

**Handbook review**

1 message

**steve** <steveofengland@googlemail.com>

To: Taxi Licensing &lt;taxi.licensing@adur-worthing.gov.uk&gt;



21 November 2018 at 11:58

Dear licensing

These are my proposals for the alteration of the handbook.

CCTV should be optional.

Worthing has not had a spate of attacks or incidents that Warrants the intrusive nature of CCTV. It is likely to be deemed unlawful and in breach of act 8 of the 98 privacy act according to the ICO. As you saw in the meeting, a lot of drivers are against this and I have provided a petition of nearly 100 drivers. A lot of us feel that we can accept CCTV as long as we can turn it off in our Private Lives.

Also the price is too much. I have sent you a cheaper version but you have not replied to that email.

Advertising should be allowed on the rear window or the rear of the car.

We have had our wages slashed by around £200 a week on average in the last 2 or 3 years, so we feel back window advertising would help pay for any CCTV. Also if CCTV is in a vehicle then the argument for not seeing into the vehicle is irrelevant.

Tinted windows should be tested by a machine. So that the differences in a day times light or someone's Vision is negated. Also if CCTV is in the vehicle then the darkness of Windows is irrelevant.

We should be allowed silver vehicles.

Silver vehicles should be allowed because they are abundant and reasonably priced and we are being discriminated against because of silver being allowed Adur.

The calling in of drivers because they have pointed to our office is ridiculous. Customers are allowed to ask us where our office is, and we have a duty to help the public.

You're punishing drivers for helping the public and the company that they work for. This Petty points system that can be applied to us, is not needed, we are adults, treat us like adults please.

I'll be happy to speak about any of these points to you or a committee in the future.

I really hope you take our suggestions on board. And understand that you are here to protect our job aswell as enforce it.

Regards Steve Powell. Driver rep at Arrow.

Worthing Hackney Carriage and Private Hire Handbook Consultation 2018

Please provide as much information by using the titles as guidance

Name M. A. ROBERTS

Address 79, PALATINE ROAD WORTHING Post Code BN12 6JR

Appendix	Page Number	Number point on page	Representation
			<p>AS ATTACHED.</p> <div data-bbox="676 1041 1134 1368" data-label="Image"> </div>

**Worthing Private Hire Plate 3188**

**Mr M. A. Roberts**

**79 Palatine Road**

**Worthing**

**West Sussex**

**Bn12 6JR**

**To Teresa Bowley**

**C.C**

**Simon Jones**

**Paul High**

**Lionel Herman**

**Sean McDonald**

**I am writing to you to request that I be exempt from the CCTV being installed in my vehicle, which as stated above is W.B.C hire plate 3188.**

**I have been a part time private hire driver and the owner of a sunbed company since 1996.**

**The majority of my work comes from people who hire a sunbed in preparation for their holiday and once the hire is complete a large percentage of them book me to take them to the airport.**

**I have in addition too those above a few customers who are professional business employees which also use my services.**

**I do not advertise for any private hire work at all, my work is all gained through personal contacts.**

**I have been through my personal contacts and advised them that as of December the vehicle is likely to have CCTV in it, To date from the information I have received back from them I currently will definitely loose £6500 worth of business and a possible further £2000, this is due to people feeling uncomfortable about being filmed.**

**The reason for the £6500 loss is that I have a customer whose employer has told them to find another taxi service when the CCTV is installed. This is on the grounds that during their journey they work on their laptops and do not wish to be filmed when working.**

**The others are customers that realise they have a choice and will refuse to get into the car if it has CCTV in it (We hire a private car and that's what it should mean).**



I have been told that if the CCTV is installed I cannot turn it off. So a £6500 loss plus installation gives me a large loss on what is a part time basis.

I personally believe that with the type of work I do there is no need for CCTV in my vehicle.

It was proposed for Adur Borough but due to the type of work that these vehicles carry out and the area that they cover it was deemed un-necessary for the CCTV to be installed.

Due to cross border hiring both Adur and Arun vehicles can be widely seen operating in Worthing.

If I have to have CCTV, the work that I lose will undoubtedly go to either Adur Borough Drive or Arun and this seems grossly unfair as I cannot compete with this.

I have requested that my car has an executive plate but was told that only BMW or Mercedes cars are allowed this and no CCTV has been authorised for these cars as I am aware.

I believe Elite cars have a Skoda Estate which is plated as an executive car with no CCTV required so I ask you how did that get through?

I would also like to mention that a new ruling has been issued and all cars must have the company name stuck on the side of the cars with a contact telephone number, I am now getting phone calls at 1am / 2am from people requesting a taxi which is something that I do not do!

I do not need to advertise my telephone number because as I said my work all comes from personal contacts.

My phone is always on through the night as I do have an elderly mother of 85 years old that lives alone and over 40 miles away, So I am asking that I can remove this from my car?

I look forward to your feedback for which then I can make a business decision regarding how and if my company operates in the future.

Yours Sincerely  
Mike Roberts

A handwritten signature in black ink, appearing to be 'MR', with a long horizontal line extending to the right.

Adur & Worthing Councils  
Licensing Unit  
RECEIVED

19 NOV 2018

**Handbook Consultation Representations**

1 message

**Daniel Aherne** <danaherne8@googlemail.com>  
To: Taxi Licensing <taxi.licensing@adur-worthing.gov.uk>

Initials

19 November 2018 at 11:58

Dear Taxi Licensing,

I am writing to make the following representations regarding the Taxi Handbook Consultation.

First: I have only recently become a taxi driver, as such I have not been able to make any representations to previous consultations. In accordance with the Freedom of Information Act I would like any and all evidence upon which decisions were made regarding the Adur & Worthing Taxi & Private Hire Handbooks.

Second: Appendix A, Section 2, "Age of Vehicle"

In the case of purpose-built taxis, especially electric ones, this timeframe should be twenty years for two reasons. One, they have both better build quality than most cars and less mechanical susceptibility than internal combustion-driven vehicles. Two, at around £60,000, one would be a very long time getting any return on such a significant investment.

Third: Appendix A, Section 7, "CCTV"

I can see no reason for this to be mandatory and request all evidence used in the decision being made. If CCTV is to be used, it is imperative the "authorised persons" able to access footage should include and be limited to the owner of the vehicle and the police. During the meeting we were told CCTV must conform to ICO Standards, I would like to know who determines this requirement and on what grounds.

Fourth: It has come to my attention that the use of rear access wheelchair vehicles is being considered. I must object to this idea, it would be completely impractical due to the amount of space it would take up on the ranks.

In reference to electric vehicles, I am considering financing either a Metrocab or a TX5, however due to the cost I would need written confirmation either would have a Hackney license lifespan of 20 years before I could go ahead.

Whilst emailing I would also remind you I have a completed taxi test form to submit, my contact no. is 07557121549.

Thanks and kind regards,  
Daniel Aherne

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## Handbook

1 message

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**lisa stanbridge** <lisastanbridge123@hotmail.co.uk>

8 November 2018 at 06:53

To: "taxi.licensing@adur-worthing.gov.uk" <taxi.licensing@adur-worthing.gov.uk>

Dear licensing I hope you are all well.

Thank you for giving us the chance to review our handbook and hopefully make some changes for the better.

First of all I'd like to say I think CCTV should be an optional choice.

I would like to suggest that if we have CCTV, we can have advertising on the back windows or the rear of the vehicle to help pay for CCTV.

I believe the argument against advertising and tinted windows was to do with you couldn't see inside the car from outside but surely the camera system solves that now.

The cost of CCTV is large as you know and I feel that having advertising is good for local business and helps us out as well.

Also I feel that having door signs or a roof light is ok but not both could we have the option to have either?

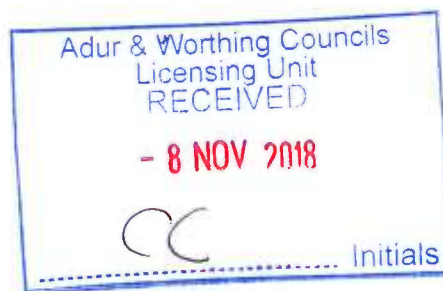
I personally haven't had a problem with my windows being too dark but I understand other drivers have. Is there not a machine that you can have to test these windows?

I can't afford to take time off to come to the meetings. Can we be sent a voting form for ideas in the future?

Thanks

Lisa Stanbridge

Get [Outlook for Android](#)





Richard Holland

Hackney Driver HD5371

26<sup>th</sup> October 2018

To: The Members of Worthing Borough Council Licensing Committee and the Taxi Licencing Team

Subject Matter: Compulsory CCTV

I hereby wish to object to the outrageous imposition and financial cost being foisted upon Worthing Taxi and minicab drivers.

The burden of such an extortionate cost during a period of financial hardship brought on by the constant stream of more and more cabs working our streets is just too great. Only last week one driver was forced to pay £600 to the company that seems to hold a monopoly on this equipment for what is a very basic system, in fear of the licensing team refusing to issue him a licence in the run up to the Christmas period!

The licencing team have constantly stated that we have been given much consultation and that expert witnesses have given their testimony to the benefits of such a system in our area.

Well, sorry, but no! We drivers have been given no formal notification of requirements, dates, or even how to voice an objection until today. I myself, back when this so called handbook update began, emailed in and asked the licencing team for a copy of the said expert witness testimony and to be supplied with proof of his/her qualifications in such a field; needless to say no such documentation has been forthcoming to this day.

I shall be circulation a copy of this letter amongst my fellow hackney drivers and will be urging them to voice their opinions upon this outrageous matter.

Yours sincerely

R HOLLAND

A handwritten signature in black ink, appearing to be 'RH' followed by a stylized flourish.





Taxi Licensing &lt;taxi.licensing@adur-worthing.gov.uk&gt;

**CCTV Taxi Handbook**

1 message

mikejohnbishop <mikejohnbishop@yahoo.co.uk>  
 To: Taxi Licensing <taxi.licensing@adur-worthing.gov.uk>

7 November 2018 at 11:59



Dear Sir/Madam,

Re the issue of compulsory CCTV in Worthing taxis by the end of 2018.

1) The drivers were never consulted regarding this ruling, thus not allowing for any their opinions or objections to be put forward.

2) The issue of the drivers privacy, let alone the passengers, appears not to have been addressed..... Have the council spoken to our fare paying customers and asked for their views?

3) I personally transport nearly all wheelchair and special needs passengers and virtually to a person they are against CCTV being introduced into the taxi, indicating that it will make them feel even more vulnerable.

\* I myself had an incident a few months ago when a passenger decided to walk away from my cab without paying. My phones camera had clear photos of this passenger, I also had their address and this was all given to the Police..... Their emailed reply was, "it wouldn't be a good use of our resources to investigate" & "maybe next time ask for the fare upfront"!

The idea of forcing taxi drivers to pay out around £500 for a CCTV system when you get that sort of response from the Police is laughable!

4) Why are Adur taxi drivers exempt from the CCTV ruling but Worthing drivers are not?  
 Clearly the council can't believe it's an overwhelming necessity for CCTV when they're neighbour is exempt!

5) In your letter dated 15th January 2018, regarding the implementation of CCTV, you state that you intend to introduce it "in the interest of public safety". This strongly infers that you believe Worthing taxi drivers(who are regularly DBS checked) are or could be untrustworthy and/or, a verbal or physical threat to their passengers.

This is insulting at best and possibly actionable!

6) The compulsory CCTV instillation in taxis would result in a tracking of the driver & vehicle 24/7 (even when the vehicle is being driven in the taxi drivers leisure time).

This would be a blatant disregard of the privacy of the taxi driver and their family or friends, who may well be travelling in the vehicle.

7) Putting all the other points to one side for a moment..... The cost of installing such a system will be astronomical to the individual taxi driver(around £500), particularly in view of the increased number of drivers coming into the trade in Worthing & the resultant dilution of work.....There has been a noticeably steady down turn in business over the past few years.

The Licencing Committee needs to look again at the CCTV proposal and try and put themselves in the taxi drivers position and withdrawl the forced implementation of CCTV in taxis!

Regards  
 Mike Bishop. HD5065



## Worthing Hackney Carriage and Private Hire Handbook Consultation 2018

Please provide as much information by using the titles as guidance

Name GILLIAN MARTINAddress 54 MUIRFIELD ROAD Post Code BN13 2NB

Appendix	Page Number	Number point on page	Representation
		CCTV	<p>I FEEL THAT I DO NOT NEED, OR WANT TO HAVE CCTV FITTED IN MY CAR.</p> <p>1. I WORK <u>PART TIME</u> DAYS.</p> <p>2. I AM HOPING TO GET A SCHOOL RUN.</p> <p>3. HAVING SPOKEN TO PARENTS IN THE PAST, NOT ONE SINGLE PARENT IS HAPPY TO HAVE THEIR CHILDREN FILMED.</p> <p>4. I HAVE BEEN A TAXI DRIVER FOR NEARLY 20 YEARS. I HAVE NEVER HAD ANY PROBLEMS.</p>

Adur & Worthing Councils  
Licensing Unit  
RECEIVED

21 NOV 2018

Ce Initials

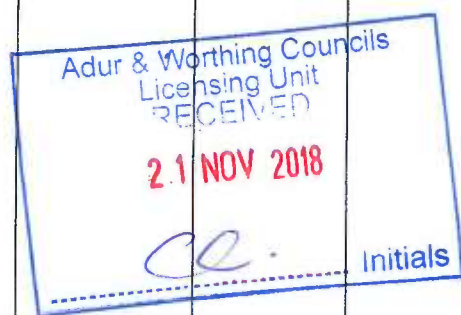
Continue on additional paper if required

## Worthing Hackney Carriage and Private Hire Handbook Consultation 2018

Please provide as much information by using the titles as guidance

Name PAUL MARTENAddress 54 MUIRFIELD ROAD WORTHING Post Code BN14 2NB

Appendix	Page Number	Number point on page	Representation
		CCTV	<p>I DONT FEEL THE NEED FOR CCTV. AS I HAVE BEEN A LICENCED TAXI DRIVER IN WORTHING FOR OVER THIRTY YEARS. NEVER ONCE IN ALL MY DRIVING HAVE I EVER FELT UNSAFE. I HAVE DONE DAY, NIGHT AND OVERNIGHT DRIVING. I FIRMLY BELIVE IT'S HOW YOU DEAL WITH THE SITUATION THAT WOULD RESULT IN A SITUATION BEING SORTED.</p> <p>I ONLY DRIVE ON DAYS NOW SO KNOW MOST OF MY CUSTOMERS EVEN THE ONES THAT <del>REGULARLY</del> GO TO THE PUBS REGULARLY. I DO AIRPORTS AND HOPE TO DO SCHOOL RUNS ONLY.</p> <p>TO HAVE CCTV FITTED WOULD BE AN EXTRA EXPENCE FOR ME AND COMMITMENT OF FURTHER EXPENCE (AS YOU HAVE TO SIGN UP FOR THREE YEAR CONTRACT)</p> <p>ADUR CARS DO NOT HAVE TO HAVE CCTV. AND THERE ARE LESS RESTRICTIONS PTO</p>



Continue on additional paper if required

83 X104399A

ON THEIR CARS. IT SHOULD BE ONE RULE  
FOR ALL. AFTER ALL IT IS ADUR AND WORTHING  
BOROUGH COUNCIL.



## Worthing Hackney Carriage and Private Hire Handbook Consultation 2018

Please provide as much information by using the titles as guidance

Name

Jane Enticknap-Hawkins

Address

74 Willow Crescent, Durrington

Post Code BN13 2SY

Appendix	Page Number	Number point on page	Representation
F	38	17	<p>I am a single mother of two children of school ages and my time at work is limited, therefore, for myself CCTV cameras being installed would not be a viable cost. I only work doing corporate and private airport and long distance of 97% customers that I already know.</p> <p>Why does one size have to fit all?</p> <ul style="list-style-type: none"> <li>• I am exempt from a Radio</li> <li>• I am exempt from a Pda</li> <li>• I work for myself and if that changes to town work I have to notify Worthing Borough Council</li> </ul> <p>Therefore I could also be exempt from CCTV installation.</p>

Worthing Hackney Carriage and Private Hire Handbook Consultation 2018

28 NOV 2018

Please provide as much information by using the titles as guidance

CC

Initials

Name R. D. FENTICKNAP

Address 14, HUDSON CLOSE, DURRINGTON, WORTHING Post Code BN13 2SS

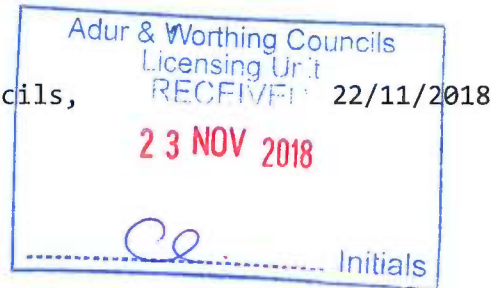
Appendix	Page Number	Number point on page	Representation
F	38	17	<p>I am sixty six years old and I am semi retired. The only work I do these days is Airports and out of town long distance runs. This amounts to between 8-10 jobs a week.</p> <p>With this in mind and the fact that I know all of my customers I don't see the need for C.E.T.V. cameras in my minibus and the customers don't either.</p> <p>Also it would not be financially viable for me with the cost of having it fitted is £500 if I buy it and £250 per year if I rent it and I have to sign a contract for three years. There is no way I can recoup this money by price increase as there are other people working in the area under different licensing councils who don't have this expense.</p> <p>A good reason for exemption would be</p> <ol style="list-style-type: none"> <li>1) I don't have a meter fitted</li> <li>2) I don't have a two way radio or a P.D.A. system</li> </ol>

Continue on additional paper if required

Dear Taxi Licensing Team Adur & Worthing Councils,

Vehicle Reg: EL10CAB  
Plate Number: 2303

Page: 38  
Number point: 14 Door Signage



14.1 a) the sign shall be constructed of vinyl, and shall be applied directly to the door.

Licence holders should note that magnetic door signs are not acceptable in fulfillment of this condition.

I wonder if you would kindly consider giving permission for all Private Hire Vehicles

not to display door signs.

As you are aware each vehicle displays already on their roof the name and phone number

of the company working with.

The reason I am raising this issue with you is because these door signs are:

1. Damaging the paint work invertible of each vehicle;
2. When I sell my vehicle I will have to have the vehicle resprayed which will prove very expensive to rectify the damage caused;
3. Many Worthing Private Hire Drivers including myself hold an Operator Licence;
  - a) many Hackney Carriage Drivers work part time with Private Hire Companies;
4. At present this confuses customers which company they have booked with;
  - a) Is the tariff Hackney Carriage rates or Private Hire rates;

For example if my customers have hired Elli Cars for an airport journey it compromises

my Company.

Currently displaying Arrow door signs.

Therefore so to avoid the situation arising with the door signage I would appreciate

if you would give permission just to allow only the roof signs.

As an alternative to the vinyl door signs please give your consideration to sanction using magnetic door signs.

I look forward to receive your replay at your convenience in writing.

Kind regards,

Elza Francis



**Worthing Hackney and Private Hire Handbook**

1 message

**Glen Harris** <glen.scp@gmail.com>

12 November 2018 at 16:05

To: Taxi Licensing &lt;taxi.licensing@adur-worthing.gov.uk&gt;, Glen Harris &lt;glen.scp@gmail.com&gt;

Good afternoon,

I would like to bring to your attention the subject of taxi meter clock settings for use in Private Hire Vehicles.

A number of my colleagues have brought to my attention that, when presenting their vehicle for re-plate and or new plate, they have had to go to the Taxi Meter supplier (in most cases in Lewis) and have their clocks adjusted to show the correct time on the meter.

This is in my opinion, unnecessary and costly for private hire drivers.

When we (Private Hire drivers) change our "rate" setting to an applicable different "rate" we do not use the meter's clock setting to change the rate. To my knowledge all private hire taxi meters are not programmed to change the tariff rate in line with the inbuilt clock and calendar.

We change the tariff rate by our watches or clocks in our cars or on our phone, the operation is totally manual and down to the driver to change the tariff rate.

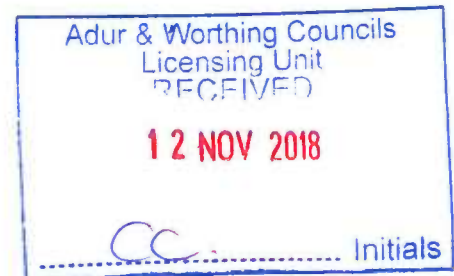
By sending the driver all the way over to Lewis to change the inbuilt clock time setting, and pay for this service is a waste of time and money.

Could you please look at this requirement, and review whether it is necessary.

Best Regards

Glen Harris

PD7001



**APPENDIX E13****From Janet Jacks (Worthing) PD7067 Ref: Recent handbook consultation.**

1 message

jannie yum &lt;yumjung2003@yahoo.co.uk&gt;

15 November 2018 at 13:04

Reply-To: jannie yum &lt;yumjung2003@yahoo.co.uk&gt;

To: Taxi Licensing &lt;taxi.licensing@adur-worthing.gov.uk&gt;

Hi,  
I was unable to attend the recent public meeting but wanted to add my name to the petition against the CCTV that was in the Arrow office, I was on holiday at the time and missed doing it.  
I also wanted to write and express again my objection to being forced to pay out £400 for a CCTV device, especially as we the drivers are not in operation of said device and personally I cannot afford such an outlay, which I think is unfair.

I would appreciate it if you could take note of my objections and hope to hear an e-mail response from yourselves about the current CCTV issue.

Sincerely,

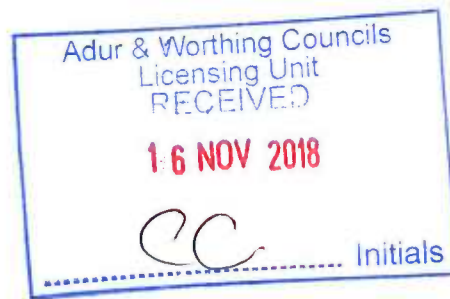
Janet Jacks. (PD7067)

Flat 1,

11, Moat Way,

BN12 4DR.

Tel - 01903 600163.



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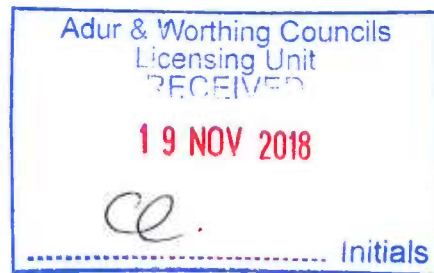
**Cctv**1 message

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**Gary Bazley** <garybazley56@gmail.com>  
To: taxi.licensing@adur-worthing.gov.uk

18 November 2018 at 10:12

I feel making cctv compulsory and not voluntarily is wrong because in my 30 years experience I think it would not warrant the expense





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**Re: Cctv objection**

1 message

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**Gary Bazley** <garybazley56@gmail.com>  
To: taxi.licensing@adur-worthing.gov.uk

12 November 2018 at 17:13

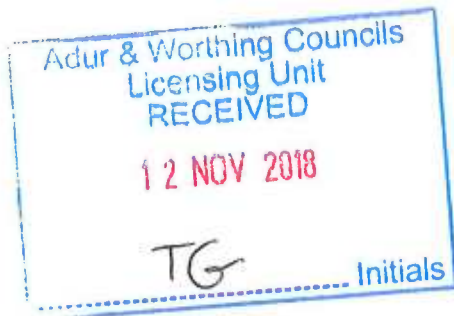
I would like to object to being made to having cctv fitted as it is an expense I feel in my 30 years experience us not necessary . Tours objectively Gary Bazley

On 12 Nov 2018 3:30 pm, "Gary Bazley" <garybazley56@gmail.com> wrote:

Dear taxi licensing office,

Please accept this as my objection.to.having. compulsive CCTV as it very expensive to.have and in.30 years experience, I find it unnecessary as I only work days





Mr R D Enticknap  
14 Hudson Close  
Durrington  
Worthing  
West Sussex  
BN13 2SJ

11<sup>th</sup> November 2018

To  
The Taxi Licensing Team

I am writing to express my comments to the introduction of CCTV in all private hire Vehicles as I am unlikely to be able to get back in time for the meeting tomorrow. I am not happy with the prospect of having to spend a minimum of £500 to have These fitted as for the work I and my daughter do these days which is Airports and Out of town Corporate Work.

Where I am concerned I feel this is a big expense at a time when as I said earlier that the Minimum cost to buy one is £500 and to rent one would be as much if not more and I Have to sign up for a minimum three year contract when at my age of 66 I am not sure I will be able to carry on for that long.

With this in mind I feel that you should be able to look at what work is being carried out by quite a few independent drivers and operators and not make it compulsory for us to have CCTV installed

R D ENTICKNAP

Please provide as much information by using the titles as guidance

Name EDWINA KOSIA - RULIS

Address 52, LITTLEHAMPTON Rd Wx Post Code BN13 1QH

Appendix	Page Number	Number point on page	Representation
	CCTV	⇒	<p>1 WISH TO NOT HAVE THE SYSTEM PUT IN AS 3</p> <p>1) - I only work 3 shifts ANNUAL - so expensive</p> <p>2) You HAVE to pay to cancel THE SYSTEM!?</p> <p>3) ONLY HAVE two Company Local to use - so no option</p> <p>4) AS WE HAVE to keep our vehicle - why hire this camera due a DASH so it could be cheaper</p> <p>5) Why <del>not</del> DASH it have to be A Two year contract</p>

Adur & Worthing Councils  
Licensing Unit  
RECEIVED  
12 NOV 2018  
TG- Initials

Continue on additional paper if required



To,  
 Worthing Borough Council,  
 Adur & Worthing Taxi Licensing,  
 Portland House,  
 44 Richmond Road, Worthing,  
 BN11 1HS.



Subject:- Worthing Borough Council Hackney/Private hire Licensing Handbook review/  
 Concerns/issues

Respected sir/Madam,

**Name: Ravindra Atluri**

**1. Appendix E,F Point 5,17 Page number of Handbook 34,38,39- Regarding :CCTV**

CCTV installation being imposed in Hackney & Private hire trade in Worthing is not necessary there hasn't been a spate of attacks or incidents that warrants the Intrusive nature of CCTV

The Information Commissioners Office (ICO) advises that taxi trade drivers have a right of privacy, as well as family members of drivers, that filming during our private and personal life is deemed to be unlawful and breach of ACT 8 of the 1998 Privacy Act.

It is also burdening on us the cost of equipment, Installation, transferring from one vehicle to another, recurring cost for retrieving data/footage when necessary.

Annual increase of license fees, other Bills, raising fuel costs, which increases lot of pressure, stress on my daily life, which demands have to work more and more hours/unsociable hours to ends meet, which effects my personal and Family life.

Year on year increasing number of new drivers, less work, sharing by more and more drivers, slow economy, uncertainty due to Brexit, these are contributing my life harder, which also affects my livelihood in great extent.

Due to all above reasons, Installation of CCTV policy should not needed, however, it should be optional who ever wish to have them, its personal choice, not compulsory.

**2). Appendix E, Point 6, Page number of Handbook 34- Regarding: Tinted Windows**

Vehicles are manufactured with tinted windows should be allowed, you have to adopt proper mechanism to measure the thickness/transmission of light with proper equipment with great transparency.

**3). Appendix E, Point 2.3a, 2.5 Page number of Handbook 32,33- Regarding: Age of vehicle**

10 years vehicle mileage is comparing with similar vehicle was used solely for

Social, domestic and pleasure purpose is unfair, not level playing field, because even up to 10

Years vehicle which are running as taxi/Business/Commuting to work have higher mileage, as

Long as met other conditions of safety, Garage certificate, MOT and etc, should be allowed for

1year.

According DVSA MOT is valid for one year, its roadworthy, Garage certificate is also valid for

1year, 10 years vehicle required to produce at 6months, another Garage certificate

Unnecessary cost to driver despite of both certificate are valid for 1year, which is unfair.

**For the point 2.5:** Silver vehicle for private hire should be allowed, because it has different Roof sign,

Different Colour License plates etc.

Whereas in Adur district has no colour restrictions for vehicles for Hackney or PH

**4). Appendix F, Point 14,14.1-14.2 Page number of Handbook 38- Regarding: Door signage**

Referring to Appendix F, point number 13 under heading ROOF Sign page number 37 serves

Same purpose as Appendix F Point14 page number 38.

Most of Councils fallow standard signs as Roof sign, Licence plates one rear& one inside

So It must not be compulsory Door sign, however it should be optional or choice to proprietor,

Door signs are affecting my personal and family life when I am off work, when you pick up my

Family members from Public places like Train station, Cinemas, etc.

If you can develop website for online processing of applications, which makes everybody life

easier and saves time & money.

Looking forward to hear your reply. If you need any clarification get back to me.

Yours sincerely

Mr R Atluri

To,

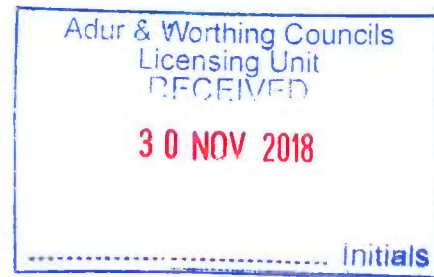
Worthing Borough Council,

Adur & Worthing Taxi Licensing,

Portland House,

44 Richmond Road, Worthing,

BN11 1HS.



Subject:- Worthing Borough Council Hackney/Private hire Licensing Handbook review/

Concerns/issues

Respected sir/Madam,

**1. Appendix E,F Point 5,17 Page number of Handbook 34,38,39- Regarding :CCTV**

CCTV installation being imposed in Hackney& Private hire trade in Worthing is not necessary there hasn't been a spate of attacks or incidents that warrants the Intrusive nature of CCTV

The Information Commissioners Office (ICO) advises that taxi trade drivers have a right of privacy, as well as family members of drivers, that filming during our private and personal life is deemed to be unlawful and breach of ACT 8 of the 1998 Privacy Act.

It is also burdening on us the cost of equipment, Installation, transferring from one vehicle to another, recurring cost for retrieving data/footage when necessary.

Annual increase of license fees, other Bills, raising fuel costs, which increases lot of pressure, stress on my daily life, which demands have to work more and more hours/unsociable hours to ends meet, which effects my personal and Family life.

Year on year increasing number of new drivers, less work, sharing by more and more drivers, slow economy, uncertainty due to Brexit, these are contributing my life harder, which also affects my livelihood in great extent.

Due to all above reasons, Installation of CCTV policy should not needed, however, it should be optional who ever wish to have them, its personal choice, not compulsory.

**2). Appendix E, Point 6, Page number of Handbook 34- Regarding: Tinted Windows**

PI3 X124399A

Vehicles are manufactured with tinted windows should be allowed, you have to adopt proper mechanism to measure the thickness/transmission of light with proper equipment with great transparency.

**3). Appendix E, Point 2.3a, 2.5 Page number of Handbook 32,33- Regarding: Age of vehicle**

10 years vehicle mileage is comparing with similar vehicle was used solely for

Social, domestic and pleasure purpose is unfair, not level playing field, because even up to 10

Years vehicle which are running as taxi/Business/Commuting to work have higher mileage, as

Long as met other conditions of safety, Garage certificate, MOT and etc, should be allowed for 1year.

According DVSA MOT is valid for one year, its roadworthy, Garage certificate is also valid for

1year, 10 years vehicle required to produce at 6months, another Garage certificate

Unnecessary cost to driver despite of both certificate are valid for 1year, which is unfair.

**For the point 2.5:** Silver vehicle for private hire should be allowed, because it has different Roof sign,

Different Colour License plates etc.

Whereas in Adur district has no colour restrictions for vehicles for Hackney or PH

**4). Appendix F, Point 14,14.1-14.2 Page number of Handbook 38- Regarding: Door signage**

Referring to Appendix F, point number 13 under heading ROOF Sign page number 37 serves

Same purpose as Appendix F Point14 page number 38.

Most of Councils fallow standard signs as Roof sign, Licence plates one rear& one inside

So It must not be compulsory Door sign, however it should be optional or choice to proprietor,

Door signs are affecting my personal and family life when I am off work, when you pick up my

Family members from Public places like Train station, Cinemas, etc.

If you can develop website for online processing of applications, which makes everybody life easier and saves time & money.

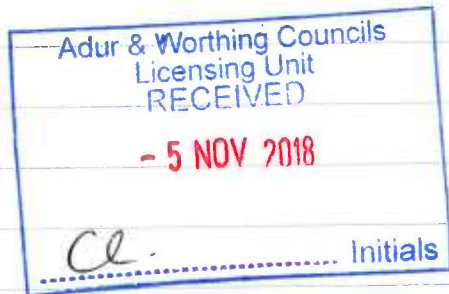
Looking forward to hear your reply. If you need any clarification get back to me.

Yours sincerely

Rajendra C Patel



# APPENDIX E20



Brought in by hand.

6 Willowbrook ent.

Old Dalls Farm Rd.

Henbury.

West Sussex

Bn 15 8 95.

Mr P. CHEAL.

Hacking Plate no 56.

07986460307.

To The Horse Licensing Team.

I Mr Philip Cheal, wish to voice  
my opinion on the points of the handbook below

CCTV

My opinion is it should be amended.

The Points register

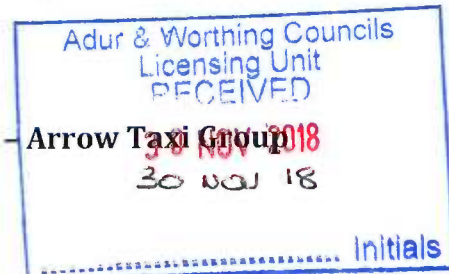
I don't think it will work because  
you don't have the main power to check things.

MOT & Hacking test.

Can't see the Point is a gauge to  
do both tests, and pay twice when you the horse team  
decide if the car is on or off the road.

Many thanks

 Philip Cheal.

**Worthing Private Hire / Hackney Consultation – Arrow Taxi Group**Statement

As operators / proprietors we propose three potential amendments to the Worthing handbook towards improving public safety & interest.

**1) Taxi Fare Calculator (PDA device)**Proposal

Remove the mandatory requirement for Private Hire vehicles to be fitted with traditional "taximeters" which would then allow the use of modern "taxi fare calculators"

Reasoning

Traditional taximeters pose an ongoing and unnecessary expense to all drivers, which could be used to subsidise costs of new CCTV requirements. Additionally, operators and licensing authorities have no ability to log or inspect fares calculated by taximeters, which is possible with modern taxi fare calculators. This would provide licensing authorities with a simple method of gathering evidence should they receive complaints of overcharging for a particular booking.

Justification

In London (TFL) it is illegal for a Private hire vehicle to be fitted with a taximeter. In neighbouring licensing authorities such as Brighton, Arun, Chichester & Portsmouth there are no mandatory requirements for Private Hire vehicles to be fitted with a traditional taximeter. Private Hire operators nationally with specific examples in London, Brighton, Chichester & Portsmouth have already permitted the use of modern taxi fare calculators.

In 2015 the high court in London declared that smartphone apps used to calculate fares are by definition not "taximeters" and can be lawfully used. Lord Justice Ouseley ruled that such a device does not constitute a taximeter. "A taximeter, for the purposes of section 11 of the Private Hire Vehicles Act 1998 does not include a device that receives GPS signals in the course of a journey, and forwards GPS data to a server located outside of the vehicle, which server calculates a fare that is partially or wholly determined by reference to distance travelled and time taken and sends the fare information back to the device." The landmark case was brought forward by UBER and the ruling has subsequently been applied throughout Europe & the UK.

Article: <https://www.independent.co.uk/news/business/news/uber-high-court-rules-that-the-app-used-to-calculate-fares-does-not-break-the-law-a6696446.html>

153 X104399A

Article: <https://www.theguardian.com/technology/2015/oct/16/uber-wins-high-court-case-taxi-app-tfl>

## **2) Card payment devices**

### Proposal

Both Private Hire & Hackney licensed vehicles should be mandatory equipped with an approved card payment device.

### Reasoning

Consumer choice is not only important, but goes without prejudice. Not all members of the public have access to cash payment (for example, mental health patients), whilst others are unable to access ATM machines either at all or safely without enduring additional "waiting time" costs (for example, wheelchair bound customers). Furthermore, drivers who hold significant cash within the vehicle could be at an increased security risk, which could be alleviated by encouraging card payments.

### Justification

In London (TFL) it is a mandatory and legal requirement for Hackney vehicles to be fitted with a card payment device. The TFL board agreed on the 3<sup>rd</sup> of February 2016 that passengers should be able to pay by card, including contactless, from 31 October 2016 all licensed taxi drivers have been required to accept credit and debit card payments in accordance with their electronic payment guidance.

Article: <https://tfl.gov.uk/info-for/taxis-and-private-hire/accepting-card-payments>

## **3) Silver Private Hire vehicles**

### Proposal

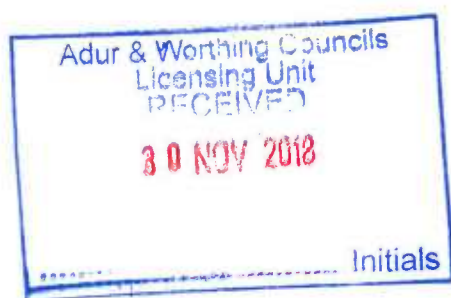
Removal of restrictions on silver Private Hire vehicles

### Reasoning

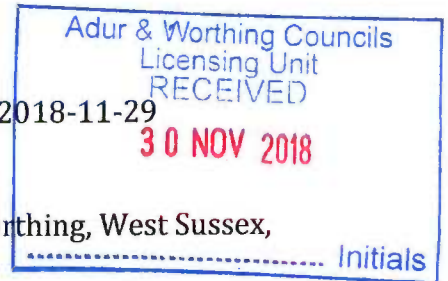
Unduly restrictive, unnecessary and further undermined by cross-border rules.

### Justification

Majority of licensing authorities have no or minimal restrictions on the colour of Private Hire vehicles. Required signage on Private Hire & hackney vehicles are sufficient enough that members of the public can differentiate between the two.







Worthing Hackney and Private Hire Handbook Consultation 2018-11-29

Alan O'Donnell

Elite Cars of Worthing, 33 New Broadway, Tarring Road, Worthing, West Sussex,  
BN11 4HP

Page number 37

Point number 10 Taxi Meters

We operate a very complex Computer System and the way work is sent to drivers is via an electronic PDA. This is the same system operated by Arrow and many large companies in this country and abroad.

Within the software is the opportunity to activate a meter system. Whilst not being able currently to use this system "Live" at present due to local licence regulations we would ask that the consideration be given to this being used as a fully approved system.

Using a highly trusted driver whom has a council approved traditional taximeter fitted we have done extensive trials alongside the regulatory meter and the following findings have been noted. It needs to be pointed out that at no time was this meter used for charging customer only for monitoring purpose. The way the system works is by using a very accurate GPS system similar to that used for navigation and from claims made by manufacturers this is accurate to about 1 meter anywhere on the globe. Thus as you can see it makes a highly accurate and reliable unit.

The benefits are many over traditional Taximeters.

It allows the dispatcher/ computer operator to be able to see where the drivers are at all the time. Each driver has his own individual identity number, which is visible on screen the whole time the driver is on shift. If you have drivers that are regularly moving from area to area it could indicate "Flipping" or the driver taking un-booked fares.

If the company has a driver whom he is unsure of it is very easy to monitor the prices being charged which on a more traditional meter is not possible for the company. When a job is booked the computer tells the operator and driver where the pick up is, any pick ups on route, where the final destination is and the anticipated fare [or fixed fare if appropriate]. If a driver keeps on finishing on a much higher price then further investigation can be undertaken to allow the company to interview and deal with any dishonesty that prior to the availability of this system [and currently using traditional taxi meters] was not possible to check or stop at an early stage.

If a query was brought up by a member of the public it is possible to bring up a full history of any job showing all details about the job including the final fare charged.

The charging tariff is only possible to access by the operator and again this can be restricted to only key personnel or the proprietors. This obviously demonstrates that it is not possible for just anybody to change tariffs only

persons whom have been trusted by the Council to operate the respective companies anyway.

The benefits to the drivers are also evident. The cost of a taximeter can be saved and for some whom only work part time or restricted hours this may make the difference between the job being viable and not. With the anticipated need for CC TV to be fitted this helps with making the job more financially viable. No holes have to be drilled in the vehicle thus increasing the cars value upon sale.

Worthing Hackney and Private Hire Handbook Consultation 2018.

Alan O'Donnell

Elite cars of Worthing & Airports 2 Go, 33 New Broadway, Tarring Road,  
Worthing, West Sussex, BN11 4HP



Page 46

Point number 7-1 Private Hire Knowledge Test

Applicants who wish to be exempt from sitting the Council's Knowledge test must provide detailed information why the council should deviate from this policy.

There was the opportunity in the past for prospective drivers to pass a "restricted licence" thus only requiring the applicant to have all of his background checks completed and pass the various courses, child exploitation, disabled awareness and driving standards test.

I do understand the availability of this licence was removed due to enforcement officers finding some persons also using this licence for local driving. We have been licensed by the Worthing Council for about 25 years now providing Airport and Long distance services to the public of Worthing and have in that time had and indeed do have some very good drivers. None of these drivers have any interest in providing local services. We have of recent had many applicants from local drivers whom want to only do Long Distance and Airport Driving and do not have good enough local knowledge to pass the test.

It would seem that again we are not serving the public's interests fully due to a shortage of drivers. A more suitable knowledge check could include that the driver understands the access roads [main roads and motorways] to get to say Gatwick or Heathrow Airport. From the point of view of a Long Distance operator this is of far more importance than knowing where for example Terringes Avenue is. The local roads in Worthing can be checked prior to commencement of the job if the road is not familiar as all work is pre booked and allocated.

Ways to ensure that Restricted Licence holders only complete the right work could include

The licence could be jointly issued to the driver and the operator. Thus if they wish to have the benefit of this type of licence they would need to commit to working for a specific company and the control would then be with the company and the honesty of the driver.

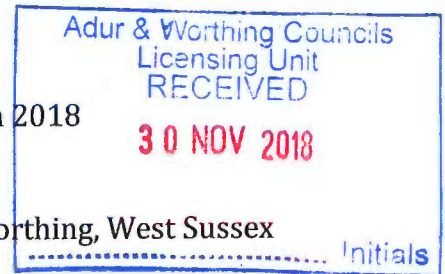
The driver could be issued with a different colour of vehicle plate. If this was made aware to the PHV drivers of Worthing then this could be self-policing. I am sure most local drivers will let the council licensing unit know as they don't want to lose their work. If there was extra cost for the plate this should be passed on to the driver. A bright red plate would stand out well.

Due to the long time we have been offering these services we have many customers coming back year after year for our services. Many of these loyal customers we had to reject due to lack of drivers. This happened regularly last year and it was not uncommon to have to say no to 600 plus enquiries. This is not a problem that is unique to us as we work with many other companies and individuals and everybody has similar problems.

We would ask that the officers look favourably upon this request as it would help with supplying employment for local people and indeed satisfy the needs of the local residents.



Worthing Hackney and Private Hire Handbook Consultation 2018



Alan O'Donnell

Elite Cars of Worthing, 33 New Broadway, Tarring Road, Worthing, West Sussex  
BN11 4HP.

Page number 46

Point number on page 7-3 Private Hire Geographical Knowledge Test

I would ask that the Council Panel look at whether the current tests satisfy the need of the Taxi Licence unit and indeed the Public.

It is appreciated that drivers do need to have a good knowledge of the Worthing area. The knowledge test though does not take into consideration the wide use and availability of digital maps. Google maps or Apple maps to name a couple of the more popular ones are available on almost every phone and built into many cars. Thus having to know where the very small roads and closes are makes the test overly difficult.

Little Pembrokes, Trevor Close, Chesham Close, Courtlands Way are examples of roads that have such a small amount of houses in the road consequently the amount of times that a driver would need to know these roads is very unlikely. I have drivers whom work for myself and in 30 years of having held a licence in Worthing have never been asked to go to these destinations and other such small roads. It would seem knowing the more regularly used roads and where they are in the town is of equal or greater importance.

For example I interviewed a driver whom had a Lancing Adur licence and was asked where Heene Road was in relation to our office in Tarring Road. He did not have a clue. This obviously shows up a huge problem of having cross boarder cars working in Worthing due to a shortage of Worthing Licensed vehicles. I am sure even the other local taxi companies would rather have a locally licensed driver. Otherwise the constant complaints will occur, that I hear regularly about other companies, the driver did not know where he was going or over charging occurs due to the lack of even the most basic local knowledge.

Having taken the opportunity to study at length the "Department of Transport best practice guide for taxi and private hire licensing" I would like to point out some of the advice that is given.

Section 8 and 9

#### THE ROLE OF LICENSING POLICY JUSTIFICATION

The aim of local authority licensing of the Taxi and PHV trades is always to protect the public. Local licensing authorities will also be aware the public should have reasonable access to taxi and PHV services, because of the important part they play in local transport provision. Licensing requirements, which are unduly stringent, will tend to unreasonably restrict the supply of taxis and PHV services, by putting up the cost of operation and restrict entry to the trade. Local

licensing authorities should recognise that to restrictive an approach can work against the public interest and can, indeed, have safety implications.

For example, it is clearly important that somebody using a taxi or PHV to go home alone late at night should be confident that the driver does not have a criminal record and that the vehicle is safe. But on the other hand, if the supply of taxis or PHVs has been unduly constrained by onerous licensing conditions, then that persons safety might be put at risk by having to wait on late night streets for a taxi or PHV vehicle, he or she may even be tempted to enter an unlicensed vehicle with an unlicensed driver illegally plying for hire.

## Section 75

### Topographical Knowledge

Taxi Drivers need a good working knowledge of the area for which they are licensed, because they can be hired immediately, directly with the driver at ranks or on the street.

However, PHVs are not legally available for immediate hiring in the same way. To hire a PHV the would be passenger has to go through an operator, so the driver will have an opportunity to check the details of a route before starting a journey. So it may be unnecessarily burdensome to require a would be PHV driver to pass a knowledge test as a taxi driver. It may be thought more appropriate to test a candidate's ability to read a map and to assess their knowledge of key places such as main roads and railway stations etc. The department is aware of circumstances where, some people whom drive school children only on school contract routes have been deterred from doing so by overly burdensome topographical tests.

As a company we are in constant need of good licensed drivers to satisfy customer demand. We have been very well received by the public and have a high demand. We do not want to go the way of other companies and have out of town drivers working for us due their lack of local knowledge. But it does seem to leave the public unserved when we have people willing to wait one hour plus at peak times. We have had some very good candidates, ex police and military persons whom have not pursued their interest in PHV driving due to the time it takes to go through the process and difficulty of knowledge test thus it leaves people unemployed whom otherwise would have not been.

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## Review of Handbook

1 message

---

**Ravindra Atluri** <ravindra\_atluri@hotmail.co.uk>

30 November 2018 at 21:00

To: Worthing/ Licensing Licence <taxi.licensing@adur-worthing.gov.uk>

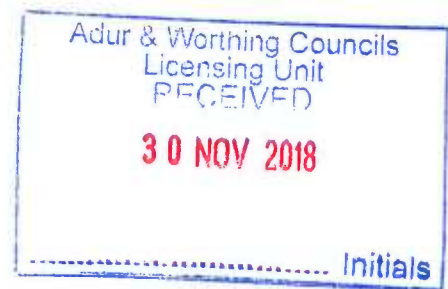
Hello sir,

With reference to Handbook Appendix M Revised under Heading as "penalty points scheme", page no's 62-66,

Before implementing this good discussion/debate on this issue is required.

Yours sincerely,  
Mr R Atluri

Sent from my iPhone



**Handbook review**

1 message

**steve** <steveofengland@googlemail.com>

To: Taxi Licensing &lt;taxi.licensing@adur-worthing.gov.uk&gt;

Adur & Worthing Councils  
Licensing Unit  
RECEIVED

21 NOV 2018 11 November 2018 at 11:58

 Initials

Dear licensing

These are my proposals for the alteration of the handbook.

CCTV should be optional.

Worthing has not had a spate of attacks or incidents that Warrants the intrusive nature of CCTV. It is likely to be deemed unlawful and in breach of act 8 of the 98 privacy act according to the ICO. As you saw in the meeting, a lot of drivers are against this and I have provided a petition of nearly 100 drivers. A lot of us feel that we can accept CCTV as long as we can turn it off in our Private Lives.

Also the price is too much. I have sent you a cheaper version but you have not replied to that email.



## Petition against CCTV from the Worthing taxi and private hire trade

We, the undersigned, believe CCTV being imposed on the taxi and private hire trade in Worthing is unnecessary.

There has not been a spate of attacks or incidents that warrants the intrusive nature of CCTV.

The ICO website states that taxi drivers have a right to privacy as well, and that filming during our Private times is likely to be deemed unlawful and in breach of act 8 of the 1998 Privacy Act.

We ask today for you to halt the enforcement of CCTV until a proper legitimate consultation with the trade has been undertaken at the soonest possible opportunity.

Yours truly

on behalf of Worthing Hackney and Private Hire Trade

Name	Address & Post Code	Badge No:	Signature
CLIFF SIM	3 CANTERBURY COM	7020	
LEE BOWEN	13 WILLOW COURT	7113	
CLIVE MASTERS	18 White House Place	7002	
MAT WHITING	23 PAXMEAD EVERSCENT	7102	
MIKE DELVAUX	23 HIGHDOWN AVE WORTHING	<del>7025</del>	
NORRIS ROSS	39 GAISFORD ROAD WORTHING	7174	
RICH WHITING	32 Montreal WAT.	7217	
Steve Powell	12 BRIDGENORTH CLOSE BN13 3QW	7354	
DAVID ROBINSON	5 CLYDE CL DURRINGTON	<del>3098</del>	
Nordine Hocine	23 Church Way BN13 1HD	7333	
Sam Nock	56 Amberley Dr. BN12 4QT	7262	
N. COURTINADU	408 MURFIELD RD BN13 2ND	7032	
V. SAUNDERS	257 FINESTON RD WON	7051	
ROGER CHRISTENSEN	44 THE AVENUE BN12 6JA	7015	
T. RAYMOND	197 DOMINION RD BN14 8LH	7119	
	114 West St BN11 3HD	7058	
MICK PEARCE	82 BRAMLEY ROAD BN14 9DT	7040	
Keith Lewis	33 Leeward Rd. Worthing	7505	
RAVINDRA ATWAL	3 The Mole Lane	7466	





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Yours truly

on behalf of Worthing Hackney and Private Hire Trade

Name	Address & Post Code	Badge No:	Signature
F. HOBBS	SMILL RD BN11 4JX	HD5025	[Signature]
P. Birch	55 HIGH ST TANNIS	HD5015	[Signature]
S. HEND	Bullock cross Lancing	HD 5019	[Signature]
P. HAYES	11 THE STREET LANCING	HD5011	[Signature]
P. Hope	150 GORING ROAD	HD 5054	P Hope
D BRADLEY	27 LONG MEADOW FINESTOWN	BN14 0HX	[Signature]
A. ASSADI	39 CLIFTON COURT	HD 5070	[Signature]
G BRADLEY	43 SONNINGDALE	HD 5013	G Bradley
LONG CB	73 QUEEN ST BN14 7BH	HD 5006	[Signature]
P. GAZZ	4 Terrace Ave Wg	HD 5362	P Gazz
FEHATWAY	12 MAGNOLIA CH DURREINGTON BN13 3PT	HD 5018	FEHATWAY
R HOLLAND	LYNDAY CHURCH WALK BN13 3BA	HD 5371	[Signature]
P. T. GIBBS	4. THE PLANT BN12 642	HD 5201	[Signature]
S. DAVIS	208 GORING RD BN12 4PQ	HD 5042	[Signature]
Nordine Haine	23 church way	3777	W Haine
S. NOSHAD	6 HERON COORS BN11 1XS	HD 5220	[Signature]
MOYNA MATH	180 KINGSFORD WARD AV	HD5401	[Signature]
16 SHA CHONGHAWAY	28 CHESTERFIELD ROAD	PD 8813	[Signature]

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on behalf of Worthing Hackney and Private Hire Trade

Name	Address & Post Code	Badge No:	Signature
JASON HARBOD	49 Mandale Rd, BN13 2AY	32	<i>Jason Harbod</i>
STELLA MCLUGHEY	38, HAYNES ROAD.	HD 5151	<i>S. Mclughey</i>
Jan Ramsay	Feltham	68	<i>Jan Ramsay</i>
A. M. L. HAN	24 SIMPSON AV	60	<i>A. M. L. HAN</i>
EMMA MACE	5, PEBBLE WAY. BN43 6AQ	PD7276	<i>Emma Mace</i>
BRIAN MARCHANT	77 B. ALLYNDALE AVE ANNACLA PO21 2ET	7212	<i>B. Marchant</i>
EDWINA KOSLA-RULB	52. Littlehampton Road WY	PB 2569	<i>E. Kosla-Rulb</i>

7



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Yours truly

on behalf of Worthing Hackney and Private Hire Trade

Name	Address & Post Code	Badge No:	Signature
MWHITING	23 PARADE crescent	7012	[Signature]
ADKIN	8 LEWIS	2298	[Signature]
SRAHMAN	BANBULAND ROAD		[Signature]
S. SOUTER	227A TANNING RD	BD7188	[Signature]
ROSHID	51 ASHACRE LANE	PD7048	[Signature]
MUHAMMAD	69 HIGH STREET	PD7169	[Signature]
TROTTER	27, NORFOLK ROAD	PD7510	[Signature]
M. ADIL	68A, Newland Road	HD5029	[Signature]
K. MCCLUSKEY	38 HAYNES ROAD	5051	[Signature]
N. KHAN	36 BRITANNY ROAD BN147DZ	HD5039	[Signature]
ADRIAN THOMAS	1 LANSDOWNE ROAD	HD5200	[Signature]
E. Serhan	Ashdown RD	PD7046	[Signature]
GUL FIAZ	48 Normand Road	PD7259	[Signature]
STANLEY MINIG	39 COMBES RD	PD2352	[Signature]
AKSAR UDDIN Sule	9 ALTON DR BN144LS	HD5143	[Signature]
SHAM SUR RAHMAN	16 CHISTERFIELD ROAD	PD7017	[Signature]

(16)

Steve Howell  
07448410556

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Yours truly  
on behalf of Worthing Hackney and Private Hire Trade

Name	Address & Post Code	Badge No:	Signature
BARBARA O'DONNELL	33 New Broadway BN11 4HP	8812.	[Signature]
PAUL MARTIN	" " " "	7153	[Signature]
KEN DORE	" " " "	7122	[Signature]
GILL MARTIN	" " " "	7151	[Signature]
CHRIS MARTIN	111, BROMFIELD AVE	5211	[Signature]
MIKE BISSETT	6FF, 196, GORMING RD, WICKHAM	5065	[Signature]
JANE ENTICKNAP	74 MILLON CRESCENT	7056	[Signature]
RAYMOND ENTICKNAP	14 HUDSON CLOSE	7036	[Signature]
MIKE ROBERTS	79 PALATINE ROAD	7140	[Signature]

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Yours truly

*on behalf of Worthing Hackney and Private Hire Trade*

[illegible]