

## Written Submission 1

### Email

**From:** Call a Cab  
**Sent:** 01 February 2021 15:54  
**To:**  
**Subject:** Taxi proposals

Please see below exact copy of email that I sent to Bob/Sussex Cars. As I say I've not had a single driver convey any negative comments about the proposed CCTV. Please would you also mind letting your superiors know that we do not concur with the time of the emails from 720 Taxis. XX raises some valid points/questions but his tone is one that I wish to distance myself from.

Having now read through the entire document that we/xx been looking at, have to say that there nothing in there that's really as alarming as xx/720 portrays there to be.

My thoughts/suggestions.

- 1 - CCTV is costing circa £500.00. This includes VAT of £83.00, net cost is £416.00 (my figures all approx).
- 2 - Steve Chambers does fit Council approved CCTV for circa £460.00. We need to ascertain if the CCTV at £500.00 is the same type as Chambers supplied but the council have leveraged to earn monies etc.
- 3 - Assuming Council approves all the proposals by March that leaves 18 months till CCTV fitted. All vehicles have to have had it fitted by Oct 2022. £418 divided by 18 months is £23.00 a month or 12 months is £34.00 per month.
- 4 - CCTV has huge benefits for all the reasons stated, especially for school run drivers. I note that Exec vehicles with livery exemptions are also exempt from CCTV. My own view would be though that if a exempt driver does apply that to the CCTV and opts out he also they not permitted on school runs etc. I would imagine once ESCC know it's part of the drivers licence they will in turn make it policy that all school run vehicles are fitted with CCTV.
- 5 - I would at 746 offer the drivers a payment plan whereby we collect the monies on their behalf each month/deduct from account work etc on basis that 746 buys the CCTV at £416 (we can claim VAT back) - I will need to clarify with our accountant but I see it is a investment in our business etc and 746 is not profiteering from the purchase etc.
- 6 - With the penalty points system. Most of this is already in practice in reality.. drivers/operators currently just don't get points. One aspect that needs clarification is where the Operator is pointed. Operators should not be pointed for example if a driver fails to inform Council of change of address. The other aspects where operators get pointed, specifically with regards to drivers not renewing insurances/VST as you know the Auriga/Cordic software systems are programmed to stop them working before they are in violation.

Those are my thoughts and xx mentioned that we had to send responses/feedback by the 4th February.

That's my view. The proposals to me are going to make the drivers act/add a degree of more professionalism to their business, which can be only positive.

Wait to hear what your views are and catch up with xx either Monday afternoon or Tuesday.  
Kind Regards

Call-a-Cab Ltd

## Written Submission 2

### Email

**From:** Name redacted

**Sent:** 08 February 2021 11:30

**To:**

**Subject**

Hi

I wish to say I do not agree that we should have permanent doors signs, when I am not working I do not wish to have door signs on my car in my social time and family time, I always display my door and council signs when I'm working.

Regards

**Written Submission 3**

**From:** Name Redacted  
**Sent:** 16 February 2021 15:11  
**To:**  
**Subject:**

Dear Sir/Madam,

In response to proposed changes in licensing the Taxi and private hire trade. This is going cost me the driver considerably more to keep my car on the road licenced for no apparent reason! Bringing these measures into place for 'Balance of probability' over possible incidents that occurred in other countys is frankly unjustified. We can not be measured in the same way. Entirely new measures for us are not an answer simply because other communities in the uk are having issues! Not here, where is the evidence for these issues!? it's not broken here, so no great change is required! The only people who will suffer here are the workers again on top of an already failing trade due to the coronavirus and soon to be double dip recession possibly into depression!

In regard to proposed CCTV, When have you seen CCTV used to protect a customer!? it's always the person working who requires it in court cases, they are the person whom it protects so therefore must be the proprietors choice.

With regard to a points system. James Button in his book Taxis, licensing law and practice states that it is "difficult to understand how the punishment of a driver by means of suspension actually protects the public" Subsequently "points systems" that punish a driver for misdemeanours do not protect the public. If a driver is a significant threat to public safety then revocation is the correct course of action i.e. been convicted of an offence involving dishonesty, indecency or violence.

Permanent door signs could be in conflict with other work undertaken, much more sensible to remove when required as it stands.

The points system is a punishment tool for the majority of drivers that are in fact good at their job and service the public well, it is therefore an unfair proposal to the detriment of the worker!

Kind  
Regards

Private Hire.

## Written Submission 4

### E Mail

**From:** Name redacted  
**Sent:** 21 January 2021 10:19  
**To:**  
**Subject:** Proposed new rules for EBC / LDC private hire / Taxi

Dear Harry

Hope you're well..?

I am emailing you about SOME of the proposed changes in our local "Taxi / PH" rules..

My name is xx, I have been a Eastbourne BC private hire driver for 17 years, I love the job and very proud of my job.

But after reading Eastbourne Herald online I was 'somewhat annoyed by licencing'

First why on earth 'licencing team' want to discuss these changes in the year we've had is absurd and beyond belief... Most of us have struggled to make ends meet.

We've had (like most people) had toughest times ever due to the pandemic, I can understand the introduction of 'English Test' as I cant understand some drivers, I can understand CCTV but I cant afford it as I'm a owner driver, (most drivers own their cabs) I personally think if licencing want it, it should be part of condition when a 'driver changes his or hers' vehicle that you have to have cctv fitted. I'm not against CCTV as I am squeaky clean

My other bug bear is why council want us to have 'permanent door signs'..?

Now I use my car for 'Personal Use' as well (I also use public transport too) when I have finished work or going on holiday I don't want big signs stuck on my car saying I'm "private hire or Taxi" yes plate i can understand permanent fixed but not door signs. I am a member of a national taxi private hire group on social media i hear so many times drivers have their cars broken into that are permanent liveried up..

It should be down too him / her wether they want permanent DOOR SIGNAGE, as council (licensing officer) or police officer (which have power to remove permanent signage) does remove 'permanent SIGNAGE' more likely to take paint with it.

This becomes even more evident when you include the licensing of so called Executive Vehicles, which have no external markings or identification let alone any internal references to it being licensed at all.

Executive Drivers have no more a thorough check by the Disclosure and Barring service than any other licenced

driver, so according to EBC, It would be absolutely fine to call for a car to pick you up and to be taken from A to

B in a vehicle that has no licence plate, no door signs or internal identification. This goes against all that you

are trying to implement. Many of these types of vehicle work for App Based Companies and are freely and legally working both within the EBC area and elsewhere (due to the clauses on cross border licensing

regulation in law) with no identifying marks that connect them to their licensing authority. This, in itself, must go against the DoT's Standards Guidance for the safeguarding of children and the vulnerable. (Which is what

this entire exercise refers). And also Page 7 3.2 of the Statutory Taxi and Private Hire Standards Guidance.

Which states reference to all vehicles.

I also not happy about having to do 'vulnerable persons' course (at my expense) when most off its common sense, I also do a similar sort of course every 5 years to keep my Public Carriage Vehicle licence going (part off CPC)

Last agenda (not it effects me) why licencing keeps bringing up all new Hackney Carriage (Taxis) upon replacing their vehicles need to be wheelchair accessible..? The cost is huge to drivers and most people (especially more say mature folk) don't like getting in wheelchair vehicles...

Best Wishes

## Written Submission 5

### E Mail

**From:** Name Redacted  
**Sent:** 05 February 2021 12:35  
**To:**  
**Subject:** CCTV and 10 year age limit

Hi Murrae

With regard to new consultation.

1) what type of CCTV is the council looking at ? Will the recording need to be 360° ? Our customers do not always have the ability to contract due to mental / physical disabilities or age. Will this have an effect on the need or could we be granted a special exemption? Will the CCTV be able to be turned off when the driver is using the vehicle privately ?  
I presume the council will be the data controller so will they be the only ones able to access footage. Would an insurance company be able to ask for access, for example following an accident ?

2) regarding 10 year upper age limit. Will this be done on a case by case basis as our vehicles are starting to approach this milestone. They are doing limited mileage (25k a year on average) and are kept in good working order ! Would it not be easier to set a limit on mileage ?

3) I think I read that you expect all licenses to be applied for a minimum of 14 days prior to renewal date. I currently have my Mot's done a week to 10 days before expiry, allowing me time to sort any issues. This would no longer be possible as I would be past the 14 day cut off ? Please advise ?

Kind Regards  
Director  
WTS

WTS and Wheelchair Transport Specialists are trading names of Mobility Plus Transport Limited. Mobility Plus Transport Limited is registered in England and Wales. Registration Number 8937062. Registered address, 47a Prideaux Road, Eastbourne, BN21 2NB. VAT Registration Number 251952305.

**Written Submission 6****Email****From:** Name Redacted**Sent:** 08 February 2021 12:23**To: Cc:****Subject:** Eastbourne Taxi consultation 2021 closes 26 March 2021

Dear Ed,

Thank you for inviting me to the Taxi forum last week which I found very interesting. The access group are very keen (as I explained at the meeting to Jo Dunk) to hear from the Trade about any common concerns in respect of ESCC phase 2/3 closures of the town centre roads and the impact upon drop off for disabled people and carers in Terminus Road, Langney Road and Bolton Road. We are very concerned about the restrictions and loss of access to the town centre for older people, people with visual/sensory and cognitive impairments such as dementia and their families/carers who rely upon wheelchair accessible vehicles, or private hire taxis to be able to alight near to the shops and the Beacon centre.

**In respect of the current Taxi consultation I need to raise the following with you in addition to our further response by 26 March deadline:**

1. There is a question in the consultation survey about making disability awareness training mandatory, together with safeguarding training. I can see this is reflected in the proposed revised policy. Our concern is that this disability awareness training was agreed previously and is crucial to compliance with the Equality Act 2010 and licence conditions for operators/drivers. It should not be discretionary.
2. The new proposed policy does not seek to change the current unmet need situation as only newly licensed Hackneys will need to be WAVS, no change is required for renewals or changing vehicles. As we have discussed previously this will not increase the availability of WAVS for wheelchair users who struggle to book any service at all. The attached updated WAV list still contains few contact details. As you are aware it is also vital that there is a greater choice of rear and side loading WAVS available to hire on the ranks and in advance. This continues to be a deficit locally.
3. I note from the proposed amendments in the attached draft that the sections on enforcement relating to overcharging, failure to carry a



wheelchair and failure to carry an assistance dog without an exemption are crossed out? I can see you have strengthened the sections relating to medical exemptions elsewhere in the draft which is welcomed. I also see the requirements outlined in relation to the Equality Act 2010 sections 165/166 onwards. Also the conditions of licence in respect of wheelchair users later in the document. However, could you please confirm that the enforcement will not be weakened in respect of these current policy sections in order to ensure compliance with the Equality Act 2010 as regards legal enforcement action?

4. The complaints against drivers outlined in red in the proposed revised policy should include discriminatory behaviour or harassment towards customers.
5. We welcome the provisos about medical exemptions which under the proposed revised policy will not last longer than 12 months. Also if an exemption not to carry a wheelchair is refused then the WAV must still continue to be used as a WAV and the licence might be suspended until the driver is declared fit. How will this be monitored and enforced? It is still the case that wheelchair users are told that WAVS are not available even for manual wheelchairs when they try to book in advance. Also I note the revised clause about WAVS having working order equipment to carry wheelchairs, otherwise licences will be suspended. How will this be monitored and enforced?

I have attached the national guidance you are initiating the consultation on dated July 2020 for information for colleagues copied in here. I have reviewed this and thank you for your confirmation as you quite rightly explained there are not specific updates in respect of equality.

For your information the spelling error 'read' rather than 'rear' loaders as crept back into the draft policy! Also I think where it reads 'EDC' this should be 'EBC'?

Thank you for your consideration of the above.

I look forward to hearing from you.

Kind regards, Name Redacted, co-chair, Eastbourne access group

## Written Submission 7

### Representation: Eastbourne Taxi and Private Hire Licensing Guidance Consultation 2021

Department of Transport (DoT) entitled “Statutory Taxi & Private Hire Vehicle Standards” July 2020.

I welcome the report by the Department of Transport (DoT) entitled “Statutory Taxi & Private Hire Vehicle Standards” July 2020 available via the link below:

<https://www.lewes-eastbourne.gov.uk/resources/assets/inline/full/0/295826.pdf>

Section 2.7 of the report states that “Having regard to these standards requires public authorities, in formulating a policy, to give considerations the weight which is **proportionate** in the circumstances”.

It is clear in section 2.9 that “The Statutory Taxi and Private Hire Vehicle Standards does not purport to give a definitive statement of the law and any decisions made by a licensing authority remain a matter for that authority”

Therefore, committee must have regard to the guidance document whilst considering the **local circumstances** and sanctioning a **proportionate** response in formulating local policy as intended by Parliament and in light of **evidence-based** practice.

The DoT report rightly seeks to address the non-repetition of the heinous acts undertaken by individuals in Rotherham and the scandalous dereliction of duty of the authorities in relation to this. The BBC have provided a valuable synopsis via the link below:

<https://www.bbc.co.uk/news/uk-28942986>

Professor Jays “report said the *collective failures* of political and officer leadership were *blatant* over the first 12 years covered by the inquiry. Senior managers within social care were said to have *underplayed* the scale and seriousness of the problem. Police were said to have given CSE no priority, regarding many child victims *with contempt* and failing to act on their abuse as a crime”

### **Eastbourne Borough Council: Draft Taxi and Private Hire Policy**

For the most part I welcome the amendments made by Eastbourne Borough Councils Licensing team in light of the DoT report.

However, I feel that the licensing team could have had dialogue with the trade prior to launching the public consultation. This should have been undertaken; as a matter of courtesy and as directed by *Local Government Association best practice*, to find commonality and highlight points of contention in order to facilitate the public

consultation. Launching a public consultation without dialogue with the primary stakeholder to receive constructive feedback is most peculiar?

This is compounded by the timing of the exercise (during a global pandemic?) which has understandably angered members of the trade who are trying to stay in business. They feel that the consultation is being forced through at a convenient time for the licensing authority and is not in the spirit of consensual democracy which we should all hold dear.

For my part, I have three points of contention:

- Permanent Door Signs
- Mandatory CCTV Installation
- Penalty Points System

### **Permanent Door signs**

Even before Covid drivers have not exclusively utilised their commercial vehicle as a taxi/cab. Many drivers have been working for Deliveroo, Uber eats, Hermes, Amazon, DPD and a myriad of other companies.

*My point, is it right for the licensing authority to be associated with these companies when the driver is not undertaking work as a licensed vehicle?*

If there were a customer service issue in relation to another line of work, the licensing authority should not be involved should they want to be associated with another company. To do so could in fact breach data protection legislation.

Not all drivers have the luxury of secure overnight parking.

*Permanent door signs will increase the chance of a break-in and theft when parked, especially overnight as commercial vehicles are often targeted by thieves.*

Taxis and cabs are also used for social/domestic purposes.

*Is it right for a driver on holiday to advertise Eastbourne's logo, for example towing a caravan, or visiting family/friends on the continent?*

As some of you may recall:

Scrutiny committee, on the 10th December 2012, considered permanent door livery for taxi and private hire vehicles in Eastbourne. A steer was given to General Licensing to favour magnetic door livery. This was agreed as per the following link:

<https://democracy.lewes-eastbourne.gov.uk/Data/Eastbourne%20Borough%20Council%20General%20Licensing%20Committee/20130318/Agenda/Minutes%20-%20General%20Licensing%20-%202018%20March%202013.pdf>

On that basis I thought it prudent to make a **Freedom of Information Request** to ascertain if there is a problem in Eastbourne with vehicles not displaying livery.

Hence the following question:

Since the 10th December 2012, how many incidences per year have licenced vehicles been recorded not displaying council issued door livery whilst working?

In response I received EFOI 12990, tabulated as follows:

2013	0
2014	0
2015	0
2016	3
2017	6
2018	6
2019	4
2020	6
2021	2

Frankly the licensing team cannot justify permanent livery.

**The evidence shows it is an insignificant problem.**

There are over 350 licenced vehicles in Eastbourne. An average of **3 vehicles per year** over the last 9 years **does not constitute sufficient evidence to support permanent livery**. I would therefore urge committee to continue to support the current livery regime.

I would however suggest that if an individual vehicle is found to be working as a licensed vehicle without door livery then a licensing officer should issue a stop notice to prevent the car from working unless s/he is satisfied there is a reasonable excuse i.e. a theft of door sign/s that is proven to have been reported to the council.

Very small problem solved!!!

### **Mandatory CCTV Installation**

I refer committee to a document released by the **Local Government Association (LGA)** entitled **“Developing an approach to mandatory CCTV in taxis and PHVs”** which is available via the link below:

[https://www.local.gov.uk/sites/default/files/documents/5.42%20LGA%20Guidance%20developing%20an%20approach%20to%20mandatory%20CCTV%20in%20taxis%20and%20PHVs\\_WEB.pdf](https://www.local.gov.uk/sites/default/files/documents/5.42%20LGA%20Guidance%20developing%20an%20approach%20to%20mandatory%20CCTV%20in%20taxis%20and%20PHVs_WEB.pdf)

Page 7 of the document makes it clear that:

*“It is therefore **important to work with the trade as early as possible when considering a policy on CCTV systems** and ensure that key messages around why this approach is being considered, and the potential benefits to drivers, are clearly communicated. Issues raised by the trade can then be considered and where possible addressed as plans develop”*

Unfortunately, the licensing authority has amazingly not followed the advice of the LGA?

The first that members of the trade heard about this is when the public consultation was released. This is clearly poor practice and not in the spirit of the guidance released from the LGA.

CCTV for many drivers has been prohibitively expensive, especially in light of the fact that many drivers are suffering economically.

No doubt many drivers would welcome CCTV installation for their own personal safety to deter bilking and offences against the person. Nationally more than 1 cab driver is attacked every day as per the following link:

<https://www.phtm.co.uk/news/2432/phtm-news/call-for-action-after-hundreds-of-taxi-drivers-attacked-in-last-two-years>

It would therefore be useful if the licensing authority undertook a cost benefit analysis of CCTV in cabs. A few questions to consider:

- How much does the system cost?
- What company(s) would fit the system?
- What is the technical specification?
- Does the CCTV pick up data through a COVID screen?
- How many drivers have been attacked in Eastbourne?
- How many passengers have been attacked by licensed drivers?
- How many journeys involve the transportation of children?
- Should drivers with school runs be the primary focus to ensure protection of children and what is the view of ESCC in relation to this?

I would therefore suggest that committee **direct the licensing authority to have meaningful dialogue with the trade to facilitate this activity in light of guidance from the LGA before arriving at a decision.**

### **Penalty Points System**

As I am sure many of you will remember committee *considered the implementation of a penalty points system in 2018*, as per the link below to the minutes of the meeting:

<https://democracy.lewes-eastbourne.gov.uk/documents/g1537/Printed%20minutes%2008th-Jan->

[2018%2018.00%20Eastbourne%20Borough%20Council%20General%20Licensing%20Committee.pdf?T=1](#)

The trade was afforded the opportunity to make representation and subsequently organised a petition (much easier when there is not a global pandemic!!) available via the link below:

[KM\\_C308-20170803100841 \(lewes-eastbourne.gov.uk\)](#)

It was clear that the trade did not favour the penalty points system and I suspect still do not based on the observations made in the petition.

In relation to the current consultation the proposed penalty points system are tabulated in Appendix 7 of the guidance the arguments raised in 2018 still hold true.

Many of the offences contained in the report are not the licensing officer's remit as intended by parliament. Therefore, *ultra vires*. Also many of the offences have penalties enshrined in parliamentary and case law. Why not use these powers?

I have tabulated below some of the specific offences that are problematic in relation to the proposed penalty points system offered by the licensing team:

	Details of the misconduct	Issue
5	Plying for hire by Private hire drivers or Hackney Carriage drivers plying for hire outside the district	Licensing officers from neighbouring authority must enforce investigate and determine guilt.
6	Private hire vehicle parking or waiting on a taxi rank	No powers from parliament for licensing officers to deal with parking offences. Undertaken by civil enforcement in Eastbourne. Customers request to be picked up/dropped off on rank ie Sainsburys rank, Ashford Road. If there is not a plying for hire offence, there is not an issue.
7	<b>Inappropriate behaviour at a taxi rank</b>	No powers conferred by parliament. What is inappropriate? Very vague and arbitrary number of points 1- 12?
11	Unsatisfactory condition of vehicle, interior or exterior	Issue a stop notice.

12	Failure to undergo the 6 monthly VCT on time	Issue a stop notice
13	Failure to provide proof of insurance cover when requested	Issue a stop notice
14	Failure to produce Hackney Carriage or Private Hire vehicle for re-testing when required	Issue a stop notice
20	Carrying an offensive weapon in the vehicle	Police power to arrest if suspected of carrying an offensive weapon. Licensing team should report to police to investigate as licensing officers would be acting <i>ultra vires</i> . An offensive weapon is determined by statute and case law. Licensing Officers are not qualified to make the decision. It is a police matter.
30	Evidence of smoking in vehicle	Some passengers smell of smoke and this may linger in the car.
31	Evidence of food or drink in Vehicle	<i>Ultra vires</i> . When did it become an offence to eat or drink in your own car? As long as the car is clean, what difference does it make if there is a water bottle in the driver's cup holder?
36	Failure to have the driver's badge clearly displayed	Used as ID to pick up passengers. Where should it be displayed without it being potentially stolen by a passenger?
38	<b>Unsatisfactory appearance of driver</b>	<i>Ultra vires</i> . The fashion police will punish you for an ensemble of clothes that is below par, a two-day stubble or jackboots that you can't see your face in! What is unsatisfactory appearance< North Korea or Eastbourne?
44	Using a licensed vehicle in a dangerous condition	Issue a stop notice
46	<b>Unsatisfactory behaviour or conduct of a driver.</b>	Punishment that is arbitrary and at the

		discretion of the licensing officer? What is unsatisfactory behaviour/conduct? Looks very similar to point 7. Punished twice? The Stasi would be proud.
48	<b>Failure to behave in a civil and orderly manner or bringing the trade into disrepute.</b>	What is disrepute? Very broad. There are a worrying number of definitions that could confer arbitrary powers

There are so many examples, I am just frankly amazed this has been brought to the committee's attention again without following the *steer of the last meeting on the matter in 2018*:

On that basis I requested a **Freedom of Information** (FOI) request as follows:

Since the 1st October 2018, how many incidents have been logged by the licensing authority that contravene the proposed rules of the penalty points system contained in the consultation that closes on the 26th March 2021

I received the following table as EFOI 12991

<b>2018 (from 1/10)</b>	<b>28</b>
<b>2019</b>	<b>136</b>
<b>2020</b>	<b>78</b>
<b>2021 (to 9/2)</b>	<b>5</b>

I further requested a breakdown of the offences that had been alleged/committed and received a table that I have illustrated as a graph on the following page.

It clearly shows there are **only 27 issues that the licensing authority currently records.**

**Why then would the licensing authority wish to start recording 60 "offences" if the penalty points system were to be adopted???**

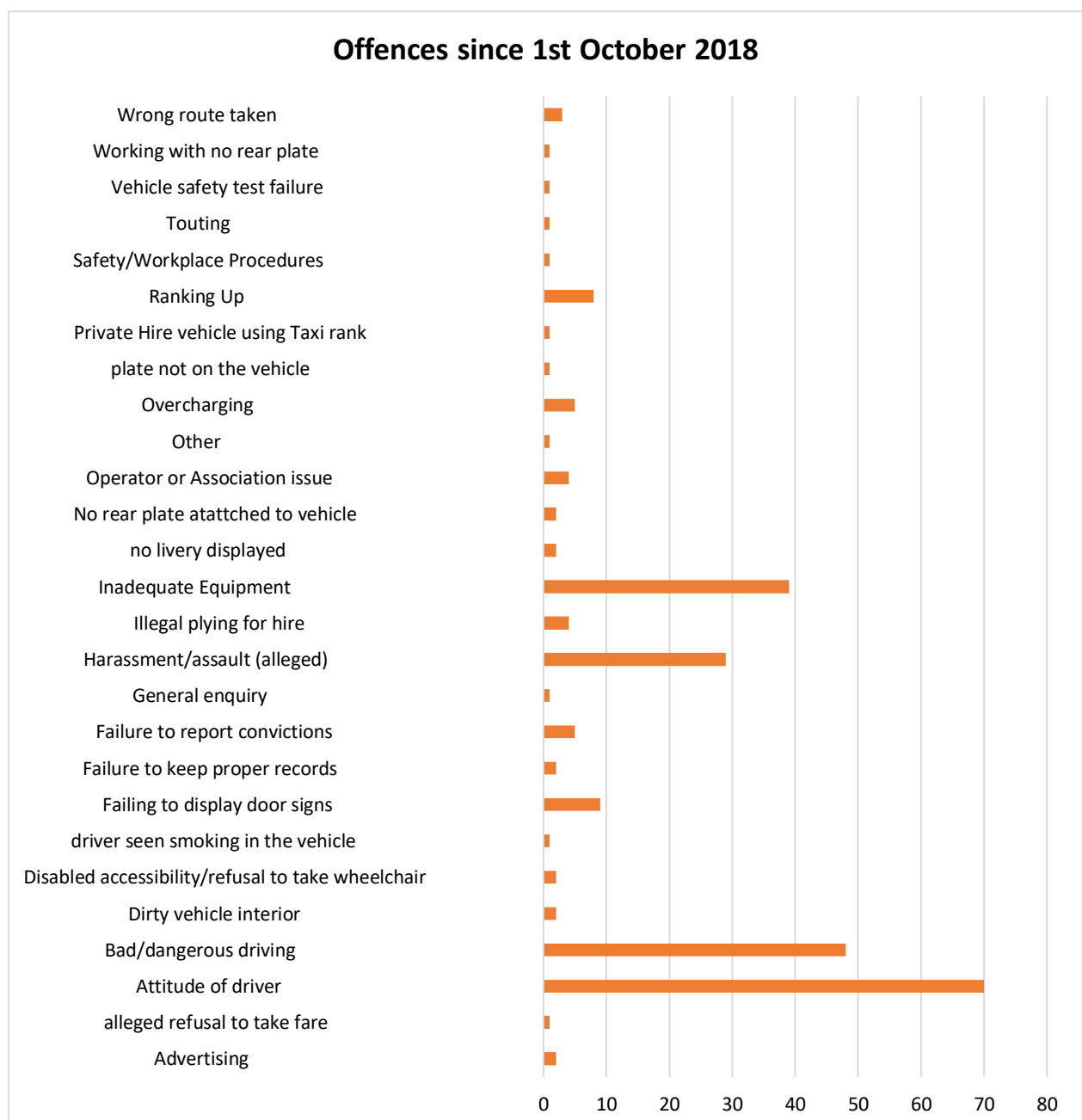
The local authority cannot ride roughshod over the intention of parliament and create a *cottage industry of offences*. The Licensing Authority should discharge its duty as per parliamentary intent with the plethora of powers already at its disposal to deal with the very small percentage of drivers that are problematic, as opposed to pedantically looking for non-existent issues and punishing drivers with heavy handed *arbitrary* measures.



The licensing regime has been set by parliament and subsequent case law to uphold public safety, not to arbitrarily punish drivers. No mention has been made in the consultation as to how this would be enforced. It appears excessive, arbitrary, and potentially punitive. The link below highlights the point:

<https://www.taxidefencebarristers.co.uk/2018/07/02/licence-suspensions-punishment-or-public-safety/>

With such a paucity of data supplied by the licensing team it would be *farical* to accept that a penalty points system is needed in Eastbourne. Further it insults the licensing committees considered deliberation from 2018. The original decision is correct and should stand. The data shows it is not required in Eastbourne and that much of it is *ultra vires* and creates unnecessary bureaucracy.



## **Conclusion**

The DfT report is guidance. It is not primary statute. It is for committee to carefully consider its merits. Much of which is compelling. However, parliament intended for local councillors to mould the local taxi regime as they see fit.

Local factors and nuances should be duly considered. Without evidence-based practice the licensing function would become arbitrary and not in the spirit of locally determined consensus politics which we pride ourselves on.

**We all agree public safety is paramount, but not at the expense of, evidence, reason, debate and proportionate local democracy.**

**Written Submission 8**



Tel: (01323) 720720    Admin: (01323) 417555  
Fax: (01323) 639443    Email: info@720taxis.com

Eastbourne & County Taxis Ltd.  
1a Susans Road, Eastbourne, East Sussex BN21 3HA

Dear Licensing committee and officers,

We fully endorse the proposals regarding public safety but would encourage councillors to vote – taking into consideration the current climate – that the installation of C.C.T.V is from October 2022 and not before. We would also like to request that there is further consultation with the trade to address issues and concerns with regards to details of the supplier, fitting, data monitoring etc which could be addressed via the Taxi forum.

Also, we would like you to consider further consultation on some of the detail in the proposed Penalty System.

If you have any questions relating to this, please don't hesitate in contacting us

Yours sincerely

The Directors

720 Taxis

## Written Submission 9

Name Redacted

Badge Redacted

I note that the Dft guidance raises the question of safety in respect levels of abuse by members of the Taxi and Private Hire trade in Rotherham/Oxford and other areas. I believe that the purpose of the report is to both raise awareness and give a requirement for both the Licensing Authorities and Trade to examine accepted current practice and agree on changes which have a specific impact on both customer and driver safety.

### DOOR SIGNS

When I consider the proposal for the trade to move to permanent council livery, I can make no reasonable argument against. I would however ask the Council to consider a reduction in the size of the door sign in line with Wealden and Lewes councils. In line with neighbouring councils and customer usage I believe that the location should be standardised and that the sign should be displayed on the upper panel of the rear door.

### CCTV

With respect the introduction of CCTV I can also make no argument against in the long term, but, given the impact that Coronavirus has had on the trade would ask for a delay and further consultation with the trade to assess both the financial impact and concerns regarding installation, maintenance, gathering of data and the ongoing costs to the driver.

I believe that following full consultation the trade will accept the benefits associated with CCTV however, Eastbourne Borough Council must be transparent on their genuine reasons and justification for mandatory installation. All aspects must be considered before the scheme can be implemented and in the interim, drivers should be encouraged to invest in CCTV systems. This may require the Council to retrospectively agree to approve systems which are already installed, even if they do not meet the final approved standard.

### POINTS SYSTEM

I feel that the proposed points system is disproportionate. The Council licensing officers already have the power to take action for most "Offences" listed in the proposal. Many of the proposed items listed as misconduct are for other agencies such as the Police or Parking Wardens to administer with possible action after the event by Licensed Officers. Matters such as unsatisfactory appearance, offensive weapons food and drink and several others are subjective, and given that licensed vehicles are also used as personal transport, unreasonable. I also note that several items have been repeated, albeit with different wording and in some instance's different penalties.

The FOI request submitted by – name redacted - clearly shows that most of the issues reported since 1<sup>st</sup> October 2018 are of a comparatively minor nature. I would also question if a points system is appropriate for the more serious issues shown?

**CONCLUSION**

I welcome most of the changes proposed in the “Eastbourne Borough Council Hackney Carriage and Private Hire Licensing Guidance”. The safety of both drivers and passengers is of major importance and the proposals address these concerns. The installation of CCTV in vehicles increases safety for both users and drivers but given the current financial situation and lack of detail should be delayed for further consultation with the trade.

I would however bring to your attention my proposal for the reduction in size of council door signs and their relocation to the rear door panel. The standardisation with regard location and type of signage will also make it easier and safer for members of the public to correctly identify a licenced vehicle.

Yours sincerely

Name redacted