

Lewes District Council Licensing Consultation September 2018

Response from Uber

Overview

Thank you for providing us with the opportunity to respond to the Council's consultation on proposed changes to the Private Hire and Hackney Carriage policy and conditions.

Uber welcomes the opportunity to contribute to Lewes District Council's consultation on Private Hire Vehicles and Hackney Carriages. We believe that local licensing requirements should be regularly reviewed, so are happy to be involved in the current consultation.

Please find our response below—if you would like to discuss any of the points further please don't hesitate to contact me.

The four objectives

We strongly agree with the four proposed objectives, namely:

- To ensure the safety and welfare of the public
- To encourage environmental sustainability
- To ensure an efficient and effective Hackney Carriage and Private Hire provision in the district
- To monitor and improve standards of services in the trade

On maximum ages of newly-licensed vehicles

Uber is keen to support vehicle licensing policies that centre on reducing vehicle emissions and maintaining safety standards.

In order to future-proof policy and process, we would suggest standardising age requirements for vehicles at a level that is reasonable but which ensures that (for example) cars older than eight years are not able to be licensed for private hire, or vehicles must meet certain emission standards.

On lowering the requirement for the vehicles to 1000cc to improve air quality

Following on from the previous point re age of vehicles, we would again focus on emissions standards, particularly as enforcing requirements based on engine capacity does not allow councils the ability to license electric vehicles. For example, Birmingham City Council do not license EVs as they have a requirement not to license any car with an ICE smaller than 1600 cc.

On mandatory CCTV

As there is not enough evidence to date to warrant mandatory CCTV in all taxis, Uber is open-minded about its widespread adoption. However we are open to supporting further inquiries into the use of CCTV in taxis, including sharing anonymised, aggregated data to trusted third parties to run analyses on the impact on public safety that CCTV may provide over other options.

Arguments against CCTV to date often centre around the cost to driver—it can significantly increase the cost of a private hire vehicle licence by up to £550 for existing (and aspiring) private hire drivers. This requirement is beyond the norm seen elsewhere in the majority of other cities, and the significant cost impact could potentially act as an incentive for potential applicants to apply for a licence elsewhere.

The DfT Best Practice Guidance is clear that a balance must be struck between the potential for CCTV systems to detect or prevent crime versus other less expensive systems that offer similar safety features. It also advises that expensive requirements such as CCTV are considered carefully; “Local licensing authorities will...want to be sure that... the cost of a requirement in terms of its effect on the availability of transport to the public is at least matched by the benefit to the public, for example through increased safety.”

Rather than mandating CCTV installation, we recommend Lewes District Council consider an optional CCTV policy for private hire, an approach taken by many other Councils. This is consistent with the recent ICO code of practice, and also with the DfT guidance which states “Local licensing authorities may not want to insist on such measures [as CCTV], on the grounds that they are best left to the judgement of the owners and drivers themselves.” This approach would allow drivers that value the perceived added protection from CCTV to pay for it, and those that benefit from other innovative technology and safety features to not incur the cost. Councils following this approach often have agreed installation guidelines to ensure that minimum standards are met.

On approved vehicle specification lists

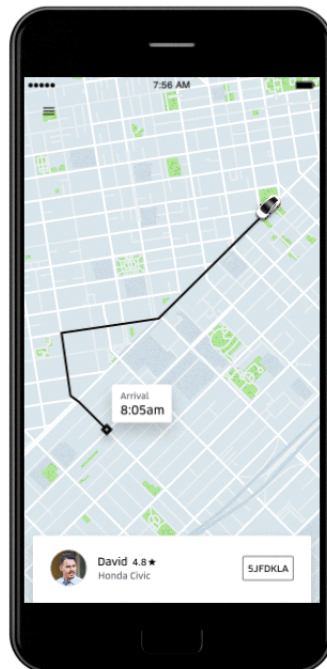
We believe that drivers would find a list such as this to be very useful.

On adopting door signs across PHVs and Hackney Carriages

Uber’s view is that it is possible for passengers to be able to identify PHVs 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.

Providing information to passengers

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. 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.



It is worth noting that following Northern Ireland's Department of Infrastructure recent 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.

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.

Uber recommends that the following information be mandatory for an operator to provide upon a pre-booked journey;

- Vehicle make/model
- Vehicle registration mark (VRM)
- Driver's name
- A way to contact the driver allocated to the booking

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. TfL's more discreet signage requirements appear to correlate with a reduction of plying-for-hire cases.

Liaising with enforcement

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. 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.

Conclusion

Uber is very happy to share learnings from its experiences elsewhere in support of policy updates. We would love to continue building a positive relationship with your team, prioritising public safety while maximising the efficiency of cars on the road for long-term gains in future mobility.

I thank you for your consideration of this submission. We would be more than happy to discuss in further detail if that would be of benefit.

Best wishes,

Eugenie Teasley
Head of Cities | South & East of England
eugenie@uber.com
07931 932251