

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"> • 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. <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"> • The protection of the public; • The establishment of professional and respected hackney carriage and private hire trades; • Access to an efficient and effective public transport service; and • The protection of the environment <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"> • 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 <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"> 1. Holds a SCDC operator's licence, 2. Operates a fleet of only plate exempt vehicles with no street hire,

	<p>3. Is a member of the LPHCA.</p> <p>Our current members are:</p> <ul style="list-style-type: none"> 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>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>
R. Drivers	<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"> • Vehicle Ages • Emission requirements • Exemptions • The Wider Consultation (Covered above)
<h2 style="margin: 0;">2. Environmental Issues</h2>	
<p>A. Resident</p>	<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>
<p>B. Driver</p>	<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>
<p>C. Operator</p>	<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 https://www.independent.co.uk/life-style/electric-car-volkswagen-e-golf-london-cornwall-drive-a9056226.html</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 & 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 transaction from petrol,/diesel car with a viabil 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 & 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 & 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>
3.1 DBS	
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>
3.2 Safeguarding	
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: https://www.uber.com/en-GB/drive/resources/safeguarding-tips/ 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: https://www.uber.com/en-GB/drive/resources/modern-day-slavery/ 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>
3.3 Competency Test	
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.
4. Operator	
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"> ● Vehicle make/model ● Vehicle registration mark (VRM) ● Driver's name ● A way to contact the driver allocated to the booking <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: t.uber.com/uksupport We have a number of policies covering many and various issues, these can be found here https://www.uber.com/en-GB/legal/policies/feedback-policy/en/</p> <p>Asides from our feedback policy, other specific policies include:</p> <ul style="list-style-type: none"> ● Refund policy ● Zero tolerance policy <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.
5. Vehicles	
5.1 Age of Vehicle	
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"> <i>• A new vehicle licence will not be granted in respect of a vehicle unless it is less than 4 years old.</i>

	<ul style="list-style-type: none"> • <i>A vehicle licence will not be renewed for a petrol or diesel vehicle unless the vehicle is less than 7 years old.</i> <i>ii. To incentivise investment in ULEV and Zero Emission Vehicles, this rule will be extended as follows</i> <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> <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>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>
F. Driver	<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"> • 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. • Proposed upper age limit to 7 years for petrol/diesels is disastrous for many reasons: • 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. • 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. • 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. • 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 • 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.

	<ul style="list-style-type: none"> • WAV service will be wiped out within a year or two under these age rules – this is not scaremongering. • 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. • 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. • 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. • 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"> • <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> • <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> • <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> • <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> • <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> • <i>City council are currently reviewing their own plan & 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> • <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> <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>
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5.2 Wheelchair Accessible Vehicles

<p>A. Operator</p>	<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>
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5.3 Private Hire Plate Exemption

<p>A. Operator</p>	<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 his 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>
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	<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>
5.4 MOT/ Certificate of Compliance (COC)	
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>

5.5 Safety Equipment

A. Operator

Safety Equipment.

ii. Fire Extinguisher:

Need to specify what counts as 'efficient' otherwise there will be confusion among drivers and testers.

Follow city council with minimum 1KG ?

5.6 Door Signage/ Licence Plate

A. Drivers

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 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 & 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.</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 & 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 & Private Hire Vehicles:</p> <p>3.5.1iii & 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>
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5.7 Internal Vehicle Notice

<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: https://accessibility.uber.com/ . 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>
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	<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
5.8 CCTV	
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 & 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"> 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?
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. 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.</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 & 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>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/798087/SCC-taxi-consultation-response-DfT.pdf</p>
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5.9 Hackney Carriage Vehicles

<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>
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	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?
5.10 Transfer of Ownership of Vehicle	
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 .
6. Enforcement	
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 & 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.

7. Relevance of Convictions

A. Driver	Agree with current proposals.
B. Resident	A firm stance is necessary.
C. Cllr	In general too diffuse and terribly repetitive.

8. Any other Comments

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 prevent 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 Samsung 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 & 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.</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>