



Consultation on proposed updates to Southampton's Taxi Policy - Report

southampton
dataobservatory 

Data, Intelligence & Insight Team | *March 2024*

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Southampton City Council undertook a public consultation on a Taxi licensing policy consultation.

This consultation took place between **08/12/2023 – 22/02/2024** and received **87** responses.

The aim of this consultation was to:

- Communicate clearly to residents and stakeholders the proposals for the Taxi Policy consultation;
- Ensure any resident, business or stakeholder in Southampton that wished to comment on the proposals had the opportunity to do so, enabling them to raise any impacts the proposals may have, and;
- Allow participants to propose alternative suggestions for consideration which they feel could achieve the objectives of the strategy in a different way.

The primary method of gathering feedback for this consultation was via online questionnaire. Physical paper versions of the questionnaire were also made available, and respondents could also email yourcity.yoursay@southampton.gov.uk with their feedback, as well as respond by post.



Southampton City Council is committed to consultations of the highest standard and which are meaningful and comply with the *Gunning Principles*, considered to be the legal standard for consultations:

1. Proposals are still at a formative stage (a final decision has not yet been made);
2. There is sufficient information put forward in the proposals to allow 'intelligent consideration';
3. There is adequate time for consideration and response, and;
4. Conscientious consideration must be given to the consultation responses before a decision is made.



New Conversations 2.0
LGA guide to engagement



Rules: The Gunning Principles

They were coined by Stephen Sedley QC in a court case in 1985 relating to a school closure consultation (R v London Borough of Brent ex parte Gunning). Prior to this, very little consideration had been given to the laws of consultation. Sedley defined that a consultation is only legitimate when these four principles are met:

1. **proposals are still at a formative stage**
A final decision has not yet been made, or predetermined, by the decision makers
2. **there is sufficient information to give 'intelligent consideration'**
The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response
3. **there is adequate time for consideration and response**
There must be sufficient opportunity for consultees to participate in the consultation. There is no set timeframe for consultation,¹ despite the widely accepted twelve-week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of impact of the consultation
4. **'conscientious consideration' must be given to the consultation responses before a decision is made**
Decision-makers should be able to provide evidence that they took consultation responses into account

These principles were reinforced in 2001 in the 'Coughlan Case (R v North and East Devon Health Authority ex parte Coughlan²), which involved a health authority closure and confirmed that they applied to all consultations, and then in a Supreme Court case in 2014 (R ex parte Moseley v LB Haringey³), which endorsed the legal standing of the four principles. Since then, the Gunning Principles have formed a strong legal foundation from which the legitimacy of public consultations is assessed, and are frequently referred to as a legal basis for judicial review decisions.⁴

¹ In some local authorities, their local voluntary Compact agreement with the third sector may specify the length of time they are required to consult for. However, in many cases, the Compact is either inactive or has been cancelled so the consultation timeframe is open to debate

² BAILII, England and Wales Court of Appeal (Civil Decision) Decisions, Accessed: 13 December 2016.

³ BAILII, United Kingdom Supreme Court, Accessed: 13 December 2016

⁴ The information used to produce this document has been taken from the Law of Consultation training course provided by The Consultation Institute



The agreed approach for this consultation was to use an online questionnaire & paper questionnaire as the main route for feedback; questionnaires enable an appropriate amount of explanatory and supporting information to be included in a structured way, helping to ensure respondents are aware of the background and detail of the proposals.

Respondents could also write letters or emails to provide feedback on the proposals: emails or letters that contained consultation feedback were collated and analysed as a part of the overall consultation.

The consultation was promoted in the following ways:

- Contacted Licence holders & key partners including police, neighbouring local authorities and appropriate community groups.
- Advertised on Council websites.

All questionnaire results have been analysed and presented in graphs within this report. Respondents were also given opportunities throughout the questionnaire to provide written feedback on the proposals. All written responses and questionnaire comments have been read and then assigned to categories based upon sentiment or theme.

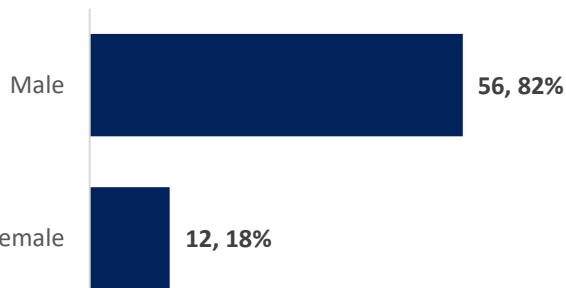


Total responses

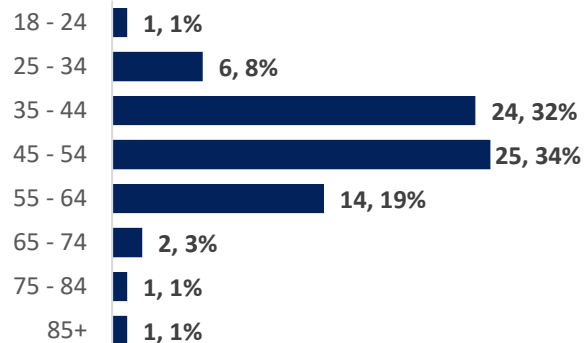
84 survey responses
3 email/letter responses
87 total

Graphs on this page are labelled as percentage (count).

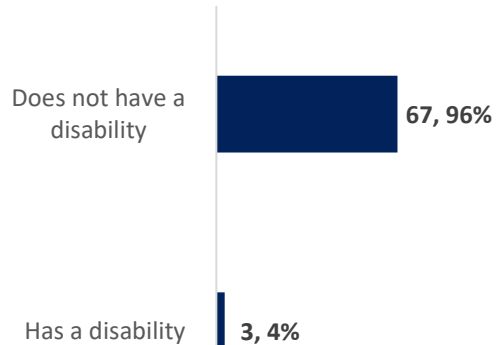
Sex



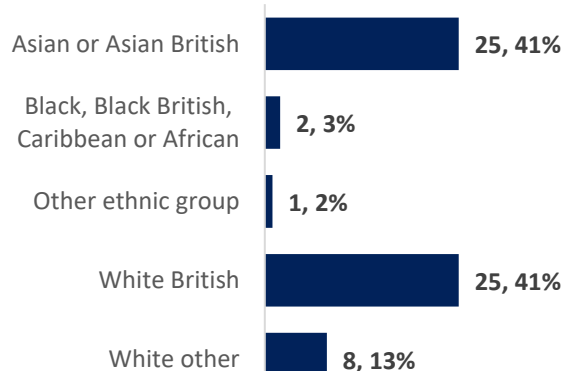
Age



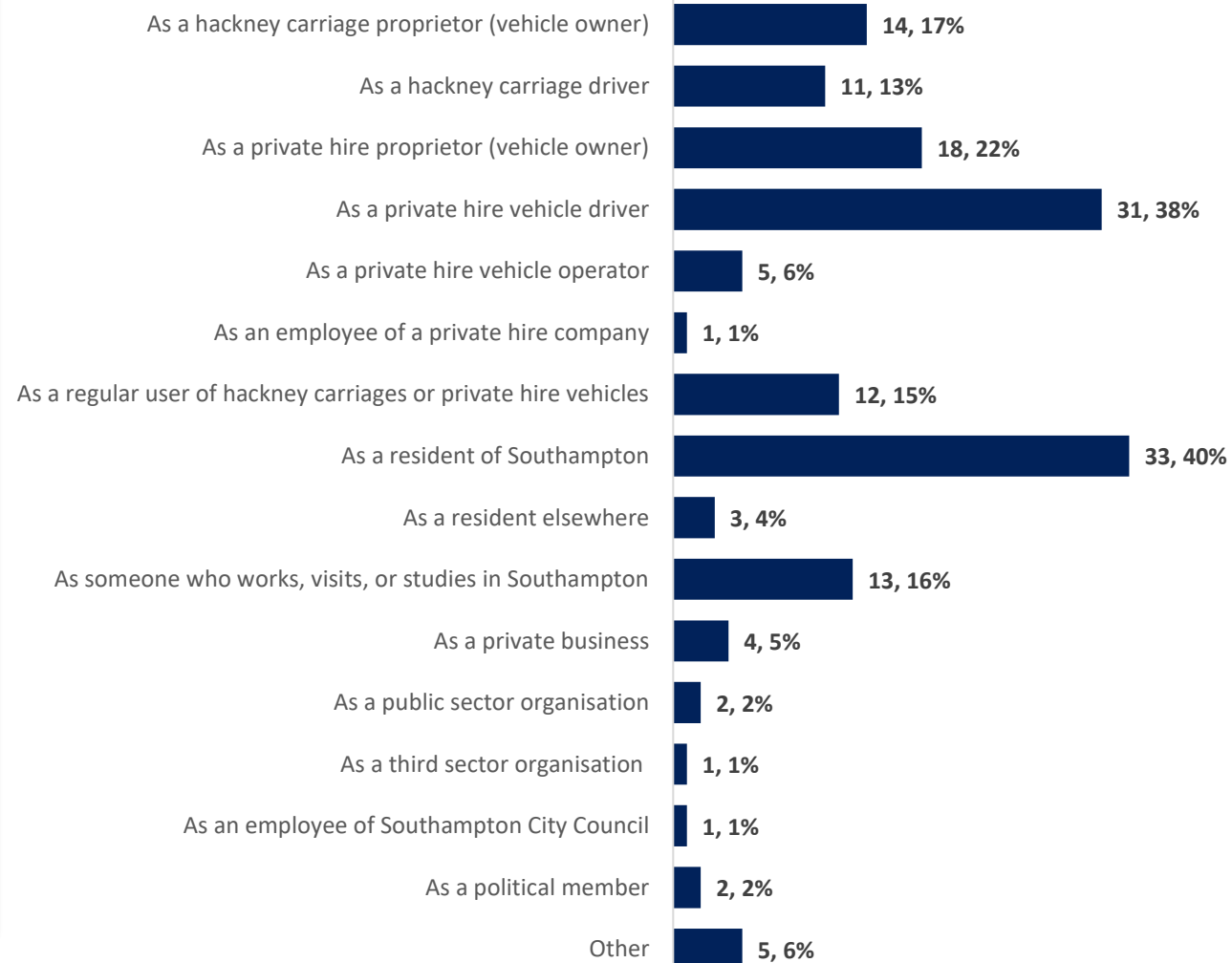
Disability



Ethnicity



Interest in the consultation





Consultation feedback

Proposed appendix on Taxi Cameras





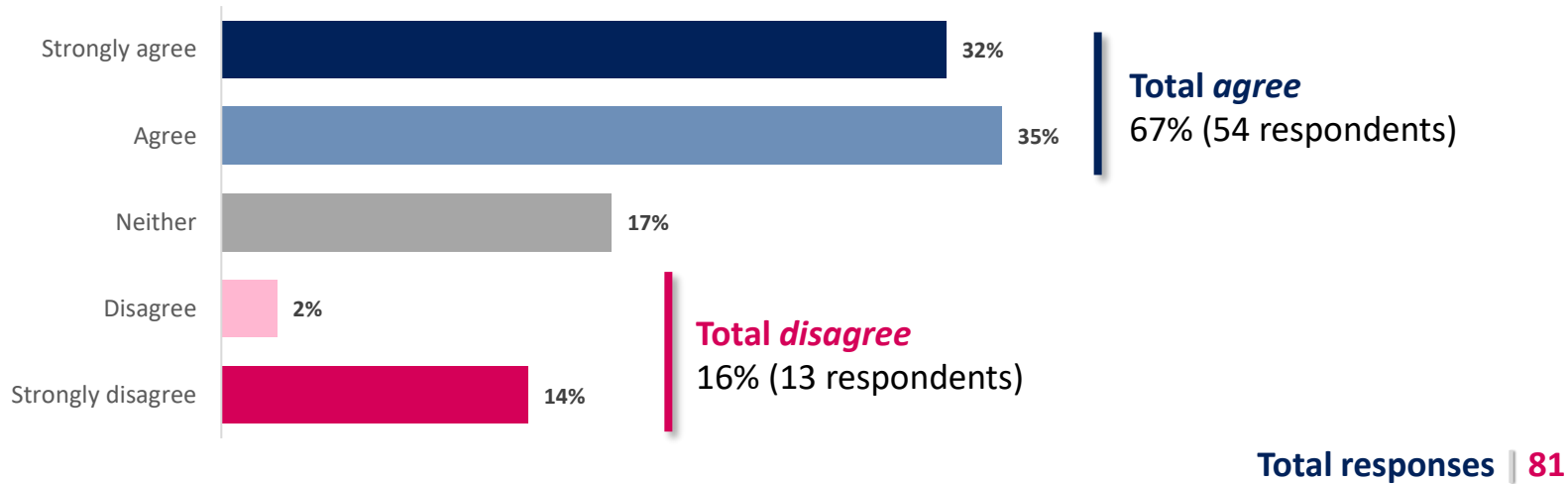
The proposed Appendix 11 covers the use of safety cameras in taxis. This appendix is the same as the previous taxi cameras policy and is only being brought into the main policy for consistency, so all of the elements of taxi policy in Southampton are in one place.

Taxi cameras have assisted police in numerous criminal investigations, some of which have resulted in prison sentences for both passengers and drivers. They have also been pivotal in determining the fitness and propriety of drivers.

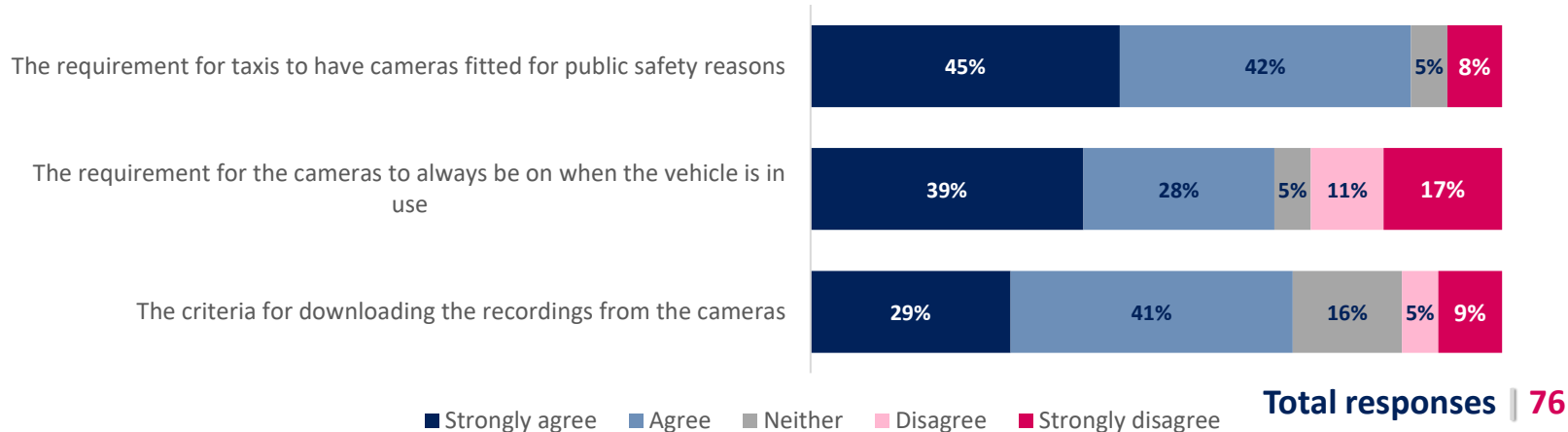
Taxi cameras only record activity inside of the vehicle. Visual data is always recorded, and audio data can be triggered by the pressing of a button by the driver. The recorded data is encrypted and held securely within the vehicle. The policy outlines the strict criteria when a download will be performed: effectively, an active investigation into a crime or complaint.

As hackney carriages and private hire vehicles remain a commercial vehicle the whole time they are licensed and can only be driven by the holder of the relevant hackney carriage or private hire driver licence, the cameras are required to remain on the whole time the vehicle in question is in use, regardless of the use the vehicle is put to.

Question 1 | To what extent do you agree or disagree with the proposal to move the policy on taxi cameras to an appendix of the main taxi policy?

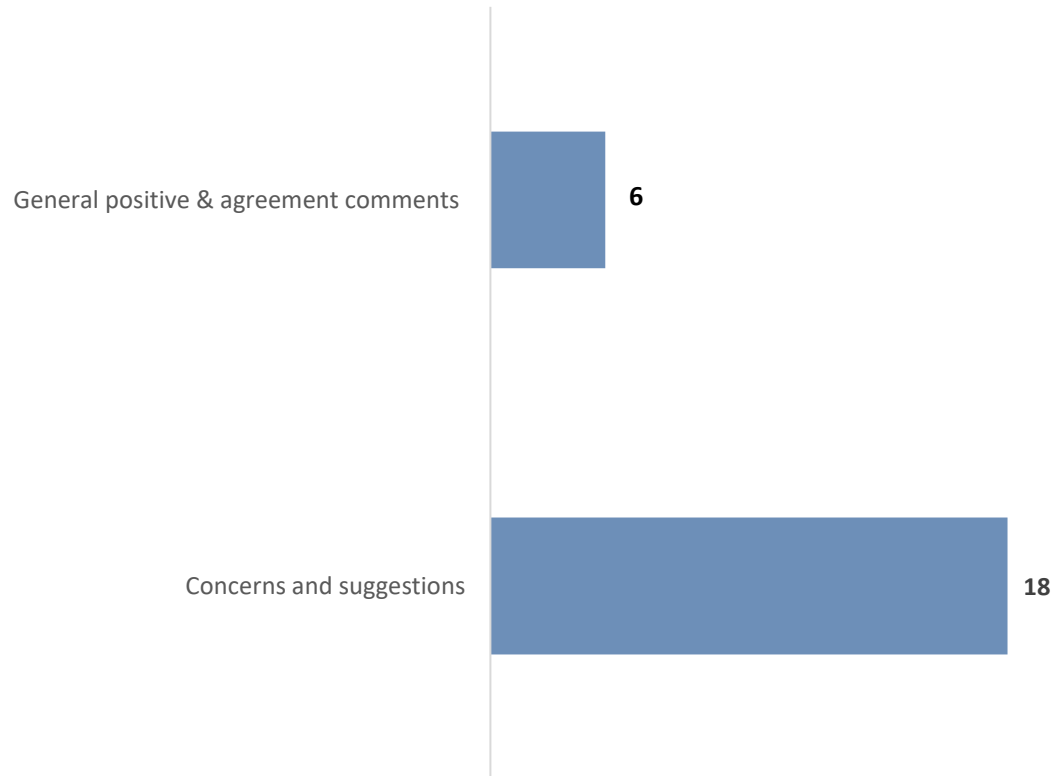


Question 2 | While you are here, it would be good to hear your thoughts on taxi cameras overall. To what extent do you agree or disagree with the following elements of the policy on safety cameras?



Key findings

- **67%** of respondents **agree** with the proposal to move the policy on taxi cameras to an appendix of the main taxi policy. Furthermore, **69%** of the **Taxi trade agree** with this proposal.
- **17%** of respondents **strongly disagreed** with the requirement for cameras to always be on when the vehicle is in use. While **45% strongly agreed** with the requirement for taxis to have cameras fitted for public safety reasons, this element was also **highly supported** with those in the **Taxi trade (90%)**.



General positive & agreement comments (6)	
	<i>"The camera in the Taxi is good for public safety and Driver safety."</i>
	<i>"As long as 'Restricted' 'Specialised' Private Hire vehicles are continued to be exempt. This is due to the nature of their work and executive/business clients."</i>
	<i>"I do agree and do not mind the cameras."</i>
	<i>"Agree with cameras in the car switch on while working."</i>
	<i>"Appendix 11 - Taxi Cameras note (includes PHV): We support steps to raise safety standards across the industry. We recognise that there can be safety benefits to installing CCTV. Experience from Uber's global business shows that CCTV can have safety benefits and better investigative outcomes are achieved where CCTV footage is available when complaints are made.!"</i>
	<i>"Every licensed vehicle working in Southampton should be required to have a camera fitted. Each operator should be told that if they haven't got a camera, they cannot be given any work within our city boundaries."</i>

Concerns and suggestions (18)

"No agree with this decision."

"Because sometimes I use for my family."

"I think it's not fair for drivers to push by licensing."

"When we use our car for family, like going on holiday, travel, shopping. This is not right to keep my camera on."

"Recording of data should only take place if there has an incident or in the event of crime."

"But this rule should be for one to all who working as a taxi in Southampton surrounding area should have safety cameras like Eastleigh cab new, Forrest, Winchesters, Fareham and more."

"Should be switched off Driver is not working."

"Without any complaint from drivers or customer not need to check the cameras."

"It shouldn't be a requirement to always have the camera on as the vehicle can sometimes be a personal used when not on working shift."

"However, the cost is quite steep given the pricing. One can get an even better camera for half the price , which not only looks on the inside but also on the outside !."

"The camera should be recording at all the time only when the vehicle is operating as a taxi but NOT in that period of which is for the personal use."

"I only disagree how is fitting the cameras they over charged to set up a camera £500 is way too much to set up a camera we can save £400 plus with purchases a camera for example in Amazon that will costs us £50 and setting up cheapest."

"I like having the taxi camera but having it on constant recording is that I don't agree on. If whenever we are working or having customers in the vehicle, it should start recording. If there are no customer or we are with family, I prefer it not to record as it personal and not in danger of anything."

"To have permanently operating cameras when a vehicle is not being used as a taxi impinges upon the drivers right to privacy. To not have permanent recording would make it incumbent upon the driver to enable recording during work periods, so presumably the permanent operation is in place to ensure video availability. I believe that the personal privacy of the driver always outweighs the safeguarding of passengers/drivers. You could have reminders in the taxi for the passengers to request that the camera is on if need be and an indicator lamp to confirm that it is so. Why would audio be at the discretion of the driver? Illogical."

"When you have Southampton registered operators bringing in out of town cars as employees to circumvent the requirement of a camera in a car (different Licencing departments) it means that those that want to commit sec acts on people do so . And let's be honest Southampton has had more taxi / phv rapists than the neighbouring departments."

"Also, we should be allowed to go elsewhere to get our cameras fitted to probably get better cameras at a cheaper cost."

"I find these surveys a waste of time, because you have already decided what course of action you are going to take. It is a bit like being in a dictatorship? At the recent trade consultation meeting in December 2023, according to the notes that I took, you had 1290 complaints against drivers for one reason or another. How many of those complaints have been identified from using CCTV footage? Let us have some proper figures on this. You have got an encrypted CCTV camera device which can only be downloaded by somebody from the licensing office using a special key but you still allow drivers to have dashcams in their vehicles despite knowing they are not legal to use. They can record pictures and voice 24 hours a day, 7 days a week and these can be posted on one of the social media sites. Because your CCTV policy does not include dashcam footage, a dashcam footage considered to be 'private', you are not only bypassing the ICO regulations, but your CCTV policy can now be rendered as useless."

"3. TAXI CAMERA SPECIFICATION 3.1 To manage the administration of the scheme Southampton City Council will approve no more than 5 systems at any one time. Each system will have to meet the specifications set by Southampton City Council. We support the provision of choice for drivers but would encourage the council not to limit the number of systems and instead prioritise the affordability and availability of systems as a factor in their approval process. Drivers should not be overburdened with the cost of installing CCTV and equally the systems should be easily available for purchase by drivers so they can obtain the one they choose. Additionally, the systems should be reviewed regularly to take into consideration any new technology or more affordable products that may come to market. We would be keen to understand what the transition period would be for drivers as time would be needed to be able to install the systems into their cars once the options are made available. 5. AUDIO RECORDING STRICTLY CONFIDENTIAL - CONTAINS COMMERCIAL SENSITIVE INFORMATION 5.3 To be properly prepared drivers should consider various potential scenarios and think of options on how they will deal with it in the safest manner. We would encourage the council to provide clearer guidance to drivers on the scenarios in question as the condition 5.4 lays out certain situations. The wording 'various potential scenarios' does not give enough information for drivers to follow. 6. DOWNLOADS 6.4 Data will only ever be downloaded on four occasions. It is unclear how operators can request data from drivers or councils. As an operator, we have the responsibility and requirement to investigate complaints and access to any CCTV footage would enable us to investigate complaints thoroughly. We would encourage the council to include a provision for operators to be given footage as part of 6.4 (iii) where a Data request is received from an applicant e.g. police or social services, that has a legitimate requirement to have access to the data requested to assist them in an investigation that involves a licensed vehicle or driver or passenger."



Consultation feedback

Proposed new appendix on Drug Testing





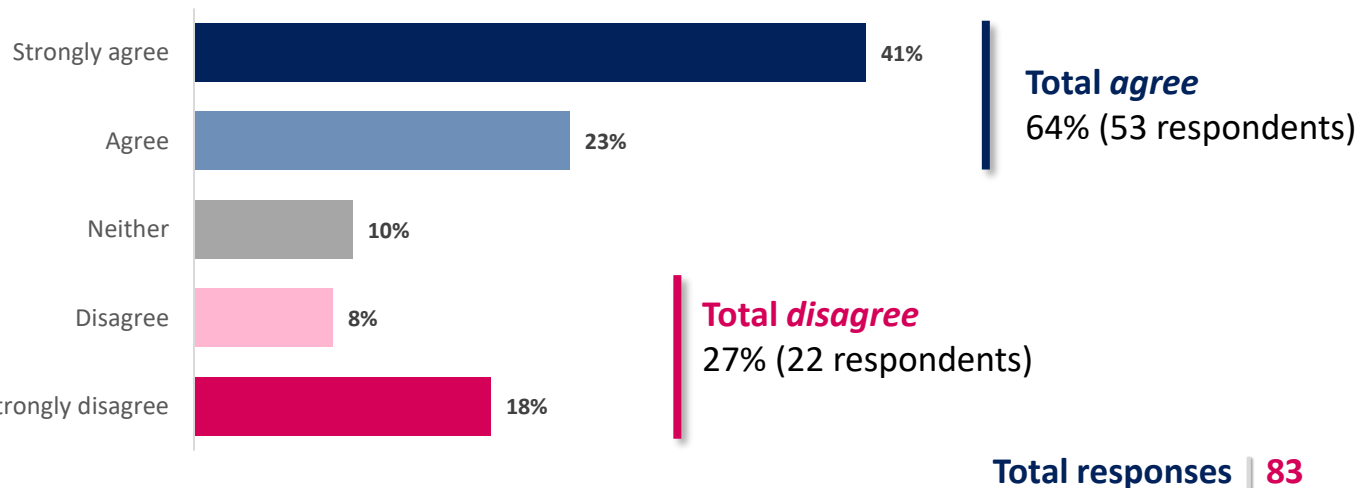
This proposed appendix is a new part of our taxi policy, intended to support both officers and drivers in the carrying out of drug testing.

Applicants or an existing holder of a hackney carriage or private hire driver's licence would be required to demonstrate that they are medically fit to drive by having a medical check with their Doctor or approved GP. In addition, a licence holder must also be, and remain, a 'Fit and Proper Person'.

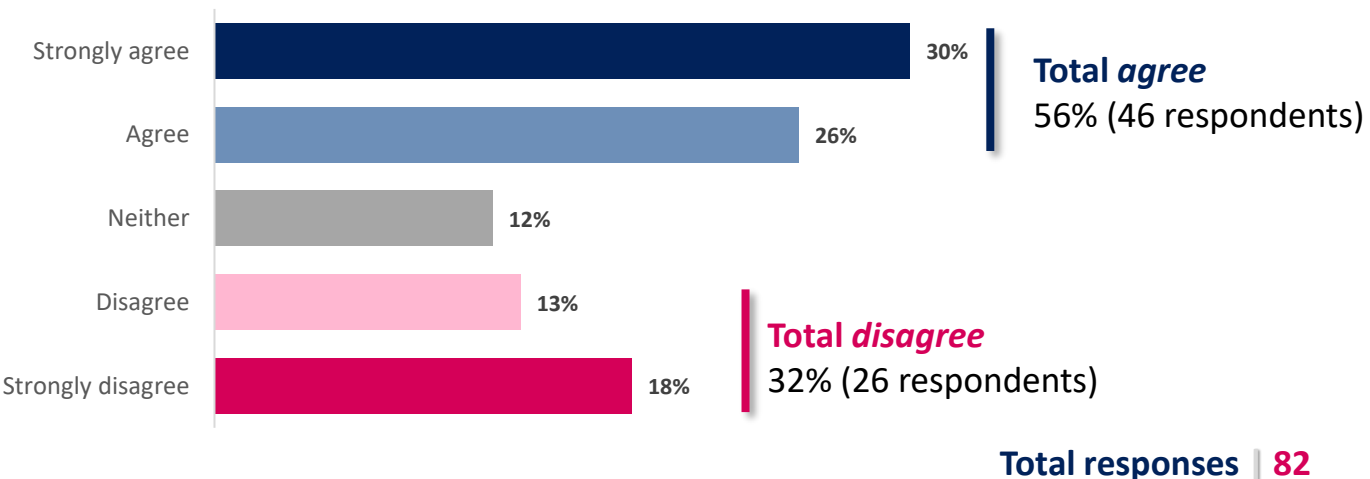
In addition to undertaking a medical examination, we are proposing that we may on occasion require evidence of satisfactory negative drug screening as part of their overall medical fitness to hold a licence. There will be times when a driver is asked to submit to a test if there is information to suggest the driver may have taken drugs, or random tests on the instruction of the licensing committee.



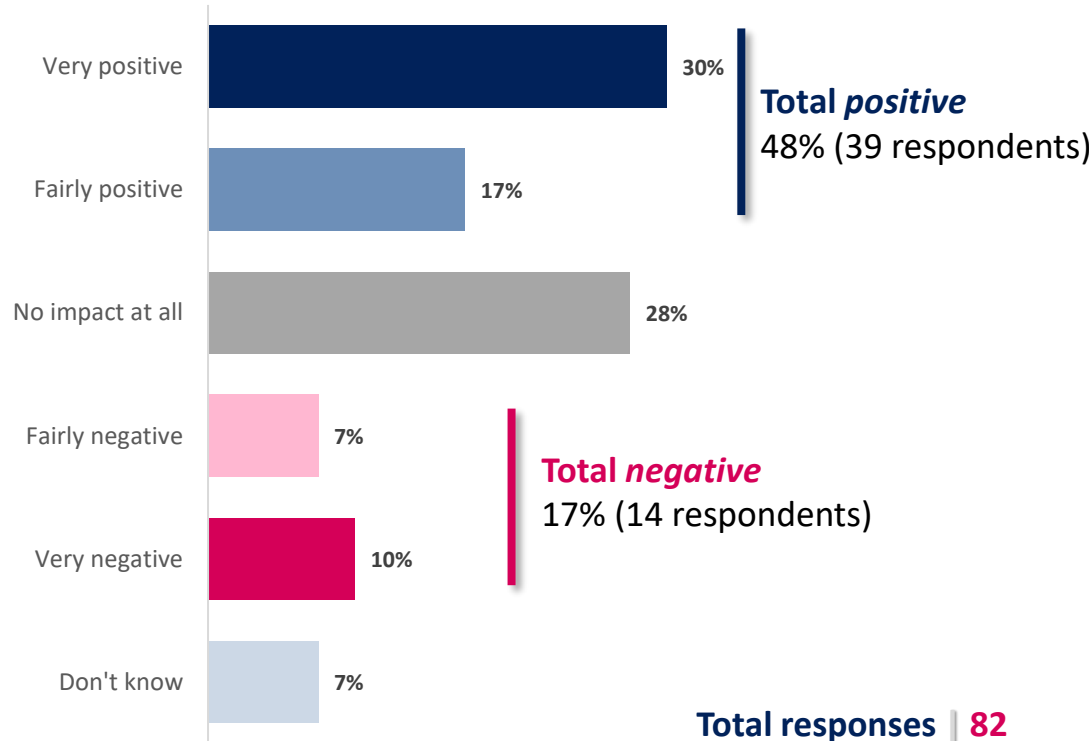
Question 3 | To what extent do you agree or disagree with the proposed policy on drug testing for taxi drivers in Southampton?



Question 4 | To what extent do you agree or disagree with the proposal that random drug testing only take place if instructed by the Licensing Committee?

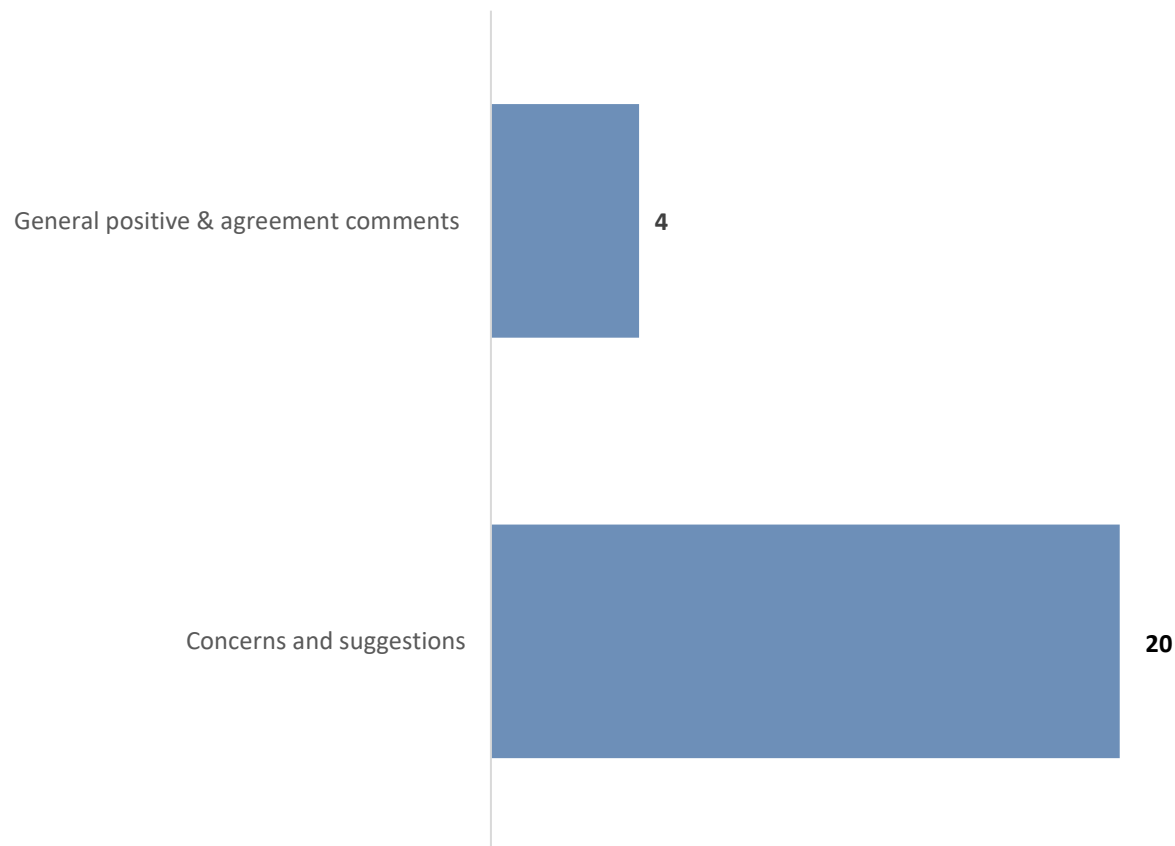


Question 5 | What impact do you feel this proposal may have on you, your business, or the wider community?



Key findings

- 64% of respondents agree with the proposal policy on drug testing for taxi drivers in Southampton, while 59% of the Taxi trade agree.
- 56% of respondents agree with the proposal for random drug testing to only take place if instructed by the Licensing Committee. While overall 32% disagreed, 57% of the Taxi trade agreed.
- Overall, 48% of respondents said this would have a positive impact, while 43% of the Taxi trade stated a positive impact.



General positive & agreement comments (4)
<i>"Regular drug and alcohol tests are crucial, given the reported concerns about certain drivers experiencing impairment while operating vehicles."</i>
<i>"Doing a drug test can be good."</i>
<i>"I agree to do the test if you pay for it."</i>
<i>"The use of Cannabis by taxi drivers is noticeable and needs to be eradicated for public safety. This random testing should be required without doubt and should be conducted regularly I feel."</i>



Drug testing free text comments

Concerns and suggestions (20)

"However, it could be very inconvenient given if it is a busy time of the day, and the drivers need to work for it."

"Question is on who will finance this extra cost and the impact on drivers' earnings when the tests are taking place. School runs, cruise ships etc."

"require evidence of satisfactory negative test, this will be another cost to drivers, I agree to do the test if you pay for it."

"A Driver that is given fit by GP. It means Driver goes through record and test by GP. To add more random testing in Disrespectful to all hard-working Drivers. This is not licensing business to integer with Doctors jobs."

"I don't think so any drivers using drugs specifically when they are at work."

"I don't think so any drivers using drug when they work."

"Taxi driver not using drug when they working."

"Will this just be on recreational drugs ? There are a few different cultures that use drugs to act as a stimulant and to keep them awake all night.."

"And the drug testing policy when will u learn. Yet another point to be challenged on."

"If someone choses to drink or take drugs when not at work then that is their private personal affair. To take drugs or drink then at work however is wrong, of course! Surely there is a means to screen for safety during work? To expect complete sobriety at all hours is a way bigger ask, many statutory services don't demand it of their workers so why demand it of drivers who have distinct time off work and time working? What someone choses to do to their body when not working is their business and no one else's."

"We all know most drugs are out of the system after 72 hours . If you have a drug issue . You can just licence in a different area . In addition to that . The equalities act is quite clear that drug addiction and or use caused my medical intervention is a protected characteristic . My main concerns are that this would lead to discrimination."

"Random drug testing is overbearing. If you consider that drugs would endanger the general population through unfitness to drive, then you should perhaps do the same for all council employees (and not just drivers) to ensure their fitness to work and also councillors to ensure that their fitness to make prudent decisions is not impaired. There are plenty of poor council decisions...."

"Most of the people still not trusting taxi driver which you can realized when you picking up customers. When they are always trying to show some one is tracking them. If you keep doing these it will show you find something, that's why you start to doing this step, so they are not going to trust taxi driver at all."

"I feel that if the council or licensing have any suspicion of illegal drug taking, they should report it to the police's don't think it is the licencing dept. Job to act as police officers. If it is found that an individual is driving under the influence of drugs that is when licensing should be involved."

"Unless drivers are showing signs of drug misuse then drug tests should not be used. If a driver shows signs of being impaired while working, then an alcohol breath test should be the first port of call before instantly thinking drug use. Drug tests should ONLY be used when there is a justified reason and a significant suspicion with supporting information. Bearing in mind driver pick up MANY passengers who have used cannabis (some right before stepping into the vehicle) and it makes the car smell. This can linger on to the next passenger so reports of the car smelling of cannabis should only be acted on if they are repeated reports or accompanied by reports of the driver acting impaired. If licencing wants to pull drivers at random, it should be while they are working only, and as a complete check of their suitability to drive at that moment. This includes car condition and state and how the driver is. At this point alcohol or drug tests should only be administered if there is significant suspicion a driver is under the influence and not applied to drivers at random. Random drug tests for drivers is a breach of our rights and suggests SCC do not trust their drivers despite the lengths they go to get their licence including enhanced DBS.."

"If your new policy on drug testing is agreed, how are you going to implement it? Are you going to model the drug testing policy on Portsmouth City Council's taxi and private hire policy? If so, the drug testing policy in 2016 that was undertaken in Southampton by the Portsmouth licensing team, was a disaster. The sample was lost in the post and the driver had his licence taken away for nearly 2 weeks? So how are you going to put this into practice? Have you also considered (doubt it) the ingredients that chocolate bars, Ibuprofen tablets, and something I took in the form of a liquid medicine which I bought from my local One Stop store which was Corvonia for a chest infection, when you peel the back of the label off, it reads contains alcohol? The drug policy needs to be 100% Fit and Proper. If a sample is sent away for analysis and it proves to be negative, but the driver's licence has been suspended until results are available, do we receive compensation from your department?"

"2. Have not stated which Drugs. Will it be the same as what is on TFL's list ? Will it be drawn blood and where ? If not, how will it be done ? With or without legal representative ? What constitutes a suspicion. Will it only be from fully identified person to prevent random vendettas ? Will it be only the Licensing Team conducting random or regular checks ? 3. TFL also has alcohol tests which we do not have. Is this up for consideration ?"

"Further clarification should have been given in regard to the equalities act and drug testing."

"How will the drug test be done and who will be doing them ? If someone has been reported to you have been taking drugs why haven't you just informed the police?"

"Drug testing should be done on the Driver, by council individual because some Driver is not drinking, no smoking, nothing bring them up to the test, not fair for them. Thank you."



Consultation feedback

New proposal on a requirement for Card Machines in Taxis



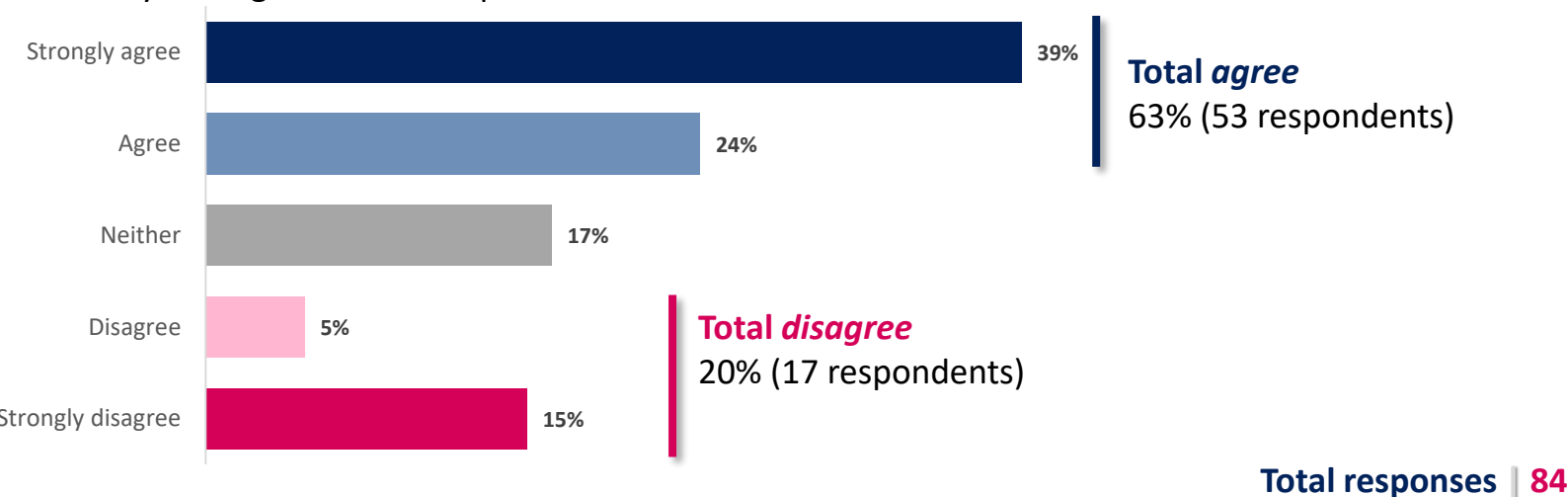


We are proposing to add this new element of our taxi policy to make sure all hackney carriages in the city have a working card machine, including contactless, so that customers can pay by card for any journey.

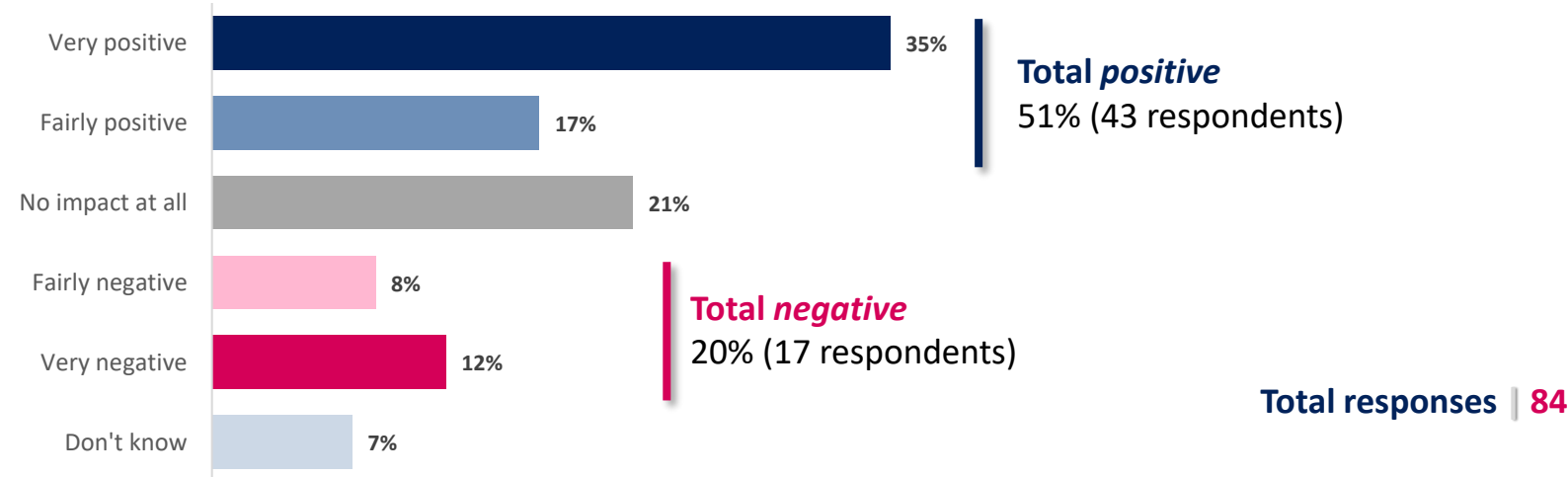
We propose requiring hackney carriage drivers ensure the device is connected, maintained, and working, and that receipts shall be issued upon request.



Question 6 | To what extent do you agree or disagree with the proposal requiring card machines in all hackney carriages in Southampton?

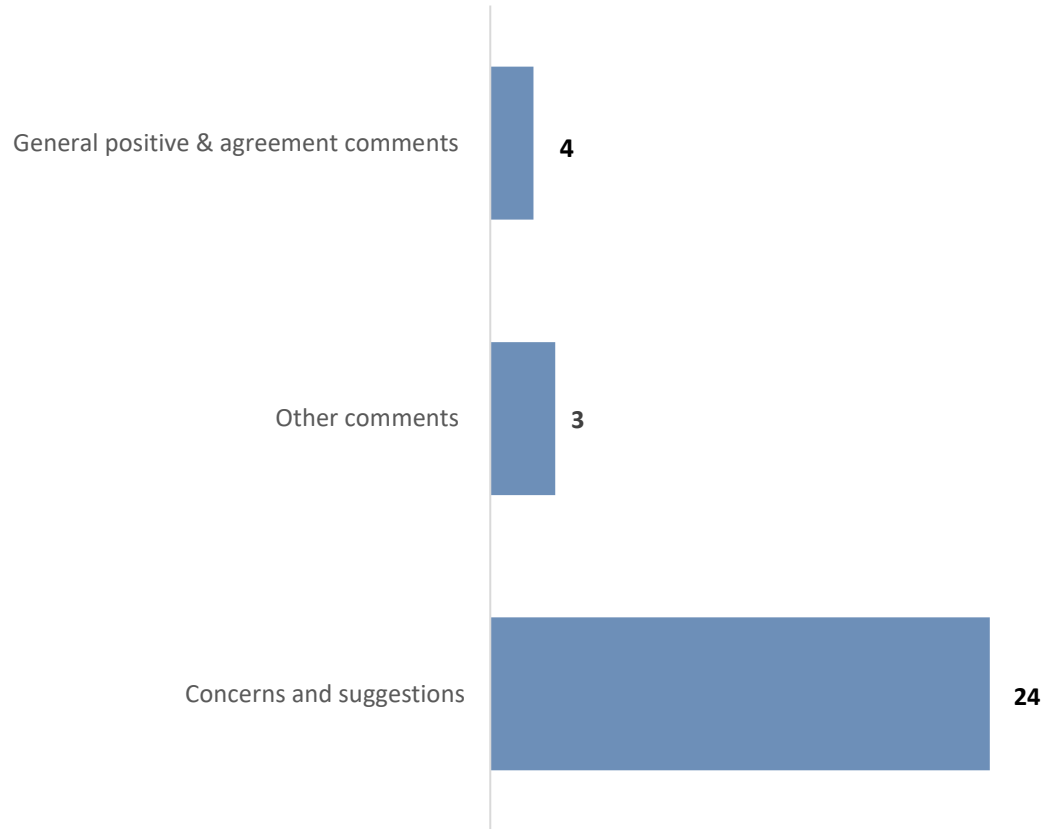


Question 7 | What impact do you feel this proposal may have on you, your business, or the wider community?



Key findings

- 63% of respondents **agree** with the new proposal requiring card machines in all hackney carriages. **24%** of those in the **Taxi trade disagree** with the proposal.
- Just over half of the respondents said **this proposal** would have a **positive impact (51%)** on them, their business and the wider community. While **12%** of respondents said the **impact** would be 'Very negative'. **Taxi trade positive impact is slightly lower** than the overall at **42%**.



General positive & agreement comments (4)
<i>"Some drivers they refuse customers not taking card, but they do pick and choose. If card machines are compulsory, then driver will not have excuse to refuse the job. And it's not good for customer and not fair for to the other driver. Strongly believe card machines r way forward."</i>
<i>"Everyone should take card payment."</i>
<i>"No Hackney cars should not have the ability for customers to pay by card and there is no reason why drivers should not want this option, other than to hide money from paying taxes."</i>
<i>"Card payment agree."</i>
Other comments (3)
<i>"Does not make difference to me."</i>
<i>"I thought they anyways had a card machine?."</i>
<i>"In the summer, while returning by taxi at 1am from a private party, the taxi driver insisted on card payment up front which I've not heard of before."</i>

Concerns and suggestions (24)

"Drivers has the right to demand cash."

"Many times, we have signal issues."

"Taxi driver all self-employed they should decide to accept or not."

"Taxi drivers are self-employed they must decide to take card payments or not."

"Each time we take card, we are charged 1.69%. Legislation should be changed so that the customer has to pay that and not the driver."

"All of hackney drivers got their card machine after covid19, so this proposals not going to change anything."

"For every cards payment we must pay commission to the card supplier. Some area signal issues."

"I fail to see how it is your business to tell anybody they should take payment that is not legal tender unless they are willing to underwrite any losses for non-payments if the card does not work."

"Card machines are welcome but not instead of cash. Older people prefer to use cash and the choice should remain."

"We lose money, for example tips from the costumers and the other hand card machine charging us, the charge of the card machine that it is taking from us, could cover our bills."

"Would the council tender this idea to different card machine companies to get a better deal for the trade, as they do in London?"

"Details of card machines and 24-hour SUPPORT service level for card machines."

"If the driver refuses to take a card payment what will happen to him or her or they?"

Concerns and suggestions (24)

"Both cash and card should be mandatory, I don't want to see the cash element replaced by card only."

"The machines should be affordable for taxi drivers to carry and use/manage. Ideally, they should rent them or have some of the cost covered by the taxi firm rather than be lumped with all the costs to have them in the cab."

"When customers use contactless payments if the card is stolen or not authorised the payment reverts to the card holder. As Hackney Carriage pick up everywhere, don't have fixed pickup & drop-off address."

"Sometimes they say I pay by card but the end the card show me decline and during the night they make lots of excuse to run away. So, I have cards machine they can pay by card but not by force."

"If a driver's card machine is not working. Then the driver must let the passenger ride for free, and that they must go home until such times as the machine is working. This will ensure that all drivers have a working machine."

"It is also very important that all drivers are also required to accept cash if offered as payment."

"'Restricted' 'Specialised' Private Hire vehicles to be exempt. Due to the nature of the client's payment is by invoice and can be pre-paid or post-paid by bank transfer. Occasionally card payment is taken but in the office via a secure website. I never take card payments at the time of service and do not have a card machine."

"21. You can never guarantee to have a working card machine when you are mobile as it depends on having a signal where you are taking payment. 2.What would happen if the internet was to go down or if the server is down for maintenance. This would mean all taxis would be off the road as no taxi driver will work for no payment."

"I find it distasteful that this council which is nearly bankrupt, can order us to have card machines? It places far too much burden on drivers to ensure that there is a constant SIM card signal available, constant internet connection, absolutely zero failures on behalf of the customers online banking, or indeed the driver's own internet banking? How do we know that the customer's card is working and has money in their account? If you want to provide this facility, do not accept the burden of constantly working. Customers should have the facility to pay cash when required and if that means going to a cash machine to get money for the driver, that would be acceptable and should be written into your conditions. I have considered your three new policies and I speak as a sole trade not as the chair of the SHPHA and I hope that you will treat my valued time for completing this questionnaire and respect my comments?"

"Yet again u are trying to impose even more. Restrictions on us telling us we must take card payments I have a card machine and have had several times where I couldn't get a signal in one the customer had no cash, so I had to do job for free yet again u fell to understand the meaning of self-employed .U do not have the right to tell us how we take payments for journeys that's our choice I disagree with this policy. "

"1. The new proposed addition states - to always take electronic payments. This statement infers that when the card machine is not working the Taxi is then 'off the road'. 'Would then incur loss of earnings. Reasons card machine may not work with no fault of the driver. Due to 'no signal'. Banks offline for a few hours. Technical fault with card machine. Fault with banks network or mobile network . I propose a good size sticker to say ' NO CARD MACHINE ' with city logo. So, a customer can efficiently ! go to the next Taxi. This then gives a good insensitive for drivers to buy a card machine. Also, a driver could not reject a small job using the excuse he has 'no card machine' when he has. Or maybe taking cash for selected journeys saying he does not have card machine. Stops the picking and choosing of jobs. We may prefer a card machine but remember to force other drivers to have a card machine. You are forcing a self-employed driver to take less profit for each journey. The card machines are not free and there is a high percentage taken off each fare for the cards use. "



Consultation feedback

Reading the draft strategy



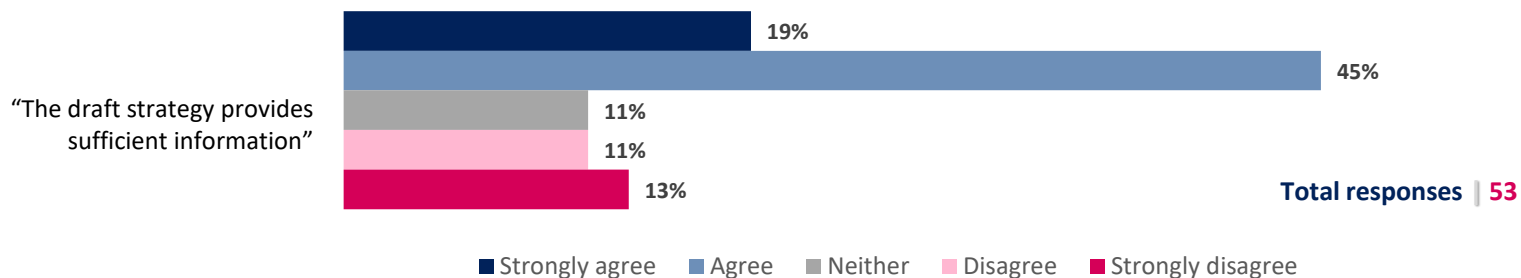
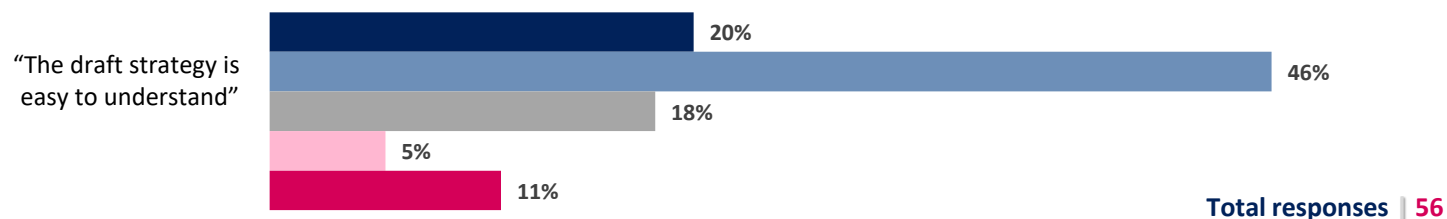


Question 8 | Have you read the proposed draft strategy?



Question 9 | If you have read the proposed draft strategy, to what extent do you agree or disagree with the following statements?

Asked if "Yes, all of it" or "Yes, some of it" response to question 8.



Key findings

- Of the **80%** of respondents that said they'd read at least *some* of the draft strategy, **66% agreed that it was easy to understand**, and **64% agreed that it contained an appropriate amount of information**. Those in the **Taxi trade** had **corresponding results**.



Comments (4)

"No not."

"I read all the parts."

"There is not enough information on who is responsible if these policies are adopted and have a negative effect on the driver's mental health and any financial losses due to a negative impact on the trade."

"Not only have I read the Hackney Carriage and Private Hire Polity Statement 2021-2026, I have printed off the 53 pages. I disagree with the age policy, the colour white which was included in the 2000 Transport Package, the policy of private hire's parking on the street (they need to be out of the public view) I do not believe the council's regulatory structure is concurrent with the governments directive. I also do not agree with the taxi trade representatives code of conduct , item 6 representatives contact with the media, item 8 breeches of code of conduct and can you explain on item 7 political affiliation - what do you mean by paragraph 7.1?"