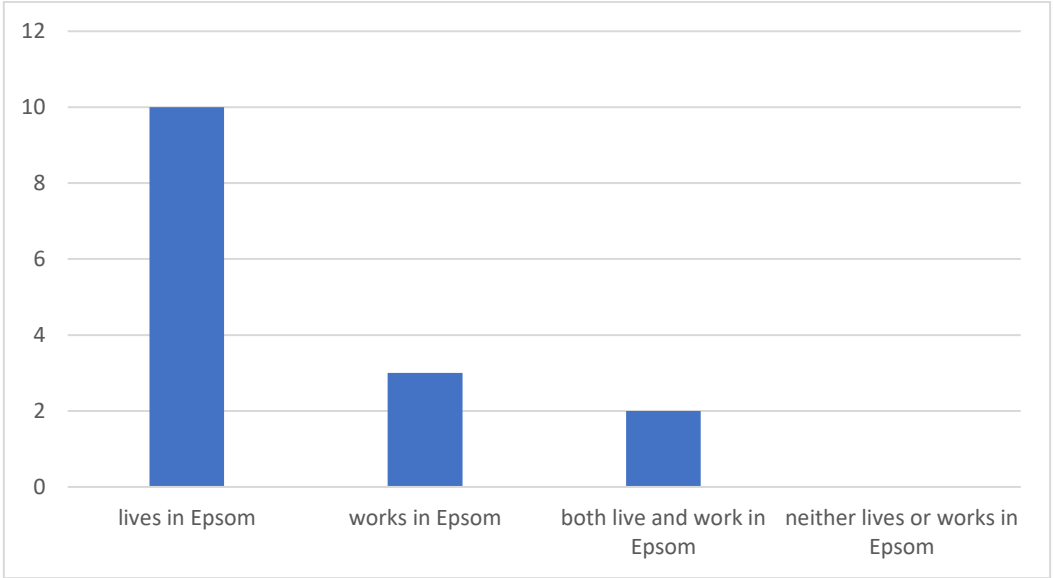
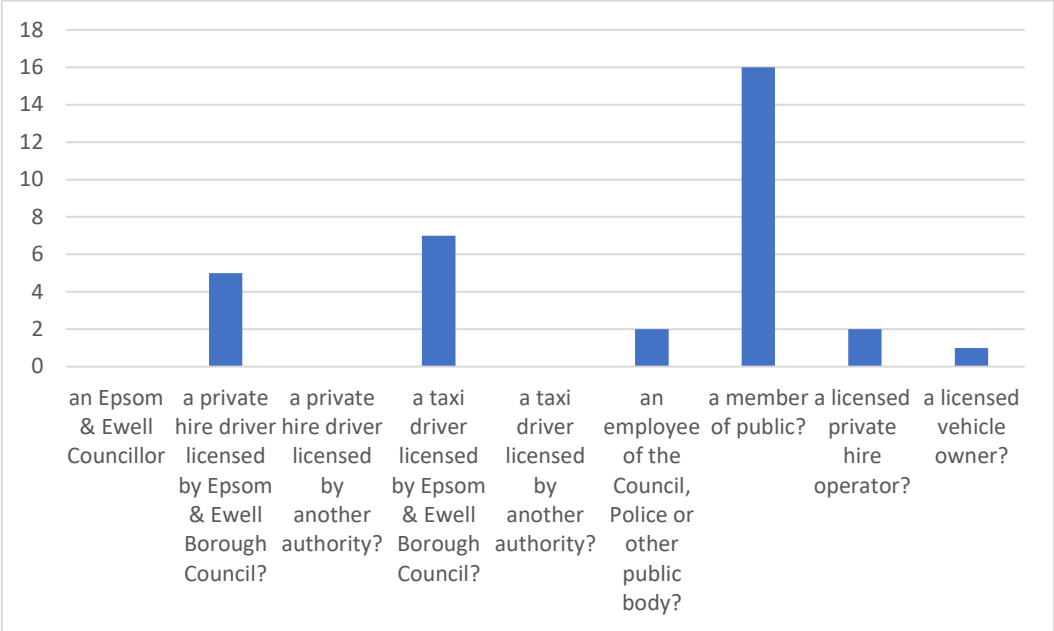


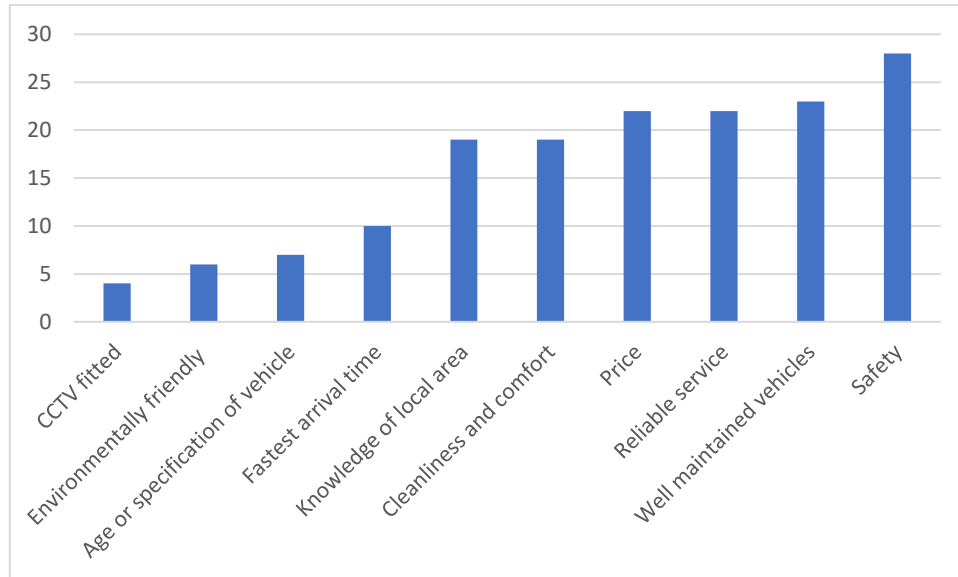
Analysis of consultation responses

Demographics of those responding to survey, where provided

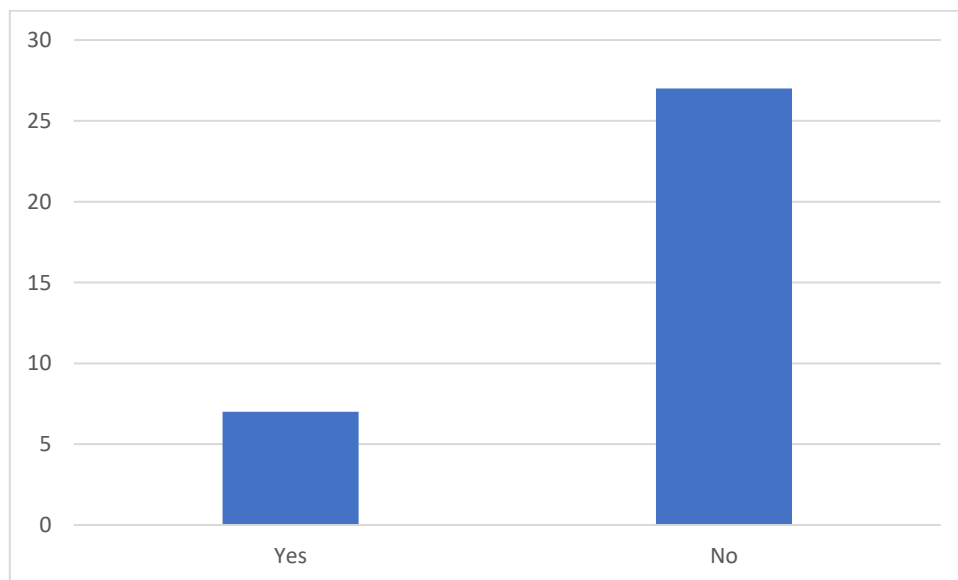


Survey questions

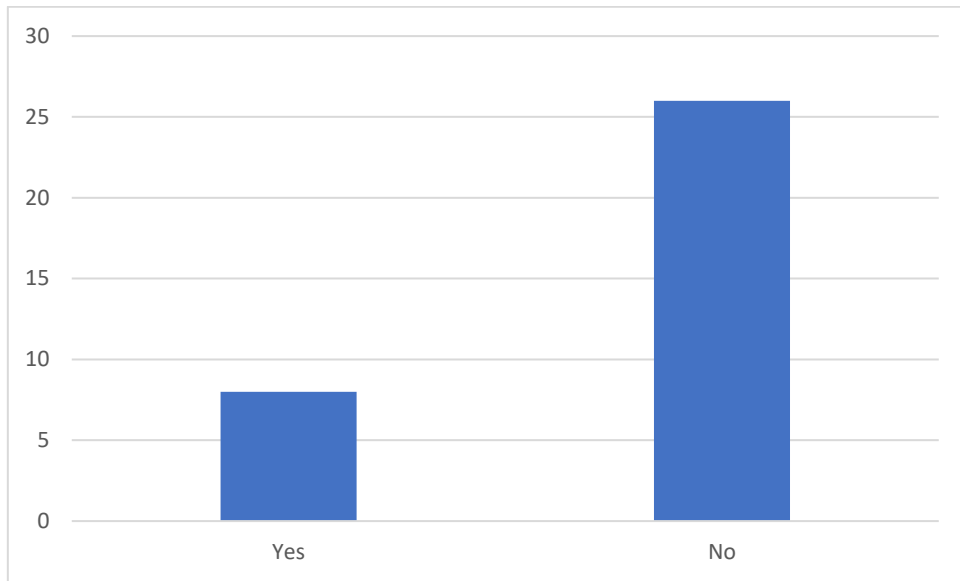
1. The important factors when choosing a taxi or private hire provider



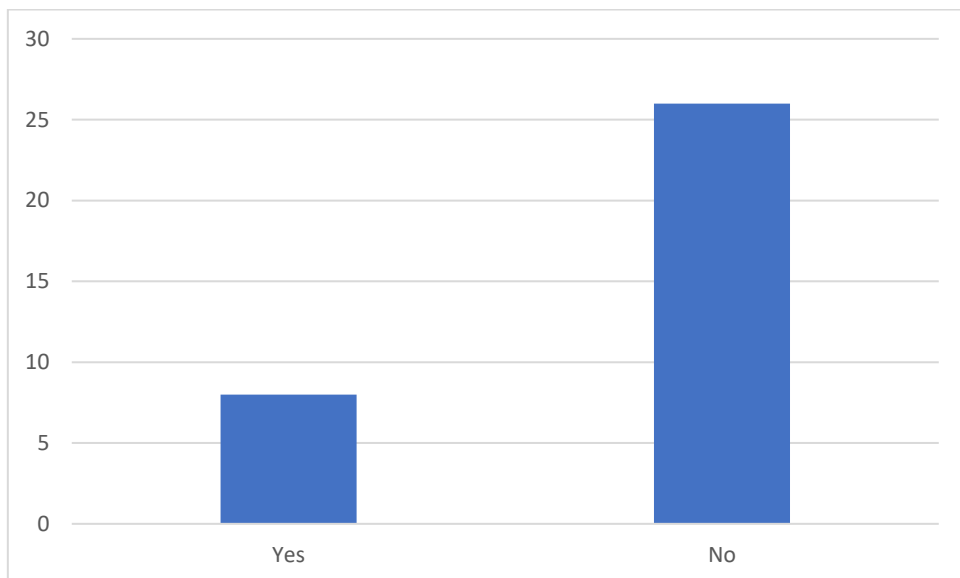
2. Have you ever had an experience in a licensed taxi or private hire vehicle where you believe the installation of CCTV may have had a positive effect on safety?



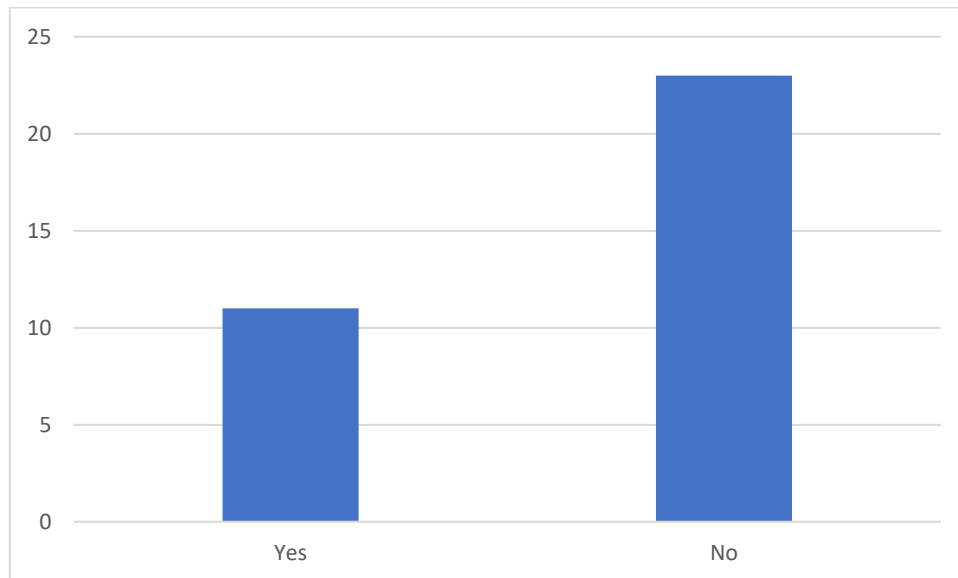
3. Would you pay extra for a licensed taxi or private hire vehicle with CCTV installed?



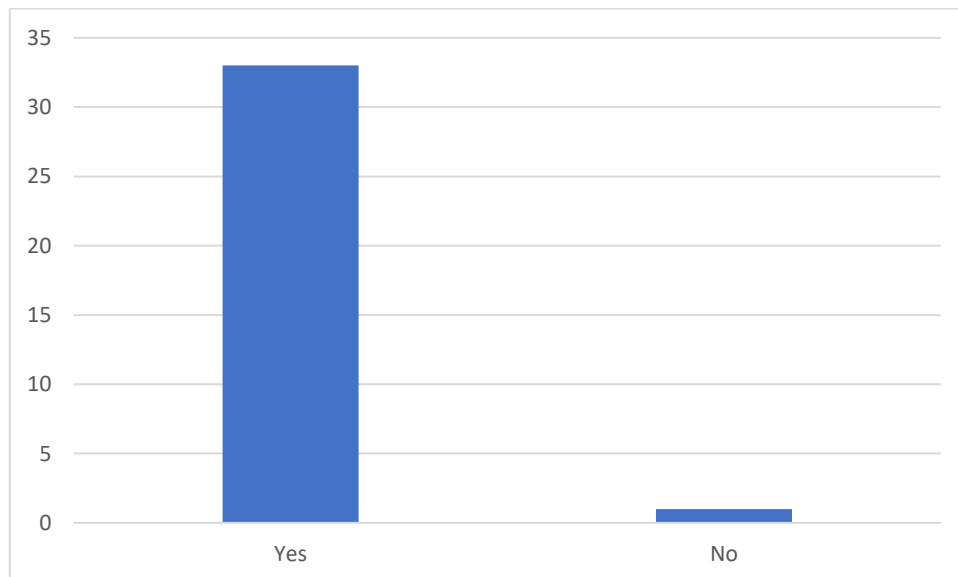
4. Would you pay extra for greener (i.e. lower emissions) licensed taxi or private hire vehicles?



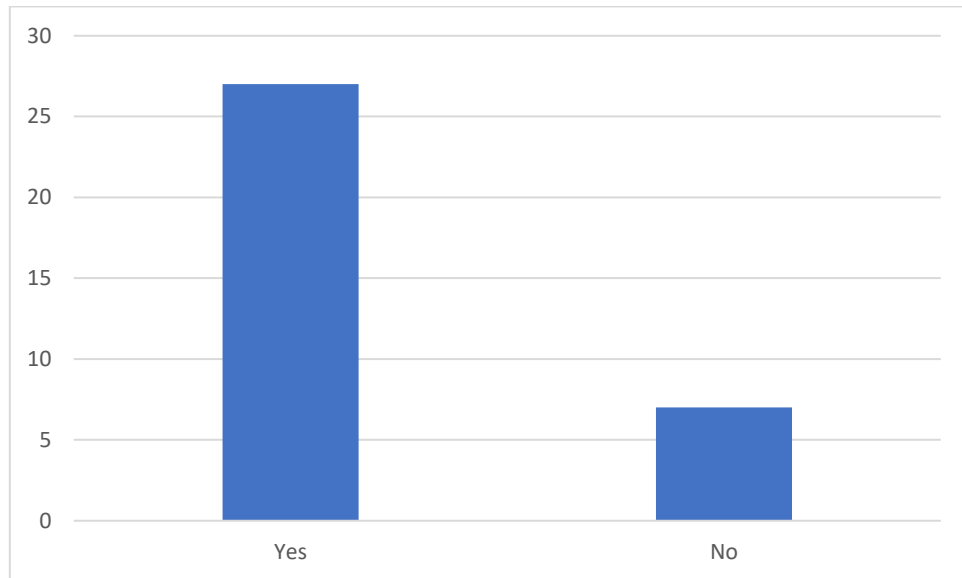
5. Should there be an additional requirement for vehicles over ten years old that they should have an MOT every four months?’



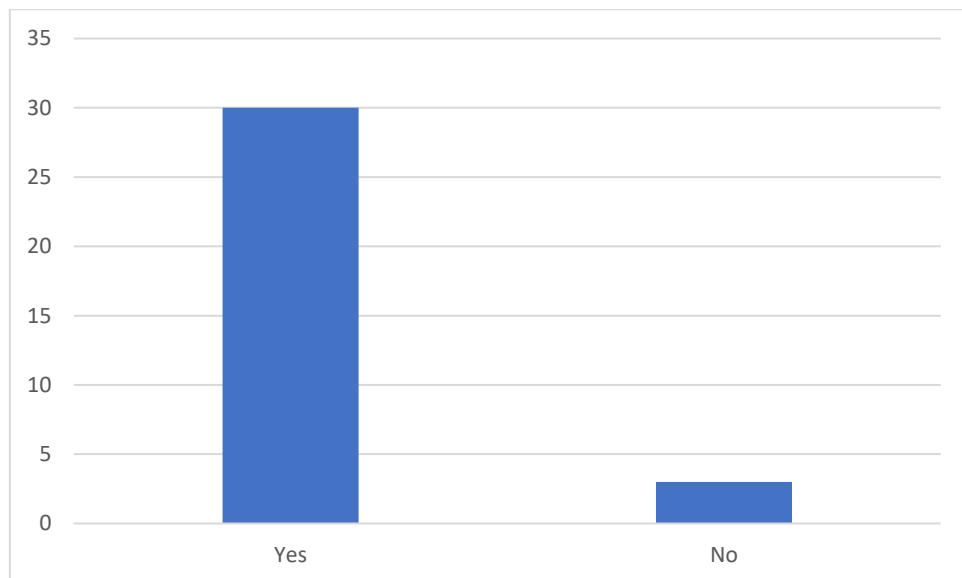
6. Is it reasonable that licence holders must notify the Council in writing with 7 days of any change of address or contact details, and within 48 hours of any arrest and release, charge or conviction of any sexual offence, any offence involving dishonesty or violence and any motoring offence, including penalty points?



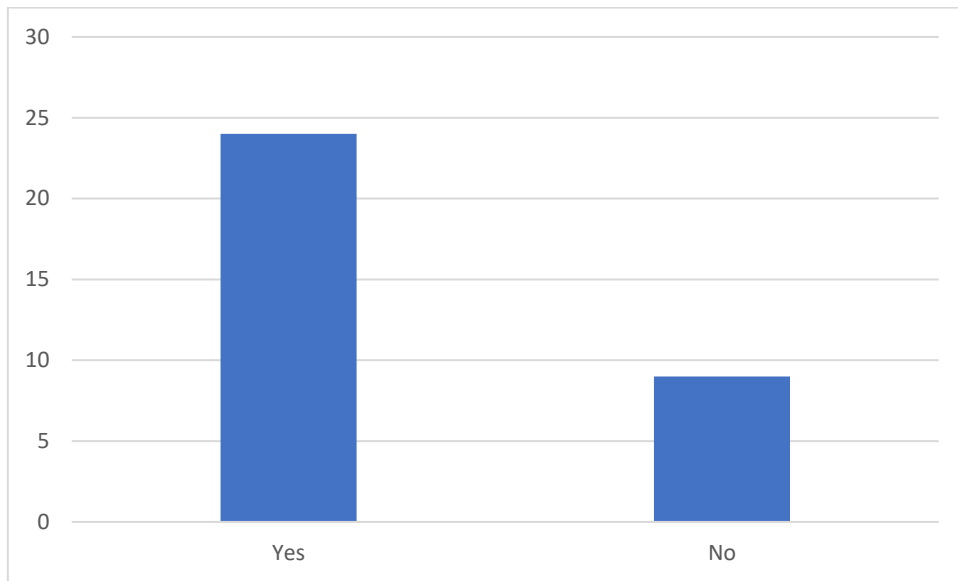
7. Should all taxis that use the ranks by the train station be required to have card payment terminals installed?



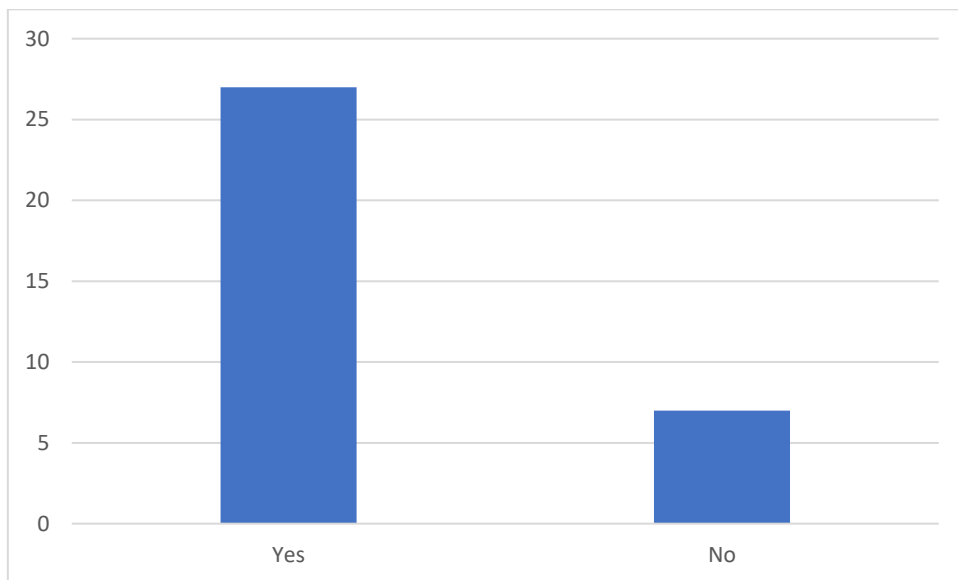
8. Should new applicants for private hire or taxi licences be assessed on their English language ability?



9. Should existing licensed taxi or private hire drivers be assessed on their English language ability, and have their licence revoked if they do not pass the test, even if no complaint has been received?



10. In addition to the current ban on smoking tobacco should the Council prohibit vaping and the use of e-cigarettes in licensed taxis and private hire vehicles?



Additional comments provided as part of the survey

1. some good idea's and some not, here's the thing how many private hire cars licensed to Epsom and Ewell council are signed up too Ubar and Bolt while working for the local cab firms? TFL drivers (green badge) aloud to do anything they wont park in un safe places, park in the middle of the road when there passenger could be run over. One last thing Clock Tower should be made into a toilets' and baby changing rooms and disabled toilet for wheel chairs. Clock Tower Cars have there office in Waterloo RD they don't need the Tower so many people have nearly been knock down when they stop outside it. the whole town should be double red lines and put in certain pick up points in town.

Officer comment: The revised policy set out in section 4.4 that dual licensing of private hire vehicles (i.e. licensing by two different licensing authorities simultaneously) will not be permitted. Whilst this paragraph is a new addition to the policy, it is only setting out for clarity the current long established licensing position at EEBC. As EEBC does not currently licence Uber or Bolt as private hire operators, the answer to the first part of the response is 'To officer's knowledge no EEBC licensing PHV are signed up to Uber or Bolt while working for locally licensed PH operators'. If anyone has any information to the contrary, we would ask that they forward details to licensing@epson-ewell.gov.uk so we may investigate further. It may be the respondent is referring to private hire operators who lawfully hold multiple operator licences issued from different licensing authorities, and who are accordingly able to pass the booking to drivers and vehicle licensed by different authorities provided the booking is recorded under the corresponding operator licence. Case law has upheld that this is lawful, however officers will undertake compliance checks of the relevant operators to ensure bookings are being properly recorded, and that the 'trinity' of licence (driver, vehicle and operator) all match and all conditions relevant to EEBC are being complied with.

EEBC licensing officers have no direct powers over drivers licensed in other areas, and complaints about driver standards should be directed to the relevant licensing authority so they may investigate. Where complaints relate to public safety we would additional request that complaints are sent to licensing@epson-ewell.gov.uk so we may investigate whether it may be possible for action to be taken under other statutory powers (e.g. parking regulations). Illegal driving should always be reported to the police.

The comments concerning the use of the Clock Tower and the provision red lines within the town are outside the scope of this policy, however these comments will be forwarded to EEBC Planning and SCC Highways respectively.

2. Stop plating so many vehicles, drivers are having to work more and more hours to take home what they used to take about 4 years ago Also the cost of a licence for cars and drivers is exorbitant, what do they get for this money as it is supposed to be non profit making

Officer comment: The legislation controlling private hire vehicles is primarily concerned with public safety and does not allow the arbitrary limiting of licence numbers, leaving this to market factors. It is theoretically possible to limit Hackney Carriage numbers if the results of a 'No

significant unmet demand survey' warrant it, however current EEBC taxi numbers are significantly down from pre-covid levels (from approx. 55 hackneys down to a approx. 35), so currently there can be little justification for instigating a cap on taxi numbers.

Taxi and private hire licensing fees cannot be used for revenue generation. The licensing team will shortly be undertaking a review of licence fees as part of the budget setting for 2023/24.

3. The council needs to introduce a multiple choice question knowledge test.

Officer comment: When the revised policy is adopted the knowledge test will need updating to reflect changes in licence conditions etc that licensees need to be aware of, and as part of this review all knowledge test questions will be reviewed to ensure their relevance. In order to maximise cost effectiveness and quality of testing the out-sourcing of the test to a third-party provider will be considered. The use of multiple-choice questions will be explored as part of this review on how the knowledge test should be delivered, however it is recognised that multiple-choice testing has both advantages and disadvantages.

4. we feel that the drivers have to have had a licence for three years should be reduced to two years as more young drivers are looking to get in the trade

Officer comment: This comment supports the proposed changes in policy. The existing Hackney Carriage and Private Hire policy requires an applicant for a driver licence to be at least 21 years of age, and have held a full UK/EU Driving Licence for at least 3 years prior to application. The revised policy at para 3.5.2 allows a driver under 21 or who has held a relevant driving licence for less than 3 years to apply for a licence if they have completed a driving assessment from an approved provider. This change in policy will help support young people entering the trade whilst ensuring adequate driving skills.

5. Clockhouse cars are terrible

Officer comment: The Council attaches conditions to operator licences concerning the Standards of Service to be maintained. Specific complaints should be sent to licensing@epson-ewell.gov.uk so we may investigate further.

6. All taxis must accept card payments.They must also display clear signage as we get the situation where passengers are told to go to the cash machines

Officer comment: The revised policy at para. 4.26 proposes making card payment terminals in hackney carriages mandatory. Currently there is not a proposal to have mandatory signage in this regard. The majority of hackneys already have card payment machines, and officers believe the expectations of the public is that this should already be a requirement, and so it is not considered necessary at this stage to mandate further signage within the cab.

7. All hire vehicles in the case of diesel vehicles should have at least an EU 6 catalytic converter and petrol at least an EU 4/5 catalytic converter. We need to remember that these vehicles do as huge amount of mileage and it we dont control this we will get all; the old taxis running around Epsom and Ewell from London because they are phasing out out diesel taxis. Black diesel cabs hace the highest emissions of any vehicle and a they regularly travel up and down my road polluting the air The most common black cab models in London are polluting the streets with nitrogen oxide (NOX) emissions up to 30 times the level of personal petrol cars of the same age.

Officer comment: As a result of the consultation responses officers are proposing to report back to the Licensing and Planning Policy with an effective plan on how to effectively control emissions from private hire and hackney carriage vehicles.

8. i think you should add - 'or at risk of significant harm' to the Safeguarding Children poster at the end after the word abused. There is also mention of CSE and training - is there any training on CCE - Child Criminal Exploitation? we are now saying Child Exploitation as that covers both Child Sexual Exploitation and Child Criminal Exploitation - children being groomed to commit crime often groomed to deal drugs, signs of this can be identified by taxi drivers

Officer comment: Comments accepted in full and policy updated to include this wording.

9. Credit card machine are a must...so are signs on the taxi ranks saying Epsom and Ewell taxi only ,camera's other ranks to stop uber and mini cabs waiting on them also camera's on the parking bays at the station for the same thing.The drivers feel let down by the council..they need your help so they can up date there taxis.

Officer comment: The revised policy at para. 4.26 proposes making card payment terminals in hackney carriages mandatory.

Officers will review the signage at taxi stands and engage with SCC Highways over possible improvements. Specific complaints concerning unauthorised use of taxi stands should be sent to licensing@epson-ewell.gov.uk so we may investigate further. The current level of complaint would not justify the cost of installing and monitoring CCTV, however officers will undertake increased monitoring and compliance checks if complaints warrant it.

It is regrettable that this respondent feels let down by the Council. It is recognised that it has been a challenging couple of years for the licensing trade, and that some areas of the trade still wait to return to normal levels of custom. It is hoped the revised policy more clearly sets out the expected service level to be provided by the licensing team. Information on how to make a complaint is available on the Council's website <https://www.epson-ewell.gov.uk/council/complaints/what-complaint>. Complaints about the licensing service can also be sent to the Principal Licensing Officer via licensing@epson-ewell.gov.uk

10. Your proposed change to the virtual office regulation is baffling, we have cross border access due to legislation change to accommodate Über, so what are you trying to achieve? On a personal basis a virtual office enabled me to continue working in the borough after my relationship imploded and I lost my house within the borough, did you want me to be unemployed as well as homeless or do I have to cease caring for my mum who lives out of the borough, put her in a home and find somewhere to live myself in the borough so I can continue working and having more hassle plus all the tribulations of getting a vehicle which is ULEZ compliant in time for the next rollout. You are putting more regulations in place to make the job harder, are you getting pressure from somewhere to put your regulations on a par with TFL, what is the point of it, other than to justify a more draconian authority, are the population of Epsom up in arms about shoddy standards? You would be better off making snap, unannounced inspections on present taxi drivers to weddle out any illegal activities, this will mean getting out of the office and not going home at 5.00pm occasionally, but once it became known what was occurring you would find more compliance with current regulations and the need for a set of new ones irrelevant. Hopefully that has been of help, I suspect that you will ignore this as the

wheels are in motion to process all the changes that you need and you are not held accountable to anyone other than your employers, who will be happy with any extra revenue you generate. Please feel free to discuss with me if you like, but I won't be holding my breath

Officer comment: The proposed policy at section 5.2 sets out that virtual offices will not be licensed as operator bases for new applicants, however this proposal does not extend to existing operators who retain grandfather rights. This proposal is intended to address officer concerns that too many operators licensed by EEBC are de facto operating a very long distance outside the borough, raising issues with the ability of officers to carry out compliance checks, and potentially frustrating enforcement options. The proposal would not prohibit residential addresses within the borough being licensed as operator bases (subject to the proper licensing checks), or applicants applying to their local licensing authority if they operate outside of the borough. The proposal is justified by proper regulatory reasons with public safety as the paramount consideration

The Statutory Standards published by the Department of Transport sets out minimum licensing standards that all licensing authorities are expected to meet, and whilst EEBC already met most of these standards, however they had been adopted piecemeal and were contained in separate policy documents. Other additions to the revised policy reflect existing licensing practice that had simply not previously been documented. Most of the revised policy is not then actually 'new' policy, and with a few notable exceptions relating to the Statutory standards should not create any further burden on licence holders. Those additional measures required as a result of the publication of the Statutory Standards are the result of reviews following high profile abuse cases where the proper licensing of taxis and private hire may have played a role in preventing their occurrence, and on balance they are considered reasonably necessary.

It is agreed that snap unannounced compliance checks will help with compliance, and officers are keen to ensure these checks happen more frequently. However, this applies equally to operators, and to return to the respondents' initial point, snap unannounced visits are difficult when operators are actually operating more remotely.

11. If this questionnaire is for taxis eg black cabs then some questions should be for private hire

Officer comment: All questions apply equally to hackney carriage and private hire, with the exception of the question relating to the use of card machines which only applied to hackney carriages.

12. all taxis in the borough should have a device that accepts card payments, machines such as zettle, sumup, square & paypal do not have to be installed and work better and faster than older installed machines, however there is a problem in many areas of the borough with internet signal which is needed to accept payment with any device that is used. m.o.t. should not be required every four months for vehicles over 10 years old and I doubt that any hackney carriage in the borough have a higher annual mileage than vehicles which are less than ten years old, these are purpose built vehicles and are capable of achieving over 500,000 miles, two m.o.t are sufficient.

Officer comment: The comments on card payment support the proposed policy changes. The comments relating to signal drop out with the card payment machines is noted – further guidance

on how drivers should deal with these situations should they arise can be issued following further discussions with the trade.

The comments concerning the number of M.O.T.s required each year are also noted. Following discussions with the trade it is being recommended that the current frequency of M.O.T. testing remains unchanged in the policy pending further guidance or research on the subject.

13. Q1 should have been scaled, all options have a different relevance to all individuals

Officer comments: Noted, whilst the survey was prepared to be as quick and easy to complete as possible, it will be considered whether 'weighting' of answers in further similar surveys will be of benefit.

14. With Google Translate, and Google Maps (or similar), everyone should be able to communicate and navigate effectively.

Officer Comment: The Statutory Standards advises that 'Oral proficiency will be of relevance in the identification of potential exploitation through communicating with passengers and their interaction with others.' The use of Google Translate would not be an adequate alternative to a ready comprehension of English to a suitable standard.

15. Why are we allowing polluting vehicles to become taxis? All new taxis should be fully electric.

Officer comment: As a result of the consultation responses officers are proposing to report back to the Licensing and Planning Policy with an effective plan on how to effectively control emissions from private hire and hackney carriage vehicles.

Consultation responses received outside of the survey, and other correspondence relevant to the policy review.

16. Dear Mr Tapping/Mr Holliday with regard to your list of questions concerning policy changes i have been a Hackney carriage driver in Epsom for 22 years and have been treated with respect by the licensing team and in return i always respect them i feel for me the one thing i think you could do to improve is give us some more support with vehicles parking on the station rank as i have mentioned in previous correspondence this is something we have to self police and often ends with threats of violence this is a real issue for us which i believe could be easily solved by the installation of a camera and appropriate signage. A revised emissions policy and an age limit on vehicles is a good idea but we are not London drivers we earn very little the only way to afford new vehicles that comply with these requirements is to work longer hours then it becomes a safety issue do you want drivers that have been working 16 hour shifts driving your public around?! also think 2 mots a year is sufficient. Regarding card payments most of us offer this service already and am happy to do so but we use hand held machines to have one fitted in the cab would be an extra expense we could do without, and i believe we need to keep the London style taxis if for no other reason than are wheelchair accessible i like to see load a wheelchair into a saloon car. The taxi ranks you mention have always puzzled me feel free to get rid of them all i ever see on them is delivery vehicles. One last issue do you intend to do anything about Uber ,they are clearly working the area without being licensed by you and taking a lot of work away from both locally licensed Hackney carriage and private hire drivers, maybe if we got rid of Uber and got some work back we could afford to buy the emissions friendly vehicles you want us all to drive, apologies for the lengthy email but i feel very strongly about these issues i will attempt to attend the meeting but if i please give my issues some consideration, regards

Officer comment: Officers will review the signage at taxi stands and engage with SCC Highways over possible improvements. Specific complaints concerning unauthorised use of taxi stands should be sent to licensing@epson-ewell.gov.uk so we may investigate further. Any threats of violence should be report to the police, via 101, or in an emergency 999. The current level of complaint would not justify the cost of installing and monitoring CCTV, however officers will undertake increased monitoring and compliance checks if complaints warrant it.

The concerns around added costs to the trade of introducing emissions limits for licensed vehicles are noted, and an appropriate balance would have to be struck to ensure any changes were introduced at an appropriate rate. Any changes to the emissions requirement would only be introduced following further consultation with the trade.

The comments concerning the number of M.O.T.s required each year are also noted. Following discussions with the trade it is being recommended that the current frequency of M.O.T. testing remains unchanged in the policy pending further guidance or research on the subject.

The requirement for card payment terminals in hackney carriages includes handheld devices. The wording of the policy has been amended in light of feedback concerning the use of hand held devices to say the device must be able to produce (as opposed to print).

The comments concerning the wheelchair accessible taxis are noted. Any proposed future changes to the policy in this regard would be subject to an Equalities Impact Assessment.

Case law has ruled that private hire operators can lawfully operate across borders, and licensing authorities are unable to take action against vehicles and drivers licensed by outside licensing authorities that are operating lawfully inside our borough.

17. A way in which we would like to be more efficient going forward is in relation to 6 monthly inspections. Due to the size and scope of our business – we also operate a fully functioning workshop for vehicle repair/maintenance. We rarely entertain walk-in customers for our workshop as its primary objective is to support our vehicles and ensure they remain on the road. Our workshop is fully equipped with 3.5T vehicle lift, Snap-on Diagnostic machine*, Autodata subscription*, hoists, tyre changing machines plus much more. In addition, we keep in stock all the tyre sizes of our vehicles on the road, wipers, bulbs, wing mirrors, alternators/starter motors, pulleys, belts plus much more. In conjunction with our Service Vehicle, we can get vehicles back on the road as quickly as possible by keeping the most commonly replaced parts in stock always, as opposed to relying on a supplier.

*This is the same machine/subscription that main dealers/specialist vehicle repairers use in their large service centres

Officer comment: As a result of a site inspection to the operator's workshop officers are satisfied that the maintenance checks carried out by this operator are equivalent to an M.O.T test. To reduce unnecessary burden on operators, it is proposed that the wording of the policy be amended to allow, by prior arrangement only, an exception to the requirement to produce an interim MOT shall be allowed where a competent motor engineer has confirmed in writing the mechanical fitness of the vehicle on a Council approved form.

18. Letter received from the Department of Transport concerning the effect of the Taxis and Private Hire Vehicles (Disabled Persons) Act 2022

Officer comment: section 4.18 'List of licensed wheelchair accessible vehicles' updated to reflect updated legislation.

19. For incidences where an individual has moved/worked in a country outside of the UK, however, individuals that have served in HM forces are exempt from proving good conduct bonds under the immigration act, see attachment below, as time spent outside of the UK is considered to still fall under UK enforcement with any misdemeanours being registered on the PNC (Police National Computer) and would therefore be registered on any DBS. Indeed, it would be impossible in some cases for such bonds to be obtained from certain war-torn countries.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/488261/HM_Forces - Criminality v1.0.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/488261/HM_Forces_-_Criminality_v1.0.pdf)

Officer comment: Proposed policy updated to reflect the above.