

SOUTHAMPTON PRIVATE HIRE REPRESENTATION
PO Box 1360, Southampton SO15 1WG

Mr P Hall
Licensing
Southampton City Council
PO Box 1344
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23rd April 2009

Dear Phil,

Following receipt of Richard Black's letter dated 30th March, we thought it prudent to consult members of the Private Hire Trade in order that members of the Licensing Committee have a balanced view of the measures proposed.

Please accept my apologies for the delay in submitting this information however I am sure you appreciate that my approach to matters such as these is both factual and thorough. The proposals are quite wide ranging and if implemented will have a substantial effect on the Trade within Southampton. Naturally the delay in providing this response is borne out of correct and proper consultation with those drivers we represent and I am confident that the comments below are a true and fair representation of the majority.

I hope that the delay in submitting this information will not preclude it from the Licensing Committee's deliberation and that it may somehow be included within your report.

Yours sincerely,
Lee Haynes

1. B. Tech Qualification

The general consensus is that the introduction of this industry standard is a positive step, there is some disquiet that it was July 2007 when Officers first suggested adoption of the B Tech – nearly 2 years ago. It would have been favourable to act sooner as the City could have been one of the leaders within the industry nationally, rather than just another Authority who is going to implement. Apart from the benefits acknowledged below, it was agreed that the B Tech qualification would actually slow entry of new drivers into the Trade, which in the current economic climate is a beneficial side-effect.

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In our opinion introduction of the B Tech within Southampton will:

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Raise the profile and professionalism of the industry.

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Provide a more consistent approach to skills development in our industry.

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The opportunity for those who work in the Hackney and PHV industry to improve their skills through nationally recognised vocational qualifications and skills development initiatives.

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Raise standards in the industry resulting in a better quality of service.

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Assist the industry to present an improved experience for visitors and tourists thus improve levels of business.

- Ensure the sustainability of this essential passenger transport service and create a progressive career opportunity.

For the operator it will:

- Attract more drivers with the right skills
- Improve reliability and retention of drivers
- Improve competitiveness and best value
- Raise standards in the quality of service provided
- Increase customer satisfaction, reduce complaints and liabilities
- Improve loyalty of customers
- Raise the profile of the company
- Improve business performance

For the driver it will provide:

- Improved self-esteem and job satisfaction
- The prospect to enhance earnings through quality of service provided
- The opportunity to work in an acknowledged profession
- An opportunity to engage in learning and obtain a recognised qualification
- Enhance the quality of service provided
- The potential to reduce insurance costs

2. Driver Assessment

The standard of driving ability throughout the Trade is acknowledged to be far inferior to that experienced no longer than 7 or 8 years ago. Current legislation allows any EU Citizen to transfer their native driving licence to that of the UK without undergoing any assessment whatsoever. It is staggering that an individual may qualify for a UK driving licence without ever having driven on UK roads. Provided that when the licence is transferred it complies with the City Council PH or HC Conditions an individual may drive a licensed vehicle, with fare paying passengers, having never previously driven anywhere in the UK.

Again, consensus is that the introduction of driving assessments both at entry level and as a punitive measure is vital to ensure not only public safety but public confidence in our trade within the City. Any financial implications to the individual, will again require a certain level of commitment to joining our

industry, which in turn creates a professional, safe and customer focussed driver rather than someone who just needs the fiscal rewards.

3. Engine Size

The majority again supported the proposal, however there were several other issues raised within the Vehicle Conditions field which we would like to address at any future consultation. In summary it was suggested that rather than address a single issue ie. engine size against bhp - an in depth review should be conducted on Vehicle Conditions as a whole. Advances in technology, changes in personal lifestyles and perhaps more importantly environmental concerns raise valuable questions with regard to the operation of suitable licensed vehicles. Electric cars, single passenger cars, restricted licence conditions and assessments all require consideration and consultation.

4. Testing of Vehicles

In principal this was acknowledged as an effective way to improve driver and passenger safety, raise vehicle standards and minimise accidents due to mechanical defects. Cost again was a concern although drivers recognise that this measure may dissuade new applicants to the trade, thus safe-guarding existing income levels. Whilst it is acknowledged that the proposed MOT test must be carried out within the Southampton City boundary, there is some concern that a high proportion of drivers have access to what one can only describe as 'dodgy' garages. Naturally we would expect the Council to try and identify any patterns in submitted MOT documents, perhaps involving VOSA if suspicions were raised.

It was suggested that the Council consider designating up to 5 VOSA approved testing stations to ensure equality and standards of testing. Implementation of the additional 6 monthly MOT immediately is supported, provided that there is strict monitoring of submitted documentation and an option to designate approved VOSA outlets in future. We would also welcome ad hoc re-testing at the designated VOSA outlet ie. First Bus should suspicion fall upon the validity of a submitted MOT document.

5. Vehicle Specification

We would refer to our previous comments on point 3. Agreement was reached on items such as wheel trims and other cosmetic items of bodywork; however a clear distinction should be made in so far as vehicle enhancements which may actually assist passengers such as an accessibility step on an high entry vehicle particularly MPV's. Traditionally no such item is supplied when new whereas after-market kits are easily available, so should one be fitted technically the vehicle does not conform to manufacturer's specification. The same may be true for exterior vehicle lighting, headlights in particular, xenon or HID offer far greater visibility at night yet do not necessarily conform to manufacturer's specification. A need for clarity and precise Conditions are required.

6. Digital Cameras

Beyond doubt the most controversial item proposed. Whilst driver and passenger safety is of paramount importance, cost is the predominant factor to practically every driver consulted. If we accept that a camera unit has to conform to certain criteria to safeguard the integrity of any evidence that may be captured by the device the cost of each camera is prohibitive. Estimated at £500 per unit, this would require a significant investment from a driver; notwithstanding the argument 'how much is your safety worth?', for very little reward.

Subsidies – It is accepted that the Council have been able to secure several 'rounds' of funding both currently and in the past to subsidise the cost of this equipment. Our information is that stock of the device is available from the Licensing Office at a subsidised cost of approx. £150 per unit – clearly value for money. However we cannot accept that the cost of what would be a compulsory item under vehicle Conditions, is reliant on the ability of a Council Dept to obtain funding. Quite simply if no-one attempts to obtain or indeed cannot obtain funding then the retail price for a camera is quite simply prohibitive.

Necessity – Many drivers pointed out that they only work during the day, most undertake school runs morning and afternoon and work on their circuit in between times. Whilst there is no guarantee that their safety and that of the passenger is never at risk, the likelihood of an incident during daylight hours is negligible. To impose a huge financial commitment on these drivers is unjustifiable.

In summary, we cannot agree to the implementation of compulsory CCTV until either a guarantee of consistent funding can be given or cost is dramatically reduced by manufacturers.