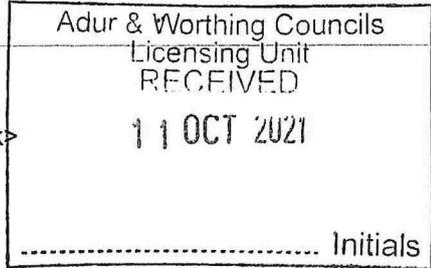


TAXI HANDBOOK REVIEW

1 message

Zoom Worthing Office <office@zoomworthing.co.uk>
To: Taxi Licensing <taxi.licensing@adur-worthing.gov.uk>
Cc: Teresa Bowley <teresa.bowley@adur-worthing.gov.uk>



9 October 2021 at 20:25

Hi Teresa & team,

I would like to make a representation requesting a change to the current rules that Worthing Licensing Authority have on tinted windows.

Ask any Private Hire or Hackney driver in Worthing how easy it is to find a vehicle that meets the current tint standards, and they will all give you the same answer. Almost impossible. It is a rule that adds massively to the stress that all Worthing licensed drivers face when changing vehicles, and it is completely without grounds for enforcement. It needs changing now.

The simple fact is that almost all modern cars are now made with a reasonably heavy tint on the rear windows. The reasons for this are:

1. It reduces harmful UV rays and therefore improves passenger health and safety;
2. It reduces glare coming through the rear windows, therefore improving passenger comfort;
3. It reduces the temperature in the car on sunny days, reducing the need for air conditioning, which in turn reduces harmful emissions

The almost impossible task to find a car that can be licensed in Worthing is compounded by the fact that almost all of us buy our cars on the second hand market, where tinted windows are on 99% of cars. Is it really fair that we are forced to travel sometimes hundreds of miles to buy a used car that we hope will be licensed, only to find on presenting the car to the licensing officer that the tint is too dark? And then having to spend a further £1000 to get the glass replaced?

If this measure has been put in place for the safety of customers, where is the evidence that it is a factor? A recent Freedom Of Information request was sent to all police forces in the UK which asked:

"Has the fact that a vehicle has tinted windows ever been considered to be a factor in any taxi or private hire related incident? "

The answer from all forces was a resounding "No".

Further to this, the current rules on window tint could well be in violation of the Regulator's Code 2014, which states:

When designing and reviewing policies, operational procedures and practices, regulators should consider how they might support or enable economic growth for compliant businesses and other regulated entities , for example, by considering how they can best:

- understand and minimise negative economic impacts of their regulatory activities;
- minimise the costs of compliance for those they regulate;

Another major factor to consider is that this has become such an issue in Worthing, that a large number of previously Worthing licensed drivers have switched to a neighbouring authority, where there are no such rules on window tint. You can't help but notice that literally half of the Private Hire vehicles working in Worthing are now on Chichester

licenses, and have heavy rear window tint. If this trend continues, the long term budgetary affect this will have on Worthing Licensing Authority is obvious.

Taking all of this into consideration, it is my recommendation that there is **no set limit** on rear window tint in the revised Handbook. I believe that all other current standards on vehicles should remain unchanged. I also believe that the standards of the new handbook should apply to both Worthing and Adur boroughs.

Kind Regards,

██████████ - Director Zoom Private Hire.

Fwd: Adur Hackney Carriages predominantly working in Brighton & Hove

1 message

Teresa Bowley <teresa.bowley@adur-worthing.gov.uk>
To: Taxi Licensing <taxi.licensing@adur-worthing.gov.uk>

25 October 2021 at 10:53

This is a representation that needs to be included in the Adur handbook review, if you could copy and add to the file that would be great

I am waiting to see if it is also meant for the Worthing handbook review

----- Forwarded message -----

From: **Brighton & Hove Cab Trade Association** <info@bhcta.co.uk>
Date: Sun, 24 Oct 2021 at 21:33
Subject: RE: Adur Hackney Carriages predominantly working in Brighton & Hove
To: Teresa Bowley <teresa.bowley@adur-worthing.gov.uk>

Dear Teresa

It is very unfortunate that I did not received the email from Adur Council with regards to the consultation on the forthcoming revision of the Adur hackney carriage and private hire licensing conditions because earlier this year retired my position on the GMB Brighton & Hove Taxi Section where the consultation invitation was sent to my GMB email address.

My position is now Secretary of the Brighton & Hove Cab Trade Association.

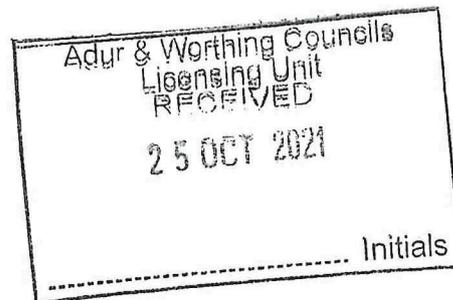
It has only been by chance that that I discovered the email today:-

I appreciate that my response is four weeks late but I hope that my input will be given consideration on the basis that we have had previous communications on there being an Intended Use Policy for Adur hackney carriages.

Thank you

Regards

[Redacted signature]



bhcta.co.uk - info@bhcta.co.uk

BHCTA
Brighton & Hove Cab Trade Association

facebook.com/groups/bhctabta
@cabsbrighton

Working Together

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Adur District Council
Licensing Department

October 25 2021

I write with reference to the consultation on the Hackney Carriage and Private Hire Handbook

I have already had constructive communications with Adur Licensing Officer Teresa Bowley on an issue which needs to be addressed with regards to the many Adur hackney carriages that are predominantly working outside of the Adur District Licensing Authority.

Under legislation a hackney carriage may carry out private hire work in another licensing area but of course not act as a hackney carriage in the way of undertaking street hirings and using ranks which is strictly limited to working in such a way in its respective licensing area. Undertaking such private hire work 'out of area' is perfectly legal and has been a part of natural cross border hiring for many years.

However, over the last few years since Uber has been operating in the UK hackney carriages has been encouraged to work 'out of area' under Uber. For clarification a hackney carriage cannot work for Uber within its own licensing area on the basis that the council controls hackney carriages charging rates. This model of the Uber fare charging is based on 'Surge Pricing' which may be up to four times the standard rate as and when Uber decides. However when a hackney carriage leaves its respective licensing area there is no council control of fares.

Brighton & Hove Local Issues

In respect of Brighton & Hove the area was saturated with Lewes hackney carriages predominantly working within the Brighton & Hove area out of sight of Lewes Licensing Control.

This meant that the area of Lewes was very much deprived of hackney carriages as the vast majority was predominantly working in Brighton & Hove.

The same applied to Mid-Sussex hackney carriages that were again working out of sight of Mid Sussex Licensing Control.

Under these circumstances we found that such hackney carriages were flaunting respective licensing conditions such as either removing rear plates, door signs and roof signs. This didn't help that both Lewes and Mid Sussex licensing allowed magnetic rear plates and door signs. However, in respect of Lewes the use of magnetic door signs has now stopped and are being replaced with permanent ones.

Because of overwhelming reports we presented to Lewes District council of its hackney carriages never returning to the Lewes area we took the opportunity to take part in the revision of its hackney carriage and private hire conditions of licence two years ago and recommended that it adopted an 'Intended Use Policy' for its hackney carriages and used the conditions of Brighton & Hove as an example.

The revision resulted in the following condition being applied to the Lewes DC hackney carriage vehicle licences:

Lewes DC Licensing Committee Meeting - February 2019

"The introduction of Intended Use (Hackney Carriages only). It is believed that some drivers who have applied

for a licence recently may not be predominantly working within the district. In order that the Council may retain local control over the hackney carriages it licenses, applicants will be asked as part of the application and renewal process which area they intend to entirely or predominantly operate from for the purposes of fulfilling pre-booked hirings. It will be incumbent upon the applicant to demonstrate to the Council's satisfaction that they intend to ply for hire predominantly within the District.

Consequently the following conditions of licensing for Lewes DC hackney carriages was adopted:

Intended Use (Hackney Carriages only)

"A hackney carriage vehicle licensed by one local authority can be used to fulfil prebooked hirings on behalf of private hire operators licensed by another local authority. In order that the Council may retain local control over the hackney carriages it licenses, applicants will be asked as part of the application process which area they intend to entirely or predominantly operate from for the purposes of fulfilling pre-booked hirings. It will be incumbent upon the applicant to demonstrate to the Council's satisfaction that they intend to ply for hire predominantly within the District."

If the applicant indicates that they will not predominately work within the District the application will normally be refused. This section is not intended to act as a restraint of trade since applicants may make applications to any local authority in which area they intend to ply for hire

Eastbourne District Council then introduced the same condition as well as Mid Sussex District Council.

Brighton & Hove City Council has had the requirement for an 'Intended Use' declaration on the hackney carriage vehicle licence application for a number of years but at the last revision of conditions of licensing this was specifically put in place in what we refer to as the 'Blue Book of conditions of Licensing'.

Summary

Adur District Council is asked to introduce a specific 'Intended Use Policy' for its hackney carriages to ensure that these vehicles do not predominantly work outside of the Adur District Licensing Authority Area which is out of the control of Adur Licensing Control.

This ensures that such hackney carriages predominantly serve the streets and ranks of the area of Adur Licensing Authority area.

This also ensures that whilst an Adur hackney carriage can continue to carry out natural cross border hirings that it cannot predominantly work outside of the Adur Licensing Authority area.


Secretary

Brighton & Hove Cab Trade Association

From: Teresa Bowley [mailto:teresa.bowley@adur-worthing.gov.uk]

Sent: 24 May 2021 12:18

To:  GMB

Subject: Re: Adur Hackney Carriages predominantly working in Brighton & Hove

Good Morning 

I hope this email finds you well.

I fully understand the legislation change that removed cross border hiring has created a difference into how the industry works and its ability to work in other local authority areas. Our licence holders experience the same issues as Brighton and Hove where we have a considerable number of Chichester, Havant and Lewes vehicles. I would be interested to know if you are writing to any other authorities on this matter, due to this not being an issue from neighbouring authorities only

Currently we ask on the application form where the applicant intends to work but we do not have a policy in place to enforce; however; our Taxi and Private Hire handbook is due for review this autumn, i think it is certainly something we could look at in the review all be it I feel it may be an ineffective policy if all authorities do not have this in place and may be more damaging to the trade if they have these restrictions that do not apply elsewhere.

I trust this answers your inquiry and if you need to discuss further then let me know and I will ensure your details are included in the consultation list for the handbook review in the Autumn.

Best regards

Teresa

On Wed, 28 Apr 2021 at 16:54, A [REDACTED] s GMB <[REDACTED]> wrote:

Adur District

Taxi/Private Hire Licensing

Dear Teresa

I write with reference to a specific Adur hackney carriage that is predominantly working in Brighton & Hove which is presumed to be under Uber. There are also other Adur hackney carriages also doing the same and never returning to Adur.



It is common knowledge that a hackney carriage can undertake private work in another area. However where there seems to be an increase in Adur hackney carriages doing this it then deprives Adur of hackney carriage services. Added to this is the forever diminishing loss of local licensing control which Uber does not have any consideration for.

As we know a hackney carriage cannot work within its own licensing area under Uber on the basis that a council has controlled on the rate of fares and with Uber using 'Surge Pricing' a hackney carriage driver making such a charge within its own area would be causing an offence

Eighteen months ago I persuaded Lewes District Council to adopt an 'Intended Use Policy' for Lewes hackney carriages as most of these were predominantly working in Brighton & Hove and never returning to Lewes. Eastbourne council then did the same. Ed Hele who worked as Lewes Council and now at Adur Council can confirm this.

Mid Sussex also had many hackney carriages predominantly working in Brighton & Hove and through my correspondence with Jon Bryant at MS Licensing the council has now adopted an 'Intended Use Policy' as well.

The 'Intended Use Policy' does not allow a hackney carriage to predominantly work outside its respective licensing area.

Brighton & Hove has this as a condition of licence:

197. Hackney Carriage Intended Use Policy

A hackney carriage vehicle licensed by one local authority may be used to fulfil pre-booked hirings in another licensing authority as well as on behalf of private hire operators licensed by another local authority.

In order that the Council may retain local control and enforcement over the hackney carriages it licences and assist other licensing authorities with local control and enforcement, the proprietor of

the vehicle will be asked as part of the application process as to which area the vehicle is intend to entirely or predominantly operate from for the purposes of fulfilling pre-booked hirings. It will be incumbent upon the proprietor of the vehicle to demonstrate to the Council's satisfaction that it is intended for the vehicle to undertake hirings predominantly within the licensing authority area.

If the applicant indicates that the vehicle will not predominately work within the licensing authority area the application will normally be refused or if found to be acting in such a way the vehicle licence revoked.

I am aware that Adur does not have an 'Intended Use Policy' for hackney carriages.

However I would like to suggest that Adur Licensing looks at introducing its own 'Intended Use Policy' on the basis that there appears to be more Adur hackney carriages never leaving Brighton & Hove and consequently adding to the ever diminishing loss of local licensing control not only for Brighton & Hove but also for Adur.

With my communications with A [REDACTED] at Brighton & Hove L [REDACTED] I am aware of some joint Enforcement agreement in place which is a good first step.

However I do believe that it would be very good forward thinking if Adur considered going further with its own 'Intended Use Policy' which would legally determine the use of an Adur hackney carriage.

And of course there is nothing to stop anyone obtaining a Brighton & Hove driver and private hire vehicle licence

I would be interested in the views of Adur Licensing on this and I have copied Alex Evans into the email.

Thanks

With regards

[REDACTED]
Secretary

GMB Brighton & Hove Taxi Section



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Subject: Amendments to Adur Handbook.

Message

From: Adur Licensing <taxi.licensing@adur-worthing.gov.uk>

Date: 7 December 2021 at 13:54

To: Timothy LOUGHTON <tim.loughton.mp@parliament.uk>

Good afternoon [redacted]

Thank you for your comments on the current Taxi and Private Hire handbook and the additional consultation on door signs for Adur Hackney Carriage and Private Hire vehicles.

The current handbook was first Approved 16 January 2017 by Adur licensing committee. The committee requested a further report on the installation of CCTV this was approved 4 March 2019 and at members request an amendment was made on 20 January 2020 with regards to a tinted windows policy.

The standard review practise of Taxi and Private Hire handbooks is every 5 years but as the Adur Taxi and Private Hire licensing handbook was a new document, the Licensing committee took the decision to have an interim review.

The main handbook consultation closed on the 26 October 2021. The consultation received responses of which the majority can be dealt with in the report to the licensing committee; however, one area in regards to Adur vehicles having compulsory door signs would be a new condition if approved. After seeking legal advice, the fairest, transparent and most economical way to deal with representation on vehicle identity and door plates was to consult with the Adur licence trade before the licensing committee hearing. This will allow the Licensing committee to look at all representations equally and fairly on all matters raised.

The licensing committee has already considered the DfT Taxi and Private Hire Statutory Standards July 2020 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/928583/statutory-taxi-and-private-hire-vehicle-standards-english.pdf

These standards were introduced as there is evidence to support the view that taxis and private hire vehicles are a high-risk environment. In terms of risks to passengers, this can be seen in abuse and exploitation of children and vulnerable adults facilitated and in some cases perpetrated by the trade and the number of sexual crimes reported which involve taxi and private hire vehicle drivers. Links between the trade and child sexual abuse and exploitation have been established in many areas and other investigations continue.

The Statutory Taxi and Private Hire Vehicle Standards reflect the significant changes in the industry and lessons learned from experiences in local areas since the 2010 version of the Department's Best Practice Guidance. The council are committed to provide public safety and access for all of those travelling, with licensed driver's in licensed vehicles. Any changes to the law, standards and policies are in put in place to also protect and support the Taxi and Private Hire industry.

I have recorded your representation against the door sign consultation, which will be presented in the papers for the Licensing committee hearing on the 17 January 2022, details will be available on line at <https://democracy.adur-worthing.gov.uk/mgCalendarMonthView.aspx?M=12&CID=0&OT=&C=-1&MR=0&DL=0&D=1&ACT=Later&DD=2021>

I hope this information including the links and attachments makes it clear on what and why the current requirements are in place. If you need to discuss further then do not hesitate to contact me.

Regards
Resa Bowley
Licensing Officer

Sun, 5 Dec 2021 at 15:38, [redacted] wrote:

I am at a loss as to why there is a constant need to keep seeking out amendments to the Handbook ? The fact that the Adur book has 67 pages (and Worthing 72) of rules and regulations speaks volumes of how over regulated the trade is.

Our vehicles have signs on the doors, internal signs, roof lights, ID plates on the rear of the vehicle but you deem it important to add further signage ? In 40+ years in the trade, I have never seen or heard of a passenger who couldn't identify a Private hire or Hackney. We have worked with St Dunstons and 4 Sight.

Council staff decided to redesign the Hackney roof lights which clearly stated " TAXI " in large bold lettering. At our expense, this was replaced by a less prominent one because it had to include the Councils latest new logo !

We were told to have CCTV fitted at our expense which also added another sticker to our vehicles along with the other No Smoking sign and internal window plate ?!

We had to adjust our door stickers at our expense because the Council staff wanted a specific font ?!

Every year, Council staff seem to search out petty reasons to impose more regulations and I suggest that if you are looking for vulnerable groups to help, you need to look no further than the trade members.

The numbers of very experienced and long standing drivers who have left or are leaving the trade is unprecedented. I cannot express how sad this is.

We have seen business slump to an all time low. The drivers have put their lives at risk to supply transport through the pandemic causing their

This consultation will be no different to any other in the past 5 years and members of the trade will not be listened to, so we will simply await the latest instruction to go out and redesign the signage on the vehicles at our expense.... Again !

Regards,

[REDACTED]

 **Adur Taxi and Private Hire Handbook Consultation door plates Dec 2021.docx**
21K

Adur District Council and Worthing Borough Council Taxi and Private Hire Handbook Consultation

1 message

26 October 2021 at 18:20

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

Dear licensing team,

Please find below feedback on the above consultation from the RNIB & Guide Dogs.

1. Include in the mandatory disability training for all taxi & phv drivers specific training on how to guide passengers with sight loss.
2. Move the mandatory training from 3 years to every 2 years.
3. Ensure that refusal of assistance dog owners is highlighted more prominently & ensure that all drivers are aware that it may result in them losing their license if they do refuse.
4. Ensure all communications on or within the taxi are accessible to people with sight loss.
 - a. The number of the taxi in large numbers in a heavily contrasted print on the rear doors & internally on the back of the front seats.
 - b. CCTV recordings for every journey made mandatory. Protecting both passenger & driver.
5. For the wider disability community we'd like to see a minimum % of WAV's in the licensing policy & for the council to adopt a policy of not issuing any further licenses until that percentage has been met.

If you require any further detail or explanation on any of the above then please don't hesitate to get in touch.

Many thanks.

Community Connection Lead Volunteer,
London & The South East
RNIB(Royal National Institute of Blind People)

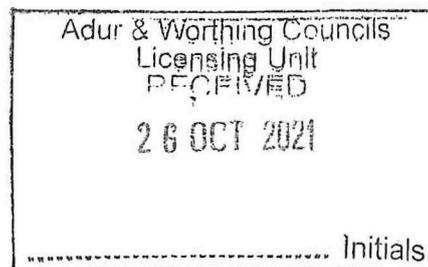
Campaign Volunteer, Guide Dogs.

NHS Vaccination champion.

Trustee @ Sight Support Worthing.

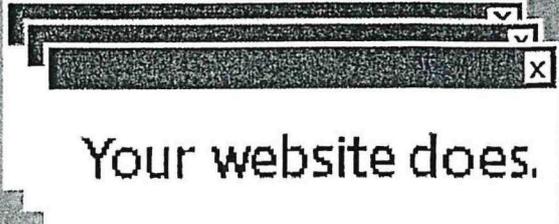
NB: This is a volunteer role & am available M,T & Weds only.

m: 07500608008
e: Brian.Butcher@rnib.org.uk
w: rnib.org.uk



Get help and information on making your website accessible for people with sight loss

Glaucoma doesn't
stop me splashing the
cash on a new outfit.



Your website does.

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RNIB Registered Charity Number: 226227

Website:

Adur and Worthing Borough Council Taxi and Private Hire consultation

1 message

k [REDACTED]
To: "taxi.licensing@adur-worthing.gov.uk" <taxi.licensing@adur-worthing.gov.uk>

26 October 2021 at 18:40

Dear Sir/Madam,

Please find attached consultation response from Guide Dogs for The Blind Association.

Thanks

[REDACTED]

Regional Policy and Campaigns Manager (South East)

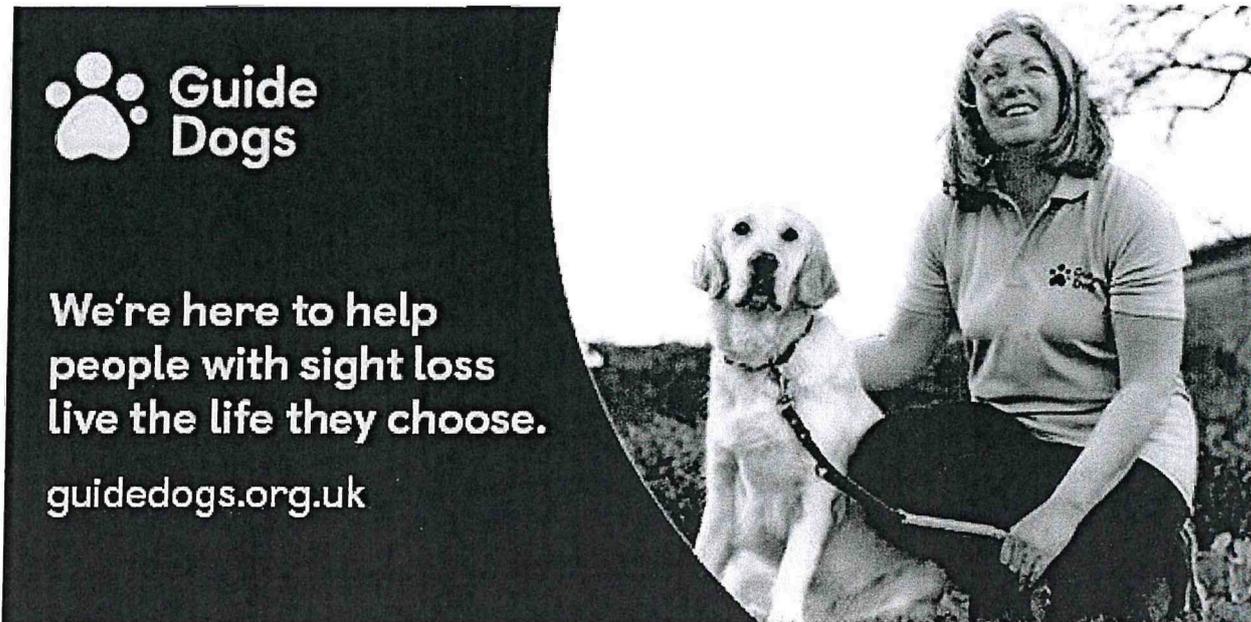
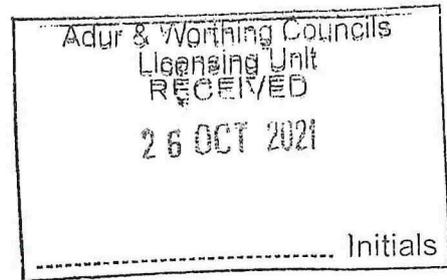
[REDACTED]

Guide Dogs for the Blind Association

M: [REDACTED]

E: [REDACTED]

W: www.guidedogs.org.uk



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The Guide Dogs for the Blind Association

Tel: 0118 983 5555

Email: guidedogs@guidedogs.org.uk

Website: <https://www.guidedogs.org.uk>

Registered Office: Hillfields, Burghfield Common, Reading, Berkshire, RG7 3YG.

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Adur and Worthing Borough Council Taxi and Private Hire Handbook Consultation 12.10.21.pdf

101K



Guide Dogs response to Adur District Council and Worthing Borough Council Taxi and Private Hire Handbook Consultation (September 2021)

12 October 2021

About Guide Dogs:

Guide Dogs provides mobility services to increase the independence of people with sight loss in the UK. Alongside our mobility, work we campaign to break down physical and legal barriers to enable people with sight loss to get around on their own terms.

Introductions:

There are an estimated 35,400 people living with sight loss in the west sussex area (RNIB, 2019).

Taxis and private hire vehicles (PHVs) and the door to door service they provide are essential for disabled people. They are particularly important for the independence of blind and partially sighted people, who are unable to drive, and often face barriers when using public transport. However, accessing taxis and PHVs can be a major challenge for assistance dog owners. A 2019 Guide Dogs survey found that 73% of assistance dog owners who have experienced an access refusal were refused by a taxi or PHV driver in a one year period - despite this being a criminal offence under the Equality Act 2010. Such access refusals can have a significant impact on assistance dog owners' lives, leading to feelings of anger and embarrassment and a loss of confidence and independence.

As guide dog owners report:

- "Each refusal is crushing, confidence shattering, rejecting, and traumatic. I always feel that I don't want to go out after - but work dictates I must." Guide dog owner, Stevenage
- "I was left on my own at the side of the road in the dark. I am deaf and unable to phone for help and it made me feel very vulnerable. It makes me feel afraid to go out." Assistance dog owner

Key recommendations:

- **Highlighting the law:** We note that the policy (4.5) states that all drivers are under a duty to comply with the Equality Act 2010 to carry, free of charge, any assistance dog. We advise highlighting within the policy that this is a legal requirement under the Equality Act 2010 and failure to do so is a criminal offence.
- **Zero tolerance:** The policy should state that Adur and Worthing Borough Councils will use its best endeavours to investigate all reported violations of the Act in a timely manner with a view to pursuing a conviction.
- **Test for medical exemption certificate:** In 5.6 The policy should be more specific and state that a medical exemption certificate for carrying assistance dogs will only be issued when authorised by a medical practitioner and accompanied by medical evidence, such as a blood test, a skin prick test or clinical history. The medical exemption certificates should be accompanied by features distinguishable to vision-impaired passengers, such as an embossed or raised 'E'.
- **Sample purchasing:** The policy should state that the Borough Councils will work together in conjunction with assistance dog owners to ensure that licensing requirements are being complied with by various means such as, but not limited to, test purchases to ensure that licensing requirements are being complied with.
- **Disability equality training:** We welcome the inclusion (5.16) that all new applicants will be required to undertake disability awareness and equality training including awareness of the Equality Act 2010. We feel that the policy should be clear on how this training will be delivered and refresher training will be requirement within a reasonable period.
- **Disclosure and Barring Service (DBS) Guide Dogs** welcome any amendments to this policy that will allow the Borough Council to take further steps in ensuring the safety of passengers, including children and vulnerable adults.
- **CCTV:** We are of the view that CCTV has great benefits in protecting both drivers and passengers from harm, inappropriate behaviour, abuse and poor customer service. We would ask that a requirement for audio recording is included. This amendment would help to resolve disputes by providing important evidence. For example, if an assistance dog owner makes an allegation of being refused carriage by a driver, due to the person travelling with an assistance dog. As part of the proposed disability equality

training, we would ask that drivers are reminded to make blind and partially sighted passengers aware that CCTV is in operation as they are unlikely to see signs notifying them of this.

Highlighting obligations under Equality Act 2010 in respect of Assistance Dogs

The consequences of delayed travel, combined with the emotional impact of facing discrimination and confrontation when trying to carry out everyday activities, take a significant toll on assistance dog owners. Apart from feelings of anger and embarrassment, refusals can undermine the independence that assistance dogs bring to their owners. Assistance dog owners also reported that the stress of refusals has had a detrimental impact on their mental health and on whether they feel able to leave the house. This also has a negative impact on their ability to access work and other opportunities. As guide dog owners report:

- “I was very upset, it was dark, raining and 10pm at night. I was scared. I avoid evening invites, as I worry about getting home. I lose out on the chance of socialising with friends, which is bad, as I have no family.” Guide dog owner, Rochester
- “I used to have a very tough two-hour commute to work. The taxi part of the journey was the shortest bit travel wise, but it always ended up being the bit that held me up the most because I was having to spend time facing drivers who wouldn’t take me with my dog. ... It’s good that my contract was flexi hours otherwise I’m sure I would have been sacked for being late all the time - it happened so often.” Guide dog owner, Daventry

Enforcement

While our survey shows that many assistance dog owners have been refused access over a one-year period, many of these incidents are not reported. Indeed, research in 2019 found that only 8% of owners who had been refused access had taken legal action which resulted in prosecution. In part, the underreporting is due to challenges of reporting, especially for people with sight loss. However, it is also due to disappointment at the lack of action taken following an access refusal and the low fines issued.

Considering the significant impact an access refusal can have on assistance dog owners and their communities, it is important that assistance dog owners know that all cases of access refusals are viewed very seriously and are investigated.

As mentioned, it is a criminal offence for any operator or driver to refuse to carry assistance dogs. On conviction for such an offence, drivers can be fined up to £1,000. As failure to carry an assistance dog is a criminal offence, we recommend a zero-tolerance approach to enforcement of the Equality Act. We therefore recommend that it is clearly stated that failure to carry an assistance dog without the requisite medical exemption certificate will result in immediate suspension or revocation of a driver's license.

Further, the current conditions do not contain any reference to prosecution of drivers who refuse a passenger. We also recommend a zero-tolerance approach to enforcement of the Equality Act in seeking prosecutions and therefore recommend stating that Basingstoke and Deane Borough Council will use its best endeavours to investigate all reported violations of the Equality Act in a timely manner, with a view to pursuing a conviction.

We also recommend that the Borough Council works together in conjunction with assistance dog owners to ensure that licensing requirements are being complied with by various means such as, but not limited to, test purchases to ensure that licensing requirements are being complied with.

Medical exemption certificates

We believe the policy should specify that in order to apply for a medical exemption certificate for carrying assistance dogs:

- 1) this must be authorised by a medical practitioner and
- 2) **be accompanied by medical evidence which demonstrates the driver's genuine medical condition that is aggravated by exposure to dogs, such as a blood test, a skin prick test or clinical history.**

Further, it is often difficult for vision-impaired passengers to identify the validity of exemption certificates. Currently, it is not permissible for licensing authorities to issue exemption certificates which incorporate tactile features, as this would alter the certificate's

Taxi and Private Hire Consultation Response Sompting Parish Council

1 message

Sompting Parish Council Clerk <clerk@sompting.org.uk>
To: taxi.licensing@adur-worthing.gov.uk

14 October 2021 at 10:27

Dear Sir

Please find attached, Sompting Parish Council's formal response to the above consultation.

Could you please confirm receipt

Many thanks

[REDACTED]

[REDACTED]

Clerk to Sompting Parish Council

Old School House

Harriet Johnson Centre

Sompting

West Sussex

BN15 0BG

[REDACTED]

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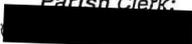


SOMPTING

www.sompting.org.uk

PARISH COUNCIL

Parish Clerk:


The Clerk
Old School House
Harriet Johnson Centre, Loose Lane
Sompting, West Sussex
BN15 0BG
Tel: 07813484857
Email: clerk@sompting.org.uk

October 2021

Dear Sir

Adur and Worthing Taxi and Private Hire Consultation. Formal response from Sompting Parish Council.

Most changes in the main text appear to be measures to update the Safeguarding provisions. There are no suggested changes to these sections.

However, in Appendix K there are matters that the Council feel require attention:

Appendix K.
Private Hire Operator's Licence Conditions.

Many Private Hire Companies employ office staff and Taxi Marshalls who make contact with Bookers/Passengers and would not be listed on the records submitted or be subject to DBS checks with the current wording of the Conditions. Therefore :

- 3.1 Add 'The name of any individual that is in contact with the Booker or passengers either electronically, by telephone or in person'.
- 3.9 amend to 'The operator must provide a monthly register to the Council of all staff taking bookings, dispatching vehicles, or in contact with the Booker or passengers either electronically, by telephone or in person. All changes must be notified immediately.'
- 3.10 amend to ' All staff taking bookings, dispatching vehicles, or in contact with the Booker or passengers either electronically, by telephone or in person. must provide a basic DBS check on employment and thereafter every 12 months. It is the responsibility of the operator to ensure compliance.

It is suggested that the following paragraph should be deleted:

- 3.12 The use of a driver who holds a PCV licence and the use of a public service vehicle (PSV) such as a minibus to undertake a private hire vehicle booking should not be permitted as a condition of the private hire vehicle operator's licence without the informed consent of the booker.

If the intention is to indicate that a Private Hire Operator can supply a PCV vehicle, providing the booker/passengers are aware, then the Conditions should indicate that sub- contracting

Sompting Parish Council's mission: " To help foster a Sompting community which gives people a reason to be proud and engaged with the area we all live in"

to a PCV Operator is permissible with the Booker/passenger's permission. However, a Private Hire Operator who is not familiar with PCV Regulations could follow the proposed Conditions and use a PCV vehicle against PCV Regulations. In particular, they would need to be aware of the following:

- A Private Hire Operator can already sub-contract a PCV Operator to supply a vehicle and Licensed Driver but cannot use and control a licensed PCV vehicle unless they are also a Licensed PCV Operator. (Holding a National or International Licence).
- Where a Private Hire Operator also holds a Restricted PCV License, they are only permitted to carry up to 8 passengers on each journey.
- PCV vehicles cannot undertake shared journeys with passengers who booked separately. (this would require a Stage Carriage Licence which is only granted for 'Bus Route' style regular journeys).

Yours faithfully

[Redacted Signature]

[Redacted Name] Clerk to Sompting Parish Council

Licensing Office
Portland House
Richmond Road
Worthing
BN11 1HS



Taxi Licensing <taxi.licensing@adur-worthing.gov.uk>

wheelchair friendly cabs

1 message

TheInsight Team <theinsightteam@adur-worthing.gov.uk>
To: Taxi Licensing <taxi.licensing@adur-worthing.gov.uk>

6 September 2021 at 08:22

Dear worthing council

Please make sure there are more wheelchair friendly cabs on the taxi rank soon or let the driver keep there London cabs after ten years. Twice I waited two hours with none turning up.

From

Good morning

Please see comments received on social media

Many thanks

Customer Insight & Performance Officers

Adur & Worthing Councils

Email: theinsightteam@adur-worthing.gov.uk

Website: www.adur-worthing.gov.uk

Portland House, Richmond Road, Worthing BN11 1HS

