

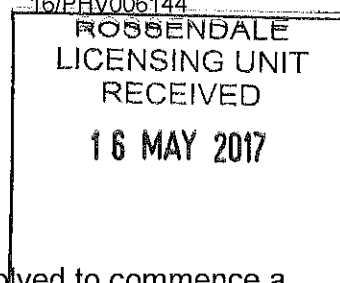
Licence Holder  
278 Derby Street,  
Sheffield,  
South Yorkshire.  
S2 3NP

## BUSINESS DIRECTORATE LICENSING & ENFORCEMENT UNIT

The Business Centre, Futures Park, Newchurch Road,  
Bacup, OL13 0BB  
Tel: 01706 217 777  
Minicom: 01706 252 277  
licensing@rossendalebc.gov.uk  
**THE COUNCIL DOES NOT ACCEPT SERVICE OF  
DOCUMENTS BY E-MAIL**

This matter is being dealt with by:  
Name: Phil Morton  
Telephone: 01706 252 442  
Email: licensing@rossendalebc.gov.uk

Our reference: 16/PHV006144



Dear Licence Holder,

### ROSSENDALE BOROUGH COUNCIL REVIEW OF PRIVATE HIRE CONDITIONS

On 16<sup>TH</sup> March, Rossendale's Licensing Committee resolved to commence a consultation exercise on the revision of the Council's Taxi Licensing Enforcement Policy, and conditions relating to private hire vehicles, drivers and operators. The draft conditions are attached to this letter, and your opinion is sought on these.

Specifically your thoughts would be welcome on;

- First Aid kits
- Fire extinguishers
- The use of trailers
- Commercial advertising on vehicles

It is important that the consultation process invites comments from organisations who may be affected by current and future taxi policies, as well as Rossendale's licensed trade. Rossendale Council welcomes consultation responses from as wide a range of interested parties as possible.

Please note the consultation is open until **26th May 2017**. Any comments received after this date may not be considered as part of the review.

*"Rossendale will have strong communities with an enhanced environment and heritage. It will be an attractive place to live where tourists visit and employers invest."*

Keep up to date with Rossendale Borough Council via [www.rossendale.gov.uk](http://www.rossendale.gov.uk) or follow us on  
@RossendaleBC      Rossendale Council

All responses should be returned to [licensing@rossendalebc.gov.uk](mailto:licensing@rossendalebc.gov.uk) with the subject heading "Consultation Response"

or Licensing and Enforcement Unit,  
Rossendale Borough Council,  
The Business Centre,  
Futures Park,  
Bacup,  
Lancashire.  
OL13 0BB

Thank you for taking the time to consider this consultation.

The review is being undertaken to ensure that Rossendale Council has the necessary policies in place to ensure its licensed trade has the appropriate skills, knowledge and vehicle standards to deliver a safe and high quality licensed taxi trade.

Yours faithfully,



Phil Morton  
Licensing Manager

***"Rossendale will have strong communities with an enhanced environment and heritage.  
It will be an attractive place to live where tourists visit and employers invest."***

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Uber Britannia Limited  
Room 108  
The Business Centre  
Futures Park  
Bacup  
OL13 0BB

26th May 2017

*Via E-mail*

Dear Mr Morton

Thank you for the opportunity to Rossendale Borough Council's consultation on the review of private hire conditions. At Uber we believe very strongly in making cities more efficient, promoting high quality service and improving safety in the industry. We share the council's ambitions in this regard, and we are grateful for the opportunity to help bring the existing regulations up to date and contribute to the development of an innovative private hire market.

We acknowledge the important role that licensing plays in ensuring that the taxi and private hire industry is trusted and meets the needs of the local community. However, regulation must be proportionate and well targeted. Best regulatory practice requires an assessment of whether any interventions are justified by specific and legitimate policy objectives. We believe that local licensing requirements should be regularly reassessed with this in mind.

Once an objective has been established, an assessment should consider the proportionality of each proposal against the objective, including whether the benefits outweigh the costs or impacts. This cost/benefit analysis has to consider not only the immediate impact of the regulation on customers and firms, but also any impact on the ability of the market to efficiently meet varied customer demand at a range of qualities and price points that customers deem appropriate.

Good regulation is particularly important during times of change and technological advancements. All local authorities should be encouraged to consider if specific licensing requirements are i) appropriate for the private hire market as opposed to taxis, given that consumers can exercise choice over operators and ii) the least onerous means to achieve the intended benefits of the Licensing processes. This will encourage innovation and competition amongst private hire operators and other transport providers to continuously improve service quality standards.

In our response to the consultation we first provide a response to the four specific questions that have been asked, before going on to provide comments on the private hire driver, vehicle and operator conditions that have been proposed.



## RESPONSE TO PRIVATE HIRE CONSULTATION QUESTIONS

**Q1: Do you think that licensed private hire vehicles should have to carry a first aid kit?**

**A1: Yes**

We agree that all private hire vehicles should have a first aid kit available in the event that the driver and / or passengers have need to use it. However, given that private hire drivers are not required to complete compulsory first aid training, we would note that there should be no mandated expectation of a private hire driver to use the kit and administer first aid. That said we believe the availability of a first aid kit in all private hire vehicles would be a positive development.

**Q2: Do you think that a licensed private hire vehicle should have to carry a fire extinguisher to deal with minor fires?**

**A2: No**

We believe that this should be left to the discretion of the driver. Common guidance states that fire extinguishers should be kept in the boot of the vehicle, unless the vehicle has a separate compartment for the driver, to mitigate the risk of the extinguisher being used as a weapon or inappropriately discharged by passengers. Furthermore fire extinguishers in the 1kg to 2kg range are likely to be ineffective in fighting a serious vehicle fire and should only be used to aid escape from the vehicle. In that case, and considering the guidance that such extinguishers should be carried in the boot of private hire vehicles, it is difficult to see the practical value of mandating that a fire extinguisher should be carried.

**Q3: Do you think the use of a trailer by a licensed private hire vehicle should be allowed?**

**A3: Yes**

Whilst we have no current plans to use private hire vehicles with trailers through our operating licence, we see no issue with providing other operators with the opportunity to do so. Although we would note that this would place additional responsibilities on both the operator and the council in terms of ensuring the driver has the correct class of driving licence, ensuring the vehicle is insured to tow a trailer, and conducting regular inspections of the trailer.

**Q4: Do you think commercial advertising should be allowed on licensed private hire vehicles?**

**A4: Yes**

We believe that third party advertising should be allowed, as long as it is compliant with the code of advertising standards. Other authorities typically set a maximum size for such adverts and prevent the advertising of alcohol, tobacco or the sex industry.

## **FEEDBACK ON PROPOSED PRIVATE HIRE DRIVER CONDITIONS**

With respect to the proposed private hire driver conditions, we provide comment on the following conditions.

### **Condition 16 - Tariff Cards**

With the advancement in use of technology, we do not agree with the requirement to have a statement of fares displayed on a physical tariff card within the vehicle. We fully agree with the principle of ensuring pricing transparency, however there are now more effective and reliable ways to ensure this than through a physical tariff card and we do not believe the policy should be so restrictive as to mandate a physical tariff card within the vehicle.

With Uber, customers can obtain information on our fares (including minimum fare, price per mile / minute and any additional charges) from our website. The customer also sees an estimate of the fare upfront in the app before booking, with the price confirmed and relevant card charged at the end of the trip. Customers also automatically receive an email receipt with a breakdown of the fare charged direct to their inbox. If there are any complaints about the fare - e.g. regarding the route taken or the fare being higher than expected - then the customer is able to complain and our dedicated Customer Support team will review and, where appropriate, refund (e.g. basing our decision on GPS data when looking at route efficiency).

Based on the above we believe that the requirement to carry and display a physical tariff card within the vehicle would be unnecessary and outdated. Rather we suggest that the condition should state that there is a requirement for the vehicle proprietor or operator to ensure that transparent pricing information is clearly available to customers via an appropriate channel(s), without prescribing what that specific channel should be.

### **Condition 19 - Written Receipts**

As with condition 16 this condition is overly prescriptive. With Uber, customers are provided with an electronic receipt (via e-mail and available within the app itself) that sets out the fare, how the fare was calculated and the route taken. Customers are able to rate the driver and provide feedback on the trip. And customers are also able to raise any issues related to the trip - from lost property to concerns with the service provided or the fare charged. All such issues are triaged by an incident response team and resolved by a customer support team - who will automatically have access to all relevant information regarding the customer, the driver, the vehicle and the route taken. As such requiring the driver to provide a written receipt for the fare paid including name and badge number of the driver and vehicle licence number is overly prescriptive. We would suggest that the regulations should mandate that the operator provides

the customer with a receipt for the fare paid in an appropriate channel and in such a format that if the customer wishes to follow up with a complaint or raise an issue, either via the operator or Rossendale Borough Council, then it is easy to identify the driver and vehicle concerned.

#### **Condition 24 - Lost Property**

We note that this condition is yet to be fully drafted.

#### **Condition 31 - Notification of Change of Operator**

We are concerned that this condition seeks to prevent (or at least seriously prohibit) a driver from operating with two different private hire operator circuits simultaneously, or from quickly and easily moving from one operator to another. The effect of this would be to harm competition and efficiency in the market, whilst also being detrimental to the level of service offer provided to drivers. The ability of drivers to be flexible and move across multiple operators is vital to maintaining a competitive market and should generate upward pressure on the driver offering provided by operators.

Mandatory single-homing, by comparison, would create a strong network effect - encouraging drivers to operate solely with the operator with the largest customer base. This in turn would then lead to a market with a smaller number of large operators - risking reduced competition and higher prices. It would also create a significant barrier to new entrants seeking to enter the market. These fears were echoed by the Competition and Markets Authority in their response to a TfL consultation held during 2016.

#### **Conditions 33 and 34 - Use of Personal Information**

We agree with the key sentiment of these condition in terms of the secure storage of customer personal information and restriction of the use of such information to the purpose for which it was collected. However we would also note that private hire drivers and operators are already subject to scrutiny by regulators such as the Information Commissioner, and must comply with EU data privacy regulation. There is no evidence that current regulatory requirements are insufficient, or that an extra layer of regulation from Rossendale Borough Council would make any practical difference.

### **FEEDBACK ON PROPOSED PRIVATE HIRE VEHICLE CONDITIONS**

#### **Condition 1.2 - Tinted Windows**



## **Condition 5.4 - CCTV**

As per our response to condition 4.6 above we strongly oppose the mandate of CCTV within private hire vehicles, believing that this should be an optional decision for drivers based on the value they attach to the perceived added protection provided. Condition 5.4 states that the "audio recording must be active whenever an unaccompanied child (i.e. under 18) or vulnerable adult is being carried in the vehicle" - from a practical perspective it is unclear how a driver would be expected to determine the age of a passenger or his or her level of vulnerability when determining whether to activate the audio or not.

Similarly the condition states that "the audio recording must be activated by the driver at any time where the driver and customer are involved in a dispute" - however if the driver is the antagonist in any dispute then it is unlikely that he or she will decide to activate the audio, thus limiting the potential protection offered to the customer.

## **Condition 15 - Change of Operator**

As per our response to private hire driver condition 31 we believe that this condition will unnecessarily restrict a driver's ability to flexibly move between operators, to the detriment of the driver and competition within the overall trade.

## **FEEDBACK ON PROPOSED PRIVATE HIRE OPERATOR CONDITIONS**

### **Condition 2.4 - Public Booking and Waiting Area**

This condition seeks to mandate the provision of a dedicated area which the public can access for the purposes of making a booking or awaiting the arrival of a vehicle. It is not clear what problem Rossendale Borough Council is trying to address with this proposed condition, nor is there any evidence provided that this proposed requirement is desired by customers.

App-based operators such as Uber enable customers to make a booking via a smartphone with no requirement to visit the licensed operator's business premises, and the growth of such operators suggests that this is a business model which is welcomed by many customers. Rossendale Borough Council should not regulate how firms differentiate themselves to meet differing consumer demand. It remains open to customers who value having the ability to visit a physical office to choose private hire operators that provide such a facility. No evidence or compelling rationale is provided in the consultation document for making such a facility mandatory. It is also unclear why the proposed condition should not apply if the business premises is the residential address of the licensed operator, but should apply to all other operators.



While the need for the proposal is unclear, the cost is obvious and in a competitive market that cost will be passed on to consumers.

### **Condition 3.1 iii - Recording Booking Records to CD / DVD**

Whilst we fully agree with the requirement for a robust, secure and fully auditable form of record keeping, the requirement for a 'computerised recording system which automatically generates a permanent entry onto a recordable CD or DVD at the same time the booking is entered onto the system' is both unnecessarily prescriptive and technologically outdated. It is also less secure than more modern, alternative solutions such as cloud computing and data storage.

We believe that Rossendale Borough Council's regulatory framework should be 'future proof', with the language of regulation kept technology neutral. This proposed condition runs counter to that sentiment and would seek to lock operators into a format of data storage that has already become obsolete in many industries, with the cycle of technology having caught up to optical disks and many storage options now available that are much more convenient and much more secure.

Furthermore this requirement is likely to significantly restrict the number of computerised booking recording systems that an operator is able to use creating a barrier to entry for smaller operators, minimising competition and stifling innovation within the sector.

### **Condition 3.2 ii - Requirement to Hold Name and Address of Hirer**

It is not clear for what purpose the Council requires the operator to record the address of the hirer each time a booking is taken (save for occasions when the journey is to commence from the hirer's home address, but that would be covered by condition 3.2 iv). This is likely to cause an unnecessary administrative burden on smaller operators that do not have sophisticated IT systems, creating another barrier to entry into the industry. It is also likely to make the process of booking a private hire vehicle lengthier and more cumbersome for customers - and therefore something they are unlikely to welcome.

If the purpose here is to ensure that the operator is able to contact the hirer where necessary and appropriate after the journey - for example in the case of lost property - then there are other options available that are likely to be more closely aligned to a customer's communication preferences (for example e-mail address, mobile telephone number) and the regulations should not be as prescriptive as to mandate use of the hirer's home address.

### **Conditions 3.9 and 3.10 - Use of Personal Information**





We are concerned that the introduction of this condition would be onerous for private hire drivers licensed by Rossendale Borough Council and could also have unintended consequences for certain customers. In line with regulatory best practice, we would expect to see the introduction of any such condition accompanied by evidence of material harm (absent the proposed changes), consideration of the extent to which such harm could be addressed in ways that were less prescriptive, and assessment of the extent to which such restrictions might give rise to other unwanted harmful effects.

In the case of the proposed condition that "the front windscreen must let at least 75% of light through and all other windows must let at least 70% of light through", we are concerned about the number of new vehicles that now come with a higher level of tint in the rear windows as part of the manufacturer's standard specification and thus would be precluded from being licensed for private hire use by Rossendale Borough Council. This is particularly the case for Wheelchair Accessible Vehicles where many models come with rear privacy glass as standard precisely because of a common desire for a greater degree of privacy. The condition could, therefore, have the unintended consequence of further limiting the availability of Wheelchair Accessible Vehicles within the local private hire trade, which could be counter to the Council's broader responsibility of promoting equality.

We would also refer to the DFT's guidance on tinted windows which can be found [here](#). Paragraph 30 on page 7 states "The minimum light transmission for glass in front of, and to the side of, the driver is 70%. **Vehicles may be manufactured with glass that is darker than this fitted to windows rearward of the driver, especially in estate and people carrier style vehicles. When licensing vehicles, authorities should be mindful of this as well as the large costs and inconvenience associated with changing glass that conforms to both Type Approval and Construction and Use Regulations.**"

We believe that a more pragmatic approach would be to extend the proposed condition as follows: "Where a vehicle is fitted by its manufacturer with tinted windows which are lawful for use on vehicles on the highway the Authorised Officer may relax this requirement (for rear windows to allow 70% of light through) if the occupants of the vehicle are clearly visible through the windows in ordinary daylight conditions. A vehicle fitted with tinted window film applied after purchase will not be licensed."

#### **Condition 4.4 - Operator Door Signs**

It is not clear what purpose the mandatory operator door signs are intended to serve. If the issue is one of public safety, then we believe there are far more robust and effective ways to ensure that a customer gets into the correct licensed vehicle with the correct licensed driver. Technology can be used to provide the customer with the driver's name and photograph plus the make, model, colour and registration number of the vehicle. It can also be used to provide

the driver and customer with a mechanism to anonymously contact each other prior to a pick-up.

Imposition of a mandatory vehicle colour scheme or prescribed livery, meanwhile, is open to impersonation by those with malicious intent. In this scenario the regulations could actually be counterproductive to their intended purpose should they instill a sense of complacency amongst the customer who, to all intents and purposes, may erroneously assume that it is a legitimately licensed vehicle.

If operator livery is to be prescribed then we strongly suggest that the Council should permit magnetic door signs as an alternative option to permanently affixed stickers. Mandating a sticker-only policy will effectively restrict drivers to single-homing, or limit their flexibility to move between operators. The negative implications of this are set out under our response to private hire driver condition 31.

#### **Condition 4.6 - CCTV**

The requirement for mandatory CCTV goes beyond the norm seen elsewhere in the other authorities, and represents a significant cost to existing (and aspiring) Private Hire drivers. Many of the risks CCTV seeks to mitigate are relevant to Hackney Carriages and are not proportionate for Private Hire or the Uber platform. For example, identification of passengers can be done through the app, whereas there is no way to do this when a Hackney Carriage picks up a fare off the street.

The DFT Best Practice Guidance is clear that Councils should carefully consider if any associated licensing costs are the least onerous mechanism for achieving the intended policy outcome. There is clearly a balance to be struck between the potential for CCTV systems to detect or prevent crime versus other systems and the safety and privacy of passengers and drivers.

Rather than mandating CCTV installation, many Councils have instead made CCTV optional for Private Hire. This allows drivers that value the perceived added protection 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.

#### **Condition 4.7 - Tariff Cards**

As per our response to private hire driver condition 16, we believe that mandation of physical tariff cards within vehicles is overly prescriptive.

As with our response to private hire driver conditions 33 and 34, we would note that private hire operators are already subject to scrutiny by regulators such as the Information Commissioner and must comply with EU data privacy regulation. We see no evidence that current regulatory requirements are insufficient, or that an extra layer of regulation from Rossendale Borough Council would make any practical difference.

### **Condition 5.1 - Licensed Operator Document Validation**

This condition states that the "licensed operator must personally examine licences and insurance certificates to satisfy himself / herself as to their validity" (emphasis added). This condition is overly prescriptive and it would not be practical to limit the verification of driver documents to a single individual in larger operators that have a large number of drivers operating with them.

We fully agree that operators have an important obligation to ensure only vehicles and drivers holding a valid Rossendale licence are dispatched bookings through their Rossendale operator's licence, and must be ultimately responsible for the validity of licences and insurance certificates presented. However it is for the operator to design and implement the systems and processes that will achieve this, and these should not so tightly prescribed by the Council as to mandate a single individual takes personal responsibility.

### **Condition 5.10 - Advertising Materials**

It is not clear for what purpose the Council requires an operator to supply a copy of advertising materials to be retained on file. Operators may run frequent advertising campaigns across a variety of different channels (including digital, social media, billboard, radio, e-mail, flyers, mailshot, branded goods) and it would not be practical for the operator or for the Council to have a copy of each individual advert sent across.

A more proportionate regulation would be to require the operator to ensure that all advertising materials comply with the code of advertising standards, whilst also adhering to a set of specific conditions (e.g. advertising materials cannot include the words 'cab' or 'taxi', or include a mobile telephone number).

### **Condition 5.14 and 5.15 - Public Display of Complaints Procedure and Fare Scale**

This condition presupposes that all private hire operators provide a public area from which customers can make a booking or await the arrival of a vehicle. As per our response to condition 2.4 we do not believe that the provision of such a facility should be mandated by the Council, and therefore it would not be possible or necessary for the operator to display information relating to complaints procedures or fare scales in this manner. More appropriate

regulation would mandate that such information was clearly and readily made available to customers, without prescribing the exact method, channel or location through which such information is provided.

#### **Condition 5.16 - Lost Property**

This condition states that all lost property, if not returned to its rightful owner, must be handed in as found property to the Police within 24 hours. However we note that many Police forces are now specifically advising taxi, private hire drivers and other members of the public not to hand lost property into the Police as they no longer have adequate resource to deal with this workload. To reflect this, a more appropriate condition would be to mandate that all operators have a suitable policy for dealing with lost property enquiries, which must be approved by the Council.

Please let me know if you wish to discuss any of the above further.

Yours sincerely,

Neil McGonigle  
Head of Cities, North of England  
Uber



**PRIVATE HIRE CONSULTATION**

**MARCH 2017**

**Q.1 DO YOU THINK THAT LICENSED PRIVATE HIRE VEHICLES SHOULD HAVE TO CARRY A FIRST AID KIT?**

**(Please circle one)**

YES

NO

Please write any comments below

This is a dangerous item to carry, firstly we are not authorised to use them, and secondly they contain a pair of scissors, so should NOT be accessible to ANY passengers

**Q.2 DO YOU THINK THAT A LICENSED PRIVATE HIRE VEHICLE SHOULD HAVE TO CARRY A FIRE EXTINGUISHER TO DEAL WITH MINOR FIRES**

YES

NO

Please write any comments below

This item was removed following advice from the fire brigade who state very clearly that the instruction is "GET OUT, CALL US OUT AND STAY OUT"..... they advise very much against attempting to tackle fires alone or to having the apparatus accessible which may lead to the temptation to attempt such an action...which could result in injury or death.

**Q.3 DO YOU THINK THE USE OF A TRAILER BY A LICENSED PRIVATE HIRE VEHICLE SHOULD BE ALLOWED**

YES

NO

Please write any comments below

In many cases, when passengers book an airport run, they carry too much luggage to be carried within the vehicle, the miscellaneous provisions act allows for this as does the construction and use regulations.

**Q.4 DO YOU THINK COMMERCIAL ADVERTISING SHOULD BE ALLOWED ON LICENSED PRIVATE HIRE VEHICLES?**

YES

NO

Please write any comments below

The government best practice guide 2010 specifically mentions this, and recommends that it should be encouraged in order to subsidise the income of the trade, this was not specific to PH vehicles, but to hackney carriages too as can be clearly seen in black cabs all over the country especially "our neighbouring authority" of Manchester,.

Please feel free to comment on any other sections of the draft conditions for Drivers, Vehicles and Operators

1 Drivers must comply with the Rossendale Council Licensed Driver Code of Conduct including the dress code

The trade believe that the current (or original) policy which states "must be clean and smart in appearance and behave in a courteous manner" is enough

29 Drivers must subscribe and maintain subscription to the Disclosure and Barring Service Online Update Service. Any costs associated with maintaining this subscription must be met by the licence holder.

✓ Suggest extending this paragraph to explain the benefits of doing so...i.e "which then removes the requirement to undergo a further DBS check unless an offence has been committed and renders the DBS check transferrable between all authorities."

30 Drivers must give permission for the council to undertake checks of their DBS status should the council consider it necessary to do so. The council will use the update service to monitor the criminal record of licence holders.

✓ If permission is required then there is no must about it, this should be explained as "as and when required" as opposed to the implication that it will be at random without the drivers knowledge

33 Drivers must ensure that any personal information obtained during the course of their business is stored securely, and only retained for as long as is absolutely necessary. Access to this information must be restricted to those that will use it for the purpose for which it has been collected.

34 Personal information must not be used for any other purpose other than that for which it was collected without the express permission of the individual to which the information relates. For example, telephone numbers provided by customers so that they can be alerted / updated by SMS text message with regard to a booking they have made must only be used for this purpose. The information must not be retained by the driver after the text message has been sent, and / or used for any other purpose (such as unsolicited marketing calls).

This describes the responsibilities of a "data controller", maybe add a link and refer to the ICO so they can see this is not a council rule...but an ICO one

35 Drivers whose appearance alters significantly (for example by growing / removing a beard or moustache, changing hair colour etc), must request a replacement ID badge from the council at the earliest opportunity and supply them with a up to date photograph that is an accurate portrayal of their current appearance.

I think you mean "alters", the danger here of course is that you may well end up issuing several replacement badges if someone grows a beard...new one...has a shave..New one....grows it again....new one....see a pattern here?...there is no lawful requirement for facial hair to be considered a significant alteration..In fact passport control allows for it.

Add a last paragraph stating that "any such decision shall be subject to the statutory right to appeal within 21 days" if you are going to state legal threats...then also state legal rights.

### **Vehicle conditions.**

1.2 All vehicle windows shall be transparent or if tinted, the front windscreen, front passenger window and driver's window must let at least 75% of light through and all other windows must let at least 70% of light through to the satisfaction of the Authorised Officer. The Council will not licence a vehicle to which a laminating film has been applied.

This one right here could very well exclude any and all modern vehicles, it is subject to current high court injunction, and does NOT follow any legislation at all.

1.3 The colour of the vehicle must not be altered to XXXXXX during the period that the vehicle is licensed

this item was decided at the same time as agreeing to start this consultation, maybe remove the "XXXXXX" and insert the colour?

2.2 The proprietor must notify the licensing office in writing if their vehicle has a LPG system fitted during the currency of a licence. The notification must be made within 5 working days, and include the provision of the certification referred to above.

Unnecessary repetition, suggest remove, it even states "as referred to above" there is no longer a certificate issued it would seem, instead there is a website on which the conversions are registered which can be found at <http://www.drivelpg.co.uk>

3.3 The proprietor is responsible for ensuring that the licensed vehicle has a daily safety check. As a minimum this must be a visual check on all lights, oil, water, tyres, mirrors and seat belts. A written record must be made of each safety check, details of faults recorded and remedial action taken. The record must be signed by the person undertaking the safety checks and kept in the vehicle for a minimum of 30 days and then for a further six months by the proprietor

Firstly, there seems to be some confusion here.....in the driver conditions it states it is their responsibility, here it states it is the proprietors....which is it?...secondly, if kept in the vehicle for 30 days then the proprietor may not be aware that it has been done, and when added to the rest of the signage, records and labels, the vehicle is rapidly running out of glove box space here

3.5 With effect from 20<sup>th</sup> February 2017 all new grant for private hire vehicle licences (this does not apply to vehicles licensed before 20 February 2017 and which maintain continual renewal applications) will need to be and maintained any colour other than XXXXXXXX

as in 1.3.....unnecessary repetition and please edit to show the colour, council constitution allowing.

4.5 A Rossendale private hire vehicle plate shall be securely fixed to the rear and front of the vehicle using the appropriate backing plate. The plate shall be fixed in such a manner that it does not interfere or obscure any or part of the vehicle registration plate

what "appropriate backing plate" are we referring to here?, there is no such requirement for a backing plate to be used.

5.2 There must be provided and maintained in the vehicle at all times when it is in use or available for hire a suitable and comprehensive first aid kit of a type that meets the requirements of British Standard BS8599-2 (medium sized kit). Such kit must be kept in such a position so as to be readily available for immediate use by a passenger in an emergency.

As referred to in the start of this response, not a good idea, was removed in 2010 for a very good reason, further repeated with the CEO of this very council, these should NOT be added back into the conditions.



5.3 If a Driver Safety Shield is fitted (either before the licence has been granted or during the currency of the licence) the following applies:-

i It will be of a make, type and design previously approved by Authorised Officers of the Council (for fittings during the licence);

There is no such "previous approval" it might be advisable to provide a specification or type for "approval" before adding this in.

5.4. All private hire vehicles issued with a new/ renewal licence with effect from 15 May will be required to have CCTV fitted that meets or exceeds the Councils specification for CCTV. The system must operate in accordance with the specification

i It must be of a make, type and design previously approved by the Council;

Subject to current injunction, but as yet there is no type or design approved by the council which we can find anywhere, please advise accordingly (since this should be future proofed in case the requirement is introduced at some point.

vi The images contained in the recording device can only be downloaded by an Authorised Officer of the Council or Police Officer.

This is against the ICO ruling, maybe check other authorities such as Cannock chase, Glasgow and others, or maybe the ICO website for further instructions on this where they state clearly that the vehicle owner must be the data controller.

(personally speaking of course, SAFE systems can and will satisfy any and all requirements if approved as we do with many other authorities.

5.5 All audio equipment must be factory fitted as original standard equipment, or a factory fitted optional upgrade. No additional audio equipment e.g. Boom Boxes in boots / additional speakers are allowed to be fitted in and connected to the vehicle

This was addressed within the committee process, where the response was that this only referred to such things as "boom boxes" and did NOT introduce an exclusion on aftermarket in car entertainment devices, please amend accordingly

5.6 All private hire vehicles issued with a new or renewal licence will not be permitted to retro fit an alternative engine into the licensed private hire vehicle unless the engine is of the same or higher Euro standard

Again, addressed at liaison and committee level, it is even declared within that process itself where it was stated that "of course an engine with a lower emissions standard would fail the MOT emissions test", unnecessary condition.

6.1 The tariffs with which the meter has been calibrated must be displayed in the vehicle in such a position as to be visible to passengers.

6.2 A notice must be displayed within the vehicle in such a position as to be visible to passengers stating that if the meter is not used, the fare should be agreed between the passenger(s) and driver before commencement of the journey. Any fare agreed in this way must be the fare that is charged at the end of the journey, unless the customer agrees to it being varied.

6.3 If a fare has not been agreed between the driver (or operator) and the customer then the fare charged must be that which is shown on the meter (if fitted). A statement to this effect must be made on the notice referred to in b.above.

More signage, quite large ones too, and i see no "b.above" within this section? confusing

7.2 Where the seating in the licensed vehicle can be rearranged, the proprietor must ensure that no more seats than are stated on the licence, including wheelchair(s), are fitted in the vehicle whether occupied or not. Once the vehicle has been tested and approved by the Council the seating layout must not be altered without further approval except for the temporary accommodation of a wheelchair in vehicles approved for such purpose.

7.3 Seats can be mounted on tracking fastened to the floor of the vehicle using seat fixings approved to the satisfaction of the Council. These seats can then be removed or reinstalled as necessary to allow space for one or more wheelchairs. Any tracking system utilised must be correctly aligned and spaced to allow easy removal of the seat. Fastenings for the tracking must in accordance with the manufacturer's specification and approved for use by the Council.

Contradiction in terms, can the seating layout be altered or not?

## **8 VEHICLES WITH THIRD ROW OF SEATS**

8.1 All passengers must have access to at least two side doors, one of which must be on the nearside of the vehicle.

8.2 In cases where there is no door adjacent to a row of seats, no passenger must have to pass through a gap of less than 300mm at the narrowest point in order to exit the vehicle via the rear side doors.

8.3 The middle row of seats must have more than one seat capable of fully tilting and which meet the necessary exit dimension of 300mm at both of the exit points.

8.4 All vehicles with a row of passenger seats without adjacent side doors must provide 'means of operation signs' and low level lighting that illuminates when the side lights of the vehicle are activated.

This entire section was dealt with by licensing committee quite some time ago, where it was agreed the purpose for providing such vehicles and that they all met all construction and use regulations and were perfectly safe and acceptable to be used as passenger carrying vehicles without the need for the dimensions, measurements, or indeed additional signage or floor illuminations, the DVSA have dealt with this matter and have deemed these vehicles fit for purpose.

The requirements advocated by the Council here originally proffered by ROSPA. They have retreated from the advice, accepting that, after all the years since such vehicles were introduced, there is no evidence that rear seats are any more dangerous to travel in than any other. This was challenged a few years ago in *Shanks & Shanks v North Tyneside Council* and in view of SOSPA's changed position and applying the principles and objectives of the Regulators' Code, the court overturned the Council's decision and licensed a vehicle with three rows of forward facing seats without a 300mm gap for exiting the third row. **Suggest remove this section**

9.1 Passengers travelling in wheelchairs must face either forward or rearward to the direction of travel. Rearward facing wheelchairs must be appropriately secured against a bulkhead. Passengers travelling in wheelchairs must be restrained by a suitable method..

Suggest amend to read simply ". Passengers travelling in wheelchairs must be restrained by a suitable method."

10.1 Radio communication equipment licensed by the appropriate Government department may be fitted for use in connection with the Private Hire Operator's base station. Where fitted it must be in a manner approved by the Council. No Citizen Band Radio, or similar non-commercial radio capable of both sending and receiving messages not being appropriately licensed must not be installed in the licensed vehicle. The use of scanner equipment is prohibited.

"No Citizen Band Radio, or similar non-commercial radio capable of both sending and receiving messages not being appropriately licensed must not be installed in the licensed vehicle"

This part is factually incorrect which has been verified by the regulating authority on the use of radio equipment OFCOM who have stated clearly that citizens band radios ARE allowed for use in licensed vehicles

## **11 DRIVER RECORDS TO BE KEPT BY PROPRIETORS**

11.1 Each proprietor must, before a driver commences to drive the vehicle, satisfy him/herself that the driver holds a valid private hire drivers licence. In order to comply with this requirement a proprietor must examine each driver's licence.

11.2 The proprietor must ensure that any driver of a wheelchair accessible vehicle has completed training on safe access/egress and transportation of passengers traveling in wheelchairs.

11.3 The proprietor must keep a written record showing the following particulars in respect of every driver (for private hire purposes) of the private hire vehicle detailed in this licence:-

- i the name and address and date of birth of the driver of the vehicle;
- ii the number and date of expiry of every licence issued in respect of the driver under Section 51 of the Local Government (Miscellaneous Provisions) Act 1976 and in force during such time as the driver is driving the vehicle.
- iii the date on which the driver commenced driving the vehicle;
- iv the date on which the driver ceased driving the vehicle.

11.4 The proprietor must keep the records prescribed in (d) above for a period of two years from the date on which the driver first commenced driving the vehicle. These records must be made available upon request to any Police Officer and/or Authorised Officer of the Council.

Is this part not more relevant to the operator conditions?

**NOT COVERED BUT VIEWS SOUGHT ON**

- Fire extinguishers should these be required, if so should also be part of Rossendale vehicle test inspection

**Covered above, no they should not be required**

- Trailers should these be permitted for use and if so need conditions around usage. If not need to specify as a condition that they cannot be used

**Yes they should be allowed...and no additional conditions maybe other than "the driver must have the ability to use a trailer on his DVSA drivers license covered above.**

- Current draft conditions prevent any commercial advertising – are we happy with this approach

**No.....advertising should be allowed and is actively encouraged within the 2010 government best practice guide but not only for private hire, for hackney carriage vehicles too, as covered above.**

- Suggest debate/ discussion required regarding the use of Cat C and Ds currently allowed under policy

**The issue is obtaining such a letter of confirmation from insurance companies, many of them are unwilling to issue such a letter unless the policy has been taken out and paid for, which then becomes cart before horse syndrome, no insurance, no license....no letter from insurance no license...no license....no need for insurance...the insurance are aware of the category as they do a vehicle check before offering a quote so the requirement for such a letter of confirmation is unnecessary. Cat C & D Vehicles: The previous requirements for inspections, etc have been withdrawn by the police, Department of Transport, ABI, etc, etc.**

- Requirement for LOLER certs for any vehicle with a tail lift ?

**No, if the vehicle has been professionally converted and is shown on the logbook as being wheelchair accessible, then this should be satisfactory, the DVSA are qualified to ensure that all the necessary checks are made. Indeed they themselves ask for the LOLER certificate before amending the vehicle type if it has a tail lift fitted. The conversion companies are authorised and qualified to do so and to issue required certification.**

### **iii Health and Safety of Passengers (Duty of Care)**

Most people will be aware that employers have a duty of care to their employees, but the Health and Safety at Work Act 1974, goes further, Part 1, Section 3 (2) states "it shall be the duty of every self employed person to conduct his undertaking in such a way as to ensure, so far as is reasonably practicable, that he and other persons (not being his employees) who may be affected thereby are not exposed to risks to their health and safety". Operators, drivers and proprietors are advised that a failure to safeguard passengers could have serious implications for the licence holder, and the licence

**This whole paragraph should be removed, and a declaration made that the health and safety commissioner has openly declared that taxi drivers are responsible for their own health and safety at work which means that this is not a matter for licensing.**

### **iv Cautionary Advice**

You are strongly advised not to purchase a vehicle or any equipment or fittings, without first reading the Council's policy and preconditions to the grant of a licence and also these conditions.

If in doubt about any aspect you should make an appointment with the Vehicle Examiner at the councils appointed testing centre. Licensing administration staff are not qualified to make technical assessments and are under instruction not to offer such advice. If a vehicle does not meet the conditions it is unlikely that a licence will be granted.

Specifically this part,"you should make an appointment with the Vehicle Examiner at the councils appointed testing centre" should read "appointed testing centres" and then list the 3 appointed garages, ja taylors, waterside and the glen service station. Since they are the only garages approved or "appointed" by this council for licensed vehicles, if more have been approved then please supply contact details within the policy so that drivers may book an MOT test with them.

## **Operator conditions**

### **2. BUSINESS PREMISES**

2.1 A licensed operator must only conduct business from the Office at the address specified on the Licence. Any operator wishing to conduct business from any additional address(es) (e.g. secondary booking offices) must make application in writing to the Council's Licensing Office, and await approval from the Licensing Office before making use of any additional premises, in addition to any other consents required. The Council reserves the right for an Authorised Officer to inspect all such premises for suitability and compliance with the requirements of these Conditions.

Vague and presumptuous, this does not allow for any remote bases, in other areas, which would not be subject to or require approval from this council.

2.2 A licensed operator must not cause or permit the business premises to be used by any other person(s) for any other purpose than that connected with the conduct or operation of the private hire business. This condition will not apply if the business premises is the residential address of the licensed operator

Again, presumes that the premises are the property of the operator, which is not necessarily the case. Suggest an edit to read "this condition will not apply if the business premises are not the property of the operator or are the residential address of another party.

2.4 A licensed operator must provide at the business premises an area to which the public have access for the purpose of making a booking for the services of a licensed private hire vehicle, and for the purpose of awaiting the arrival of such vehicle subsequent to any booking. This condition will not apply if the business premises is the residential address of the licensed operator.

Again as above, but with this part, there is no lawful requirement for public waiting areas or access to be granted.

3.10 Personal information must not be used for any other purpose other than that for which it was collected without the express permission of the individual to which the information relates. For example, telephone numbers provided by customers so that they can be alerted / updated by SMS text message with regard to a booking they have made must only be used for this purpose. The information must not be retained by the Operator after the text message has been sent, and / or used for any other purpose (such as unsolicited marketing calls).

This and 3.9 again refer to the requirements set out in the ICO rules for data controller, which again allows access to data, including CCTV data

5.6 Only equipment licensed by the Department for Business Innovation and Skills (BIS)) must be used for the purpose of conducting the business authorised by this licence. The BIS licence must be produced on request to the Police or an Authorised Officer. CB apparatus must not be used in connection with any private hire booking at any operating address or in any private hire vehicle/hackney carriage available from such operating base.

Again the regulatory body for radio equipment OFCOM has declared that CB apparatus MAY be used which renders this condition mute (incorrect)

5.16 Where any property is left by a customer in the business premises, or in any vehicle used for any hiring and placed in the Operator's safekeeping by the driver thereof. The licensed operator must endeavour to arrange to return such property to its rightful owner, failing which it must be dealt with in accordance with legal requirements and handed in as found property to the Police within 24 hours.

There have been issues with this item, whereby a person's house keys have been left in a vehicle, which then must be handed in to the police station within 24 hours (as council states) which then renders the hirer locked out of their own home due to licensing conditions...this should be re worded, liaison is there for a reason so that issues like this can be addressed and professionally resolved.

Further notes.....

I don't see any mention of the stipulation that "the driver may not be directly involved in the booking process" this should really be added to all 3 policies.

Thank You

You are welcome.

D Lawrie

On behalf of Rossendale taxi association.





**PRIVATE HIRE CONSULTATION**

**MARCH 2017**

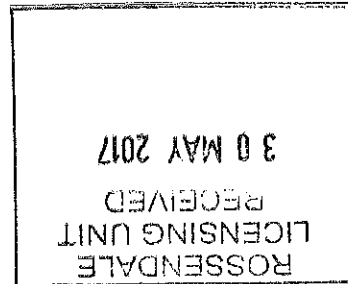
**Q.1 DO YOU THINK THAT LICENSED PRIVATE HIRE VEHICLES SHOULD HAVE TO CARRY A FIRST AID KIT?**

(Please circle one)

YES

NO

Please write any comments below



**Q.2 DO YOU THINK THAT A LICENSED PRIVATE HIRE VEHICLE SHOULD HAVE TO CARRY A FIRE EXTINGUISHER TO DEAL WITH MINOR FIRES**

YES

NO

Please write any comments below

**Q.3 DO YOU THINK THE USE OF A TRAILER BY A LICENSED PRIVATE HIRE VEHICLE SHOULD BE ALLOWED**

YES  
 NO

Please write any comments below

**Q.4 DO YOU THINK COMMERCIAL ADVERTISING SHOULD BE ALLOWED ON LICENSED PRIVATE HIRE VEHICLES?**

YES

NO

Please write any comments below

Please feel free to comment on any other sections of the draft conditions for Drivers, Vehicles and Operators

Thank You

**PRIVATE HIRE CONSULTATION**

**MARCH 2017**

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Thank You

**PRIVATE HIRE CONSULTATION**

**MARCH 2017**

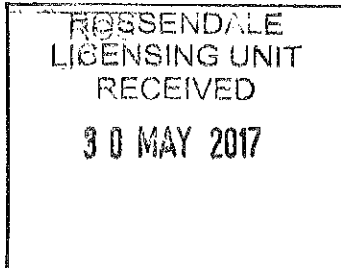
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Please write any comments below



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**MARCH 2017**

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**(Please circle one)**

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Please write any comments below

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YES

NO

Please write any comments below

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YES

NO

Please write any comments below

ROSSENDALE  
LICENSING UNIT  
RECEIVED  
22 MAY 2017

**Q.4 DO YOU THINK COMMERCIAL ADVERTISING SHOULD BE ALLOWED ON LICENSED PRIVATE HIRE VEHICLES?**

YES

NO

Please write any comments below

Please feel free to comment on any other sections of the draft conditions for Drivers, Vehicles and Operators

Thank You



**PRIVATE HIRE CONSULTATION**

**MARCH 2017**

**Q.1 DO YOU THINK THAT LICENSED PRIVATE HIRE VEHICLES SHOULD HAVE TO CARRY A FIRST AID KIT?**

**(Please circle one)**

YES

NO

Please write any comments below

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YES

NO

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YES

NO

Please write any comments below

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YES

NO

Please write any comments below

Please feel free to comment on any other sections of the draft conditions for Drivers, Vehicles and Operators

Thank You

PRIVATE HIRE CONSULTATION

MARCH 2017

ROSSENDALE  
LICENSING UNIT  
RECEIVED

10 MAY 2017

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(Please circle one)

YES

NO

Please write any comments below

Q.2 DO YOU THINK THAT A LICENSED PRIVATE HIRE VEHICLE SHOULD HAVE TO CARRY A FIRE EXTINGUISHER TO DEAL WITH MINOR FIRES

YES

NO

Please write any comments below

Q.3 DO YOU THINK THE USE OF A TRAILER BY A LICENSED PRIVATE HIRE VEHICLE SHOULD BE ALLOWED

YES

NO

Please write any comments below

I think no body give a use this things ?  
Even though no Rides will ask that  
thats any way if you think we can do

Q.4 DO YOU THINK COMMERCIAL ADVERTISING SHOULD BE ALLOWED ON LICENSED PRIVATE HIRE VEHICLES?

YES

NO

Please write any comments below

Please feel free to comment on any other sections of the draft conditions for Drivers, Vehicles and Operators

Everything going smoothly  
that fine not much changing  
the will be great!

"flaw"

Thank You

**PRIVATE HIRE CONSULTATION**

**MARCH 2017**

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**(Please circle one)**

YES

NO

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Please write any comments below

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YES

NO

Please write any comments below

Please feel free to comment on any other sections of the draft conditions for Drivers, Vehicles and Operators

Thank You

A handwritten signature in black ink, appearing to be 'S. Smith', written in a cursive style.

PRIVATE HIRE CONSULTATION

MARCH 2017

Q.1 DO YOU THINK THAT LICENSED PRIVATE HIRE VEHICLES SHOULD HAVE TO CARRY A FIRST AID KIT?

(Please circle one)

YES

NO

Please write any comments below

*I think not necessary*

Q.2 DO YOU THINK THAT A LICENSED PRIVATE HIRE VEHICLE SHOULD HAVE TO CARRY A FIRE EXTINGUISHER TO DEAL WITH MINOR FIRES

YES

NO

Please write any comments below

*Reduce space in the car*

Q.3 DO YOU THINK THE USE OF A TRAILER BY A LICENSED PRIVATE HIRE VEHICLE SHOULD BE ALLOWED

YES

NO

Please write any comments below

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YES

NO

Please write any comments below

*I think not necessary*

Please feel free to comment on any other sections of the draft conditions for Drivers, Vehicles and Operators

Thank You



**PRIVATE HIRE CONSULTATION**

**MARCH 2017**

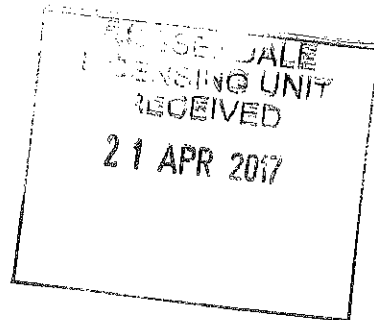
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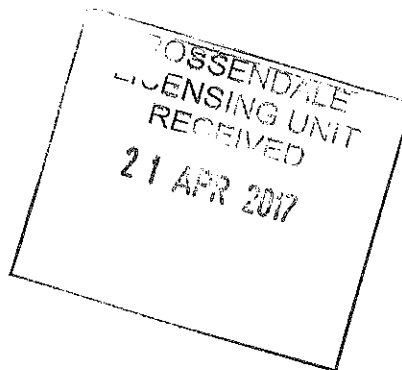
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**PRIVATE HIRE CONSULTATION**

**MARCH 2017**

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**(Please circle one)**

YES

NO

Please write any comments below

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YES

NO

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YES

NO

Please write any comments below

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YES

NO

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Thank You



**PRIVATE HIRE CONSULTATION**

**MARCH 2017**

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**(Please circle one)**

**YES** ✓

NO

Please write any comments below

**Q.2 DO YOU THINK THAT A LICENSED PRIVATE HIRE VEHICLE SHOULD HAVE TO CARRY A FIRE EXTINGUISHER TO DEAL WITH MINOR FIRES**

**YES** ✓

NO

Please write any comments below

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**Q.4 DO YOU THINK COMMERCIAL ADVERTISING SHOULD BE ALLOWED ON LICENSED PRIVATE HIRE VEHICLES?**

YES

NO

Please write any comments below

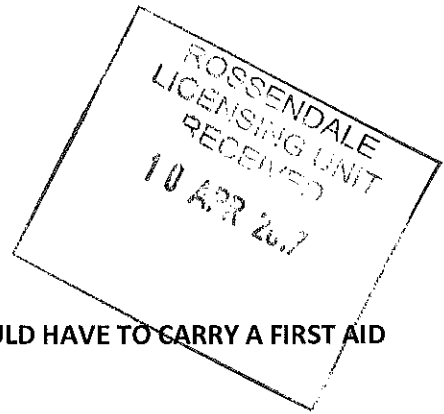
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**PRIVATE HIRE CONSULTATION**

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**(Please circle one)**

YES

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YES

NO

Please write any comments below

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YES

NO

Please write any comments below

**Q.4 DO YOU THINK COMMERCIAL ADVERTISING SHOULD BE ALLOWED ON LICENSED PRIVATE HIRE VEHICLES?**

YES

NO

Please write any comments below

ONLY IF THE REVENUE FROM THE ADVERTISING IS GIVEN TO THE CAR OWNER/DRIVER.

Please feel free to comment on any other sections of the draft conditions for Drivers, Vehicles and Operators

Thank You

PRIVATE HIRE CONSULTATION

MARCH 2017

Q.1 DO YOU THINK THAT LICENSED PRIVATE HIRE VEHICLES SHOULD HAVE TO CARRY A FIRST AID KIT?

(Please circle one)

YES

NO

Please write any comments below

Private hire/Taxi drivers are not trained Physions and if a Customer is allergic to a plaster then driver might be held responsible.

Q.2 DO YOU THINK THAT A LICENSED PRIVATE HIRE VEHICLE SHOULD HAVE TO CARRY A FIRE EXTINGUISHER TO DEAL WITH MINOR FIRES

YES

NO

Please write any comments below

so they can deal with minor fires.

Q.3 DO YOU THINK THE USE OF A TRAILER BY A LICENSED PRIVATE HIRE VEHICLE SHOULD BE ALLOWED

YES

NO

Please write any comments below

no opinion on this matter

**Q.4 DO YOU THINK COMMERCIAL ADVERTISING SHOULD BE ALLOWED ON LICENSED PRIVATE HIRE VEHICLES?**

YES

NO

Please write any comments below

extra income for private hire drivers in a deprived area.

Please feel free to comment on any other sections of the draft conditions for Drivers, Vehicles and Operators

Thank You