

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.

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