



### Appendix C: Table of Responses

Item Number	Objection	Response
1	<p>As a hackney driver I do not support the new proposal to force the trade to have a wrapping placed in the hackney carriages. Under our licensing 1975 act it states all Hackney Carriages should be black. That is our uniform colour already.</p> <p>It's not been enforced vigorously which has not let the policy slide to allow different colours.</p> <p>Plus as a hackney carriage driver I do a number of trips for funeral companies and funeral contractors request the cab is black with no adverts. Green and white would and will not go down well with families attending funerals.</p> <p>It is also not clear in the consultation who pays for this.</p>	<p>In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.</p>
2	<p>After looking at the colours you have put for the taxi livery I strongly object to this as my taxi silver and who do you think is going to pay for it to be done plus my cab has been plated by this council for the past 4 years in this colour I do not want to change the colour of my taxi at any time in the future</p>	<p>Please see response above.</p>
3	<p>I wish to send this email you formally register my protest against the proposed changes in taxi colours for Hackney carriages and private hires. I am in favour of a proposed dress code but I feel the need to change the colour is unnecessarily and a great expense to drivers who are already in a struggling profession therefore I wish to formally protest against the proposes changes and send this in this email.</p>	<p>Please see response above.</p>
4	<p>I am responding to your request for feedback to the proposed taxi licensing policy.</p> <p>I, regarding colour coding of cabs: I will gladly have mine wrapped in the</p>	<p>In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.</p>

	<p>'stars and stripes' if need be, as long as it is of NO cost to myself. I earn on average fifty pounds per day things really tough enough out there, I for one cannot afford said proposal.</p> <p>2. Uniform: I consider myself to be very clean and tidily dressed, but would be willing to adhere to an agreed dress code.</p> <p>3. Meet and greet/local history courses. I am sorry but after 20 years in the job and a born and bred plymouthian I don't feel I need instruction either. I have transported every kind of character from local pimps/prostitutes, wannabe gangsters etc., to solicitors, police officers and admirals and their wives to functions and have treated every individual with courtesy and respect I expect back (not always forthcoming) but my point is, I know how to "meet and greet" ALL these different members of society. And in the last 20 years do you not think there have not been Americans, Germans, and French etc, visiting our city? All have been greeted with courtesy and respect from myself.</p> <p>As already stated I have no problem with the trade being smartened up, i.e. no flip-flops, vest t shirts etc., but again cost to the driver must be taken into consideration.</p> <p>As for the customization of the cab I feel as long as cab is clean/tidy, lawfully road worthy, I see no reason to financially burden drivers, I am honest hardworking fair person and hope my views do not fall on deaf ears thank you.</p>	<p>The aim of the ambassador training is to raise standards and it is proposed that all drivers complete this training by 1 April 2019. Funding is currently available to support drivers.</p>
<p><b>5</b></p>	<p>I am emailing you regarding the proposed colour changes for Hackney cabs, I have six about to be seven cabs and also drive myself, I have a couple new cabs on order that are silver/grey but still have time to change to a different colour if I'm quick !</p> <p>Could you advise if I need to or think I should change as I don't want to be in a position that I need to get them wrapped after spending £70k.</p> <p>Personally I do not wish to and will not spray any of my vehicles in my fleet !</p> <p>As they are not that old,</p> <p>( If you look at my file one Reg is XXXso you should see the rest of them from that) and the financial impact on the resale of them from being resprayed when I sell them at 3 years old would me massive as I have</p>	<p>In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.</p>

	<p>invested a couple hundred thousand in them.  On the other hand I'm not against change and if wrapping a boot or Bonnet to green on a silver, white or black cab has to be done so be it or worst case full wrap as long as it's applied correctly and with some type of funding.</p> <p>Or also if we wrap part of existing licensed cabs and from let's just say from the 1st of December all new or replacement cabs being registered/plated need to be a certain colour.</p> <p>Also should all cabs end up a uniform colour what would happen to the ones baring advertising?</p> <p>Also regarding the complaint drivers points system for cleaning up the trade I think is a good idea as cleaner more professional run service means more users and that attracts more drivers to come back to the hackney trade which in turn is good for someone like myself in the cab hire/rental sector. Also could you tell me if there will be any type of funding from the council Regarding the new electric black cab TX5 as I understand some councils are starting to offer incentives.</p> <p>Thank you for your time in reading this and if you could advise on colours as time is of the essence at the moment, please feel free to call me on XXX.</p>	
<p><b>6</b></p>	<p>I wish to register my objection to the proposal to colour code the taxis in a uniform colour, making the traditional black cab disappear.</p> <p>Forcing drivers to pay for their taxi cabs to be wrapped in a uniform colour is unnecessary regulation. It creates extra expense and means the loss of all over advertising currently permitted on vehicles.</p> <p>Drivers are all self-employed and are forced to work long hours to 'make ends meet' in the is world. With the rising cost of licensing fees, insurance and fuel costs, no driver benefits from a living wage, or receives holiday pay</p>	<p>In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.</p>

	<p>and sick pay entitlements. Free bus passes for the OAP has also really impacted upon the trade therefore imposing this kind of policy is not acceptable.</p> <p>Nor is it right that the Council is wasting time on such proposals, expecting the City tax payer to fund such changes in policies particularly when the City has more important issues that need to be addressed in this current economic climate.</p> <p>I appreciate that the Mayflower 400 celebration is welcoming to our City, however as a tax payer I would rather the City Council invest in cleaning up the City, removing waste and graffiti, getting rid of weeds, sorting traffic congestion and tidying up the derelict and unsightly buildings on Union Street, which at present is an eyesore on a major gateway to the City.</p> <p>I very much hope that my objection to this policy proposal will be noted and recorded.</p>	
<b>7</b>	Identical letter to Number 6	See response in number 6 above
<b>8</b>	Identical letter to Number 6	See response in number 6 above
<b>9</b>	Identical letter to Number 6	See response in number 6 above
<b>10</b>	Identical letter to Number 6	See response in number 6 above
<b>11</b>	Identical letter to Number 6	See response in number 6 above
<b>12</b>	Identical letter to Number 6	See response in number 6 above
<b>13</b>	Identical letter to Number 6	See response in number 6 above
<b>14</b>	Identical letter to Number 6	See response in number 6 above
<b>15</b>	Identical letter to Number 6	See response in number 6 above
<b>16</b>	Identical letter to Number 6	See response in number 6 above
<b>17</b>	Identical letter to Number 6	See response in number 6 above
<b>18</b>	Identical letter to Number 6	See response in number 6 above
<b>19</b>	Identical letter to Number 6	See response in number 6 above
<b>20</b>	Identical letter to Number 6	See response in number 6 above

<b>21</b>	Identical letter to Number 6	See response in number 6 above
<b>22</b>	Identical letter to Number 6	See response in number 6 above
<b>23</b>	Identical letter to Number 6	See response in number 6 above
<b>24</b>	Identical letter to Number 6	See response in number 6 above
<b>25</b>	Identical letter to Number 6	See response in number 6 above
<b>26</b>	Identical letter to Number 6	See response in number 6 above
<b>27</b>	Identical letter to Number 6	See response in number 6 above
<b>28</b>	Identical letter to Number 6	See response in number 6 above
<b>29</b>	Identical letter to Number 6	See response in number 6 above
<b>30</b>	<p>Email – If a driver has already attended on of the pilot safeguarding sessions back in 2016 do they still have to re-sit the training?</p> <p>Plymouth Ambassador training – who is funding this? Trading conditions are not getting any easier, to be expected to have to pay for something that has limited value is going to be a hard thing to accept.</p> <p>In my view the VRQ should remain as a minimum requirement. For all current and new drivers. However, I go back to the point made in the previous comment, funding of the training needs to be addressed.</p> <p>If someone is willing to cheat on a pre-requisite test then they should be excluded from taking another.</p> <p>If someone is willing to cheat on a test then there is a greater than probability that they will cheat in other aspects of their personal and professional life.</p> <p>Code of good conduct – dress code: an excellent idea but one I fear that will be difficult to enforce.</p> <p>Private hire offices struggle to do this and they have resource to be able to check on their drivers, are the HCO officers going to be expected to carry this out as well?</p>	<p>The safeguarding course is recommended by the Safeguarding Board to be refreshed every 3-5 years. We will introduce a refresher every 5 years, however we will consider if this can be undertaken by e-learning.</p> <p>The Council have found a provider that will be able to provide full funding for the Plymouth Ambassador training in 2017, however this will not last indefinitely and the costs may have to be covered by the driver if alternative funding cannot be sought by the Council in future.</p> <p>The VRQ is a requirement for all new drivers. Unfortunately the council has no control regarding the funding.</p> <p>Cheating is regarded as serious misconduct (please see 4.6 on page 12 of the policy).</p> <p>The dress code has been updated slightly.</p> <p>We have updated this to reflect the responses received. A dress code will be introduced but will be less restricted. We have</p>

	<p>In my view there are very limited benefits to having the fleet of HC's in a council livery.</p> <p>Again I would question the cost of this as well, for those who are replacing their vehicle this can be offset but there are some operators who have recently purchased and so through the life of their HC will now have to factor in cost to add livery, will this cost be solely bourn by the operator?</p> <p>Would it be possible to include the minimum CCTV specification or link to the document for reference.</p>	<p>amended the standard in light of the responses to say:  As a minimum standard, males must wear smart trousers (no denim) and a collared shirt or polo shirt which has a full body and short or long sleeves. Knee length tailored shorts may be worn, for example during periods of warm weather.  As a minimum standard, females must wear smart long legged trouser (no denim) or knee length skirt or dress and a collared shirt/polo shirt or blouse which has a full body and short or long sleeves.</p> <p>In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.</p> <p>The CCTV specification was published on the website and all the documents will be published in one place once adopted for ease of reference.</p>
<p><b>31</b></p>	<p>Para. 13 Page 16  Why the actual system isn't suitable anymore, please? 12 points in 3 years! If I failed to wear the badge only once in one year I will accumulate 12 points!</p> <p>Para. 10 Page 21  Why do we have to spend £3000 to paint my car? It's a huge effort for me, I have to make finance for this and it will cost me at least £3500! And for What?  How much money will bring to the city my investment, please?</p> <p>Code of Good Conduct for Licensed drivers – page 3  Why Plymouth City Council imposes us a uniform? What's wrong with the old standard? Why Plymouth City Council imposes us the colours for trousers and shirts, please?</p>	<p>The primary objective of the penalty point's scheme is to improve levels of compliance and help improve the standards, safety and protection of the travelling public. The scheme has been designed so that it works in a similar way to driving points and will encourage drivers to ensure they abide by the law and comply with their licensing conditions and byelaw conditions. We will review the scheme to ensure it works effectively.</p> <p>If you fail to wear your badge, this will incur 4 points. However, you should be wearing your badge at <b>all</b> times and it is an offence not to do so which we can prosecute for either as a failure to comply with a Hackney Carriage Byelaw 14 or under s.12 PCCA 1975 requirement for Private Hire Drivers.</p> <p>In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included</p>

		<p>within the current recommended taxi licensing policy changes.</p> <p>Uniform – please see response in 31 above. The reason for introducing a uniform is to ensure we can enforce unsuitable standards.</p>
<b>32</b>	<p>I wish to strongly object to the latest idea of re- spraying my taxi's white and green based on my constructive and viable point of view detailed below.</p> <p>Having recently upgraded all my taxi's to euro 4 level, which to be fair has enhanced the fleet, which was much needed and done so at some considerable cost to myself and others at a time when myself, Plymouth and the rest of the country are in recession. Some owner/drivers have had to leave the taxi trade as the cost of renewing taxis to euro 4 has been too overwhelming for them all.</p> <p>Our City of Plymouth is at the end of a long dual carriageway from Exeter and is not yet affluent, vibrant or in any way a city striving to come out of recession. We have no industry, no business links, empty shops and business units all over the city center, empty warehouse units all over the city and no military which would all require public transport, granted we do have SEASONAL students however as they are all city based in skyscraper's that our council tax has paid for they also do not require the use of taxi's.</p> <p>The taxi fleet here in Plymouth is at the moment struggling on a daily basis for all the reasons above. As an owner myself I have taxis parked up, at considerable cost to myself, the same as other owners in my position because of the lack of drivers wishing to rent vehicles. Although of course you will put a case forward that you have many badged drivers on your records, it will not depict the amount of actual drivers on the road as many drivers just keep their badges active in case they want to use them in the future, this being good for the council but not for a driver as there is no money in being a taxi driver now or in the near future.</p>	<p>In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.</p>



	<p>Although Las Vegas has gold taxis and New York has yellow ones, our little city at the end of a dual carriageway is not as vibrant and as rich as the above. You the council need to build this much anticipated cruise terminal now to help boost the tai trade else there will not be enough business or public transport to support such an asset as they would have all sold up and moved on.</p> <p>I doubt we may well all be able to afford to paint our fleet of taxis white and green, or shall we paint them blue with fishes on them as we claim to be an ocean city, or maybe the colours of Plymouth Albion? Let's be real here and put this idea on the back burner and let Plymouth crawl on its knees out of the recession. Whilst the council's wish list of green and white may look wonderful in your eyes would you think it was great if yo had to spend pointless money on vehicles that you do not even have drivers for, let alone the owners who have saved to buy a new cab and would have to take a sander to it. How selfish!</p> <p>Maybe when Plymouth is awash with money and we do not have people sleeping on the streets, crime rates are down and businesses are open again then maybe it would be better time to look at the councils own "disposable" incomes rather than trying to spend the publics. Probably an idea someone from the council thought of whist on holiday in Las Vegas or New York "lets make all our cabs the same", well where is the differentiation, freedom of speech, individual liberty and working together in that!</p>	
<b>33</b>	Identical letter to number 6	Please see response to question 6
<b>34</b>	Identical letter to number 6	Please see response to question 6
<b>35</b>	Identical letter to number 6	Please see response to question 6
<b>36</b>	Identical letter to number 6	Please see response to question 6
<b>37</b>	Identical letter to number 6	Please see response to question 6
<b>38</b>	I. when I look at busy Royal Parade full of multi-colour buses double parking, picking up and dropping off (unsafe) on the busy lane elderly ladies with babies in prams and the bus drivers most of the time doesn't help, is a	I. This is not relevant to the taxi policy.

	<p>disgusting picture of our city. But after all the bus driver has a uniform so his attitude is less important.</p> <p>2. Every summer we have so many visitors in Plymouth, Barbican is full of people but surprise, if they need a taxi they have to walk on top of town to get one because there is only one taxi rank during the day to two taxis and because that two taxis taxi rank might be occupied we don't try to park somewhere nearby because is illegal.</p> <p>3. Are many useless taxi ranks in Plymouth (Ham Drive etc.) which are well marked but we have important taxi ranks in town, not the some monitored so private cars are parking there all the time because the mark on the road is not well visible.</p> <p>4 If we have some funds and we really want to do something for our visitors and our city people we can monitor the taxi ranks we have , create new taxi ranks where the people needs taxis not to spend it for something we don't need.</p> <p>5. After all this I don't think is really necessary to have white and green bonnets cabs in Plymouth. The taxi drivers attitude is most important, no the uniform, don't matter how the taxi drivers looks like and his professional skills makes the difference for people.</p> <p>6. After upgrading our cabs from Euro 3 to Euro 4 in 2015-16 for money, taxi drivers was huge investment that change their family lifestyle and increased the number of working hours. So another investment in our business in a such as short time when we didn't have time to breathe is not necessary.</p>	<p>2. The Taxi Enforcement Officers regularly patrol this area during the day and have often found the rank free and not being used by Taxi's so we would encourage drivers to use this rank.</p> <p>3. The taxi enforcement officers are currently reviewing all the ranks whilst the fare signs are being updated. Any maintenance issues will be addressed. We will also review the ranks in the city and consult the trade regarding any that are no longer used. Please report any maintenance issues to us so that we can address these - email <a href="mailto:taxi.licensing@plymouth.gov.uk">taxi.licensing@plymouth.gov.uk</a></p> <p>4. Agreed – we are currently reviewing the ranks.</p> <p>5/6. In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.</p>
39	Identical letter to number 6	Please see response to question 6
40	<p><b><u>Medical Exemptions.</u></b></p> <p>It seems to be the culture in the taxi trade now to get a medical exemption,</p>	<p>The Wheelchair guidance has been amended following the consultation. There will be Exemption Certificates which will be short term and will be for a maximum period of 12 months.</p>

basically so they do not have to take wheelchairs. The Council has not helped matters by making us have vehicles that are not suitable for wheelchairs, limited space for loading, not being able to turn a wheelchair and secure it safely because of the size of the wheelchairs and the wheelchair in the wrong position facing backwards. Perhaps the Council should start looking at the reasons why all these drivers keep getting exemptions. One of the reasons is they are frightened of being prosecuted for not securing the wheelchair safely and a lot of the reason behind this is because the wheelchairs are too large for the taxis.

The other reason is you have got a group of taxi drivers who are too lazy to put themselves out. My opinion of this life time exemption, if this is the case, the driver should be made to go private hire and not be a hackney driver.

You will all of a sudden see how are cured overnight. I regularly sit behind a taxi driver who has got a life time exemption and he is as fit as me. The only difference between him and me is that he is lazy.

#### **Dress Code.**

I understand that the Council want to smarten up some of the drivers, as I have also over the years cringed at the way some of them dress, sleeveless tee-shirts and shorts in the summer and flip flops. Even though the flip flops are illegal to drive in no one seems to want to enforce or take action against these drivers.

*Although I think drivers need to be smartened up, I think a sensible policy would be better off instead of enforcing a uniform, ie. No shirts without collars, no jeans and proper footwear to start with. This is probable more palatable to the drivers themselves.*

#### **Vehicle and Licensing Specifications**

*It is about time the vehicle specification is brought up to a modern standard, ie. You have got vehicles that you want to do wheelchairs with which are totally unsuitable for loading and unloading. To be brought up-to-date the council need to bring in*

There will be Lifetime exemptions which will only be granted where a driver is suffering from a degenerative injury, illness or medical condition in which recovery is not a reasonable outcome.

#### **Dress Code**

There is no law against wearing flip flops but drivers must ensure they can operate the controls safely. Wearing 'inappropriate footwear' and putting passengers and other motorists in danger is illegal.

The Code of Good Conduct has been updated to reflect the responses received. A dress code will be introduced but will be less restrictive. We have amended the standard in light of the responses to say:

As a minimum standard, males must wear smart trousers (no denim) and a collared shirt or polo shirt which has a full body and short or long sleeves. Knee length tailored shorts may be worn, for example during periods of warm weather.

As a minimum standard, females must wear smart long legged trouser (no denim) or knee length skirt or dress and a collared shirt/polo shirt or blouse which has a full body and short or long sleeves.

*back loading vehicles for wheelchairs. By doing this, there will be less excuses for any drivers not doing them, making loading and unloading a lot easier, safer for the wheelchair user and would comply with Plymouth City Council contract work and Devon contract work which specifies that all contracts must be forward facing wheelchairs.*

I approached the Hackney Carriage officer a few years ago, George Kurness and he told me that it would not happen because it would take up too much room on the ranks. I cannot see that this is a problem because it will only take a five foot box section at the beginning of a rank to be able to accommodate them. One of the ranks I work on, if I load from the side I block the pavement and I think this is more dangerous to the public than loading from the back. You have got hackney carriages at the present time that have had a conversion done which in some cases are dangerous and none of these vehicles have been crash tested and you are actually altering the manufacturers specification of travel and I am sure if these were crash tested they would fail miserably.

### **Livery**

At present, the Council have let private hire have vehicles which look identical to hackneys and in actual fact they look better than some of the hackneys with their illuminated lights on top. You are on about changing the livery of the taxis to green and white for Armada 400, but I think this is a good reason to change under safety reasons because by painting them white and green for 90% of the public this would be the easiest way to distinguish what a hackney is, by the colour. As an example, if you look at Exeter they are all done in red and grey colour, which makes them easily recognizable as hackney carriages, even though they use salon cars.

**Taxi meters** should be sealed by an independent body, as I remember years ago a certain group of taxi drivers worked out how to change the pulse rate in their favour to earn more money, so perhaps this would put an end to it if they were sealed.

### **Vehicle and Licensing Specifications**

Rear loading is not practical and would involve pushing people into the road and would require a 3m gap between each vehicle on ranks.

Thank you for your comments. The main reason for the livery is to protect the public and make a taxi easily recognisable from a private hire vehicle.

From 30 November 2017, all taxi meters in Plymouth must be sealed by an independent body.

41

Comments I am writing today to oppose certain measures to put forward by the recent consultation paper. Firstly there is no council in the country with 100% WAV fleet with livery. These vehicles are already easily recognized as being a Taxi. The cost to the vehicle owner is unfair along with the time lost off the road to have the work done. It will de-value the cabs and make void any warranty on new vehicles, thus making drivers less likely to invest in new vehicles, thus going for older models which would be detrimental to the public. For many drivers they use their cabs as their private transport as well. This livery will cheapen the appearance when doors and boots are opened to show the original paintwork inside door jams etc. Plymouth now has probably the best, cleanest and most modern fleet of taxis in the city and this has been for quite a long time. Having cabs 'wrapped' has been suggested, white soon goes off colour and dirty and you are unable to polish the plastic effectively and no doubt in time will begin to peel and look tatty. I personally prefer to keep my cab plain but other drivers choose to advertise giving them little more income. Vehicles are used as wedding cars, executive hire etc. all revenue which would be lost to the drivers by enforcing livery. Another point is identification for an incidents would be impossible with all cabs looking the same. Detrimental to the very public we are trying to protect. I may also result in the driver not being described sufficiently to be identified, once again a safeguarding issue. I also oppose the city football colours on my cab making it a potential target for the unruly football supporters. Secondly I strongly oppose any form of uniform as I am an independent self- employed driver who although dress smartly I have not worn a uniform since school days and feel this would be an infringement of our civil rights. I must add however that I do not agree with flip flops, vests or skimpy shorts, there is nothing wrong with non-offensive t shirts, sweatshirts or shirts of any colour, as with trousers of any colour or style. Personal attire in no way effects the professionalism of a driver as long as he/she is polite and helpful. Gives the customer a pleasant experience this is what matters more than how they are dressed.

We have been informed that all of the above is to satisfy the 'dream' of one

There are other councils including London that have 100% WAV fleet.

In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.

	<p>man, who expects this dream to be paid for with the time and expense of the taxi trade, which is already struggling.</p> <p>We all have a dream and that is to do the job we love for a sensible amount of hours a week for a reasonable average wage. Working 80/90 hours a week is unacceptable and customers in a taxi whose driver is going into his 18<sup>th</sup> hour of work for the day is unsafe weather he is in uniform or the cab is liveried.</p>	
<b>42</b>	Please see separate document and response sheet attached.	Please see separate document.
<b>43</b>	I would like to register my objections to the proposal for hackney cabs to be covered in white and green wrap (livery).	Please see the response in number 6.
<b>44</b>	<p>Chapter 1, 1.5 If and when the new Taxi and Private Hire Legislation from the Law Commission is passed, the term “Taxi” will be reserved for the Public Hire vehicle. A revision of the PCC Policy may then be required in short order. It may be better to reconsider the terms for Taxis and Private Hire at this time.</p> <p>Chapter 1, 2.1 The “Best Practice Guidance” (rev 2010). It is to be regretted that “Cherry Picking” from the document is in effect, encouraged.</p> <p>Chapter 1, 4.2 Once in possession of a Drivers HC or PH Licence, further qualification is not needed. A Driver is either “Fit or Proper” or is not. Further and ongoing training is not legislated for and is completely unnecessary, is burdensome in financial and time constraints.</p> <p>Livery adds nothing to Comfort, nothing to Passenger Service and nothing to</p>	<p>The general public tend to use the generic term ‘taxi’ to refer to hackney carriages and private hire and this is the reason that this term is used in the document.</p> <p>The Taxi Licensing Team refer to the Best Practice Guidance and other good practice from various sources to ensure we have a robust and suitable policy for Plymouth.</p> <p>The Taxi Licensing Department revise their policy to ensure it is fit for purpose and that any aspects of training that are highlighted as a requirement to enhance standards are addressed. The introduction of mandatory training for safeguarding and ambassador training is seen to be essential in raising standards and reporting safeguarding and modern slavery matters.</p> <p>In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.</p>

Access.

Chapter 2, 1.5

Enhanced Training is not legislatively required.

Chapter 2, 1.6

Apply to preceding or proceeding?

Chapter 2, 4.1 sub para 2(a) and (b)

VRQ is not a legislative requirement.

Ambassador training is not a requirement and is a financial drain on the Trades Accounts. If PCC wish to the PCC Accounts and not TRADE accounts should pay for the courses.

Chapter 2, 4.3

PCC would appear to “Reserve a Right” where no “Right” actually exists. It is agreed that in disciplinary matters, a VRQ may help to decide that a Driver remains “Fit and Proper”.

Chapter 2, 4.4

It could be conceded that “Safeguarding” may be possibly of benefit.

The Ambassador Training does not achieve its aim, is expensive in time and comes at a cost. A rude or sullen Driver before taking the course will be a rude or sullen Driver after the course.

Chapter 2, 5.1

This must not be revised to only the “Drivers own GP”. It has led to drivers in other areas de-registering from the GP Practice to avoid prohibitive fees charged. Re registration with a Doctors practice is difficult.

It is a legislative requirement to ensure a person is ‘fit and proper’ and every case will be considered on their own merits.

1.6 - These requirements apply to new applicants or existing licence holders.

This will be altered to read ‘These requirements apply to new applicants **and** existing licence holders.

The VRQ is a requirement of the existing Taxi Licensing Policy and will continue to be a requirement in the new policy. The Ambassador training will not be paid from the trade accounts. It will either be funded or have to be paid by the driver.

The aim of the ambassador training is to raise standards.

The policy advises that it is either their own GP or a GP within that practice who has full access to their medical records. Where a driver wishes to apply for a ‘lifetime’ exemption the applicant is required to submit an assessment form signed and authenticated by that persons GP and supported by a specialist consultant.

Chapter 2, 13.1 to 13.4 inc  
Points systems, adopted in other LA areas are open to abuse, are not legislated for and rarely work well.

The only actions that the LA can take are to “Suspend, Revoke or Refuse to Renew” a licence. Any other action, including points are to exceed the powers granted in Legislation.

Chapter 3, 1.1  
It is suggested that the Disclosure Barring Service is not sourced in Scotland.

Chapter 3, 2.2  
Livery is not required. Detailed in response to CH3. Para 10.1 below.  
Chapter 3, 10.1  
Livery is manifestly not required.

The Livery proposed is particularly disruptive because:  
i) No vehicle can be purchased brand new with this colour scheme.

The primary objective of the penalty point’s scheme is to improve levels of compliance and help improve the standards, safety and protection of the travelling public. The scheme has been designed so that it works in a similar way to driving points and will encourage drivers to ensure they abide by the law and comply with their licensing conditions and byelaw conditions. We will review the scheme to ensure it works effectively. The aim of a penalty point scheme is to work in conjunction with other enforcement options. It provides a formalised stepped enforcement plan. The purpose of the scheme is to record misdemeanours and to act as a record of drivers, vehicle proprietors and operator’s behaviour and conduct so as to ascertain whether they are a fit and proper person. It does not prejudice the Council’s ability to take other actions.

It is not possible to obtain an enhanced DBS for vehicle proprietors as the Rehabilitation of Offenders Act 1974 (Exemptions)(Amendment) Order 2002 does not cover hackney carriage or private hire vehicle proprietors. However, the applicant or licensee on renewal can be asked to obtain a Basic Disclosure which is obtainable from Disclosure Scotland.

In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.



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|  | <ul style="list-style-type: none"> <li>ii) There is great expense involved with panels being painted or covered with Green (or White).</li> <li>iii) Vehicles by being “Liveried” will be immediately devalued.</li> <li>iv) The proposed Livery is particularly unattractive, it has the effect of making pristine vehicles look as if, having been in an accident, a temporary repair has been carried out using second hand panels of a different colour.</li> <li>v) Green is traditionally an unlucky colour. Some passengers will not contemplate travel in a Green, or even part Green, vehicle.</li> <li>vi) It will be less attractive for a proprietor to buy brand new vehicles due to points (ii) and (iii) above. The fleet is likely to be of a greater average age as a result.</li> <li>vii) A liveried fleet brings a chilling vision of living in a Police State. Free choice of vehicle colour better denotes a free economy.</li> <li>viii) Loss of “all over” advertising potential will cause a serious loss of revenue to Proprietors.</li> <li>ix) No mention is made in DfT “Best Practice Guidance” of a livery. Indeed the document actively promotes a roof sign for Public Hire Vehicles (Taxis) and no roof signs for Private Hire Vehicles as the ideal differentiation between the trades.</li> <li>x) Passengers will often look for a distinctive vehicle which they have previously used as they can rely on the Driver for whatever reason. <i>(As an example my own distinctive Blue vehicle is looked for by wheelchair using clients, as I offer a better facility and am generally more amenable to their needs than many other Taxi Drivers).</i></li> <li>xi) There is no need for, and no advantage to, the PCC Logo appearing on the sides of Public Hire Vehicles. The rear “Plate”, and the current internal version are enough. Only the Rear plate is legislatively provided for.</li> <li>xii) In a free market, the Name and the Contact Number for a Taxi Office (they are not operators) should be as prominent as the Vehicle Proprietor chooses.</li> <li>xiii) The proposed livery looks disturbingly like a football strip from a</li> </ul> |  |
|--|--|--|

lower league club. Taxis may become targets for the disgruntled fans of other teams.

- xiv) After 6 years of imposed Livery the complaints by Drivers in Bristol have not abated. If nothing else, the costs of that Council in countering the complaints by Officer or Elected Official time are ridiculous and can easily be avoided by simply not having a Livery imposed. (Reported by Bristol Post 04/10/17).
- xv) PCC impose a 100% Wheelchair Accessible Fleet – this in itself provided a perfectly suitable differentiation.
- xvi) Post a non-fault accident, Drivers will find it difficult or impossible to source a liveried vehicle provide by insurance companies, to continue earning.
- xvii) Possibility of “Leasing” a vehicle will be removed.
- xviii) Obtaining finance for vehicle purchase may be impossible due to the immediate devaluation of the vehicle on applying Livery.
- xix) Though the extra premium can’t be quantified, liveried vehicles do cost more to insure.

i) Older, serviceable, pristine vehicles will become “Write Offs” if this comes to fruition.

ii) Due to lack of opportunity to sell outside the Licensing Area, vehicles will be retained for longer time scales.

Being unable to have “All Over” advertising will represent a drop in income of an annual figure in excess of £1000.00 to some Proprietors.

#### Chapter 3, 12.1 – Window Tints

The Authority need not include this. If a suspicion is that a vehicle is not compliant, pass the information to the Police or DVSA. As the competent authorities, they can take action.

Window Tints – this has been amended to the following:

Vehicles shall comply with the minimum light transmission standards for all glazing as determined by the MOT vehicle testing manual, that being 75% light transmission for windscreens, and 70% for the front side windows.

Darker window glazing tints or window films, may be fitted to the rear glazing of the vehicle. Mirrored window films or glazing is not permitted on any window of the vehicle. Window film tints, if fitted, must be professionally applied to ensure correct adhesion to the window surface without blemish, and to allow correct operation of the window opening mechanism.

Chapter 3, 13.2 – Vehicle Emissions/Age Policy  
Adequate consultation and lead in times will need to be provided in advance in any changes contemplated.

Chapter 3, 15.2  
Point agreed, rear loading should be allowed to, but never instead of, side loading for wheelchairs.

16.1 Vehicle Compliance Testing  
The tests cannot be required in excess of the maximum annual number allowed by primary legislation (PCCA 1975). The maximum is 4 tests per year.

Chapter 3, 16.2  
Vehicles converted (to WAV for example) require SVA certification.

Chapter 3, 16.3  
Primary legislation allows only a 1 year licence. The PCC would seem to be “Reserving a Right” where no such “Right” exists.

Chapter 3, 16.6  
The PCC should consult interested parties before altering or amending the document.

Chapter 3, 18.0  
This subject has to go somewhere but it is, apart from the need to display the Tariff, not part of the Chapter “Vehicles”.

Chapter 3, 18.3  
Expenses accrued, such as Tolls or similar are not included. Other “Extra” charges are not included either such as Soiling, Booking fees, Railway Station

**Vehicle Emissions** - Full consultation will occur for this in advance of any proposed changes

**Vehicle Compliance Testing** - It is not envisaged that more than the maximum tests will be required and formal action would be considered if tests are being requested in addition to the standard requirements.

Noted

16.3 - Section 4c of the PCC Act 1975 states that the vehicle licence shall remain in force for such period **not being longer than one year** as the Council may specify in the licence.

The Council normally consult with interested parties but there may be occasions where they may need to alter something in a more timely manner.

18.0 - Noted but do not see it is something that needs to be altered as it fits with the vehicle not the driver.

18.3 - An additional bullet point has been added to encompass all of these types of additional charges. ‘Other reasonable charges’.

pick up, MoD property etc.

Chapter 3, 20.2

Permission of PCC is not a requirement. PCC could, and indeed should, require that they made aware of systems being fitted.

Chapter 3, 20.3

Proprietor owned and operated CCTV systems are not in the remit of the PCC.

Chapter 3, 20.4

PCC may require this of mandated systems, not those a Proprietor owns and operates.

Chapter 3, 20.5

The registration Certificate from the ICO should make up part of the Proprietors file held by the Council. On annual renewal the new certificate should be provided to the Council.

Chapter 3, 25.1

As I personally benefit from an exemption to this provision, I feel that I should not express an opinion to this Paragraph, but I do have a well-known position on it and its ramifications.

Chapter 3, 26.1

It would appear from the wording that the PCC “Hire out” licence plates. The wording should be seriously considered. Also a courtesy that PCC have extended in the past is now given a kind of semi legal status if it remains.

20.2 has been removed from the Taxi Licensing Policy document.

Chapter 3, 20.3 – This has been altered to read ‘ A CCTV system installed in a licensed vehicle must comply with the minimum technical CCTV specification as indicated in our guidance’.

20.4 – this has been altered to read ‘ The Council reserves the right to amend the CCTV guidance from time to time’.

20.5 Plymouth City Council will not require a copy of the registration for the proprietors file.

25.1 - Noted

Chapter 3, 26.1

The licence plates are not hired out. If a vehicle is not in use for example due to a failed engine or major part, then the proprietor is granted three months to rectify the fault and the licence is held dormant on the system. It is not reissued. If the vehicle is not repaired within this time scale then the licence is retained by the council.

Chapter 3, 26.2

This will be considered.

Chapter 4, 1.3 – point noted, however there is no need for a

Chapter 3, 26.2

A procedure for re-allocation should be in place.

Chapter 4, 1.3

Consideration should be given to a 1 year licence at first application. In effect a probationary licence.

Chapter 4, 2.1

Is this for The Operator, all Office Staff or Drivers – it is not clear from the wording.

Chapter 4, 4.1

There should be no reason not to comply allowed.

Chapter 4, 4.2

In line with the primary legislation – written notice etc.

It is the right of Proprietors and Drivers (if different) to have Audio, Visual CCTV.

### **Audio Recording**

Mandated, Local Authority supervised systems are precluded from Audio except when “panic buttons” are used.

Proprietors and Drivers own systems are not constrained in this way. This is covered in the security of date when registered with the ICO.

probationary licence as you are either fit to have a licence or you are not.

Chapter 4, 2.1

The wording appears clear as it refers only to Private Hire Operators.

Chapter 4, 4.1

Large to medium sized operators should have no problem in electronic record keeping. Smaller operations i.e. those that have one or two drivers, may find investment in an electronic booking system onerous. In that case we can determine some other form of record, either a ledger, or spreadsheet on a computer for example.

4.2 This has been removed as it is already covered in the legislation.

Agreed. This has been stated in the specification document.

Audio Recording - this is not a mandatory system. You must comply with the ICO and have suitable notices.

Notification - This is guidance and it is not mandatory for this

**Notification to the Information Commissioner’s Office**

Registration must be proved to the PCC. A copy of the Registration Certificate should be filed in the relevant Proprietors or Drivers records.

**Signage for Internal Audio and Visual Recording Equipment**

Accepted – here audio recording seems to be accepted.

**The name and the contact telephone number of the Data Controller must be included on the sign**

The contact details can be an email address that does not include a name.

**Signage for External Facing Audio and Visual Recording Systems**

In the near future a sign should be available as agreed by DfT (for all vehicles, not just Taxi and PH).

**Operational guidelines**

Overwriting can occur in just a few hours.

**CODE OF GOOD CONDUCT FOR LICENSED DRIVERS**

Enhanced Training cannot be made mandatory for Public Hire Drivers. Taxi Drivers can only be mandated by utilization of Bye Laws.

Enhanced Training for Private Hire Drivers can be made a “Condition of Licence” but would seem a little unfair.

Whilst I support the aims of the dress code, the same principle of “Bye Law” comes into play.

system to be installed. It is therefore important that drivers ensure they comply with the ICO requirements.

Data controller - This is stated in the guidance.

Noted.

Noted.

Code of Good Conduct for licensed drivers - The Taxi Licensing Policy if agreed will make this a requirement.

This will not be applicable as it will be a requirement of the licensing policy and will be a consideration by the Committee members as to whether a person is fit and proper to hold or retain a driver’s licence.

## **Penalty Points Scheme**

There is no Primary Legislation that allows a Penalty Points System.

Whoever is delegated to award points is de-facto, Judge and Jury.

In other areas that have adopted these schemes, problems have become manifold.

Associations, Unions and similar, should advise all recipients of “points” to refuse them in every instance or accept that they have actually pleaded “Guilty”.

## **WHEELCHAIR AND ASSISTANCE DOGS EXEMPTION GUIDELINES**

### **Application Restrictions**

Every application for exemption must be considered entirely on its own merits with no “Time Served” requirement. A new applicant should be able to secure exemption even prior to gaining first licence. To do other may be breaking at least the spirit of the Equality Act 2010.

### **Temporary Exemption**

A level of privacy may be required. By its very nature it may be “Medical in Confidence”. To this end a Doctor stating the precise reason may be breaking this confidence. It is enough that a Doctor states the restriction (e.g.. “No pushing wheelchairs” or “No bending or Lifting”) and confirms remains fit to DVLA Group II requirements.

**Penalty Points Scheme** - This is a good practice scheme and will form part of the policy. See comments relating to penalty points above.

### **Application restrictions**

The Council has decided that every HC will be a WAV, and therefore there is an expectation that drivers of WAV’s will perform those duties. It is acknowledged under the EA 2010 that there may be occasion where an exemption to those duties under the Act is granted, but should that be extended to new applicants, it would completely negate our policy on having a WAV fleet and driver’s able to perform WAV duties.

### **Temporary & lifetime exemptions**

There is an issue surrounding medical confidentiality, which is why we introduced the medical form we have.

Following the consultation the Wheelchair Guidelines have been amended:

	<p><b>Lifetime Exemption</b></p> <p>As certification is not covered by the NHS and therefore requires payment to the Professional, form should only require a Doctor and not a Consultant to complete.</p> <p>The Council can only ask if the Doctor stands by the form previously completed, as to ask more is to breach “Medical Confidentiality”.</p> <p><b>Assistance Dogs</b></p> <p>A better term is “Service Dogs”. Dogs designated in this way are supposed to have a “Service Dog Passport”. If the “Passport” cannot be produced, carriage should be at the discretion of the Driver.</p>	<p>The Wheelchair guidance has been amended following the consultation. There will be Exemption Certificates which will be short term and will be for a maximum period of 12 months. There will be Lifetime exemptions which will only be granted where a driver is suffering from a degenerative injury, illness or medical condition in which recovery is not a reasonable outcome.</p> <p><b>Assistance Dogs</b></p> <p>The Act refers to ‘Assistance Dogs’ as they assist the person they are with. This will remain.</p>
<p><b>45</b></p>	<p>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. Current estimates suggest about 32,140 people with vision impairments are living in Devon of which about 147 are guide dog owners.</p> <p>Taxis and private hire vehicles (PHVs) and the door to door service they provide are essential to the independence of blind and partially sighted people. Who are often unable to drive or use public transport. However, accessing taxis and PHVs can be a major challenge for assistance dog owners. A Guide Dogs survey found that 42% of assistance dog owners were refused by a taxi or PHV driver in a one year period because of their dog – 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.</p>	<p>All of the comments are agreed with and this is why our policy has included guidance on Wheelchair and Assistance Dogs Exemptions.</p> <p>All new drivers must complete a VRQ which includes modules on disability awareness.</p>



To help reduce the number of access refusals, it is important that drivers know their legal obligations and how to best offer assistance to their customers with vision impairments, including those travelling with a guide dog. We welcome the reference to disability awareness training in section 4.2. However, we recommend strengthening this and specifying that all drivers must undertake disability equality training when obtaining their licence.

Recognizing the damaging effect an access refusal can have on an assistance dog owners life, the policy should clearly state that any such refusal will be investigated with a view to prosecution and that the driver's licence revoked. Likewise, the "Guidance on relevance of convictions and conduct" should make clear that any such refusal will be viewed very seriously – not only if this happens more than once.

We welcome the specification that lifetime medical exemption certificates for carrying assistance dogs will only be issued when supported by specialist medical evidence. This will help ensure exemptions are only granted where the driver has a genuine medical condition that is aggravated by exposure to dogs. We would further like to change the reference to 'Guide Dogs UK' in the "Wheelchair and assistance dog exemption guidelines" to 'Guide Dogs'

Key recommendations: We recommend that all drivers undertake disability equality training when obtaining their licence and that every access refusal is investigated with a view to prosecution and will lead to the driver's licence being revoked.

### **Disability equality training**

1.1 Drivers who refuse to carry an assistance dog are committing a criminal offence under the Equality Act 2010. The consequences of delayed travel combined with the emotional impact of facing discrimination and confrontation when trying to carry out everyday activities takes a significant toll on assistance dog owners.

This has been amended to 'guide dogs'.

This is in place and is covered in the VRQ.

We investigate all complaints regarding refusal of wheelchairs or assistance dogs and will take formal action where sufficient evidence is available. We also undertake regular test purchase operations.

I.2 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.3 I.2.1 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.2.2 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.

I.2.3 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 socializing with friends, which is bad, as I have no family. Guide dog owner, Rochester.

I.2.4 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.

I.4 A guide Dogs survey found that many taxi drivers are unaware of their legal obligations and the impact refusals have on assistance dog owners. The best way to address this is through disability equality training for all taxi and PHV drivers.

I.5 Disability equality training focuses on the concept of people being disabled by society's barriers and attitudes. It highlights the role an organization and individuals play in the removal of those barriers, while

also including awareness elements such as customer care, etiquette and appropriate communication.

I.6 Many of the positive experiences disabled people report when using taxis and PHVs come about following disability equality training report very positive results with fewer refusals and drivers feeling more confident in assisting passengers with disabilities.

I.7 To enable taxi and PHV drivers to deliver the best and most inclusive service possible, we therefore recommend that all drivers undertake disability equality training. This will ensure they are knowledgeable on disability issues, have discussed barriers in their service and how to overcome them, and are informed about their legal obligations.

## 2. Enforcement

2.1 We recommend that every refusal of an assistance dog owner will be investigated with a view to prosecution and the drivers licence being revoked. 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 £1000.

2.2 While our survey shows that 42% of assistance dog owners have been refused over a one year period, many of these incidents are not reported. Indeed only 54% of respondents said they would 'definitely' or 'very likely' report an access refusal.

2.3 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.

2.4 Considering the significant impact an access refusal can have an 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. The 'guidance on relevance of convictions and conduct' should reflect that and specify that every incident will lead to questioning whether that person is 'fit and proper' to hold a licence – rather than only if it occurs more than once, as the guidance currently states.

2.5 We suggest inserting the following paragraphs into the policy:  
2.5.1 The Licensing Authority will investigate all reported access refusals with a view to pursuing a conviction under the Equality Act 2010 and ensuring appropriate penalties are given that are in line with the distressing impact a refusal can have on an assistance dog owner.  
2.5.2 The Council will undertake periodic test purchasing on licensed vehicles to ensure that licensing requirements are being complied with.

### 3. Medical exemption certificates

3.1 We welcome the specifications in the 'Wheelchair and assistance dogs exemption guidelines' that lifetime exemptions will only be granted if supported by a specialist consultant and that they might be assessed by an independent Occupational Health advisor. This will help ensure that exemptions are only granted where the driver has a genuine medical condition.

3.2 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 prescribed form and render it invalid. We recommend that licensing authorities issue exemption certificates that are accompanied by features distinguishable to vision-impaired passengers, such as an embossed or raised 'E'.

3.3 We would also like to change the reference to 'Guide Dogs UK' in the 'Wheelchair and assistance dogs exemption guidelines' to 'Guide Dogs'.

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I attended the public consultation held at the Guildhall and have read the proposed changes that Plymouth City Council wishes to implement in our trade.

I have a few objections to mention.

### **1. Council Livery – white cabs**

If PCC wishes to have one colour taxi fleet this matter should have been planned years ahead of 2020 and not now, end of 2017. I bought my cab in October 2014. I only paid 3 years finance and still have 2 more years to go. By the time I have to comply with the new colour (2019) I would need to buy another cab. Wrapping is not an option as I lose my anti perforation warranty valid for 10 years. Also as we have seen with some older cabs, rust starts to appear under any type of wrapping.

Having a one colour taxi fleet will not benefit us or the city in any way. Nor will it attract more customers and the ones that I did inform of your intentions, were appalled by your thinking.

This matter is one mans (Cllr Riley) vision and dream. But it's not the wish of 100's of taxi drivers.

### **2. Penalty Points System**

The idea is not bad; but there is not a balance. 12 points in 3 years? I do not agree with your proposal. 12 points in 1 year would be better. Some of those points are awarded for easy to make mistakes. We are human beings that easily can commit error. I propose a reduction in the points awarded for minor offences and limit the rolling period.

### **1. Livery**

In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.

2. The primary objective of the penalty point's scheme is to improve levels of compliance and help improve the standards, safety and protection of the travelling public. The scheme has been designed so that it works in a similar way to driving points and will encourage drivers to ensure they abide by the law and comply with their licensing conditions and byelaw conditions. We will review the scheme to ensure it works effectively.

### **3. Dress Code**

We have amended the standard in light of the responses to say:

As a minimum standard, males must wear smart trousers (no jeans) and a collared shirt or polo shirt which has a full body and short or long sleeves. Knee length tailored shorts may be worn, for example during periods of warm weather.

As a minimum standard, females must wear smart long legged trouser (no jeans) or knee length skirt or dress and a collared shirt/polo shirt or blouse which has a full body and short or long sleeves.

### **3. Code of good conduct – dress code**

I agree that certain drivers, do need to improve their image and the way they present themselves to the public. But imposing which colour to wear means forcing everybody to wear a uniform. We are all self-employed. PCC is not paying us a salary; we have to pay PCC for regulating our trade. Furthermore, employees of PCC are not obligated to wear uniforms; nor should we.

That we shouldn't have people wear flip flops at work or sleeveless t-shirts or beach clothing or torn jeans: that should be addressed.

What should be done to help the trade:-

#### **1. Rank Marshall**

We need a better order on the ranks in the bank holiday weekends. Too many times, we (the drivers) have to try to keep order and impose people respect the principal 'first come first served).

#### **2. Relationship with Devon and Cornwall Police**

If a bus driver has an issue, Police attends right away. They offer public transport. But, we taxi drivers offer public transport too. Therefore in case of emergency we insist that police treat us fairly as well.

#### **3. Raised Kerbs**

I transport a lot of wheelchair customers. None of the ranks in Plymouth City Center have raised kerbs to facilitate easier loading. As you've noticed, a lot of taxi's nowadays have a underfloor ramp. Having raised kerb, will increase the angle therefore easing loading. At Derriford hospital, all drop off and pick up wheelchair passengers is to be done in Car Park F. There's not even a normal kerb in there.

7. The Plymouth Waterfront Partnership is currently arranging a Taxi Marshall Scheme for the Barbican and if this is successful, it is hoped that it will be extended to other ranks in the City.
8. The Taxi Licensing Team work closely with the Police and we have always found them to be very helpful towards drivers. Please see the guidance regarding taxi fare disputes and please contact the taxi licensing team or police to discuss your concerns further.  
<https://www.plymouth.gov.uk/sites/default/files/TaxFaresDispute.pdf>
9. The Taxi Licensing Team will review this as part of the rank reviews in the city and where possible introduce improvements. Unfortunately Derriford Hospital is private land so we cannot make any alterations to their ranks.
10. The Taxi Licensing Team will review this and make any necessary improvements.

	<p>And there is a slope as well.</p> <p><b>4. Street Lights</b></p> <p>Taxi Rank on North Hill is not properly lit. At night, is very difficult to see customers. Street light needed.</p>	
<b>47</b>	<p>I wish to strongly object to the proposed change of uniform colour coding of the traditional black cab, this is an extra expense to my personal finances that it totally unacceptable. The Licensing Authority made me upgrade my previous cab in 2015 even though it was in perfect working order but was Euro 3 emissions, so I decided to pay £28, 000 for a brand new black cab. Now you expect me to pay approximately another £1200 to have this beautiful black cab wrapped in white/green vinyl, are you out of your mind?</p>	<p>In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.</p>
<b>48</b>	<p>Strategic Transport</p>	<p>Please see separate sheet with comments</p>
<b>49</b>	<p>As a concerned resident group leader, existing in this central urban basin of Stonehouse, Plymouth, are very aware that the dangers to our citizen health while petrol chemicals are being burnt down wind of a populated city (PCT) toxic emissions from the badly sited dock yards incinerator from all the rubbish and plastics East Devon (at sea level) now being burnt up the furnaces chimney. However as a horticulturalist it has not gone unnoticed that most of the private and hackney carriage operatives continue to leave their vehicles running these engines whilst stationery in there taxi ranks adding to the high concentrations of carbon nitrates oxides into our cities atmosphere, the cities air that we breath in this basin (as viewed from kit hill on a hot congested day of a popular event) now adding to the early life expectancies of our residents (cancers and lung complaints) etc. as life time threats to human health, obviously many of these new licences and vetted cabbies are or should be aware of their geological positions when this impounds on our health and safety environmental and switching engines off when stationary.</p>	<p>The Taxi Licensing Department will liaise with Transport on the use of FPNs under Part 4 of the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002.</p> <p>This needs to be part of a city wide enforcement policy to include all transportation and targeting sensitive receptors e.g. schools.</p>
<b>50</b>	<p>Information referring to website information ADi about the life span of</p>	<p>The vehicle can either be wrapped or resprayed.</p>

vehicle wraps. This can be found on <http://aretedis.com/pros-and-cons-of-vehicle-wraps.html> The information advises that although vinyl manufacturers guarantee the material for 5 to 10 years, the life span of the wrap will be less and wraps that stay on vehicles longer than three years tend to bond more strongly to the surface and make wrap removal more time consuming.

#### Page 3, Para 1.5

You have mislead all the people listed in paragraph 5.0 and 5.1 by using the word taxi to include private hire so no paint job required there then! What representation was at these meetings to educate these people from the drivers point of view. As I see it was a one way roller coaster of the Council with their views, only put across.

#### Page 5, 4.2

Age of vehicles? No age limit required as are tested 6 monthly plus inspected by Licensing Officers on ranks randomly.

#### Chapter 2

There is nothing here to state under what reasons a driver can refuse to carry persons, drunk, dirty, not doing where there going. As a driver I will decide who rides and who doesn't.

#### Chapter 3, page 17, 2.2

All forms of advertising on private hire should be removed. They should be allowed a sign on their near side interior sun visor so that can be pulled down on arrival at pick up point for customer recognition nothing else required.

#### Page 18, 4.3

The livery proposed will take work out of the trade for taxis as people will not hire a common vehicle to get married, go to airports, cruise ships, these people apply for clean comfort, individual forms of transport is classed too

Page 3, para 1.5 - The general public tend to use the generic term 'taxi' to refer to hackney carriages and private hire and this is the reason that this term is used in the document.

4.2 - This will be reviewed in a separate consultation.

Chapter 2 – It is agreed that there are valid reasonable excuses not to take a passenger. There is no need to list these in the policy as this defence is included in the legislation

Page 17 - Private hire vehicles are permitted to advertise their company on their vehicles.

Page 18 – In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.



many as a luxury.

This will impact on my trade considerably. Only three years ago you imposed extra expense on the taxi proprietors and now you want to do it again. I and other drivers haven't finished paying for our cabs from the last expense you caused us. Promote the difference between taxi and private hire that already exist the word taxi and the light up front. Livery not required on rear of vehicle as nobody hails a taxi from the rear or when it's driving away from them.

Adding a livery would be detrimental to the taxi trade and there would be no advantage to the public as provided in London, Liverpool, Manchester and so on or are you saying the people of Plymouth are thick?

I have supporting evidence about vehicle wrapping which is used as a short term advertising material. See accompanying paperwork.

You would need to respray over 3000 vehicles plus cover their paint warranty plus you would have to pay compensation for time off work. A very high figure I would estimate about a million and a half. The police can't identify these vehicles easy. The vehicle would become targets for out of town jobs as it would be seen as advertising Plymouth argyle.

Page 22, 15.0 – 15.2

My taxi is not able to load wheelchairs on ranks at Derry's, Iceland, Old Town Street, Drake and so on. You are restricting the right of the disabled to travel with your restrictions on vehicles. Talk to the people that know?

Page 22, 15.2 and 15.3

Rear loading is a must.

Roof signs are against the law. Also the word Taxi on private hire is misleading the public putting them in danger.

Code of Conduct for drivers

Page 22 – Please contact us to discuss this further as I require further clarification as to why you cannot load wheelchairs.

Rear loading is not practical and would involve pushing people into the road and would require a 3m gap between each vehicle on ranks.

Roof signs are permitted on private hire vehicles if they use the words 'Advance Bookings Only'. There are trading names of private hire companies that contain the name 'taxi'.

The Council ensure that ranks are reviewed in consultation with the trade and that they are maintained. Please report any issues to us so that these can be investigated.

The Plymouth City Council Act 1975 section 27, refers to Prolongation of journeys. No driver can unnecessarily prolong in distance or in time the journey for which the vehicle has been hired.

	<p>Para 1, 1.4 Provide assistance to the trade is a joke, taxi ranks. Are an afterthought in planning decisions, wrong side of road, not in places where public needs ranks. Doesn't uphold existing laws against private hire.</p> <p>Transport of passengers shortest route Nowhere in law does a taxi drivers have to go by the shortest route. The shortest route can be the dearest route.</p>	
<p><b>51</b></p>	<p>I have read the full consultation in detail, without going into much detail I am broadly in agreement to most of the documents points.</p> <p>I have two sections I would like to comment on.</p> <p>I own three hackney cabs, two are rented, I am an owner driver of the third. I purchased two new Ford Pro Cabs in September, an investment of 70K.</p> <p>Luckily one is white, so happily no problem now or in the future with that one. The other is grey!</p> <p><u>Proposed vehicle livery</u> In summary a very positive, good idea. There is now a huge array of hackney vehicles in the city, many of which are not easily identifiable as a hackney carriage to the majority of the public. A lot of these are no longer even clearly marked as Taxis. However, I do not think timing wise it is at all possible to implement this for 2020 for all the many reasons you will be aware of.</p> <p>If this is going to be passed, in order to offer my small support, to what I feel is the long overdue livery standardisation of the fleet I would be prepared to put my white cab forward as a demo example for PCCs livery proposal. The driver takes huge pride in his vehicle and keeps it very clean at all times.</p>	<p>In light of the comments received, there needs to be further consideration of taxi livery and therefore this is not included within the current recommended taxi licensing policy changes.</p>

Although not ideal, in order to start and accelerate the transition process, have you considered allowing or encouraging the newer non- white vehicles to carry the livery for those willing to embrace the change?  
The phasing in, however it is structured, will take a considerable time and we will still be in the same position of a huge array of cabs until the non -white cabs have finally worked their way out of the system.  
In the case of my new grey cab, I will not be looking to update this until 2022.

Uniform

Excellent idea, however, having briefly attended the drop in session on the 6th November, sadly I just can't see this happening in any shape or form, let alone how would you police & enforce it !

Good luck and keep pushing on, I fully support what you are working to achieve.

The dress code has been amended slightly - please see the response in 30 above.