

**Thomas, Robert**

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**From:** Mike Smith  
**Sent:** 20 September 2019 15:18  
**To:** Thomas, Robert  
**Subject:** RE: Hackney Carriage & Private Hire Licensing Policy Consultation [UNC]

Hi Rob,

Thank you for the opportunity to comment on Runnymede's draft taxi policy.

I do have a couple of comments:

As you are aware, following the government response to the Task and Finish Group the government also released its draft s.177 Guidance. Both documents mention 'national minimum standards' and whilst there is no indication as to what these are or when they may be required, it is encouraging to see that Runnymede and other authorities are moving forward to raise standards. My only concern is that if the national minimum standards (as of yet to be determined) require something different, that you will be required to go through this process again.

With regards to your main proposals:

**Drivers:**

You are proposing an English test, and safeguarding course. There does not appear to be any proposal for drivers to complete Equalities training as recommended by the draft s.177 guidance. For this reason, I would recommend that you require a BTEC in The Introduction of the Role of the Professional Taxi and Private Hire Driver (details on our website). This would cover the English, knowledge of legislation and equality issues, amongst other things.

**Vehicles:**

Your vehicle standards appear to allow licensing of vehicles up to 10 years old. There appears to be no age limit for new vehicles, possibly meaning that a new vehicle could be up to 9 years old. In line with some of the other Surrey Authorities, I would recommend a maximum age limit of licensed vehicles to keep prevent the trade from initially licensing older vehicles, which may have implications for maintenance and Air quality.

The draft s.188 guidance discussed the use of CCTV and recommends that Councils consider mandating this for passenger and driver safety. Runnymede does not mention this, and only mentions CCTV 'where fitted'. I recommend that CCTV should be fitted in all licensed vehicles. This is not just for the safety of passengers, but also in the interests of safety for drivers.

**Operators:**

The s.177 Guidance also says that Licensing authorities should be satisfied that PHV operators can demonstrate that all staff that have contact with the public and/or oversee the dispatching of vehicles do not pose a risk to the public. Licensing authorities should request that, as a condition of granting an operator licence, a register of all staff that will take bookings or dispatch vehicles is kept. The operator should be required to evidence that they have had sight of a Basic DBS check on all individuals listed and produce a policy on employing ex-offenders.

The Guidance also recommends that Operators and their staff should receive similar training to that of drivers around safeguarding and equalities awareness, and that the use of a driver who holds a Public Carriage Vehicle (PCV) licence and the use of a public service vehicle (PSV) such as a minibus to undertake a PHV booking should not be permitted as a condition of the PHV operator's licence. I see that you have incorporated most of these measures.

I hope that this is of assistance.

Regards...Mike