drivers keep on issuing licence trying make more money.
Q. Driver	The two test a year again is bringing more and more cost to us the
R. Driver	I think it is unnecessary to have a certificate of compliance test twice a year. The taxi vehicles are very young cars and there should be no reason why they would need additional tests. I already have an MOT test annually and my car is serviced every 16000 miles. This additional test would only add extra cost and time to running my taxi for no obvious benefits. I keep my car in good condition for my client and my own safety.
S. Driver	Vehicle Testing – Certificate of Compliance STRONGLY DISAGREE, IT WILL ADDITIONAL BURDEN TO DRIVERS AND ADDITION FEE FOR COMPLICES ALREADY VERY DIFFICULT MAKING ANYTHING • All vehicles will be required to be tested twice a year. The Certificate of Compliance will be issued for six months and a second test must be carried out 6 months minus 1 day from the last test.
T. Operator	In addition, I would like to comment on the further proposal of MOT testing to be increased to biannually. While I understand your concerns regarding safety, I think it is important for your department to understand the financial implications of this requirement for small businesses and also the loss of earnings for drivers, particularly since your other policy changes already involve significant financial commitments for drivers and operators.
U. Resident	2 mot is a necessary measure to ensure the vehical is fit for driver and passengers. Cabs can do 5 times more mileage than average person.
V. Driver	COC check 2 times a year is a very bad idea. Every PHD I know keeps the car in the top fit all the times. If introduced it will make another day off and more unnecessary cost.
W. Driver	About two mot it's too much for private hire coz we are not independent driver like Hackney carriage we control by local operator company who do not allow us to work with another operative company at same time and number of taxi has increased in recent year and we getting less job also expense increasing which difficult to cope with situation.

<b>5.5 Dashcam</b>	
A. Driver	CCTV dash cams are quite common these shouldn't be mandatory by the council as it should licensed vehicle owner's choice to install or not
B. Driver	Dashcams NOT AGREE AT ALL, IT SHOULD BE DRIVER CHOICE• Any dashcams installed in a licensed vehicle must be outward facing only. NOT AGREE AT ALL, IT SHOULD BE DRIVER CHOICE• Internal facing dashcams will not be permitted in the licensed vehicles.
C. Driver	I don't support that dash camera should be control by council but I'm not against the dash camera, you can say every driver must have it in their car by law but strictly private control not third party.
<b>5.6 Door Signage/ Licence Plate</b>	
A. Driver	Private hire signage. 1. The council issued signage is very confusing for customers that notice them (if they are noticed) I personally have been asked numerous time's if I work for two companies. 2. The signage is very confusing with camcabs sign writing being yellow. 3. These signs damage our cars. 4. They look hideous, I firmly believe with these signs on or off it does not make a private hire car any safer. Many members of the public do not know where to start how to complain to the council. The council if enforcing the signage should put a complaints number directly to the council. 5. Operator door signs 5.1 I agree every car to have operator door signs, it's important to have the customer identify the company and car easily. Also if needed to complain the number is on the operator door sign so complaints can be sorted straight away.
B. Driver	I have asked many of my customers about the new signs. Nobody even noticed this. Those who wanted to complain was called to Panther without any problems. This all new signs policy is completely useless. Another beaurocratic costfull nonsense. Should be scrapped ASAP.
C. Driver	External Signage Door signage is not safe for drivers to change them while between the jobs on busy roads and the argument of customers safety linking those door signage is totally false as there are over 40000 private hire vehicles with no door signage and never been a passenger safety issue. Internal Vehicle Notices Interior signage should be drivers info not the company its again a joke changing every time I switch my work to other operator Operators should pay the cost for internal signage as we think its not fair for us to pay to display there info inside the car . Private Hire vehicle exemptions Why exemption for chauffeur and contract Private Hire Vehicle when normal Private Hire Vehicle have to use signage all over the car .

D. Driver	<p>External Signage</p> <p>Door signage is not safe for drivers to change them while between the jobs on busy roads and the argument of customers safety linking those door signage is totally false as there are over 40000 private hire vehicles with no door signage and never been a passenger safety issue.</p>
E. Resident	Fully support CCTV and any signage for public and drivers safety .This is a basic must in my view. And support any extra measures put forward.
F. Driver	new door signs and internal signage again more cost to us as drivers
G. driver	I can not see the point of having those extra external sings on doors. There is one on a back of the car plus company logo and info pre booked only which clearly states that in case of privet hire vehicles journey can be done only after pre booking with office. Also the internal sign does not make any sense. Passengers can not see what is on it. Frankly no one even notices that in a car.
H. Driver	Yellow stickers on the cars - very poor quality, after a few car washes, they get very uneven , upeal in the corners, anyone can peel them off and the driver should not be held responsible for that. The magnetic ones fly off on the motorway. If you manage to provide a better quality , can you guarantee that they will not damage the paint when removed? After all we are using our cars. In London the stickers on the inside the windows which are also their licence.
I. Driver	<p>Door signage:</p> <p>We are not a hailed taxi service and are only pre-booked. We can't just be flagged on the street. In addition, as a licensed South Cambridgeshire District Council Driver, I already have all the information on the back of the car on the plate. It feels like extra bureaucracy and an unnecessary extra charge. I can't see any reason why we need to have extra signage on the car or how it will benefit the public. I understand Hackney Carriage need this but can't see the benefits for Private Hire Taxis.</p> <p>In addition we are not even allowed to remove these plates, not even when we aren't working. Unfortunately Taxi cars are often targeted and damaged by people walking by or plates are stolen from the side of the car. I had a situation once when someone removed the plate from my car but I did not do anything at the time because they were in a group, it was late and they were drunk and I felt vulnerable.</p> <p>I think drivers should at least be able to remove the plates when they are not working.</p>
J. Driver	All doors sign requirements should be scraped. TLC in London is a prime example. No signs and it works.
K. Driver	<p>External Signage</p> <p>Door signage in 21st century it's pointless. In fact we didn't have it and it didn't make any positive difference since we've had it. Customer is still looking for the drivers and car details such us number plate, make model, colour, name, confirming destination. The amount of signage that we have now only make our car look like a Christmas tree. It is also not safe for drivers to change them while between the jobs on busy roads and the argument of customers safety linking those door signage is totally false as there are over 40000 private hire vehicles with no door signage and never been a passenger safety issue.</p>
L. Drivers	<p>External Signage &amp; Livery / Advertisements (Proposals 3.6 / 3.20)</p> <p>The LPHCA maintains its opposition to the over-regulation of licensing authority, and private hire operator, signage, liveries or advertisements on or within private hire vehicles. In substantiating this position, the LPHCA offers the below comments:</p> <p>(a) The proposals fail to broadly establish such licence conditions are “<i>reasonably necessary</i>” (within the meaning</p>

	<p>of section 48(2) Local Government (Miscellaneous Provisions) Act 1976).</p> <p>(b) The proposals fail to broadly account for the right to privacy of potential public personalities, and vulnerable passengers, who may request, or require, a higher level of discretion (within the meaning of <i>Schedule 1, Article 8, Human Rights Act 1998</i>).</p> <p>(c) The proposals do not appear to have considered specific Competition &amp; Markets Authority (“CMA”) concern on licence conditions which, as at Proposal 3.6(l), make it difficult for private hire drivers to work for multiple private hire operators (as found at “<i>Examples of Conditions That May Harm The Interest of Passengers’, Regulation of Taxis &amp; Private Hire Vehicles: Understanding the Impact on Competition</i>”, CMA, April 2017).</p> <p>(d) The proposals do not appear to have considered specific CMA concern on licence conditions which, as at Proposal 3.20[?], prohibit advertisements thereby limiting the ability to compete (as found at “<i>Examples of Conditions That May Harm The Interest of Passengers’, Regulation of Taxis &amp; Private Hire Vehicles: Understanding the Impact on Competition</i>”, CMA, April 2017).</p> <p>(e) The proposals do not broadly appear to have been subject to a Competition Impact Assessment (as recommended in ‘<i>Regulation of Taxis &amp; Private Hire Vehicles: Understanding the Impact on Competition</i>’, CMA, April 2017).</p> <p>(f) The proposals reference, and place reliance upon, the ‘<i>Hackney Carriage &amp; Private Hire Handbook</i>’ which is a policy document not open to public consultation, scrutiny or challenge (as found, for example, at Proposal 3.6(l)).</p> <p>We accept the statutory discretion licensing authorities possess (pursuant to section 48(2) Local Government (Miscellaneous Provisions) Act 1976). We however, recommend additional clarification be given on the prescription or restriction of signage, liveries or advertisements and seek further stakeholder discussions with SCDC, prior to any ratification, on the trade impacts of this matter.</p>
<b>5.7 Internal Vehicle Notice</b>	
A. Operator	INTERNAL VEHICLE NOTICE..NOT NECESSARY as we follow the rules of our Exempt certificate and DO NOT CARRY THE PUBLIC. The passengers in our cars do not make the booking. The booking is made by their company. The company has all information regarding our service. So, if any problem, there has been none in over 20 years, the passenger will contact their office, then the office will take it up with us. And we know exactly who the driver is. The company can then cancel our contract, or take further action if a serious offence occurs. There is no comeback on the council
B. Drivers	Internal Vehicle Notices Interior signage should be drivers info not the company its again a joke changing every time I switch my work to other operator Operators should pay the cost for internal signage as we think its not fair for us to pay to display there info inside the car .
C. Driver	New internal signage I already have a driver badge in the front of my car visible for all passengers to see, with my name and photograph clearly displayed. Putting additional signage on the dash board creates a reflection onto the window which is hazardous whilst driving. It is also completely unnecessary as I already have my photo ID displayed which is clearly visible to passengers. As above all identification is given to the passenger by the operator via text, prior to collection, and it is possible to get all this information at a later date if requested from the

	<p>company.</p> <p>You suggest these changes are for the safety of the public however you seem to completely disregard the vulnerability of the taxi driver. The threats that I face, often on a daily basis from passengers. And unfortunately I don't see you putting any measures in place to protect taxi drivers from racist and abusive passengers. If anything it feels like you are setting me up as a criminal and my car is becoming like an ice-cream van. Do you know how many passengers have run off without paying?</p>
<b>5.8 CCTV</b>	
A. Driver	<p>Just reading through the proposed changes to Taxi Licensing.</p> <p>I totally object to the need for CCTV I guess the costs which I can imagine as being very high would have to be covered by the owner of the vehicle. The proposed changes are totally unnecessary, I have been driving taxis for 23 years and have never had a situation where CCTV would have been of any use. Me and my wife are both winding down in the hours we do and the costs of such an implementation would probably drive us away from the trade we both earn less than the minimum wage.</p>
B. Driver	<p>Can I comment, if the proposed changes go ahead I will be forced to only run one taxi my wife only works part time and the additional costs of fitting cameras which I guess will be around £1000 will force her to stop working.</p>
C. Driver	<p>I would like to object to the proposed changes on taxi licencing. Especially the fitting of cctv as we haven't been given the cost of this equipment and I guess it will be very expensive. I work part-time and if the proposed changes go through I will be forced to hand back the plate. I have just plated the vehicle for 12 months will you be refunding me for not being able to work for a full year if you want cameras fitted by November?</p> <p>Yours sincerely</p>
D. Operator	<p>CCTV..section 78i states that Exempt vehicles SOLELY UNDERTAKE EXECUTIVE CHAUFFEUR WORK ONLY..we work to those rules so CCTV is not necessary as we can not carry the public! And as previously demonstrated our corporate accounts DO NOT WANT CCTV for confidentiality reasons. Why not make it compulsory for taxis but OPTIONAL for the exempt Chauffeur Services?</p> <p>Also, I can not fit CCTV as it will contravene the regulations on my finance agreement ..NOT TO MODIFY THE VEHICLE IN ANY WAY.</p>
E. Operator	<p>Regarding CCTV. The proposed policy of having CCTV in Executive Chauffeur Vehicles with exempt licences is totally unfair especially when I have previously demonstrated with letters from account customers protesting against it. But, as there are operators licensed with other authorities that DO NOT HAVE CCTV as a regulation can come in to Cambridge and "steal" our customers because they can give them the privacy and security they require. So SCDC could promote the demise of the Executive Chauffeur Service in Cambridge, therefore restricting the choice for the corporate sector in the city, at a time that the city wants to and needs to entice more large companies into the area. All those companies are global organisations who need to travel regularly and with a service they demand.</p>
F. Drivers	<p>CCTV</p> <p>WE love to have CCTV installed but there are lot of uncertainty as what will happen when the camera is broken and the company who installed they cant fix the camera same day are drivers allowed to drive ?</p> <p>Who will reimburse the driver loss of earning if the CCTV company unable to repair same day .</p> <p>My Private trips with my family how do I stop from CCTV recording my family .</p>
G. Driver	<p>CTV</p> <p>NOT AGREE AT ALL, IT SHOULD BE DRIVER CHOICE• All Hackney Carriage and Private Hire vehicles must be fitted</p>

	with a Council approved CCTV system at application no later than 31st March 2021
H. Resident	CCTV – If this becomes mandatory and a condition of licence the council will need to be the Data Controller as described by the ICO. If CCTV is optional for all vehicles the council can set a minimum standard for a system that is compliant with the ICO regulations. Implement a minimum standard within the policy so that any systems fitted must meet or exceed the requirements. This would negate the need to have a dashcam fitted and all data collected would be stored securely. In this scenario the vehicle proprietor would be the Data Controller. All those wishing to have a system fitted would need to complete and submit a registration form detailing the system being fitted, the installer, proof of registration with the ICO and any other conditions the council deem necessary. Once implemented, any vehicle with a dashcam fitted would be suspended until such time as it is removed.
I. Operator	CCTV - why does SCDC feel that it needs to have this in all PH vehicles when only 13 out of 2910 authorities require it? Is there statistical evidence to say that PH passengers would feel safer with it fitted? What about similar statistical evidence that passengers in exempt vehicles want it? It is unfair to pass this significant (and undefined) cost on to operators without full evidence of need.
J. Driver	Thirdly I totally disapprove of the fitment of any cctv equipment in the vehicle as this greatly infringes on mine and the customers privacy. I would not like to start work everyday with a camera recording and sure a lot of passengers will feel uncomfortable if they know someone can be watching them.
K. Operator	I would also like to raise my concerns regarding the proposed policy of 'Fitting approved CCTV'. Again, I fully understand the rationale behind this idea. However, I have serious concerns about the affordability of installation, maintenance, and in the event that this technology requiring transferral to another vehicle. The impact of these costs on small businesses has the potential to be detrimental, particularly if the new policies mentioned above also come into effect. I also do not feel that the issues around privacy have been adequately explained in the leaflet. Is the 30-minute delay activated each time the ignition is started? If this is the case, I see a huge privacy issue for drivers and their families who have selected a vehicle to meet both personal and business needs. In the event that drivers and their families are being filmed for the first 30 minutes of each journey they make, I see difficulties arising with breast feeding, removal of cultural/religious dress, and dignity for elderly relatives. I also have a number of other questions. If installation of this equipment causes problems to existing electrics, who will be responsible? If my car were to be stolen, who is being held responsible for this sensitive data? Will this installation be classified as a modification for insurance purposes? This will almost certainly increase the premium. Will lease companies allow drivers to install this technology in their vehicles? Since ordinarily they are not permitted to add any electrical devices, which could possibly result in breach of contract and the driver left financially responsible.
L. Driver	CCTV. 1. I have been a ph driver for four years now, not once have I felt at risk or have my customers. 2. If the council doubt some drivers and would like us to have cctv they should not have licensed those drivers. 3. The cost should be covered/reduced by the council if you are an existing plated car holder. New cars should have to pay.
M. Driver	Not happy with all policy
N. Operator	Why only external camera? What about protection for the driver with violent customers? Are council approved CCTV providers going to be checked by drivers aswell. I can get a good CCTV for under £40. How much is the council's CCTV providers going to be??? CCTV will cost more money and won't completely protect the driver.
O. Driver	However I understand the emission has to be kept low, and safety of the customers as well as myself as a driver is important so cctv is great idea
P. Driver	But to keep reading about all these new items like cctv. I'm very much against the introduction of CCTV my car is my personal car and my

	work vehicle as well. I feel having CCTV running around the clock when I'm using the car on my own personal journey is wrong I feel if there was an incident involving me the police would have free evidence to look through where Joe public will not have to abide by this. Yes it could work in my favour but also against me. I don't willingly break the law when I drive my car but the fact I'll be under the microscope 24/7 I truly do not agree with. I'm in favour of Scdc getting tougher on new drivers this in my opinion should of been done years ago. But the fact you at Scdc feel it's right to keep making us have to fork out for all these new things is not fair. It will have to stop at some point. But to expect me to go and pay £500-£600 for cctv is unfair.
Q. Drivers	I am highly concerned about the welfare of my underaged children. As licenced vehicles are not only used for business they get used privately I would feel threatened that images and footage of my children will be recorded and stored without my permission or say. Also the fact that it can be requested by the public makes that matter worse. It is the highest level of violation of a human beings privacy.
R. Driver	It involves extra costs which drivers don't get reimbursed.
S. Driver	CCTV. Your polucy says that only council appriced CCTVs are allowed. Why is that? Why not simply set a guideline of what it should be like? I mean technical requirements. As you would either earn money on drivers doing your own system and only allowing that or favouriting specific brand model, installer. I want freedon of choice and price when it comes to this. What if I want a descltreet system? I drive 7 series for Executive company and would like to choose what would he fitted to my car myself.
T. Business	CCTV must be mandatory to ensure public and drivers are protected
U. Resident	Fully support CCTV and any signage for public and drivers safety.This is a basic must in my view.And support any extra measures put forward.
V. Driver	My only concern is about approved by council CCTV. What does it mean and why council has to approved this system. If I'll be able to provide footage from the system what difference does it mean if I'll choose one. I think that the price of this is the biggest worry and who will install this. As I've checked what kind of CCTV system has to be fitted I'm worried that it will damage internal parts of my car.
W. Driver	Introducing CCTV in the vehicles- how it is justified - how many criminal offences committed by taxi drivers are unsolved by the police . and if it is compulsory the council has to provide the equipment, the drivers are unable to pay £1200. We pay expensive taxi insurance avarage of £2,000 per year, £ 135.00 per week for the Taxi company providing the jobs, equivalent to £5,500.00 per year.. council registartion fees are rising every year. Council is giving permission to new drivers , there are not enough jobs to be able to cover our expenses. Drirers are forced to work 15- 20 hours, and it is not safe for anyone - drivers, passengers, pedestrians. Our charges in some cases are cheaper then a public transport. We are working unsocial hours for less than the minimum wage.
X. Operator	as a private hire taxi driver I do not wish to have any CCTV in my car I don't know from where you get that stupid ideas but probably some of you got IQ below 20!! In India you wouldn't get paid for that what are you doing in here! How even dare you to thought that you can put CCTV into our PRIVATE cars! do you understand that word --> PRIVATE! it means we use our cars not only to work but for many other purposes like shopping, holidays with family etc etc and we do not wish to be recorded! can't wait to see your stupid faces when we take you into the court for interrupting our privacy! Just read a little bit about Protection of Freedoms Act and about Human Rights. Every year you are changing your rules and its worst and more complicated then it was before... when you loose half of your registered taxi drivers you will start scrubing your head like monkey and wonder what we have done wrong? it will be too late! They will never come back, bunch of you have no idea how to improve any service... if you like spying other people I suggest to mount mini camera in your toilet and transmit that into all countries you will also earn couple pounds from viewers... good idea?? Not bad at all you haven't got any better so far.... I do understand you get many complaints every week and most of them are silly... I will give you one free advice that what you should do when you get another phone call with complaint. First of all you need to ask for nationality of that person who's calling I can bet in 99,9% all cases they are british this nation is born to complain everywhere and on everything day without

	moaning is wasted!!!! second advice also for free! if they are not happy from one taxi company please tell them to use different one and problem will solve itself... still not happy? they can use public transport! not god enough? they can start jogging
Y. Operator	CCTV ! Again, many of my passengers have mixed feelings about this and so do I, and many prefer not be filmed and recorded so we have a greed if they choose to use the camera as a coat hanger then I am not going to stop them and run the risk of my passengers whom I have been driving for may years ! I drive for them in PRIVATE unless my passengers request different.
Z. Driver	Now outwards facing cameras where is the protection for driver non. Camera cost will be Outrageous and drivers will have no privacy we do have long wait for jobs.
AA. Business	I'm an approved installer for Safesystems CCTV Ltd and have installed many systems for taxi drivers across the southeast. Many drivers have reported that these systems act as a great deterrent and it helps give them peace of mind. We've already had a number of cases where these CCTV systems have been very useful in road rage incidents and attacks on drivers. Having these cctv systems installed in all taxis and private hire vehicles will have a measurable impact on attacks towards drivers.
BB. Driver	CCTV the way it's being proposed is very expensive, if the council would subsidised the cost, then maybe it will be a good idea, plus it drivers will support it, I think if the council contribute towards the cost, in the long run the council would save loads of money, i.e no need to enforcement meetings etc for allegations etc.
CC. Driver	CCTV I don't like having CCTV installed in my vehicle there are lot of uncertainty as what will happen when the camera is broken and the company who installed they cant fix the camera same day are drivers allowed to drive ? Who will reimburse the driver loss of earning if the CCTV company unable to repair same day . My Private trips with my family how do I stop from CCTV recording my family . In fact if you want me to have one in my car I should probably have one in my house as well. Never met a customer or driver who will be happy to be recorded while travelling with business associates or family. It is discrimination to have us install CCTV when none of the other transport services like air transport, trains and so on has to do it.
DD. Drivers	CCTV (Proposal 3.10) The LPHCA maintains its opposition to CCTV being a <i>mandatory</i> requirement for private hire vehicles. In substantiating this position, the LPHCA offers the below comments: (a) The proposals fail to broadly establish it is " <i>reasonably necessary</i> " (within the meaning of <i>section 48(2) Local Government (Miscellaneous Provisions) Act 1976</i> ). (b) The proposals exceed, at Proposal 3.10(c) the Department for Transport ("DfT") advice to merely "...look sympathetically on...or...encourage..." (at para. 35, <i>Taxi &amp; Private Hire Vehicle Licensing: Best Practice Guidance, DfT, 2010</i> ). (c) The proposals do not broadly appear to have been considered by the Information Commissioners Office ("ICO") (and / or Surveillance Camera Commissioner ("SCC")) (pursuant to, amongst others, <i>Southampton City Council v The Information Commissioner EA/2012/0171</i> ). (d) The proposals do not broadly appear to have been subject to a Data Protection Impact Assessment (pursuant to <i>section 64 Data Protection Act 2018</i> and ' <i>Blog: Continuous CCTV in Taxis – Where Do Councils Stand?</i> ', ICO, August 2018). (e) The proposals, in light of the above, do not broadly appear to take account of legislative and regulatory

requirements (pursuant to the *General Data Protection Regulation EU 2016/679*, *Data Protection Act 2018*, *Protection of Freedoms Act 2012*, *Human Rights Act 1998*, *'Surveillance Camera Code of Practice'*, Home Office, 2013 and *'In the Picture: A Data Protection Code of Practice for Surveillance Cameras & Personal Information'*, ICO, 2017).

(f) The proposals do not broadly appear to have considered CMA guidance on licensing conditions which "...*...may restrict or distort competition, potentially resulting in...higher fares or...lower quality of service...*" (as recommended in *'Guidance on the Impact of Taxi & Private Hire Licensing on Competition & Consumer Welfare'*, CMA, June 2017).

(g) The proposals do not broadly appear to have been subject to a Competition Impact Assessment ("CIA") (as recommended in *'Regulation of Taxis & Private Hire Vehicles: Understanding the Impact on Competition'*, CMA, April 2017).

(h) The proposals seek to address an unresolved issue for national legislative or regulatory reform (previous conflicting recommendations have been made by the *Task & Finish Group on Taxi & Private Hire Vehicle Licensing* in 2018 and the *Law Commission* in 2014. Richard Fuller MP also notably introduced, without success, the *Hackney Carriages & Private Hire Vehicles (Closed Circuit Television) Bill* in 2013).

(i) The proposals reference, and place reliance upon, the *'Hackney Carriage & Private Hire Handbook'* which is a policy document not open to public consultation, scrutiny or challenge (as found, for example, at Proposal 3.10(c)).

The incorporation of a CCTV licence condition remains, in the absence of Parliamentary or Governmental reforms, a difficult and controversial matter. We would, accordingly, urge caution before SCDC strictly mandates this requirement and, in the alternative, submit the use of CCTV should be a subjective decision for each private hire vehicle owner or driver.

## 6. Enforcement

A. Resident	See more basic checks and enforcement action
B. Driver	Get more enforcement in Cambridge city please because private hire taking hackney jobs
C. Driver	It's good to keep the taxi standard high and need enforcement but some drivers Are penalised for just minor things and some occasions drivers are wrongly dismissed so the appeal system need to stay
D. Driver	Again their are drivers getting cautions with out investigation of the allegations and put on their record and used against the driver in later in hearings and knowing that it was alleged complaint
E. Driver	Not happy with all policy
F. Driver	Unfortunately not enough enforcement is done. More is needed.
G. Resident	Please do note enforcement.
H. Business	Regular enforcement is needed to ensure cabs are compliant. Hope to see more action
I. Resident	Working proactively with City is a must for public safety due to the amount of plying for hire by private hires
J. Driver	What I feel you should be doing is going out down the train station and other private hire hotspots looking at the drivers and their vehicles you have drivers not abiding by the signage rules. I've sent dozens of photographs regarding this to you guys.
K. Operator	<p>There appears to be some confliction between these two paragraphs,</p> <p>Appendix B, 11a states:</p> <p>11.Motoring convictions</p> <p>a) Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. Any motoring conviction demonstrates a lack of professionalism and will be considered seriously. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the grant of a licence or may not result in action against an existing licence. Subsequent convictions MAY reinforce the fact that the licensee does not take their professional responsibilities seriously and is therefore MAY not BE a safe and suitable person to be granted or retain a licence.</p> <p>Section 13 goes on to state:</p> <p>13.Other motoring offences</p> <p>b) A minor traffic or vehicle related offence is one which does not involve loss of life, driving under the influence of drink or drugs, driving whilst using a mobile phone, and has not resulted in injury to any person or damage to any property (including vehicles). Where an applicant has 7 or more points on their DVLA licence for minor traffic or similar offences, a licence will not be granted until at least 5 years have elapsed since the completion of any sentence imposed.</p> <p>c) A major traffic or vehicle related offence is one which is not covered above and also any offence which resulted in injury to any person or damage to any property (including vehicles). It also includes driving without insurance or any offence connected with motor insurance. Where an applicant has a conviction for a major traffic offence or similar offence, a licence MAY not be granted until at least 7 years have elapsed since the completion of any sentence imposed.</p> <p>These two paragraphs seem to be at odds with each other, the first seems to imply that any driver with more than one minor traffic offenses in an unspecified time period will lose their livelihood, the second implies that two offences (6 points) would be acceptable but</p>

	<p>that more than 7 would result in the loss of the drivers licence.          Whilst we agree that professional drivers need to be held to a high standard, we feel that these paragraphs even when clarified are too absolute and that in particular existing licence holders should be assessed individually to determine the circumstances. Often there can be extenuating circumstances and revocation of licences would cause unwarranted hardship. This policy could seriously reduce the number of licenced drivers available to operators which in turn endangers public safety by encouraging unlicensed touting and out of area drivers with lower standards. Please could you consider changing the wording to may instead of will as indicated in red?</p> <p>Another small issue we have noted appears on Appendix I (Page 114)          a. The driver shall not allow any lone person, or more than one person, to be conveyed in the front of any licensed vehicle unless agreed with the operator at the time of booking.          Customers often ask to sit in the front seat, particularly on long journeys as they feel more comfortable and may get travel sick in the rear. We provide private hire vehicles and our customers have hired the whole vehicle and driver for the duration of the journey. They should be entitled to choose whichever licenced seat they wish.</p>
<p>L. Driver</p>	<p>Subside the cost of CCTV, less work for the enforcement team.</p>
<p>M. Vehicle owner</p>	<p>Proper and effective enforcement of the door sign rules would be appreciated. There should also be a move back to Operator's having to keep ORIGINAL licence DOCS as this will help regulate the issues caused by drivers working for more than 1 company and this multiple issues this causes - not least that SCDC as regulators don't know who they work with operator wise - this must be a major safeguarding issue.</p>

## 7. Relevance of Convictions

A. Resident	The lowest offence should be ok if turning a new leaf. The middling to top crimes are refused especially those offences committed involving children.
B. Driver	Get strong punishment for private hire who ply illegal hire
C. Driver	Not happy with all policy
D. Driver	Scrap the points system.

## 8. Any other Comments

A. Driver	<p>General comment.</p> <p>It's very clear that southcamb's vehicle's work along side city council vehicle's. It should be made that they are very similar to view. Southcamb's cars look very silly with council signage next to a city plated car. All of these suggested changes seem to be "what if problems" if there are any problems in the southcamb's vehicle's do you think that signage/cctv/age of the Vehicle's will help? Please explain how all of those will help. As the only one that I believe will help is cctv. Also it seems to me all of these changes have come to light ever since southcamb's agreed to license Uber. Uber is not fit and proper. They are private hire cars plying for hire through and app. Which being private hire you are not allowed to ply for hire. Many thanks one of you're licensed drivers.</p>
B. Driver	<p>Vehicles with only conference seating should be licensed. This is the case in Cambridge. Pull up seats are a trap and really uncomfortable.</p>
C. Resident	<p>I was unfortunate enough to be in an accident with one of your licensed vehicles. The Multi-seater had row of seats and only access to rear seats was to pull forward middle seat. This is a trap which I found out. PLEASE license ONLY CONFERENCE SEATING vehicles. Many thanks.</p>
D. Driver	<p>Hi just want ask if it is legal. I see lots people driving Wolverhampton licenced cars in Cambridge But there is lot cars from Witlessford operating in Cambridge. And there is no markings on cars at all. Is it legal to set up company in Cambridge and one in Witlessford. Take bookings in Cambridge and operate with Witlessford licenced cars no plates show as am not sure they have not exempt plating. Thanks for your time</p>
E. Driver	<p>You make the life of drive more complicated please don't do this new policy. These drivers are not rich, and you have to look after him. Now there is more driver and the job no like before, now is less, So maybe many people will live this job .</p>
F. Driver	<p>All above changes will help investor who gives car on rent, as difficult for new or poorer driver to buy any car, it will force driver to get on rent either from or somewhere else, richer get more richer for example Cambcab used wolverhampton council taxi which have very low required for taxi licensing. 2ndly council and police why not stopping 20-50 Extinction Rebellion for blocking roads and private properties twice a week. Is that teaching taxi driver and other block the road and make pressure. If yes, we can do, every day.</p>
G. Driver	<p>I hope I'm far from the only one who disagrees with changes to the policy and you listen to peoples opinions this time. There have been loads of changes in just last 2 years. Starting from stickers in and out of car, yellow council signs, strictness of positioning of those, green lines on silver cars, etc etc etc.. Please calm your horses down and don't make us clowns. Yes, we look like clowns on the streets. London has a green sticker on front and back of the car. Small, discreet sticker. We on the other hand are like a Christmas tree, with all the licences. Why we can't think of beautiful 1 sticker at the front and 1 at the back of the car, if you like yellow that much, make it yellow, but not 25 stickers in out, side, rear, another side, rear doors, front doors.. Simply ridiculous. Please don't take my opinion as offence. That's not my point. But please rather listen and most importantly understand what I'm trying to say. I'm just saying that this is not only my opinion. Others think the same. Also, every little thing you have added to the vehicles since last 2-3 years cost drivers extra money and fills your accounts. A bit suspicious, feels like you are thinking how to monetise Hackney/Private Hire drivers. Again, just an opinion in our democratic system. Feel free if you want to contact me on my email, I will be able to reply to any questions you might have. I understand that I might have been shortsighted due to certain circumstances, but please just try to understand how majority of drivers think. Thank you for your time reading this.</p>

	Sincerely yours,
H. Driver	Every year there are new rules and procedures, fares, rules that put by either council or the taxi companies - costs to the driver . Companies decrease the rates, and increase the radio fees that hits the drivers. You put new fees and procedures that hits the drivers The number of licences you issue are increasing whilst competition is increasing while all of your procedures are costing to drivers. STOP introducing procedures to make money to yourself. It is not about public safety or wellbeing, it looks like you are benefiting from drivers through these changes. As the name shows, this is a private company, not public business. If you care about public safety, then you should meet all the extra costs, not put the burden on the taxi drivers. If you require extra tests or check ups, then you handle the fees.
I. Business	May I suggest SCDC not to license small multiseater that require folding seats. I understand Cambridge only permits conference seating. May I also suggest SCDC policies to be in line with Cambridge or hogher
J. Resident	Insurance certificates – Currently when a new or renewal vehicle application is received it is checked to ensure that it correctly covers private hire pre-booked work or public hire for hackney carriages. However, some drivers believe that if they have another named person on the policy and certificate and it covers social, domestic and pleasure, then that person can drive the vehicle. This is not the case as the legislation clearly states that any person driving a licensed private hire or hackney carriage vehicle must hold the requisite licence issued by the local authority. Therefore, any unlicensed person driving the vehicle is committing an offence for which they may be prosecuted. Likewise, the proprietor allowing this to happen is also committing an offence and is also liable to be prosecuted. I would therefore propose that all insurance documents with named drivers are checked against the database and any that are shown as not being licensed the renewal/grant of a vehicle licence is refused until such time as a new insurance certificate is submitted with only SCDC licensed driver's named on it. For any mid-term vehicle checks where the issue arises, the vehicle should be suspended until such time that a new correct certificate is submitted. To confirm that once licensed, a private hire vehicle is always a private hire whether working or not, see Benson -v- Boyce.
K. Driver	I wasn't consulted on the previous version of consultation and would have thought a summary of changes should have been posted to all involved instead of a letter telling to go to a webpage and read over 400 pages to find changes you are playing with our livelihoods, and you won't be happy until you have put us out of business.
L. Driver	Stop private hire and hackney carriage taxi who flooding the Cambridge city area.
M. Driver	Not happy at all
N. Operator	As a driver and operator I feel as though these new rules are a type of tax for the driver. All of these rules are going to cost more money.
O. Driver	We have no union protect drivers from operator poor condition. Honestly better of working at Tesco part time and staying at home rest of the time. If you don't work in the trade you will not understand no sick pay no holiday pay and we earn even less then minimum wage. Would be very grateful if you consider my points. All the above is true and reasonable honestly have consider new trade because taxi getting to hard and becoming a charity. If you don't work 80 hours week you can't survive in taxi. 40 hours you could make enough Many years ago now you can't even survive.
P. Driver	We need taxi forum and meeting with drivers and the taxi licensing authorities and listen to the drivers complains against the operators because drivers at the moment have no one to listen to them if operators are unfair with the driver
Q. Driver	And finally are you aware already working in the district we have taxis plated in Wolverhampton working and competing against us and with all the Uber cars you are plating we are already struggling financially
R. Operator	one thing I really don't understand is South Cambridgeshire is being so strictly, but nobody talk about a regulated Fare scheme, I got a flyer once an operator charging to go to Heathrow £70, there is a war here in Cambridge putting the prices very low and this hurts the hole business, in London the council there is not that strictly and the Fares are much higher than here, is something you have to think, or be

	honest and say that you guys wants to reduce the number of cars and operators, in this case is very simple, just limited the number of cars and operator in the City, too many rules will reduce a lot of good business and service for Cambridge.
S. Driver	Also please change your policy on multiseater. Folding seats are a trap. Conference seating like Cambridges requirement are much better, safer and accessible.
T. Driver	Please treat us fairly. Thank you.
U. Driver	I think that you should represent people and their will and what's morally accepted in the society, otherwise you're forcing us to share our personal space and privacy via our way of making living.
V. Drivers	In addition to the above comments, and if not already done so, I would politely ask the LPHCA correspondence to SCDC of 26th November 2019 and 4th January 2020 be entered alongside this response. The latter being a request for extension to the consultation period based on SCDC failures to comply with the Cabinet Office ' <i>Consultation Principles 2018</i> '. We wholly appreciate the very difficult balance local authorities must strike between duties to prevent crime or disorder and promote economic, social and environmental well-being of its area. The LPHCA supports these endeavours and is likewise committed to the overriding consideration of ensuring public safety. I wish to, once again, sincerely thank SCDC for its helpful assistance throughout both consultations and welcome continued dialogue in the future.

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Hackney Carriage and Private Hire  
Policy Consultation Feedback  
2020

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## Background

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South Cambridgeshire District Council has reviewed its Taxi Policy and the proposed changes identified will apply to all Private Hire and Hackney Carriage Drivers, Vehicle Proprietors and Operators holding or wishing to obtain a licence from this authority.

Consultation event open days were held on the 29<sup>th</sup> and 30<sup>th</sup> July in the Council Chamber where the taxi trade and other interested parties came to discuss the proposed policy and provide their feedback. The event was very well attended and appreciated by trade and the public.

Cambridge City Council has engaged very well with the consultation and there has been a consensus of support for the proposed policy.

It is felt that with the two neighboring authorities working at harmonising their policies, it will provide a more streamlined Hackney Carriage and Private Hire regime across both areas where many of those licensed with South Cambridgeshire District Council frequent.

Following the consultation, the Licensing Committee will be asked to sign off the policy at a Formal Licensing Committee Meeting 10<sup>th</sup> February 2020 to be adopted at Full Council on 20<sup>th</sup> November 2020.

The policy update is intended to address the Business Plan objectives for 'Green to the Core' and supporting local businesses. It also helps address residents need for safe, reliable and convenient local transport.

## Overall Proposed Policy

Consultation Responses:		
Key Points	Index	
	Consultation Response 2019	Consultation Response 2020
	Section 1	
<b>Support</b>		
<ul style="list-style-type: none"> <li>Support for more frequent vehicle safety checks, safeguarding and lower emission vehicles, public safety</li> </ul>	A,C	
<ul style="list-style-type: none"> <li>Thanks given for recognising of the market for executive private hire services</li> </ul>	C	
<ul style="list-style-type: none"> <li>Support from residents for proposed policy</li> </ul>		L, O
<ul style="list-style-type: none"> <li>A driver supports all proposed changes</li> </ul>		K
<b>Concern</b>		
<ul style="list-style-type: none"> <li>Timing of the policy review as government are considering introducing national standards is not helpful to the trade.</li> </ul>	Appendix B R	
<ul style="list-style-type: none"> <li>Additional costs would prompt applicants to go elsewhere (Inc. cross-border working)</li> </ul>	B,G	
<ul style="list-style-type: none"> <li>Lack of flexibility detrimental for different business models and didn't support small rural operators and residents</li> </ul>	D H	
<ul style="list-style-type: none"> <li>A "one size fits all" approach is not appropriate and will discriminate against smaller operators, create a financial burden and disadvantage many of South Cambridgeshire's more rural residents'.</li> </ul>	H	
<ul style="list-style-type: none"> <li>Several drivers were unhappy with the overall proposed policy</li> </ul>		B, H, I, Q, V, W
<ul style="list-style-type: none"> <li>Operators feel that it is difficult to find new drivers</li> </ul>		D, E,
<ul style="list-style-type: none"> <li>It is felt that the proposed policy will increase business costs and put drivers in financial difficulties</li> </ul>		E, H, T, U
<b>Suggestions</b>		
<ul style="list-style-type: none"> <li>Offer to consult with the licensing team to establish a clear understanding of the (executive) market and help shape the definition (Driver)</li> </ul>	U	
<ul style="list-style-type: none"> <li><b>(Cambridge City Council)</b> - would like South Cambridgeshire District Council to consider the following as part of their policy changes.               <ol style="list-style-type: none"> <li>i. Would like South Cambridgeshire District Council to consider Cambridge City Council garage as the sole tester of vehicles for their COC as they believe it is more effective, more robust and contact with council on issues more efficiently.</li> <li>ii. We request that South Cambridgeshire District Council look into making it mandatory for their drivers to provide customers a means of paying for a booking, with their credit, or debit card,</li> </ol> </li> </ul>	V	

whether it be chip and pin, or via an app.		
• Limiting the amount of hours worked.	I	
• Request for a price freeze when new regulations came into force.	O	

## Officer Comments

- i. The main aim of the local authority in the licensing of Hackney Carriage and Private drivers, vehicles and operators is the protection of the public.
- ii. We believe that the proposed policy does demonstrate the promotion of the following objectives:
  - i. The safety and protection of the public
  - ii. Vehicle safety, comfort and access
  - iii. The prevention of crime and disorder
  - iv. The promotion of environmental sustainability
  - v. Protection of children and adults at risk from harm
- iii. No date has been given for the setting of National Standards by the Government. The existing Department for Transport (DfT) Best Practice Guidance has been consulted on and we await the outcome.
- iv. With regard to information and data sharing the policy states that the Council may process the information provided to prevent and detect fraud in any of our systems and may supply information to other departments within this Licensing Authority and externally to government agencies, credit reference agencies, audit or other external bodies for such purposes. We may share personal data with Local Partner Authorities, Police, Legal, Courts, Internal/External audit, Disclosure and Barring Service, HM Revenue & Customs, Driver & Vehicle Standards Agency, Customs and Border Agency as required.
- v. All licence fees are cost recovery and do not include enforcement work.
- vi. The priority of this Licensing Authority is on public safety and whilst we recognise that different business models have differing challenges, the aim of the policy is to have consistency and transparency for the objectives to be adhered to.
- vii. South Cambridgeshire District Council's current approach is to have a network of garages across the district to undertake C.O.C's. This is in line with the South Cambs Business Plan objectives of supporting small local businesses. This will also reduce mileage and therefore carbon emissions across the district.

## Environmental Issues

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### Proposed Changes to Policy

- New conditions added to the policy to line up with Cambridge City and to work towards South Cambridgeshire District Council Business Plan for a carbon free future
- Cambridge City intend to restrict City Centre Access to Ultra-Low and Zero Emission Licensed Vehicles only by 2028.
- Ultra low emission vehicle (ULEV) is the term used to describe any vehicle that:
  - Uses low carbon technologies
  - Emits less than 75g of CO<sub>2</sub>/km from the tailpipe
  - Is capable of operating in zero tailpipe emission mode for a range of at least ten miles

Policy	Rationale	Implementation
All first-time Hackney Carriage and Private Hire vehicle licence applications to be Zero or Ultra-Low Emission	This allows proprietors/ potential proprietors to focus on planning to move to Zero or Ultra Low emission vehicles by a set date.	With effect from 1 October 2021
All Hackney Carriage and Private Hire vehicle licence applications to be Zero or Ultra-Low Emission	This allows proprietors/ potential proprietors to focus on planning to move to Zero or Ultra Low emission vehicles by a set date and allows adequate business planning.	With effect from October 2028

Consultation Responses:		
Key points	Index	
	Consultation Response 2019	Consultation Response 2020
	Section 2	
<b>Support</b>		
• Health of residents/children adversely affected by pollution, this policy will help tackle it	A	
• Consistency with Cambridge City a good thing	AS	
• Long-term approach with investment in charging points helpful	A	
• Green cars and ultra-low emission vehicles	R	
• Time frame – fair and reasonable	T	
• Council is progressive and ambitious and aligning its licensing conditions with broader sustainability goals - encouraging.	T	
• Concern about the impact of diesel taxis on air pollution		C
• One business supports proposal measures for environment issues		J
<b>Concerns</b>		
• Electric vehicles isn't feasible due to charge time and number of charging points in the area	F	
• Limited vehicles available and unsuitable for taxis	B	
• To reduce pollution, should reduce the number of vehicles licenced	D	
• Cost of vehicles too expensive at present	K,U,V,	
• Blue efficiency diesel cars are less harmful to the environment overall	L	
• Hackney/Private Hire are different to Chauffeurs who do not operate in the city and this will put their businesses in jeopardy	V	
• Mileage range insufficient	U	
• Electric Wheelchair accessible vehicles not widely available and those that are - too expensive and are Hackney Carriage vehicles	U	
• No secondhand markets for vehicle	U	
• At present the market is unpredictable for vehicles	U	
• Proposed changes are unacceptably slow.		C
• Several drivers feel that the environmental policy is a national Issue and the taxi trade is being discriminated against		K
• An operator has asked if an accurate assessment been made of the environmental impact of the manufacture and delivery of new vehicles and the disposal of old ones against the retention of older (but well maintained) ones? Has the impact of the disposal of lithium batteries been considered (currently no known method of disposal)		G
<b>Suggestions</b>		
• 'Make all licensed cars electric and hybrid only from 2021. With help from the councils we could change our cars easily within a year! 'Massive improvement on Cambridge roads!'	F	
• A suggestion was made to support the transaction from petrol/ diesel car by creating a car loan scheme for private hire and hackney drivers.	P	
• Vehicles should comply with Euro 6 emissions standards at first to allow for owners who have entered into financial commitments	L	

<ul style="list-style-type: none"> <li>Several suggestions for vehicle licences for ULEV to be reduced or free of charge</li> </ul>		<b>B, F</b>
<ul style="list-style-type: none"> <li>One drive feels that the focus should be on big companies and not the self employed</li> </ul>		<b>P</b>
<b>Relevant information</b>		
<ul style="list-style-type: none"> <li>Cambridge City recently consulted on changing the set date for all new licensed saloon vehicles to be zero or ultra low emission from 1 April 2020 to 1 April 2021.</li> <li>Members decided to keep the implementation date of 1 April 2020.</li> </ul>		

### Officer Comments:

- i. Overall drivers recognise that low emission vehicles have a positive impact on the environment but are concerned that the infrastructure is not there. Officers agree that there are not enough charging points and ULEV/Electric vehicles still do not have the mileage range to successfully act as taxis and cover all facets of service provision expected by public.
- ii. SCDC to install 3 rapid charge-points for Hackney Carriage and Private Hire use only.
- iii. Public charge points in supermarkets/carparks are often free to use for the duration of your stay.
- iv. The Government has already taken steps to ensure that existing homes are electric vehicle ready by providing up to £500 off the costs of installing a charge-point at home.
- v. Technology allows drivers to be able to plan journeys taking into account distance, time and charging points available.
- vi. There is a Government grant available for up to a maximum of £3,500 off the purchase of approved vehicles. These vehicles have CO2 emissions of less than 50g/km and can travel at least 112km (without) any emissions at all.
- vii. Legally - we cannot limit the number of private hire vehicle

## Drivers

Proposed Changes to Policy	
i.	New Private Hire and Hackney Carriage driver licences will be issued for one-year probation period with a renewal check for a further 2 years.
ii.	Thereafter licences will be renewed every 3 years
iii.	To confirm 'fit and proper' before granting full licence
iv.	All Hackney Carriage and Private Hire driver applicants are required to provide two referees, at least one from a professional person (e.g. accountant, solicitor, magistrate), who has known the applicant for at least three years.

Consultation Responses:		
Key points	Index	
	Consultation Response 2019	Consultation Response 2020
	Section 3	
<b>Support</b>		
<ul style="list-style-type: none"> <li>Probation period for Hackney Carriage and Private Hire drivers is generally accepted. One driver commented 'some bad men want to be taxi drivers'.</li> </ul>	A, J, K	
<ul style="list-style-type: none"> <li>A driver felt it was a good idea to obtain references.</li> </ul>	F	
<b>Concerns</b>		
<ul style="list-style-type: none"> <li>Several drivers thought that restricting the issue of new Hackney Carriage and Private Hire drivers licence to one year as a blanket policy seemed unfair, one driver commented that '<i>we should be encouraging entry to the trade not discouraging</i>'.</li> </ul>	Appendix B I	
<ul style="list-style-type: none"> <li>One driver felt that there was no need for references.</li> </ul>	G	
<ul style="list-style-type: none"> <li>One driver commented 'this section does NOT distinguish between taxi/private hire and Chauffeur drivers who do NOT operate in Cambridge'.</li> </ul>	J	
<ul style="list-style-type: none"> <li>One driver was concerned about the time it took to renew licence</li> </ul>		D
<ul style="list-style-type: none"> <li>A driver felt the 'fit and proper' check was insulting</li> </ul>		I
<b>Suggestions</b>		
<ul style="list-style-type: none"> <li>Several drivers thought there should be a mandatory English test for all drivers.</li> </ul>	E, F	
<ul style="list-style-type: none"> <li>It was felt that drivers needed disability training</li> </ul>		A,C

• A driver has suggested that license should not be issued to people from locations out of the district		H
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## Officer Comments

- i. Question 18 of the Department for Transport Consultation on Statutory Guidance for Licensing Authorities recommends that all licensing should consider whether an applicant for a licence is able to communicate in English orally and in writing with customers.
- ii. The statutory and practical criteria and qualifications for a Hackney Carriage driver are like those of a Private Hire driver. The only difference would be the Competency test – Hackney Carriage driver applicants would have additional questions i.e. shortest routes.
- iii. Drivers are sent renewal reminders up to three months before expiry of licence. From the 1<sup>st</sup> April this will be done by email rather than paper copies being sent.
- iv. The legislation places a duty on the local authority to only license those who are ‘fit and proper’ or ‘safe and suitable’ to hold a licence. The legislation allows local authorities to set their own conditions, requirements and application processes to ensure that the public are protected

## DBS Update Service

- i. Currently all licensed drivers will be required to subscribe to the DBS Update Service and renew on an annual basis to continue to hold a South Cambridgeshire District Council driver’s licence.
- ii. This authority will undertake an annual online check of the DBS Update Service for the applicant’s current status.
- iii. There are **no proposed changes** to the requirement for Hackney Carriage and Private Hire drivers to subscribe to the DBS Update service.

Consultation Responses:		
Key points	Index	
	Consultation Response 2019	Consultation Response 2020
	Section 3.1	
<b>Concerns</b>		
• Potential loss of licence if card expires or driver forgets to register	A B	
• DBS update does not allow payment to be made by direct debit		A
<b>Suggestions</b>		
• ‘We are proposing to council, if there any driver failed to update his/her DBS on time or laps, notice them to subscribe this service within	A	

reasonable time period’.		
<ul style="list-style-type: none"> <li>Non-driver owners to sign up to the DBS update service save having to re-do a basic check every year – would save money for the proprietor in the long run’.</li> </ul>	<b>C</b>	

## Officer comments

- i. Subscription renewal to the update service can be made by choosing automatic renewal at the start or by logging on to the account created at the subscription start.
- ii. A reminder is emailed before the end of the subscription allowing renewal 30 days before the current subscription ends.
- iii. We can only ask non-driver proprietors for a basic DBS and this does not allow update service.
- iv. Disclosure Barring Services are working to allow payments to be made by direct debit

## Safeguarding Course and Test

- i. Currently all new applicants for Hackney Carriage and Private Hire driver, proprietors of Hackney Carriage and Private Hire vehicles and Operator licences will be required to participate and undertake a safeguarding course and test.
- ii. All existing licensed drivers, proprietors and operators will be required to participate and undertake a safeguarding course and test, as required by this Local Authority, in order to obtain a pass certificate which must be produced within 1 calendar year of adoption of this policy or on renewal whichever is earlier. Failure to do so may result in suspension of the licence until successful completion of the test.
- iii. There are **no proposed changes** to the requirement for Hackney Carriage and Private Hire drivers to undertake the Safeguarding course and test.

Consultation Responses:		
Key points	Index	
	Consultation Response 2019	Consultation Response 2020
	Section 3.2	
<b>Support</b>		
<ul style="list-style-type: none"> <li>Most comments were in support of the safeguarding course and test.</li> </ul>		
<b>Concerns</b>		
<ul style="list-style-type: none"> <li>One driver commented that he didn't '<i>know english, so an exam will be very difficult</i>' for him</li> </ul>	<b>D</b>	
<ul style="list-style-type: none"> <li>Drivers of exempt vehicles feel that a safeguarding test has no bearing on the type of work they do</li> </ul>		<b>A</b>
<b>Suggestions</b>		

• Drivers who have poor written English should be able to take the safeguarding course and test verbally.	<b>A,C,F</b>	
• One driver suggests that drivers who have already passed a safeguarding course with Cambridge City should not have to pay again.		<b>C</b>

### Officer Comments

- i. This Authority is committed to safeguarding and promoting the welfare of children, young people and adults at risk. We take our responsibilities seriously and expect all our licensed drivers, proprietors and operators to share this commitment.
- ii. It is therefore essential that drivers have a good understanding and command of the English language. This will be tested by way of communication at the appointment and through the competency and safeguarding tests.

### Competency Test

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- i. Currently the policy states that in order to be a licensed driver a new applicant must first complete and pass the Private Hire or Hackney Carriage Competency Test which should have been completed no more than 12 months prior to application.
- ii. Existing drivers may be required to undertake the Competency Test as determined by this Local Authority.
- iii. There are **no proposed changes** to the requirement for new Hackney Carriage and Private Hire drivers to undertake the Competency test.
- iv.

Consultation Responses:		
Key points	Index	
	Consultation Response 2019	Consultation Response 2020
	Section 3.3	
<b>Support</b>		
• Drivers need to have a good geographical knowledge and cannot be sat nav dependent. I suggest a robust knowledge test'.	<b>D</b>	
<b>Concerns</b>		
• Existing drivers should not be required to take the Competency test.	<b>A,B</b>	
• A driver of exempt vehicles feels that as they do not work in South Cambs a competency test is unnecessary		<b>A</b>

<b>Suggestions</b>		
<ul style="list-style-type: none"> <li>The content of the competency test should be made available to operators and drivers for training purposes.</li> </ul>	<b>C</b>	

### Officer Comments

- i. Existing drivers will only be required to take the Competency test if there are concerns.
- ii. The competency test covers general vehicle questions, points of Interest, numeracy, licence conditions, Highway Code and road signs. Hackney Carriage driver applications will be required to answer question on the shortest routes. Revision suggestions are made in the handbook.

## Operator

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<b>Proposed Changes to Policy</b>
<p>New operator licenses will be issued for probation of one year with a renewal application for up to a further five years</p> <ul style="list-style-type: none"> <li>All Private Hire Operator applicants are required to provide two referees, at least one from a professional person (e.g. accountant, solicitor, magistrate), who has known the applicant for at least three years</li> <li>To confirm 'fit and proper' before granting full licence.</li> </ul>

<b>Consultation Responses:</b>		
<b>Key points</b>	<b>Index</b>	
	<b>Consultation Response 2019</b>	<b>Consultation Response 2020</b>
	<b>Section 4.1</b>	
<b>Support</b>		
<ul style="list-style-type: none"> <li>One driver commented that more should be done to check the fit &amp; proper status of some Operators.</li> </ul>	<b>M</b>	
<ul style="list-style-type: none"> <li></li> </ul>		
<b>Concerns</b>		
<ul style="list-style-type: none"> <li>'This section does NOT distinguish between taxi/private hire and exempt Chauffeur Operators'.</li> </ul>	<b>J</b>	
<ul style="list-style-type: none"> <li>One thing I miss is any understanding of the difference between, say, Panther and my local firms with 1 and 2 persons.</li> <li>I suggest we think about a different regime for companies with fewer</li> </ul>	<b>I</b>	

than 5 employees allowing them to specialise and freeing them from burdensome and useless requirements.		
• A driver feels that the proposed changes are unfair for smaller businesses.		<b>H</b>
<b>General Comments</b>		
• Operators need to play an active role in enforcement	<b>G</b>	
• Operators need to take responsibility by managing their drivers	<b>F</b>	
• Operators need to take responsibility and have relevant complaints policy	<b>AC</b>	
• A resident thinks that operators must only use hybrid and electric vehicles.		<b>A</b>

### Officer Comments

- i. The introduction of a probation period falls in line with Cambridge City and most employers. Issues reported quite often emerge during the first year after the initial licence has been issued. The goal of this new probation period is to allow for the Licensing Authority to review and perform any relevant checks i.e. Basic DBS to ensure that the operator is complying with the conditions of his licence.
- ii. The priority of this Licensing Authority is on public safety and whilst we recognise that different business models have differing challenges, the aim of the policy is to have consistency and transparency for the objectives to be adhered to.

## Vehicles

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<b>Proposed Changes to Policy</b>
<ul style="list-style-type: none"> <li>• A new vehicle licence will not be granted in respect of a vehicle unless it is less than 4 years old.</li> <li>• A vehicle licence will not be renewed for a petrol or diesel vehicle unless the vehicle is less than 9 years old.</li> <li>• A vehicle licence will not be renewed for a Ultra-low emissions vehicle unless the vehicle is less than 12 years old. All petrol and diesel vehicles must comply with at least the “Euro 5” emissions standards</li> </ul>

limiting CO, NOX and particulate matter emissions

- A vehicle licence will not be renewed for a zero emissions vehicle unless the vehicle is less than 15 years old.

<b>Consultation Responses:</b>		
<b>Key points</b>	<b>Index</b>	
	<b>Consultation Response 2019</b>	<b>Consultation Response 2020</b>
	<b>Section 5.1</b>	
<b>Support</b>		
• <i>'help drivers to better manage the current more limited availability, and higher capital cost, of zero and ultra-low emissions vehicles.'</i>	<b>AV</b>	
• <i>'helps drivers recover the increased cost of these vehicles over a longer period.'</i>	<b>A</b>	
• <i>'fewer moving parts than petrol and diesel vehicles, zero emission vehicles experience less wear and tear and can therefore be expected to have longer operational lives'</i>	<b>A</b>	
• <i>'It is known that many older model vehicles emit higher emission levels as compared to newer vehicles'</i>	<b>E</b>	
• Old vehicles are unsafe and polluting		<b>Q</b>
<b>Concerns</b>		
• may be a be an issue to those many drivers who have loans/ finance/ HP agreements on their vehicles may	<b>I</b>	
• There were many comments asking for the renewal age limit of 7 years to be reconsidered.	<b>CDEFG NOPSU</b>	
• A number of drivers do not believe that excluding vehicles by age is necessary and other things should be considered instead i.e. mileage, emissions	<b>BCH</b>	
		<b>E, F</b>
• Many drivers feel that the age limit of 9 year for renewal is unreasonable		<b>EFGIJLN PSWZ</b>
<b>General Comments</b>		
• <i>One driver asked if there will be a period to allow for those not in a position to immediately replace a vehicle that is too old.</i>	<b>M</b>	
• <i>Specify some emission test results (and not just CO2) instead'.</i>	<b>A</b>	

## Wheelchair Accessible Vehicles

- i. Currently Hackney Carriage vehicles must be Wheelchair Accessible Vehicles (WAV's). New vehicles will need to comply with this immediately, and for those vehicles currently licensed as a Hackney Carriage they will have 3 years to comply. Failure to do so will result in the vehicle being de-licensed.
- ii. There are **no proposed changes** to the requirement for Wheelchair Accessible Vehicles

<b>Consultation Responses:</b>		
<b>Key points</b>	<b>Index</b>	
	<b>Section 5.2</b>	
	<b>Consultation Response 2019</b>	<b>Consultation Response 2020</b>
<b>Concerns</b>		
• One driver thought that all Operators should be able to offer Wheelchair Accessible Vehicles.	<b>A</b>	
• Having all HC vehicles be wheelchair accessible is inappropriate	<b>5.9A</b>	
<b>Suggestions</b>		
• I was suggested that Wav vehicles should be excluded from proposed timeline for UVLA implementation		<b>A, B</b>

### **Officer Comments**

- i. This Local Authority encourages all Private Hire operators to include wheelchair accessible vehicles amongst their fleet
- ii. The Council encourages all Private Hire operators to include WAV's amongst their fleet and to ensure that no additional costs are levied by them or their drivers, for conveying disabled passengers.

## **Private Hire Vehicle Plate Exemption**

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- i. The current policy aims to ensure public safety whilst taking a balanced approach to licensing requirements. Its objective is the provision of an exemption to allow "executive vehicles" to operate without displaying external identification plates (private hire vehicle licence plate).
- ii. Current policy allows plate exemptions for vehicles which primary undertake executive chauffeur work.

### Proposed Changes to Policy

- Vehicles which have been issued with an exemption certificate to solely undertake executive chauffeur work with no exceptions

This Licensing Authority recognises that there is a specialist market for the use of unmarked hire and reward vehicles in the following circumstances:

- Chauffeur / prestige-type services
- Fulfilling a pre-existing, written contract (pre-existing meaning signed at least 10 working days in advance of the hire)
- Providing a regular service (whether to an individual or to a business)

Consultation Responses:		
Key points	Index	
	Section 5.3	
	Consultation Response 2019	Consultation Response 2020
<b>Support</b>		
<ul style="list-style-type: none"> <li>• In favour if <i>'determined beyond doubt that the work is 'specialty or executive' and that this can be verified.'</i></li> </ul>	<b>A</b>	
<b>Concerns</b>		
<ul style="list-style-type: none"> <li>• discriminating against customers and dictating who is worthy to travel in a particular style.</li> </ul>	<b>D</b>	
<ul style="list-style-type: none"> <li>• <i>'REFUSING people my type of service will be restricting my trade and this will eventually CEASE my employment.'</i></li> </ul>	<b>D</b>	
<ul style="list-style-type: none"> <li>• <i>'need the flexibility... of our vehicles being... interchangeable in case of breakdown, servicing etc'.</i></li> </ul>	<b>G</b>	
<ul style="list-style-type: none"> <li>• Cllr - <i>'discriminatory to use terms such as 'senior personnel', and 'stars', and to allow any organization to determine that junior staff must travel in inferior vehicles.'</i></li> </ul>	<b>F</b>	
<ul style="list-style-type: none"> <li>• Cllr – <i>'all PHVs should be regarded as exempt vehicles, and their drivers instructed accordingly'</i></li> </ul>	<b>F</b>	
<ul style="list-style-type: none"> <li>• It is felt that the policy does not make it clear what the requirements are for exemption work</li> </ul>		<b>B C E G H</b>

## Officer Comments

i. Licensing Officers recommend the following:

- Pre-booked, pre-existing contract signed in advance and operator cannot dispatch a plate exempt vehicle to undertake non-plate exempt work of bookings.
- The type of work which would be considered for the grant of an exemption could be termed 'executive style' using high-end, prestige vehicles.
- Such work includes, but is not limited to: –
  - contracts with senior personnel of large companies to carry managing directors or their clients
  - contracts with national or local government, or similar agencies, to carry senior personnel and guests on official business;
  - the carriage of the bride and/or groom to a wedding (but not guests)
  - All other categories require Licensing Authority approval
- High-end, prestige vehicles which have been issued with an exemption certificate to solely undertake executive chauffeur work with no exceptions

## MOT/ Certificate of Compliance (COC)

Current policy requires all new and renewal Hackney Carriage and Private Hire vehicles to have a yearly MOT and yearly COC

<b>Proposed Changes</b>
The vehicle must have a yearly MOT certificate and a Certificate of Compliance issued for every six months.

<b>Consultation Responses:</b>		
<b>Key points</b>	<b>Index</b>	
	<b>Section 5.4</b>	
	<b>Consultation Response 2019</b>	<b>Consultation Response 2020</b>
<b>Support</b>		
• <i>Two COC's a year will enable mine and public safety'.</i>	<b>C</b>	
• <i>OK with the notion of 6 monthly testing</i>	<b>H</b>	
• <i>We are in agreement with the requirement that all licensed vehicles requiring two yearly Certificates of Compliances. Hackney Carriage and Private hire vehicles are used regularly and are likely to experience</i>	<b>B</b>	

<i>greater levels of wear and tear, as compared to family or company vehicles.</i>		
• <i>This promotes public safety, as vehicles are ensured to be maintained to high levels.</i>	<b>B</b>	
• <i>'Cambridge City Council employ a two-yearly Certificate of Compliance and have found this beneficial in ensuring our licensed vehicles are fit for purpose'.</i>	<b>B</b>	
<b>Concerns</b>		
• Completely unnecessary and an additional expense that will impact most on smaller businesses.	<b>G</b>	
• Several drivers feel that a 6 monthly compliance test is unnecessary, and some feel that council are trying to make money from drivers		<b>AG HK O PUV</b>
<b>General Comments</b>		
• Accredited garages need more training/ regulating for testing to be consistent.	<b>F</b>	

## Officer Comments

Vehicle testing once a year has shown that vehicles are not maintained to a high degree. More MOT certificates are showing advisories, for example 'nail in tyre' or brake pads close to limit'.

## Safety Equipment – Fire Extinguisher

<b>Proposed Change</b>
All vehicles must have an efficient fire extinguisher which shall be carried in such a position as to be readily available for use.

Consultation Responses:		
Key points	Index	
	Section 5.5	
	Consultation Response 2019	Consultation Response 2020
<b>Concerns</b>		
• <i>'Need to specify what counts as 'efficient' otherwise there will be confusion among drivers and testers.</i>	<b>A</b>	
<b>General Comments</b>		

• Follow city council with minimum 1KG ?'.	A	
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## Dashcam

Proposed Change
<ul style="list-style-type: none"> <li>Any dashcams installed in the licensed vehicle must be outward facing only.</li> <li>Internal facing dashcams will not be permitted in the licensed vehicles.</li> <li>It is the sole responsibility of the proprietor of the licensed vehicle, with dashcams installed, to be registered with the Information Commissioners Office (ICO). Further information can be found on the following link;  <a href="https://ico.org.uk/for-organisations/register/">https://ico.org.uk/for-organisations/register/</a></li> </ul>

Consultation Responses:		
Key points	Index	
	Section 5.5	
	Consultation Response 2019	Consultation Response 2020
<b>Concerns</b>		
<i>'I don't support that dash camera should be control by council but I'm not against the dash camera, you can say every driver must have it in their car by law but strictly private control not third party'</i>		C
<b>General Comments</b>		
• Drivers feel that dashcams should be a choice		A B

## Door Signage/ Licence Plate

Current policy states that the vehicle shall display on both rear external passenger doors in a prominent location affixed door signage, "Private Hire Vehicle – Must be Pre-booked with Operator". The vehicle shall display on the driver and front passenger door in a prominent position the name and telephone number of the Operator fulfilling the booking.

### Proposed Change

- Wording amended in policy to 'Council issued' signage
- Hackney vehicles must affix permanently on the front and rear external passenger and driver doors in a prominent location, South Cambridgeshire District Council issued door signage.
- Private Hire vehicles must affix on the rear external passenger doors in a prominent location, Council issued door signage.

### Consultation Responses:

Key points		Index	
		Section 5.6	
		Consultation Response 2019	Consultation Response 2020
<b>Support</b>			
• A driver thinks door stickers are important for safety.		A	
• <i>'in favour of rule that states signage should be in place at all times'</i> .		M	
• <i>vehemently in favour of signs being on display permanently and - crucially - with the operator's phone number clearly displayed.</i>		R	
<b>Concerns</b>			
• doesn't agree with the amount of signs that are on vehicles		I	
• door signage should be removed altogether and that South Cambridgeshire District should adopt the London round small style sign.		C	
• customers find door signage intrusive and unnecessary for the private trips they want to make		D	
• <i>'I do not like the idea of signage. I do a variety of contract work plus some executive work for SCDC Licenced chauffeur companies who hold plate exemption'</i> .		L	
• 'The easiest way to ensure that 'the public are able to easily identify between a Hackney Carriage and a Private Hire vehicle' is to remove all livery from the latter category'.		J	
• One driver feels that the signage is confusing for customers			A
• Several drivers feel that the signage is unsafe			C D K
<b>General Comments</b>			
• <i>Operators should have office and phone number available 24/7 for</i>		N	

<i>customers to utilize to take complaints’.</i>		
<ul style="list-style-type: none"> <li><i>If is felt the telephone number on external door signage is a safety &amp; safeguarding necessity. South Cambridgeshire District Council crests should be allowed to be removable for Private Hire drivers who wish to do occasional executive work through their operator where the customer requires the vehicle to look less like a taxi’.</i></li> </ul>	<b>M</b>	
<ul style="list-style-type: none"> <li><i>‘As Uber’s bookings are taken via the app it is felt to be reasonable to allow the URL (website address) in lieu of a telephone number.</i></li> </ul>	<b>B</b>	
<ul style="list-style-type: none"> <li><i>complaints made by members of the public to be put on door signs, it could be the council telephone number and incorporated into the South Cambridgeshire door signs, not that of an operator.</i></li> </ul>	<b>B</b>	
<ul style="list-style-type: none"> <li><i>Uber strongly recommend that it should be rephrased to require ‘contact information’ on operator door signs, such as a telephone number or website URL or email address’.</i></li> </ul>	<b>B</b>	
<ul style="list-style-type: none"> <li><i>‘Panther would like to see different size plates and brackets routinely/properly offered to South Cambridgeshire District Council drivers at the point of application if possible in order that they can make informed decisions about how best to fix the plate to their vehicle’.</i></li> </ul>	<b>R</b>	
<ul style="list-style-type: none"> <li><i>‘It is a fact that the more signage you put on a PHV, the more it looks like a taxi and the more the public are confused. Regulatory signage on PHVs should be discreet, and the number plate should be the primary thing that a passenger looks for, not a licensing plate, door stickers, branding or other identifiers’.</i></li> </ul>	<b>A</b>	

#### **Relevant Information**

- Mr Tariq Ahmed submitted a petition of 149 signatures.
- Taxi Drivers Reject Company Door Sign mandatory by South Cambridge District Council
- Appendix A – Covering letter from Mr Ahmed
- Appendix B – Submitted Petition
- Why the petition?
  - Panther do not want their drivers to work for other companies, for example, Uber. This is because Uber price surge at busy times of the day. This means that Panther cannot get enough drivers to work for them at busy times as they are paid more by Uber. Having the Operator details on the vehicles means that Panther can easily be seen if one of their drivers is working elsewhere.

### **Officer Comments**

- i. The display of the Operator name and telephone has been set in place to ensure that members of the public (not just the passenger) are able to make complaints and report safety issues directly to an operator. An example of this could be if a vehicle is parked across someone's drive or if a member of the public had concerns about a customer travelling in a vehicle
- ii. Certain app-based companies do not allow the general public to make a complaint via the app. A telephone is on the website which allows the public to make complaints.
- iii. We feel that it a telephone on door signage is important for the protection of public safety
- iv. In setting out this policy, South Cambridgeshire District Council seeks to carry out its licensing functions with a view to promoting the following objectives:
  - The safety and protection of the public
  - Vehicle safety, comfort and access
  - The prevention of crime and disorder
  - The promotion of environmental sustainability
  - Protection of children and adults at risk from harm

## Internal Vehicle notice

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- i. Currently the policy states that there must be a clear mechanism in place that informs passenger of :-
  - The business name of the operator, or proprietor if it is a hackney carriage,
  - The telephone number where a customer can make a complaint or report a concern,
  - The vehicle registration number, and
  - The vehicle licence plate number.
- ii. This can be by way of use of digital technology sent to the customer prior to the booking or an Internal Vehicle Notice contain the information and displayed in a conspicuous place which can be easily read by a passenger travelling in the rear and front of the vehicle

<b>Proposed Change</b>
<ul style="list-style-type: none"> <li>• In order to protect the public and to allow customers to correctly identify and report either a driver or a vehicle which caused concern, the Council has determined that certain information must be displayed inside all licensed vehicles, in the form of a Council issued Internal Vehicle Notice</li> </ul>

<b>Consultation Responses:</b>		
<b>Key points</b>	<b>Index</b>	
	<b>Section 5.7</b>	
	<b>Consultation Response 2019</b>	<b>Consultation Response 2020</b>

Support		
<ul style="list-style-type: none"> <li>• 'Panther are in favour of the internal signage which should include plate exempt vehicles too.</li> </ul>	<b>G</b>	
<ul style="list-style-type: none"> <li>• Internal signage MUST in our opinion, include information on the operating company under which the vehicle is conducting the job/its services'.</li> </ul>	<b>G</b>	
Concerns		
<ul style="list-style-type: none"> <li>• <i>What you MUST remember is clients are sent emails AND texts of all drivers details should they require them, unlike a normal taxi'.</i></li> </ul>	<b>B</b>	
<ul style="list-style-type: none"> <li>• Most drivers are self-employed and often work for several operators, the internal notice contains the information of the operator as well as the vehicle so it can be misleading to passengers'.</li> </ul>	<b>C</b>	
<ul style="list-style-type: none"> <li>• A couple of drivers felt that by pre booking the passenger is already aware of the Private Hire Operator company details and wonder why it is mandatory to have internal sign.</li> </ul>	<b>D</b>	
<ul style="list-style-type: none"> <li>• One of the most evident ways we have improved safety is via the information we provide passengers in their app. Before their vehicle arrives, the passenger has access to the make, model, colour and vehicle registration mark of the car; the driver's name, picture and the parties' anonymised contact details are exchanged. Furthermore, the passenger has the ability to see where their vehicle is in real time via the map on their phone'.</li> </ul>	<b>A</b>	
<ul style="list-style-type: none"> <li>• 'Internal signage in Private Hire vehicles is a bad idea, as it can be fraudulently copied and used to entice a passenger into a vehicle and a potentially dangerous situation'.</li> </ul>	<b>H</b>	
<ul style="list-style-type: none"> <li>• A number of drivers feel that operators should pay for the internal vehicle signage rather than the drivers</li> </ul>		<b>B</b>

### Officer Comments

We feel that the Internal Vehicle Notice this is vital for public safety as the person travelling in the vehicle is not always the person who makes the booking.

### CCTV

Current Policy – All vehicles except plate exempt vehicles must have CCT installed before 1 April 2020

**Proposed Change**

- All (including exemptions) Hackney Carriage and Private Hire vehicles must be fitted with an approved CCTV system no later than 30th November 2020.

<b>Consultation Responses:</b>		
<b>Key points</b>	<b>Index</b>	
	<b>Section 5.8</b>	
	<b>Consultation Response 2019</b>	<b>Consultation Response 2020</b>
<b>Support</b>		
<ul style="list-style-type: none"> <li>• Belief that CCTV will be enforced by central government and every taxi or private hire vehicle need to have one by law regardless local council policy</li> </ul>	<b>K</b>	
<ul style="list-style-type: none"> <li>• <i>In favour - no reason why plate exempt should mean CCTV exempt too!</i></li> </ul>	<b>Q</b>	
<ul style="list-style-type: none"> <li>• <i>'cost to driver of £300 - £400 is agreeable/sensible – anything above £500 is definitely cost prohibitive'.</i></li> </ul>	<b>Q</b>	
<b>Concerns</b>		
<ul style="list-style-type: none"> <li>• <i>Large majority of executive operators and drivers feel that CCTV is inappropriate for their type of business as they provide a different type of service and doesn't cater to the needs of their clients which will detrimental to their business</i></li> </ul>	<b>BHMR</b>	
<ul style="list-style-type: none"> <li>• <i>To have it by 2020 is a very short notice. Authorities need to understand that we are already struggling to meet our needs'.</i></li> </ul>	<b>KL</b>	
<ul style="list-style-type: none"> <li>• A number of drivers are concerned about the cost of installation, the aftercare, who will be the data controller, who will be covering the loss of earning if council need to extract the footage and driver privacy.</li> </ul>	<b>ER</b>	
<ul style="list-style-type: none"> <li>• They are concerned using the car for personal use and wonder what the requirement will be for video recording 24/7.</li> </ul>	<b>KL</b>	
<ul style="list-style-type: none"> <li>• No consideration made passengers' right to privacy in their privately hired vehicle</li> </ul>	<b>AHMP</b>	
<ul style="list-style-type: none"> <li>• Drivers are concerned that contract with leasing companies state that that no modifications must be made to the vehicle as this will invalidate the warranty.</li> </ul>	<b>C</b>	
<ul style="list-style-type: none"> <li>• Drivers are concerned about what allowances would be made for temporary vehicles in the case of breakdowns and accidents?</li> </ul>	<b>M</b>	
<ul style="list-style-type: none"> <li>• <i>'I do not see that CCTV meets the objectives [ of 3.9.ii. GDPR further restricts its usefulness, as attempts by cyclists to use CCTV footage from Stagecoach demonstrate. It would be worth consulting the Cycling Campaign here. Internal CCTV will be extremely unpopular'.</i></li> </ul>	<b>O</b>	
<b>Suggestions</b>		

<ul style="list-style-type: none"> <li>• ‘drivers will will not understand ICO It must be cost effective for driver - £400 max’.</li> </ul>	<b>J</b>	
<ul style="list-style-type: none"> <li>• Supports ICO guidelines and takes the view that this is a matter with which only vehicle proprietors must be compliant (and therefore it is the responsibility of the proprietor to notify the council that the equipment has been installed)’.</li> </ul>	<b>D</b>	
<ul style="list-style-type: none"> <li>• No need for operator to play a role in this, other than to ensure drivers are aware of requirements for their vehicle reducing additional administrative steps for both the council and operators’.</li> </ul>	<b>D</b>	
<ul style="list-style-type: none"> <li>• Provision needs to be carefully thought out with regard to the law and driver protection and not cost prohibitive or burdensome for the driver.</li> </ul>	<b>Q</b>	
<ul style="list-style-type: none"> <li>• Cost to driver of £300 - £400 is agreeable/sensible – anything above £500 is definitely cost prohibitive’.</li> </ul>	<b>Q</b>	

### Officer Comments

- i. The Department for Transport Consultation on Statutory Guidance for Licensing Authorities recommends that licensing authorities should carefully consider potential public safety benefits and potential privacy issues when considering a policy mandating that taxis and PHVs have CCTV installed.
- ii. The policy states the installation of CCTV in licensed vehicles can be both a deterrent to would-be trouble makers and a source of evidence in the case of disputes between drivers and passengers, other incidents and accidents.
- iii. CCTV codes of practice, including clear signage that the vehicle uses CCTV.
- iv. South Cambridgeshire District Council will be the data controller and will be responsible for complying with all relevant data protection legislation.
- v. South Cambridgeshire District Council and Cambridge City are doing a joint procurement to find a reasonably priced system which confirms to our specifications. This will also include looking at the cost of aftercare.
- vi. The ‘panic’ button will allow the driver and/ or the customer to start audio recording.
- vii. There will be a flashing light to show that the CCTV is working – in case of a breakdown drivers must contact the manufacture. Equipment will have a warranty.
- viii. The owner/ driver of the vehicle will be responsible to the maintenance.
- ix. The owner/ driver will have bring the vehicle (unless vehicle is not drivable) to SCDC offices. Data will be downloaded onto a designated computer.
- x. There will be off button within the boot. This will have a delay of 30 minutes.
- xi. Temporary vehicles in the case of breakdowns and accidents would be exempt from CCTV.

### Enforcement Officer Comments

- i. CCTV - As an officer for the authority I'm aware of the increasing number of driver's who have fitted or intend to fit, dashcams to their vehicles.
- ii. Due to the number of hours licensed drivers spend on the road it is quite understandable that they wish to protect themselves against false allegations if their vehicle is involved in an accident.

- iii. Some of the cameras fitted view from the front outward, another may be fitted at the rear of the vehicle viewing outward. However, some of the cameras are also viewing inwards from the front and recording passengers during the journey and as they enter and exit the vehicle.
- iv. This recorded footage may be of children, or vulnerable persons which may include inebriated female passengers who may be economically dressed. The cameras may be situated in such a position that captured footage would reveal more of the passengers than they would feel comfortable with.
- v. I believe that some drivers are fitting these systems to be used as internal vehicle CCTV, and that having their system of choice fitted will preclude them from having the council approved system fitted later. What the drivers are not aware of is that these systems are also recording audio which is specifically not allowed by ICO (Information Commissioners Office) unless it is attached to some form of "Panic button", which of course these systems do not support.
- vi. Although a driver can go into the settings manual and turn off the audio, in some systems it is reactivated when the camera is turned off and then back on again. Drivers also seem unaware that they should register the use of any such system with ICO to ensure compliance.
- vii. There is also a question on the security of any captured footage, which are generally held on removable and rewritable media such as a USB flashcard. This means that there are no control measures in place to stop footage being viewed by the driver and distributed on social media.
- viii. I would therefore suggest that the council make it as part of the policy that we do not allow dashcams to be fitted to any of our licensed vehicles. If drivers/proprietors wish to have a system that records the external journey, either front and/or rear, it should be incorporated into the council approved CCTV system as and when a system or systems have been approved as meeting the requirements.

## Hackney Carriage Vehicles

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Consultation Responses:		
Key points	Index	
	Section 5.9	
	Consultation Response 2019	Consultation Response 2020
<b>Concerns</b>		
<ul style="list-style-type: none"> <li>A driver wondered why there the necessity to have all Hackney carriages white and why do all Hackney Carriage vehicles have to be accessible when there is need to accommodate a very tiny fraction of the travelling public.</li> </ul>	<b>A</b>	
<ul style="list-style-type: none"> <li>All Hackney Carriages need to be wheelchair accessible is inappropriate when just a percentage would be more fitting.</li> </ul>	<b>A</b>	
<ul style="list-style-type: none"> <li>Cllr - 'In my village there are wheelchair users who much prefer travelling in the who much prefer travelling in the comfort of a saloon than stuck in the chair, and a Hackney carriage which never</li> </ul>	<b>C</b>	

plies for hire but uses its status only to be able to use London bus lanes. Why should these be penalised?'		
<b>Suggestions</b>		
<ul style="list-style-type: none"> <li>Cllr - It is appropriate that a PHV should be identifiable as such both by passengers and the public</li> </ul>	<b>B</b>	

## Transfer of ownership of vehicle

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Consultation Responses:		
Key points	Index	
	Section 5.9	
	Consultation Response 2019	Consultation Response 2020
<b>Suggestions</b>		
Expect there to be reasonable charge for a transfer and re-issue of a license	<b>A</b>	

## Enforcement

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Consultation Responses:		
Key points	Index	
	Section 6	
	Consultation Response 2019	Consultation Response 2020
<b>Support</b>		
<ul style="list-style-type: none"> <li>Penalty point system is good</li> </ul>	<b>K</b>	

<b>Concerns</b>		
• Several drivers thought that the Penalty Point system was unfair and the driver should have the opportunity to appeal them.	<b>JKLM</b>	
• One driver felt that there was no need for enforcement.	<b>A</b>	
• <i>Cllr - In general too diffuse and terribly repetitive</i> '.		
• There are a few drivers and residents asking for more enforcement work		<b>ABFH</b>
<b>Suggestions</b>		
• <i>Many comments asking for more enforcement</i>	<b>BCDE FHI</b>	
• We are proposing to Authority allow drivers fair chance of explanation if points are given maybe he has genuine reason that he may not need to be issued with points'.	<b>J</b>	
• A driver suggests that more enforcement work should be done at the train station and other hot spots		<b>J</b>
• <i>'Subside the cost of CCTV, less work for the enforcement team.'</i>		<b>L</b>

## Complaints

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<b>Consultation Responses:</b>		
<b>Key points</b>	<b>Index</b>	
	<b>Section 6</b>	
	<b>Consultation Response 2019</b>	<b>Consultation Response 2020</b>
<b>Suggestions</b>		
• 'It is Uber's view that one core aspect of the Council's role in promoting public safety is to provide a service to process complaints about licensed vehicles from members of the public, while operators process the vast majority of feedback from both drivers and customers'.	<b>Appendix B</b>	

## Relevance of Convictions

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<b>Consultation Responses:</b>		
<b>Key points</b>	<b>Index</b>	
	<b>Section</b>	

	7	
	Consultation Response 2019	Consultation Response 2020
<b>Support</b>		
• Agreement that current proposals produce a 'firm stance'	AB	
<b>Concerns</b>		
• Scrap the points system		D

## Summary

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- i. It was felt by the majority of respondents that South Cambridgeshire District Council had produced a decent consultation and endeavored to engage with the trade in an open and transparent manner.
- ii. Overall residents were happy with policy and pleased to see that public safety is top priority and that *'SCDC taking these necessary steps to ensure driver and public safety is up to speed locally and nationally.'*
- iii. Several respondents from all sections responded extremely positive to the environmental considerations proposed by this Council, but there were many concerns in relation to the timing of the introduction of ultra-low emission vehicles as it is felt that the infrastructure for this particular demographic will not be sustainable in the near future.
- iv. The consultation event days were extremely well received, and the trade expressed their appreciation at the opportunity to liaise with officers and members in such an open manner.
- v. Feedback from James Button, Solicitor, Founder Member of the Local Government Licensing Forum and President of the Institute of Licensing found the policy to be an 'impressive and well-considered piece of work' in general. The feedback and advice provided has been considered by officers and minor changes have been included in the policy as deemed necessary. Matters where a fundamental change is required will be discussed at the Licensing Committee Workshop event.

## APPENDIX E

[https://www.change.org/p/south-cambs-taxi-driver-taxi-drivers-reject-company-door-sign-mandatory-by-south-cambridge-district-council-e4acf3a8-5a1b-4a49-af31-8dfed16bf43e?response=8a84771bb9bf&utm\\_source=target&utm\\_medium=email&utm\\_campaign=one\\_hundred](https://www.change.org/p/south-cambs-taxi-driver-taxi-drivers-reject-company-door-sign-mandatory-by-south-cambridge-district-council-e4acf3a8-5a1b-4a49-af31-8dfed16bf43e?response=8a84771bb9bf&utm_source=target&utm_medium=email&utm_campaign=one_hundred)

# Taxi Drivers Reject Company Door Sign mandatory by South Cambridge District Council

Started April 2019  
149 signatures at present

Dear South Cambs Taxi Licensing team

We drivers like to point out that we are very happy with having yellow taxi crest on the car but we can't see why the council have to make compulsory company signs as it surely don't make any sense and the only purpose having a company sign is to advertise for the company.

Taxi Plate fitted back proves its a taxi

Yellow crest sign proofs it has to be pre-booked

A company sign it is an advertisement for the company

Now we drivers want taxis to be more secure and safe for public when they use us and putting burden on us displaying company sign does not mean that the passenger is safe, at many occasions at busy times passenger just jump in the taxi because it is displaying the company sign he or she booked with just they want to get to their destination and lie to drivers, now this driver has not picked legally his passenger and breaking the law without knowing he did it .

Did the South Cambridge council team have considered their driver's safety? Drivers in Cambridge work with more than one company and we think changing door signs between jobs on the Cambridge busy roads it's not safe for the drivers to come out on busy road and change company door sign for the next job he got from a different company.

We live in the technology era and all the booking system that is used by companies using clearly sends message to the customer when they book a taxi the information of the driver and his car by text, call or displayed on booking app.

So to establish it is a legal and safe taxi we strongly believe that the taxi plate and yellow sign are there to establish that.

Now putting us drivers safety in the risk for some greedy company has been pushing to make company door signs mandatory because they don't want their cars to work with other companies.

I think the council should make it Mandatory for companies to provide full information of the car and the driver to the customer which is very easy nowadays with new technology if the taxi company can't do that then they shouldn't be allowed to operate for passengers safety.

So we South Cambridge district taxi Drivers reject the mandatory of the company door sign

**change.org**

Recipient: South Cambs Taxi Driver, south cambridge district council, South

Letter: Greetings,

Taxi Drivers Reject Company Door Sign mandatory by South  
Cambridge District Council

## Signatures

Name	Location	Date
Jay Joy	UK	2019-04-14
Dariusz Kowalczyk	Bury Saint Edmunds, England, UK	2019-04-14
Sandor Szalai	Cambridge, England, UK	2019-04-14
Muhammad Mirza	London, UK	2019-04-14
Ionut Rincu	Peterborough, UK	2019-04-15
Deividas Vasinias	Glasgow, Scotland, UK	2019-04-15
ibrahim shadi	Cambridge, UK	2019-04-15
Wazadur Chowdhury	Cambridge, UK	2019-04-15
Chaudhry Amir	Cambridge, England, UK	2019-04-15
Mohammed Mirza	Birmingham, England, UK	2019-04-15
Tomas Janulis	Huntingdon, England, UK	2019-04-15
Petar Michev	Chiswick, UK	2019-04-15
Paul Sandu	Cambridge, England, UK	2019-04-15
ADRIAN TOMA	Cambridge, England, UK	2019-04-15
ventsoslav michev	Barking, England, UK	2019-04-15
Jakir Chowdhury	Cambridge, England, UK	2019-04-15
Dumitru-Gabriel Murgu	Romania	2019-04-15
Iulian Putinelu	Cambridge, UK	2019-04-15
Marian Iordache	Cambridge, England, UK	2019-04-15
Miz Chowdhury	Cambridge, UK	2019-04-15

Name	Location	Date
Alamin Choudhury	Luton, England, UK	2019-04-15
Nabil Madhat	Cambridge, England, UK	2019-04-15
Akram Ahmed	Luton, UK	2019-04-15
Teresa Wright	Devizes, England, UK	2019-04-15
AHMED ANSAR	Cambridge, UK	2019-04-15
Emil Verveshev	UK	2019-04-15
Ahmed Fisal	Hunstanton, England, UK	2019-04-15
Mihail Bozhkov	UK	2019-04-15
Botond Zilahi	Cambridge, England, UK	2019-04-15
Amer Adalat	Cambridge, England, UK	2019-04-15
Muhammad Shakeel	Winchester, England, UK	2019-04-15
Mohammed ashraf Uddin	Cambridge, England, UK	2019-04-16
Peter Chamberlain	London, UK	2019-04-16
Arif Mahmud	Cambridge, UK	2019-04-16
Mehbub Rehman	Batley, England, UK	2019-04-17
Eduard Popat	Wolverhampton, England, UK	2019-04-17
Karolina Piotrowska	Cambridge, UK	2019-04-17
Cristian Anton	Bedford, England, UK	2019-04-17
Krush Barot	Cambridge, UK	2019-04-17
mohammed omar sayed	Sidmouth, England, UK	2019-04-17
J D	Cambridge, UK	2019-04-17
Mindaugas Sabaliauskas	Cambridge, UK	2019-04-17

Name	Location	Date
Sunny Chowdhury	Newcastle Upon Tyne, UK	2019-04-17
Mohammed mizanur Rahman	Sawston, UK	2019-04-17
Magda Czerwińska	Cambridge, UK	2019-04-17
Imran Miah	Bedford, UK	2019-04-17
Syed Ahmod	Birmingham, England, UK	2019-04-17
James Uddin	Cambridge, England, UK	2019-04-18
Khaled Ahmed	CAMBRIDGE, England, UK	2019-04-18
J D	Cambridge, UK	2019-04-18
Md Karim	Camberwell, UK	2019-04-18
Hushem Samrra	Cambridge, UK	2019-04-19
Ali Hamed	Greenwich, England, UK	2019-04-19
Abdulla Ali	Dunfermline, Scotland, UK	2019-04-20
sumon chowdhury	Cambridge, UK	2019-04-20
Sherzad Heji	Huntingdon, England, UK	2019-04-21
Sadique Ahmed	Cambridge, UK	2019-04-22
SHAKIL Hoque	Norwich, UK	2019-04-22
Joao Carrega	Cambridge, England, UK	2019-04-22
Mohammad Ahmed	New Delhi, India	2019-04-22
abul Babul	Saint Ives, UK	2019-04-22
Muhammad Khan	Godalming, UK	2019-04-22
Omer Sadat	Stanmore, UK	2019-04-22

Name	Location	Date
Tahir Ahmad	New Malden, UK	2019-04-22
Wahida sultana	Newcastle Upon Tyne, UK	2019-04-22
Emdad Ali	Leicester, UK	2019-04-22
Muhibur Rahman	Newcastle Upon Tyne, UK	2019-04-23
Dawood Sultan	Birmingham, England, UK	2019-04-23
Ramunas Norkus	Cambridge, England, UK	2019-04-24
Santa Prilevskyte	Camberwell, UK	2019-04-24
Nasir Uddin	Cambridge, England, UK	2019-04-24
Anna Czerwińska	Wloclawek, Poland	2019-04-24
Ivo Lilov	London, England, UK	2019-04-26
Delwore Khan	Newcastle Upon Tyne, UK	2019-04-26
Kazi Jakaria	Barking, UK	2019-04-26
Sharmarke Amin	Newcastle Upon Tyne, UK	2019-04-29
Emil andrei Udrea	Huntingdon, England, UK	2019-05-06
Petre Croitoru	Cambridge, England, UK	2019-05-06
Amin Syed	Cambridge, UK	2019-05-06
Nikolay nikolov	London, UK	2019-05-06
Sunil Abraham	Cambridge, England, UK	2019-05-07
Petar Shabarkov	Peterborough, UK	2019-05-08
Konstantin Dimitrov	Oldham, UK	2019-05-08
Dalius Sirmelis	Camberwell, UK	2019-05-10
Sabaj Ali	Cambridge, England, UK	2019-05-12

<b>Name</b>	<b>Location</b>	<b>Date</b>
Oussama Zakkour	Cambridge, England, UK	2019-05-13
Yacine Zakkour	Cambridge, UK	2019-05-13
Djamel Smail	Newmarket, UK	2019-05-13
Brahim Lakri	Cambridge, England, UK	2019-05-14
Cinesh Mathew	UK	2019-05-17
Ramazan Akaslan	Cambridge, UK	2019-05-17
george ghita	Bedford, England, UK	2019-05-17
Mohammed Abdul-Ali	Marylebone, UK	2019-05-17
Manu Mathew	Cambridge, England, UK	2019-05-20
Waqas Sardar	Cambridge, UK	2019-05-20
Nawan Jirapanan	Cambridge, England, UK	2019-05-22
Stoyan Tilev	Longstanton, England, UK	2019-06-04
Maru Radu	Cambourne, England, UK	2019-06-05
Shabir Ahmad	Winchmore Hill, England, UK	2019-07-08
Inayat Ullah	Ilford, UK	2019-07-08
Niaz Sardar	Cambridge, UK	2019-07-26
Kiril Tonev	Cambridge, England, UK	2019-07-26
Muhammad Islam	Cambridge, UK	2019-07-26
Surjit Sidhu	Barking, England, UK	2019-07-26
Tuncay Cicek	Kahramanmaras, England, UK	2019-07-27
Mohammad Shawn	Walsall, UK	2019-07-27
Gulam Noor	Maidenhead, UK	2019-07-27

<b>Name</b>	<b>Location</b>	<b>Date</b>
Abul Kadir	Huntingdon, England, UK	2019-07-28
Nicolae Ionescu	Kew, UK	2019-07-28
Fakeuz Zaman	Walsall, UK	2019-07-29
Imran Ahmed	Bishops Stortford, England, UK	2019-07-29
Nadeem Hussain	Bedford, England, UK	2019-07-29
Viktor Bozhkov	Warlingham, UK	2019-07-29
Momin Chowdhury	Cambridge, UK	2019-07-29
Abdul subhan	Cambridge, UK	2019-07-29
Ankar Miah	Cambridge, UK	2019-07-29
Ruby Begum	Peterborough, UK	2019-07-29
Mohammed Ahmed	Sidmouth, England, UK	2019-07-29
Muhammad Khalil	Milton Keynes, UK	2019-07-29
Abdul Waris	Peterborough, UK	2019-07-29
Muhammad Saleem	Peterborough, UK	2019-07-29
Muhammad Rehman	London, UK	2019-07-29
RAJA JARRAL	Northampton, UK	2019-07-29
Niaz Ahmed	Cambridge, England, UK	2019-07-30
Muhammad Chowdhury	London, UK	2019-07-30
Mohammed Hussain	Sible Hedingham, UK	2019-07-30
Muhammad Baig	Coventry, UK	2019-07-30
Sumon Ahmed	Camberwell, UK	2019-07-30
Viorel Rujoiu	St Neots, England, UK	2019-07-30

<b>Name</b>	<b>Location</b>	<b>Date</b>
Azhar Waqas	Peterborough, UK	2019-07-30
Salah Ahmed	Bromley, UK	2019-07-31
Alinur Miah	Cambridge, UK	2019-07-31
Shiju George	Cambridge, England, UK	2019-07-31
Babur Bik	Cambourne, England, UK	2019-08-01
Alban Cera	Cambridge, England, UK	2019-08-01
Anil Kumar	Huntingdon, England, UK	2019-08-01
DAVID Varley	Newcastle Upon Tyne, UK	2019-08-01
Belal Ahmed	Cambridge, England, UK	2019-08-01
Abdul Jalil	Bedford, England, UK	2019-08-01
Andras Kelemen	Hardwick, England, UK	2019-08-01
ASHFAQUE SHAHIN	Cambridge, UK	2019-08-01
Gulam Hussain	Cambridge, England, UK	2019-08-01
Muzammal Butt	Cambridge, England, UK	2019-08-01
Monsur Ali	Barking, England, UK	2019-08-02
Modasir Ali	Cambridge, England, UK	2019-08-02
Asim Khan	Cambridge, UK	2019-08-03
syed samiullah Hussaini	Cambridge, England, UK	2019-08-04
Marcin Hanus	Bromsgrove, England, UK	2019-08-04
Zanna Jasinska	Haverhill, UK	2019-08-05
John Cundy	UK	2019-08-05

<b>Name</b>	<b>Location</b>	<b>Date</b>
Muhammad mukim Samasuddin	Cambridge, UK	2019-08-06
Neofit Zhelev	Soham, UK	2019-08-07
Reza Mohammadi	Newcastle Upon Tyne, UK	2019-08-08
Raihan Ali	Cambridge, England, UK	2019-08-09
Daniel Mladenov	Cambridge, UK	2019-08-10
Abdul Rahman	Camberwell, UK	2019-08-10
Asif Nazir	Cambridgeshire, England, UK	2019-08-13
Shamim Chowdhury	Brighouse, UK	2019-08-17
Mathivanan Subramaniam	Cambridge, England, UK	2019-08-18
Tariq Ali	London, UK	2019-08-19

## Comments

Name	Location	Date	Comment
Arif Mahmud	Cambridge, UK	2019-04-16	"I been working as private hair drive many years and once in while I left my door sing on and someone brake into my car and take all my changes and left me with over £300 of damages. Now with two door sing it is even more visible for theft.I been working many years never had any problem Coustomer and with all this Morden technology Coustomer knows what type of car coming and the driver name and they can even contact the driver by phone or text. I don't see any problem there.Thank you"
Omer Sadat	Stanmore, UK	2019-04-22	"I'm signing the petition because I don't want the signage on the car"
Amin Syed	Cambridge, UK	2019-05-06	"I'm not a slave to any system"
Nikolay nikolov	London, UK	2019-05-06	"Ok"
Nawan Jirapanan	Cambridge, England, UK	2019-05-22	"Safety."
Inayat Ullah	Ilford, England, UK	2019-07-08	"I am signing this petition Cz it will leave me on the mercy of one operator.It will also limit my work options. & effect my earnings ."
Gulam Noor	Maidenhead, UK	2019-07-27	"It's unacceptable"
abul Babul	Saint Ives, England, UK	2019-07-28	"It's really unfair with taxi drivers"
Sandor Szalai	Cambridge, England, UK	2019-07-29	"Good idea"
abul Babul	Saint Ives, England, UK	2019-07-29	"It's not acceptable"
Shamim Chowdhury	Brighouse, UK	2019-08-17	"I am not agree with the dissection."

Also sent to:  
Leader of the Council  
Head of Legal  
Head of Licensing  
Licensing Committee Chairman

South Cambridgeshire Executive Operators Group  
Unit 1, The Service Station  
Ely Road, Waterbeach  
Cambridgeshire  
CB25 9PG  
southcambsexecutiveoperators@gmail.com

Cllr. Douglas de Lacey  
Chairman of the Council  
South Cambridgeshire District Council  
Cambourne  
Cambridgeshire  
CB23 6EA

27 November 2019

Dear Councillor,

I am writing to you as the lead representative of The South Cambridgeshire Executive Operators Group. We are a trade group consisting of 20 private hire operators that work solely in executive chauffeur travel and currently utilise the plate exemption conditions.

We are asking you to reject the proposed new taxi policy before you on the 28<sup>th</sup> as, after taking legal advice we believe the consultation has not been carried out correctly and requires further discussion with the public and trade.

We have major life changing policy proposals being put forward for policy that were not in the consultation document such as:

1. The removal of dispensation for existing operators whose bases are up to 10 miles outside of the SCDC Border. This will serious effect employment and cause genuine hardship to experienced operators who were advised at the time that they should licence with South Cambridgeshire.
2. The introduction of a ban on forward facing dash cams. These safety devices are a recognised by the police and insurance companies alike and some insurance companies insist upon their use. There are some units that could possibly be excluded but we see no reason to ban non audio forward facing dash cams. This was not part of the consultation.
3. New policy is worded that drivers incurring more than one motoring offence will have their licence revoked. We support road safety and professionalism in driving but this stance is too severe and again was not in the initial consultation.
4. The safeguarding course (which we support) was described as a course or workshop, we now learn in the proposed policy that it is a test or exam rather than a training course.

In regard to the consultation process we feel there were a number of irregularities including:

1. A submission from the only national trade association (LPHCA) was not presented to the Licensing Committee as it was submitted but was cut and pasted into the electronic submissions and referenced as a driver.

2. We feel that it was inappropriate for the Licencing Enforcement Officer to be responding to their own consultation, any recommendations from the Officer should have been sought initially and included in the consultation.
3. The rights of privacy to the public have been ignored with the introduction of a blanket policy for CCTV. This goes against the guidance of the Information Commissioners Office and codes of practice. We submitted a significant number of objections from the public regarding this policy, there is clearly a much greater discussion needed regarding the different types of work that private hire vehicles do, particularly those performing business transfers and chauffeur work and the need for CCTV
5. The reasons presented to you for the increase in volume of applications for the plate exemptions was given as due to the wording of the 2018 policy. We believe it to be more likely that the 2018 regulations introduced compulsory signage. We can't find this statement in the consultation.

Please see attached a copy of our submission to the council in response to the consultation.

In light of the above we respectfully ask that you refer the policy back for further discussion to achieve workable solutions.

Yours sincerely

Steve Russell

South Cambridgeshire Executive Operators Group

**Taxi & Private Hire Vehicle Licensing Team**

South Cambridgeshire District Council  
South Cambridgeshire Hall  
Cambourne Business Park  
Cambourne  
Cambridge  
CB23 6EA

22 September 2019,

Dear Licensing Team

I am writing to you in response to your consultation on proposed changes to Taxi licencing on behalf of The South Cambridgeshire Executive Operators Group.

We are a newly formed group representing operators in the executive and chauffeur profession and our aim is to promote better communication and understanding between the licencing team and our members. Currently we represent 18 executive/chauffeur operators utilising over 150 licenced vehicles and drivers which places the group as a majority voice in this sector. We are affiliated to the LPCHA to assist with legal and procedural advice, the group is open to any operator that 1. Holds a SCDC operator's licence, 2. Operates a fleet of only plate exempt vehicles with no street hire, 3. Is a member of the LPHCA.

Our current members are:

Airport Lynx  
Blue Rose Cars  
Business Drive  
Cambridge Business Chauffeurs  
Cambridge Chauffeurs  
Cambridge Premier Chauffeurs  
Cambridge City Cars  
Cambridge Connections  
Carlton Executive Cars  
Executive Car Service  
Grafton Executive Cars  
Kenway Chauffeur Services  
Merlin Executive Cars  
Milton Executive Cars  
RJM Cars  
Silver Star Chauffeurs  
Voyager Executive Cars  
Windrush Executive

To begin with we would like to reassure the licensing team that the group is fully behind having sensible regulations of a high standard that are correctly and fairly enforced. We don't want to have rogue operators competing against us without being accountable to a standard that their passengers

should expect, public safety is an important issue and by working together to improve the standard of private hire in the area will only increase public confidence in the trade and increase our business in turn. There are many things in the new consultation which we wholeheartedly support such as more frequent safety checks on licenced vehicles, the drive towards lower emission vehicles and sensible safeguarding and awareness training, in reality our concerns are reasonably limited.

We found it difficult to form a full opinion on the consultation as the handbook that was referenced on many occasions is not yet available to view, as a result it is only the broad issues we can comment upon.

### **Signage & Livery.**

- It is our opinion that signage on Private Hire vehicles overall is unnecessary and only confuses the public when trying to identify a public hire vehicle such as a hackney carriage, it therefore increases the risk of criminal activity by impersonation. However the SCEOG is exclusively made up of operators who use vehicles that have been afforded an exemption from displaying this signage. What is new to us is the inclusion of an internal notice (previously these details were allowed to be given electronically). Most drivers are self-employed and often work for several operators, the internal notice contains the information of the operator as well as the vehicle so it can be misleading to passengers. It would not be practical to keep swapping multiple notices throughout the day, the potential for error is enormous and these notices could get lost or stolen.
- It is our opinion that this notice should be changed for plate exempt vehicles to a tamperproof disc similar to that used by Transport for London that would permanently be affixed to the windscreen. The notice would contain the licence number, vehicle details and the address of the licencing office, we believe it is important that the operator details are not given here as they are not permanent to the vehicle. It is really important that complaints are directed to the council, operators may try to hide the complaint and protect a driver from repercussions which is not in the interests of public safety. Situations where a passenger in a private hire vehicle does not know the operator are generally very rare and even rarer in an executive vehicle. In any event, the notice would contain the licence number, the proprietor of that vehicle is duty bound to keep records of the driver at the time and operators are bound to keep details of the journey so tracing a complaint would not be difficult.

### **CCTV.**

- We strongly oppose the introduction of compulsory CCTV in executive (exempt) vehicles and there are a number of reasons for this:
- Our passengers value privacy and this is why they hire a private car. Customers have reported that they would seek operators from other areas who do not have to have CCTV, this is the crux of the problem, it would be wholly unfair to impose a significant financial cost and negative customer experience on South Cambridgeshire Executive Operators when our competitors (that can and do operate in our area) are not burdened by these conditions. This should be a decision made at national level or given as a subsidised option for drivers & operators.
- Current licensing policy states that exempt vehicles are excluded from needing CCTV, this was after a similar consultation a few years ago where a few of our members put forward

the need for privacy rights and that the violent disputes do not occur in executive vehicles. We are not aware of any increase in complaints involving exempted vehicles over the last two years, in fact no member of the group can recall any complaint that would have benefitted from CCTV footage.

- As operators, drivers and vehicle owners we do not feel any benefit from mandatory CCTV and this is also the view of our passengers. There has been no consideration made for the passengers right to privacy in their privately hired vehicle, this is something our trade hold very dear, discretion, reliability and professionalism are at the very front of our passengers wishes. At our meeting earlier this month you kindly asked us to provide evidence from our customers, this has been collected by our members and forwarded to the LPHCA (for confidentiality), to date the LPHCA has only received objections in writing and more are expected.
- On the subject of CCTV itself there are a number of things also not very clear in the consultation:
  1. The data is controlled by licensing and can only be accessed by them, what steps would be taken to ensure the data is managed in a proper way and compliant to GDPR and other data protection regulations?
  2. What allowances would be made for temporary vehicles in the case of breakdowns and accidents?
  3. What allowances would be made for system breakdowns, how will it be monitored that the system is even working at all?
  4. It is understood that the system can be turned off when the vehicle is being used privately, what steps are being made to ensure that the driver cannot accidentally turn it off?

#### **Vehicle Ages & Emissions requirements.**

- We do not believe that excluding vehicles by age is necessary. If a vehicle is safe and fit for purpose then it should be allowed to be licenced, if the reasoning is for roadworthiness then there is already a compliance test in place to ascertain that.
- If the reason is for lower emissions then there is already a well-used and researched European standard for this. We would recommend that all vehicles should comply with Euro 6 emissions standards at first test and for renewals by a date to be determined to allow for owners that have entered into financial commitments on the strength of existing policy.
- If the reason is for safety or structural integrity then again a more efficient European standard is available in the form on NCAP ratings, we would recommend only 5 star be permitted.
- The two parameters above would make a much clearer and understandable policy.
- We also have concerns regarding ULEV & Ultra Low emission vehicles. While there is certainly a need to try to reduce carbon emissions, two things are clear Firstly there are not enough charging points in the South Cambridgeshire area to cope with the proposed rise in PH vehicles. Secondly some studies have shown that when taking into account the style of electric production in the UK and the production of the batteries that a modern blue efficiency diesel car could be less harmful to the environment overall.

## **Smaller Issues**

A few less concerning issues but for the sake of completeness to your request for comments are:

- New private hire drivers and operators licences are being restricted to one year as a blanket policy. The LPHCA has advised us that this is contrary to the requirements of the 2015 Deregulation Act. This seems unfair to new applicants that they be penalised for no reason other than they are starting out, we should be encouraging entry to the trade not discouraging.
- We believe clauses should be added to some regulations to allow the licensing officer discretion in exceptional circumstances, this could include vehicle accidents or family bereavements.
- The content of the competency test should be made available to operators and drivers so training can be given

## **Executive Private Hire Service.**

Finally we would like thank you for recognising that there is a strong market for executive private hire services (often referred to as chauffeur services), it is always the subject of much debate as to what defines that, some would believe it is only reserved for pop stars, royalty and ceo's!

We would like to offer in the future to consult with the licensing team to establish a clear understanding of the market and help shape the definition.

Yours Sincerely,

Steve Russell  
South Cambridgeshire Executive Operators Group



Also sent to:  
Leader of the Council  
Head of Legal  
Head of Licensing  
Licensing Committee Chairman

59 Beaufort Road  
Upper Cambourne  
Cambridge  
CB23 6FP

27 November 2019

Cllr Douglas de Lacey (Chairman Of Council)

I was very surprised after reading the proposed policy  
Ref: Report to Licence committee on 11 November 2019  
from the Council Subcommittee -Meeting regarding the Taxi/Private Hire consultation  
that a since end of Consultation (Late September) there has been some significant  
major changes to policy added.

I was on the understanding that the consultation period was a time for putting  
forward changes to the trade and by scdc licencing sub-committee, to give us as a  
trade to consultate on the new proposals.

Some of the new changes that removed/added have been added which could cause  
major financial impact on many small businesses.

1.For example since consultation ended to the 10 Mile rule has been completely  
removed for Scdc Operators who are based outside of Scdc area but within the  
current policy 10 mile rule regulation.  
Although this doesn't directly impact our business as im located inside south cambs I  
work along side and sub-contract to other Scdc operators it will. So therefore will in  
directly effect and impact me as a small business.

This will no doubt Cause other operators scdc great expense they haven't planned  
for as no prior warning has been given or any written notification has been sent prior  
to the new policy before full council.

I can see why you may want to add this on new applications, but to penalise your  
existing customers who have set up substantial businesses for something you  
allowed in the past with no prior warning seems rather unfair.

At the very least you should review this issue at the least give them some time into  
restructuring relocating their businesses plan accordingly.

This was advised on the recommendation of the Scdc enforcement officer of a 1  
year grace period for all new renewal that this affects at time of renewal  
This recommendation has been totally ignored by the licencing team/ committee

2.The introduction of drivers having their licence revoked once they have exceeding  
6 points (ie 7 or more) appears to be extremely harsh

Although I understand that the main focus is on safety and professionalism Due to previously being 9 points in current policy.  
This also wasn't in consultation.

3. When have had engagement during the consultation period and after with Scdc regarding our main issue of CCTV being fitted to all Private hire vehicles, including plate exempt vehicles.

We were also asked during our engagement with Scdc for written proof from our accounts/Clients (Which we submitted around 40 from separate businesses) stating that this is something that is not wanted due to very delicate and discrete conversations being held in the car.

This has been ignored completely and needs further discussion as there is a big risk for our sector of losing business.

4. The removal of forward and rear facing dash cams which are mainly been asked for our insurance companies in the new policy.

By the removal of these stand to have a financial impact from insurance companies in my opinion.

Also an financial impact for removal costs and cancellation fees from insurance companies and new set up fees.

5. Hackney carriage and Private Hire handbook that has been mentioned through the consultation period has not been available.

Just to finalise I feel it would be totally un reasonable to approve this policy at full council on 28<sup>th</sup> November 2019 until further consultation has been discussed on the issues stated above.

Small businesses clients and livelihoods are dependent on decisions on the outcome of your decision with full council.

I therefore hope you will consider these points and further discuss with the trade for a new consultation.

Yours Sincerely

Rob Chapman

## Business Drive

Newton Hall,  
Town Street,  
Newton,  
Cambridge.

CB22 7ZE

T:01223872597

E-mail:admin@business-drive.co.uk

27 November 2019

Cllr Douglas de Lacey (Chairman of Council)

Also sent to:  
Leader of the Council  
Head of Legal  
Head of Licensing  
Licensing Committee Chairman

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I therefore hope you will consider these points and further discuss with the trade for a new consultation.

Yours Sincerely, /

Peter Burrell

Letter sent to :

Chairman of Council

Leader of Council

Head of Legal

Head of Licensing and the Licensing Cttee Chairman.



South Cambridgeshire District Council  
Cambourne  
Cambridgeshire  
CB23 6EA

27 November 2019

Dear Councillor,

We are writing to you as the operator of Milton Executive Cars Ltd who have been a licenced Private Hire Operator in South Cambridgeshire District Council for 25 years who have serious concerns over the proposed new taxi policy that you will be presiding over on 28 November 2019, and the way the consultation process has been carried out.

Firstly, Milton Executive Cars Ltd are fully in support of more rigorous policy that protects passenger and driver safety and ensures that Operators are fit for purpose. However, there are several points in the consultation that we believe will have a serious impact on our business and its future, and that the proposed policy should go back for further consultation with both the public and the trade.

#### **1. The introduction of CCTV in vehicles, including Plate Exempt Private Hire Vehicles**

As a company who purely operate a Plate Exempt fleet, we predominantly carry corporates who are often maximising their time by having meetings in our vehicles. With many of these companies, we have to sign confidentiality agreements as often the conversations carried out in the car are commercially sensitive. The blanket introduction of CCTV will cause some of our largest clients to seek alternative service providers from outside South Cambridgeshire who are not subject to the same conditions. Numerous client's letters were provided in response to the consultation, supporting this statement and we are really dismayed that they have not been taken into account. This could have a significant impact on the viability of our business and the drivers who earn their living, receiving work from us.

Furthermore, if a client exercises their right to privacy, and asks not to have active CCTV during their journey, a driver is then in the unenviable position of having to break Data Protection laws or their Councils licencing conditions. This directly contravenes the guidance provided by the ICO.

#### **2. The introduction of a ban on forward facing dash cams**

The ban of dash cams did not form part of the original consultation and therefore both the public and the trade were not afforded the opportunity to provide their contribution to this policy.

Dash cams are often a mandatory precursor to many insurance policies and a recognised safety feature by the police. They have often contributed in insurance disputes.

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Cambridgeshire CB7 4BA  
Tel: 01223 525354  
email@ info:miltonexecutivecars.com  
[www.miltonexecutivecars.com](http://www.miltonexecutivecars.com)  
VAT Registration No. 127 3919 03  
Company No. 6630839 Registered in England

### 3. Motoring Offences Effecting Licence Renewals

The policy regarding motoring convictions effecting the granting or renewal of a licence did not form part of the original consultation, so once again, both the public and the trade were not afforded the opportunity to provide their contribution to this policy.

This policy has wide reaching implications for many drivers, and whilst as a Operator, we take public and road safety very seriously, we feel that this policy is excessive and further consultation over the sort of convictions and length of licence revocation should be consulted upon.

### 4. The introduction of a Safeguarding Test

Ensuring the safeguarding and welfare of children and adults at risk is paramount, and the introduction of a safeguarding test is something, as an Operator, we support. However, policy wording has now changed from a *course* to a *course and test*.

We feel a training course to ensure drivers and operators understand their commitments to ensuring safeguarding and welfare would be far more suitable, but as this did not form part of the consultation, we were not afforded the right to contribute to this important policy.

Policy states that you can take the test as many times as needed, but we have seen through the introduction of Competency testing, that waiting times can be long and when this forms a mandatory part of the licence, this could impact on drivers licence renewals being granted.

We hope you find these comments constructive and understand that we are only trying to contribute to strong policy is fit for purpose and that will stand the test of time.

Due to the points laid out above, we would respectfully ask that you refer the policy back for further discussion.

Yours sincerely

**Bob Fisher**

**Director**

**Claire Thompson**

**Director**

# Licensed Private Hire Car Association

56 Austins Mead, Bovingdon, Hemel Hempstead, Herts. HP3 0LH  
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E-mail: [office@lphca.co.uk](mailto:office@lphca.co.uk) Chairman Email: [steve@lphca.co.uk](mailto:steve@lphca.co.uk)  
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**Council Leader Bridget Smith**  
**South Cambridgeshire District Council**  
South Cambridgeshire Hall  
Cambourne Business Park  
Cambourne  
Cambridge CB23 6EA

Also sent to:  
*Chairman of Council*  
Head of Legal  
Head of Licensing  
Licensing Committee Chairman

27<sup>th</sup> November 2019

Dear Councillor Smith,

**Subject: Hackney Carriage & Private Hire Licensing Policy & Conditions Proposals (December 2019)**

I am writing to request South Cambridgeshire District Council ("SCDC") **rejects or otherwise does not approve or adopt** the proposed 'Hackney Carriage & Private Hire Licensing Policy & Conditions' on 28<sup>th</sup> November 2019.

The Licensed Private Hire Car Association ("LPHCA"), are national private hire trade representatives, who submit this request on behalf of, and in support of, affected members in the district. This includes the South Cambridgeshire Executive Operators Group ("SCEOG").

We, like them, have serious misgivings about SCDC's (a) *consultation process*, (b) *resultant report* and (c) *final proposals*. By way of example, attention is drawn to the following:

- (1) In respect of the consultation, **SCDC has failed to consult, in any way, on the blanket removal of private hire operator licences for businesses based outside the district.**
- (2) In respect of the report, **SCDC has failed to give due consideration to stakeholder consultation submissions, redacted aspects of those submissions and unduly relied upon SCDC Licensing Officer opinion.**
- (3) In respect of the proposals, **SCDC has failed to satisfy Information Commissioner Office (ICO) guidance and Surveillance Camera Commissioner (SCC) codes of practice on CCTV (and dashcam) requirements.**
- (4) **In general terms policy not proposed or covered in the consultation process would be introduced.**

Additional detail on our concerns, as expressed in our original consultation response, can be found in the attached letter dated 16<sup>th</sup> September 2019.

We are acutely mindful these complaints imply serious legal questions as to the *general fairness, impartiality, procedural propriety and reasonableness* of the proposals. It furthermore raises wider *accountability* concerns about the *transparency* of SCDC as a licensing authority.

In light of the above, I would welcome the opportunity to meet with SCDC officials to discuss how workable solutions may be achieved on these proposals.

Yours sincerely,

Steve Wright MBE LPHCA Chairman



# Licensed Private Hire Car Association

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Tel: 01442 833464 Chairman Mobile: 07956 329288  
E-mail: [office@lphca.co.uk](mailto:office@lphca.co.uk) Chairman Email: [steve@lphca.co.uk](mailto:steve@lphca.co.uk)  
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**Taxi & Private Hire Vehicle Licensing Team**

**DRAFT**

South Cambridgeshire District Council  
South Cambridgeshire Hall  
Cambourne Business Park  
Cambourne  
Cambridge CB23 6EA

16<sup>th</sup> September 2019

Dear Licensing Team,

## **South Cambridgeshire District Council (SCDC) - Taxi Policy Consultation**

Thank you for consulting on Taxi Policy with a wide-ranging consultation and for hosting a Taxi Policy Consultation Event, which I was delighted to attend and meet so many of you at.

I am responding to your consultation as Chair of the Licensed Private Hire Car Association (the LPHCA), a national Trade Association for Operators of Private Hire Vehicles and Taxi services, with over 250 operator members from Portsmouth to Glasgow.

### **Overview**

As previously advised I was contacted by executive private hire service providers (SCDC licensed operators) who had major concerns about some of the proposals in your consultation. I initially visited Cambridge on the basis of helping them and they subsequently formed The South Cambridgeshire Executive Operators Group (SCEOG).

This group is autonomous but has now affiliated to the LPHCA for guidance and support from myself and the Association. To that end, I have now visited Cambridge on numerous occasions and the SCEOG will be sending in their own considered submission, independently of the LPHCA's submission, which follows.

Our mandate has been to help them engage with you, to respond constructively to your consultation and to collectively work in harmony with you for the delivery of sensible regulations that ensure safety for drivers and the travelling public.

As previously advised I was afforded a great deal of courtesy and time at your Taxi Policy Consultation Event and managed to gain a lot from my visit with those involved from SCDC.

It was also helpful that we met with you following my request to meet you with SCEOG colleagues to discuss matters to enable your team to consider concerns and suggestions from the group and myself. Although the meeting had 3 different people to deal with at different times I feel it was beneficial to us, even though your colleague Jane Jackson (your Resource Team Leader) was unwell and therefore unable to attend.

Our response is as a national organisation extremely experienced in working with safety groups, operators, licensing authorities, alongside local and national government to deliver good regulations that work for all.

We will be forthright with our responses and constructively critical where we believe there are shortcomings, having said this, our responses are sent in the spirit of being helpful and collaborative.

Please consider the above Overview as part of our formal response to the actual consultation, which continues below.

## Consultation structure and process

South Cambridgeshire District Council (SCDC) has produced a decent consultation and endeavoured to engage with the trade in an open and transparent manner. The documentation is well indexed and easy to follow however there are some considerable problems therein, which for potential responders are confusing at best and quite perplexing if you are not very familiar with previous policy.

### Timing of the policy review

A key point to make at the outset is regarding the timing of the policy review and the potential policy introduction date. With government ministers considering National Standards, CCTV and consulting on replacing existing Department for Transport (DfT) Best Practice Guidance with Statutory Guidance, alongside your policy having been updated in 2018, it seems very odd to be proposing to introduce new policy in December 2019, especially as December is the busiest time for the industry and passenger trips.

### Reference to a handbook not yet finished

Your proposal document well-over 40 times refers to the Hackney Carriage and Private Hire Handbook for details, without actually saying what the handbook is or how or where it can be obtained. As many, including the LPHCA, are looking at the online documentation, this renders it impossible to form a considered opinion on many matters in the consultation proposals without sight of this handbook.

At your Taxi Policy Consultation Event, I sought a copy of the handbook, only to be advised it was not ready prior to the consultation, which of course renders swathes of the consultation impossible to comment on in a 'learned' manner.

I mentioned that I had been given a copy of policy dated 2017 and referred to my not seeing or being able to access the referenced Handbook. Jane Jackson your Resource Team Leader subsequently kindly sent me the most current policy document in a series of PDFs, dated 2018 and advised that 'This policy replaces all previous Handbooks'.

This of course, with the timing issues referenced previously, makes bringing in major new policy, completely inappropriate as the consultation is undermined without the handbook it refers to throughout.

Notwithstanding the aforementioned, I have read the existing (2018) policy, which appears to be fairly sound and this could be a basis to work from but the consultation process without the handbook it refers to, is with respect, flawed.

In light of this alone I do not believe SCDC has consulted effectively enough to bring in serious policy changes in December 2019, without further consultation and trade discussion.

### Proposed way forward

As mentioned in the overview we will be forthright with our responses as well as constructively critical and our response is sent in the spirit of being helpful and collaborative.

To this end, I have responded on the primary matters of concern, that I have identified from the proposals and feedback from the trade, alongside my own knowledge of what has worked well elsewhere. These are set out below and were forwarded then discussed as part of our meeting with SCDC on 4<sup>th</sup> September.

- Signage in/on Private Hire Vehicles
- CCTV
- Vehicle Ages
- Emission requirements
- Exemptions
- The Wider Consultation (Covered above)

### **Signage in/on Private Hire Vehicles (including branding)**

The LPHCA has a long-standing belief and much evidence that there should be very little signage on Private Hire Vehicles for proven safety reasoning, including the confusion of the travelling public. Furthermore, the fact that Private Hire Vehicles (PHVs) are just that - Privately Hired Vehicles, is often lost on many.

It is a fact that the more signage you put on a PHV, the more it looks like a taxi and the more the public are confused, especially in licensed areas where traditional London style taxis are not utilised and the same vehicle can be licensed for taxi or PHV usage.

For this reason, regulatory signage on PHVs should be discreet, and the number plate should be the primary thing that a passenger looks for, not a licensing plate, door stickers, branding or other identifiers.

As the London Private Hire Car Association, we worked very hard with the Public Carriage Office in London on appropriate signage on PHVs, prior to licensing in 1998. We spent 2 years with other trade bodies agreeing to 'hologrammed' screen discs front and back that contain all the licence details, which very importantly can be seen from the outside of the vehicle.

With government currently constructing a taxi and PHV database that will carry that information in real time there will be even less reliance on such a disc.

We know that horrendous sexual attacks, robberies and assaults have taken place when unsuspecting members of the public have been lured into danger by false signage on vehicles that are not-purpose built like London taxis.

#### **Branding**

After many years of success with the screen disc system in London the question of what branding as opposed to regulatory signage could be allowed on PHVs was asked. It was resolved that almost no company branding would be permitted other than on the rear of vehicles, to ensure that PHVs were not hailed and mistaken as publicly hireable taxis.

Rear windscreen signage that meets light and opacity regulations was agreed upon, alongside MOGO number plate type attachments and approved sign-written company branding (all rearward facing). This has worked very well and there is no evidence to suggest otherwise, most importantly PHVs are far less likely to be mistaken as being taxis and members of the public are not likely to be confused.

#### **Disc System and even greater safety**

The disc system has been in place for over 15 years now in London and we estimate that well over 1 million have been issued (at the vehicle licensing point).

In addition to the fact that new government vehicle database is coming online, Transport for London (TfL) have regulated that Private hire operators must provide a booking confirmation to a passenger before their journey starts.

The operator is expected to request passenger contact information and offer to provide a booking confirmation for all bookings.

All operators must (at a minimum) be able to provide a booking confirmation to passengers via email, text (SMS and MMS) message and phone (regardless of what booking channels the operator offers). The booking confirmation must contain, as a minimum:

- The vehicle registration mark
- The first name of the driver
- The driver's private hire licence number, as shown on the ID the driver is wearing
- Where the passenger can receive it, a photo of driver

Where the customer books in person or by landline phone, a photo must be provided if the customer requests confirmation through a communications channel that can provide an image, for example an email or smart phone.

All this negates the need for confusing and in some cases very dangerous signage on vehicles that we know can be copied and used to confuse unsuspecting members of the public. From the Chauffeur and Executive perspective many corporates do not wish to have the company their staff are travelling with identified for aesthetical and security reasons.

## **Prosecution for false signage and badges**

LPHCA research has revealed that in April this year (2019) a bogus cab driver used stickers to trick potential customers into thinking he was in a legitimate private hire vehicle. He also stuck no-smoking signs in the front windows of a dark-blue Vauxhall Zafira.

Fortunately, he was caught by council licensing officers and prosecuted by Southampton Magistrates' Court.

In 2017 'fake' South Cambridgeshire taxi drivers' badges were seized in an investigation which involved police in Buckinghamshire following the discovery of a fake taxi drivers badge purporting to be issued by you - South Cambridgeshire District Council. This prompted a police investigation into fraudulent taxi licences and a South Cambridgeshire vehicle plate was also seized.

False signage and badges have often been used to aid and abet criminal activity and with modern technology, police and enforcement teams can now check in real-time, as they do with road tax nowadays. With the DfT & DEFRA taxi & PHV database being constructed, which will identify the registered keeper, the licensing authority, date of licensing, etc., alongside the customers ability to check in real time with the company booked with, anything other than basic signage is unnecessary.

We know that the more you put on a PHV the more likelihood there is of illegal activity, including touting, bogus cabs and far worse. Some naively believe that putting 'pre-booked only' on doors helps but this does not help tourists or others who don't understand written English, it only serves to confuse. Council crests can be copied, as can branding and magnetic door signs, which can easily be removed by a criminal for potentially very sinister use.

## **Executive & Chauffeur Vehicles Signage**

The case for discreet signage on executive vehicles is even more compelling because such vehicles are not utilised for street hiring's. Typically, but not exclusively, Executive & Chauffeur Vehicles are utilised for corporate work or executive business that may have emanated by recommendation or website promotion.

Street bookings are a rarity for Executive & Chauffeur Vehicles and in some cases never happens. The more discerning customers that utilise such specialist services in nearly 100% of cases book such vehicles well in advance.

If SCDC adopted the successful London signage model it could also be utilised by the wider Private Hire Vehicles you licence that has been so effective in the capital. Executive & Chauffeur Vehicles in London and in general all PHVs have accepted the Screen Disc option alongside the new operator requirements as the norm and it works well because it is discreet.

With government constructing the new Private Hire and taxi vehicle database, not only will safety improve because passengers with smart devices will be able to check in real-time, alongside the police, licensing & compliance officers, who will also have access to all the required details too.

Our response to signage and branding is that 'less is more', so please seriously consider the London Screen Disc and branding model not only for Executive Vehicles but for all PHVs that you licence. The public will be less easily confused and much safer.

Internal signage in PHVs is also a bad idea, as it can be fraudulently copied and used to entice a passenger into a vehicle and a potentially dangerous situation. With 'self-destruct on removal' screen discs, the practice of issuing things like a licensing information card, that can easily be replicated, removed by passengers and I understand, in the main gets stored in the glove box anyway, is negated.

All the Executive drivers I have spoken to in SCDC have said that the plate exemption you currently utilise should not be radically changed unless a screen disc option comes into place.

Finally, I think it useful to point out that vehicles especially for executive use, nowadays for very good business and environmental reasons, work for multiple companies. It is therefore not a good idea to tie vehicles or drivers to companies, especially as this can compromise their self-employed status. Working for multiple companies, increases the earnings potential and has considerable environmental benefits as drivers that are available to multiple operators have reduced dead mileage.

**Executive & Chauffeur Vehicles Signage Position** – Improve what you already have for Chauffeur & Executive, consider screen discs and far less signage more widely on PHVs, so they are not confused as taxis.

## CCTV

The case for CCTV in Executive & Chauffeur Vehicles in particular and more widely in Private Hire Vehicles is controversial, unproven and subjective. Whilst there is slightly more of a case for publicly hired taxis as no independent record (unlike under PHV regulations) or tracking is assured, the Surveillance Camera Commissioner's response to the Department for Transport consultation on statutory guidance for taxi and private hire vehicles for licensing authorities makes significant points.

**I have put our comments in bold below the Surveillance Camera Commissioner consultation response and I have put the full link at the bottom of this section in italics.**



Surveillance Camera Commissioner consultation response to the Department for Transport consultation on statutory guidance for taxi and private hire vehicles licensing authorities.

*1. The Surveillance Camera Commissioner welcomes the opportunity to provide input into this consultation on statutory guidance for licensing authorities with regard to taxis. He has worked with the Department for Transport in development of the draft guidance that was issued for consultation.*

*2. The Commissioner recognises that it refers local authorities to the Surveillance Camera Code of Practice. The Protection of Freedoms Act 2012 (PoFA) s.33(5) sets out that they must pay due regard to the code. It is also encouraging that the guidance refers to a number of the tools the Commissioner has issued to help organisations comply with the 12 guiding principles in the code. As relevant authorities under PoFA, local authorities must be made aware that if they do not pay due regard to the code this is admissible as evidence in court. The Crown Prosecution Service revised their Disclosure Manual in December 2018 to reflect this.*

*3. That said blanket licencing may be disproportionate and should only be used where there is a strong justification as set out in paragraph 1.15 of the code:*

*When a relevant authority has licensing functions and considers the use of surveillance camera systems as part of the conditions attached to a licence or certificate, it must in particular have regard to guiding principle one in this code. Any proposed imposition of a blanket requirement to attach surveillance camera conditions as part of the conditions attached to a licence or certificate is likely to give rise to concerns about the proportionality of such an approach and will require an appropriately strong justification and must be kept under regular review.*

### **LPHCA COMMENT - In section 3.9 CCTV you state:**

**i. The installation of CCTV in licensed vehicles can be both a deterrent to would-be troublemakers and a source of evidence in the case of disputes between drivers and passengers, other incidents and accidents.**

**We question whether a lot of this is accurate and ask what evidence, especially for Chauffeur & Executive and basic pre-booked and often tracked PHVs do you have for SCDC?**

**Recent media footage has shown CCTV has not acted as a deterrent on busses, tube stations and main line railway, where murders and serious assaults have occurred. As PHVs are pre-booked we are not convinced that the cost of installation, maintenance and overheads a) are necessary, b) proportionate and can therefore be reasonably justified.**

**As well as this we would like to know if you conducted a formal regulatory impact assessment to cover costs to drivers, operators, SCDC and ultimately to the fare paying passengers.**

**In addition, what have you done to directly engage with businesses and passengers, who may well object?**

**At our recent meeting on 4<sup>th</sup> September we were asked by your goodselves to evidence how Chauffeur & Executive passengers would regard CCTV and we are now compiling the responses from Cambridgeshire businesses and expect to have them within 28 days of your request. Evidence gathered to date shows total resistance to CCTV being in place in a Private Hired Chauffeured or Executive Vehicle.**

ii. The key objects are:

- The protection of licensed drivers.
- The protection of the travelling public.
- To ensure that licensed drivers continue to be 'fit and proper' in line with licence conditions.
- To enable investigations to be fully supported with evidence in a secure and retrievable form.

**To understand the necessity for the protection of licensed drivers and the travelling public in SCDC are you able to provide statistical information on previous problems in PHVs please?**

**We have grave concerns regarding the bullet point that licensed drivers continue to be 'fit and proper' in line with licence conditions via CCTV surveillance as being reasonable and proportionate.**

iii. All Hackney Carriage and Private Hire vehicles must be fitted with an approved CCTV system no later than 30th November 2020.

**This seems to be a blanket policy and as stated above should only be used where there is a strong justification.**

4. *The Commissioner is aware of the blanket requirement for taxis in Rotherham to have CCTV installed. This was one of a number of measures implemented following the child abuse issues in the Town where taxis were used to transport a number of the victims. Here there was persuasive evidence to argue sufficient justification but the Commissioner would not expect widespread installation of CCTV in taxis without well evidenced justifications. The local authority's Senior Responsible Officer for compliance with PoFA and the code will be able to advise on justification requirements for CCTV.*

**In Rotherham, we understand there were major failings at Council Licensing & Enforcement level.**

5. *Furthermore, CCTV in taxis typically also records audio (as well as video). The recording of conversations is extremely intrusive and requires strong justification as set out in paragraph 3.3.2 of the code:*

*Any proposed deployment that includes audio recording in a public place is likely to require a strong justification of necessity to establish its proportionality. There is a strong presumption that a surveillance camera system must not be used to record conversations as this is highly intrusive and unlikely to be justified.*

**It is clear that customers do not want to be voice recorded**

6. *A key part in the process for justifying a surveillance camera system is consultation. The Commissioner would expect to see clear evidence of public consultation before any final decision about installation is made. This consultation should involve members of the public, taxi drivers, police and any relevant regulators.*

**Whilst you have clearly consulted via the proposal document, what direct level of engagement has been done with passengers and businesses by you on CCTV?**

7. *Local authorities must also have completed a data protection impact assessment prior to installation and have consulted their data protection officer and legal teams. There is a surveillance camera specific DPIA template on the Commissioner's website which was developed in conjunction with the Information Commissioner's Office.*

**Has this been done and if so is it available?**

8. *Where it is the case that taxi drivers use the vehicle for their own private use the Commissioner would expect there to be a facility to switch off recording. In addition, there must be clear policies and procedures in place regarding how the CCTV system is used and who can access the footage it records and where CCTV systems are IP enabled (connected to the internet) then they must be cyber secure.*

**Is this in place and applicable – the consultation does not appear to have covered this?**

9. *The Commissioner would recommend that installation of any system should include a full operational requirement which can be achieved by using the Commissioner's Buyers' Toolkit and/or Passport to Compliance documents. This will ensure that a system is installed that is fit for purpose and actually delivers footage that can be used in court if required. Whilst the Commissioner appreciates the austere times that local authorities are working in, he would not expect that substandard systems are installed to save money particularly if the justification of the system is passenger and driver safety.*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/798087/SCC-taxi-consultation-response-DfT.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/798087/SCC-taxi-consultation-response-DfT.pdf)

## Vehicle Ages and Emission Requirements

**LPHCA COMMENT - In section 3.6 Age of Vehicle you state:**

i. As an incentive for the uptake of zero and ultra-low vehicles within the Hackney Carriage and Private Hire Licensing Policy and to comply with the South Cambridgeshire District Council's recognition of the global climate and health emergency action plan to deliver a zero-carbon future for South Cambridgeshire, it is required that:-

- A new vehicle licence will not be granted in respect of a vehicle unless it is less than 4 years old.
- A vehicle licence will not be renewed for a petrol or diesel vehicle unless the vehicle is less than 7 years old.

ii. To incentivise investment in ULEV and Zero Emission Vehicles, this rule will be extended as follows

iii. A vehicle licence will not be renewed for an Ultra-low emissions vehicle unless the vehicle is less than 12 years old.

iv. A vehicle licence will not be renewed for a zero emissions vehicle unless the vehicle is less than 15 years old.

**This policy proposal, whilst well intended I do not believe will achieve the objectives you seek in i. above.**

**The regulatory impact will in my view be extremely disproportionate on different companies and different drivers in several ways for many reasons. The proposal presumes that 'age of', is better than 'condition of' and / or 'specification of' vehicles as the way forward.**

**I do not believe this will achieve the objectives you seek to achieve in i, as there are in my view many unforeseen consequences that a thorough regulatory impact assessment will highlight.**

### Age requirements

**Age is a flawed method of determining the suitability and condition of a vehicle, so we are surprised that this method is being utilised, especially as SCDC already has in place, as set out in section 3.10 Vehicle Testing the following:**

i. The vehicle must have an MOT certificate and a Certificate of Compliance that is no older than 1 month at the date of application for both new and renewal.

ii. The Certificate of Compliance will be issued for six months and a second test must be carried out 6 months minus 1 day from the last test.

**As a former qualified mechanical engineer and operator of thousands of vehicles I can assure SCDC that the above policy is the right way to determine fitness and suitability of a vehicle, not age. It is the condition of a vehicle, not the age of the vehicle that is important and your Certificate of Compliance (COC) system that you already have, is in our view the correct measure.**

**A well-maintained older vehicle will mechanically almost certainly be in far better shape than a poorly maintained newer vehicle. Your COC deals with this aspect fully, without needing tick-box 'age-based' criteria.**

**You will be aware that primary regulation already permits more frequent testing for older vehicles, which is a far better option than a blanket age policy that could refuse or fail a perfectly suitable vehicle.**

**Importantly, specialist vehicles as used by Chauffeurs and Executives, as well as accessible / special needs vehicles are far more expensive. Some will have been purchased for a lengthy lifetime of work, often at great cost, in some instances over a long 'pay-back' period for the operator or the driver.**

To enable owners of such vehicles to transition into their next vehicle they will need to repay outstanding payments and earn the money to do that, so they can move into the next generation of environmentally friendlier vehicles, which we will cover below.

SCDC is not alone in believing that integrating taxi and Private Hire licensing into its Air Quality Improvement strategy is prudent. There are however considerable issues in transitioning for both taxis and PHVs. If age limits are brought into the equation this is further complicated and we assert that Air Quality standards are a far more reliable basis for taxi and PHV than age limits.

#### Environmental considerations

Understandably Local Authorities are rightly looking at all possible ways to improve 'Air Quality' as soon as possible. The LPHCA has regularly been attending the Joint Air Quality Unit (JAQU) sessions with the Department for Transport and DEFRA.

As part of JAQU's strategy a national database is being created by government to help Local Authorities determine whether taxis and PHVs meet the particular emission standard for their vehicle type in Clean Air Zones (CAZs) in major cities in England & Wales.

To complicate matters, some cities are opting in and others opting out, furthermore the government has delayed the introduction of the database until at least July 2020.

The principle of improving Air Quality by Euro Standards and Fuel Type and the associated harmful particulates is sound and in London this has trumped determination by age.

Manchester like SCDC, also sought to tie in standards policy with air quality requirements but has now postponed doing so and the following statement was issued by John Garforth, JP, MIOL Chair – GM Licensing Network.

*In 2018, Greater Manchester's 10 local authorities agreed to collectively develop, finalise and implement a common set of minimum standards for Taxi and Private Hire services licensed in Greater Manchester. The proposed standards have four areas of focus: driver standards, vehicles standards, operator standards and local authority standards.*

*Greater Manchester Leaders have consistently stated that these standards must align with the Greater Manchester Clean Air Plan proposals and support the requirements to tackle air pollution across the region. The 10 local authorities are awaiting feedback from government on some elements of those proposals, most notably the funding available to support vehicle upgrades – including taxis and private hire vehicles (PHVs).*

*With this uncertainty, and the lack of clarity around the Government's intention to legislate for national minimum licensing standards for taxis and PHVs in the future, there will be no consultation on the proposed Greater Manchester common minimum standards this autumn, however we will continue to engage with the trade on the development of both Clean Air Plan and common minimum standards.*

What is clear is that many regional and Local Authorities are determining their standards for taxi & Private Hire via Euro Standards and Fuel Type and not by age. This in our view is not only sensible but Best Practice.

With National Standards now being discussed by Ministers and cited as a priority Post-Brexit at DfT meetings I have recently attended and with Low Emissions Standards coming into place, it would seem sensible to make taxi & PHV licensing policy going forward based on defined standards rather than criteria like age of vehicles.

The taxi and PHV industries will need to transition into more environmentally friendly vehicles in a cost-effective and achievable manner, especially for specialist vehicles as used by Chauffeurs and Executives, as well as accessible / special needs vehicles, which as previously mentioned are far more expensive.

Infrastructure, vehicle availability, scrappage schemes and grant money, all needs to be determined to enable a smooth transition and the avoidance of supply shortages.

In summary, it is not in our view timely to introduce age limits or be too prescriptive with new regulations at local level until government has determined new national standards, which we believe in most cases should be 'absolute' and not minimum.

#### Exemptions

I have been privileged to work with safety groups, trade bodies, politicians, ministers and government officials at local and national levels on taxi & PHV licensing. I have also been fortunate to work with the

Law Commission on its wide-ranging review of taxi & private hire, as well as being on the government's recent task and finish group.

Along the way, I have learnt that all good regulations are considered thoroughly, but most importantly have within them the ability to empower regulators to make exemptions and have flexibility for officials to have discretion to make alternative arrangements where sensible.

I wish to thank SCDC for the courtesy, consideration and assistance shown in this consultation exercise.

Yours sincerely,

**Steve Wright MBE LPHCA Chairman**

