

## **COMMISSIONER NEY'S MEETING**

**Venue: Town Hall, The Crofts,      Date: Monday, 6th July, 2015**  
**Moorgate Street,**  
**Rotherham. S60 2TH**

### **A G E N D A**

1. Whilst the requirements of the Local Government Act 1972 do not apply to this meeting it is still proposed to determine if the following matters are to be considered under the categories suggested in accordance with that Act.
2. Hackney Carriage and Private Hire Licensing Policy (representations attached) (Pages 1 - 11)

**COMMISSIONER M NEY  
TAXI LICENSING POLICY**

**29 June to 6 July 2015 (5 days' period for receipt of representations)**

**REPRESENTATIONS RECEIVED CONSEQUENT UPON THE FORMAL APPROVAL OF  
THE TAXI LICENSING POLICY ON 29 JUNE 2015**

*This document, prepared for publication via the Borough Council's internet web site, does not contain the identities of individual people making representations on the Commissioner's decision, but retains the identities of the trade associations*

**FIRST REPRESENTATION ...**

Good morning Ms Ney

The members of the..... Association wish to raise the following points in relation the Council's proposals to make CCTV mandatory in all taxis. Whilst we do agree with the aims of the proposal, we do not feel that some issues have been fully considered.

Continuous recording – The majority of our members use their licenced vehicle in their own time as their family vehicle. Continuous recording would mean our children and families being recorded. In the UK, human rights are protected by the Human Rights Act 1998. Article 8 details the right to respect for your family and private life, your home are rights protected by the Human Rights Act. Whilst we understand that a public authority is able interfere with an individual's Article 8 rights if it proportionate and necessary, we do not that this is proportionate or necessary given that there are other options which could be explored. Other options could include CCTV which is linked to taxi meter, so that recording commences when the meter is started. Rotherham Borough Council may be in breach of Article 8 for demanding that drivers install CCTV with continuous recording.

Voice recording – The Information Commission's Office has ordered Southampton City Council to stop requiring all city taxis and private hire cars to install CCTV equipment in order to provide a rolling record of activity in the vehicles. The council introduced the requirement in August 2009 but the ICO said the policy breached the Data Protection Act.

The Information Commissioner has said "The Data Protection Act states that organisations can only collect personal data when it is fair and lawful to do so". For CCTV equipment in taxis, the ICO advises that images should only be recorded where it is clearly justifiable. Audio recordings should only be made on very rare occasions, for example where there are a high number of serious incidents and where recording is triggered due to a specific threat in a taxi cab."

Information Commissioner, said: "By requiring taxi operators to record all conversations and images while the vehicles are in use, Southampton City Council have gone too far." He also said, "We recognise the Council's desire to ensure the safety of passengers and drivers but this has to be balanced against the degree of privacy that most people would reasonably expect in the back of a taxi cab," he added. "It is only right that the privacy of drivers and passengers is respected. This is particularly important as many drivers will use their vehicles outside work. While CCTV can be used in taxis, local authorities must be sensible about the extent to which they mandate its use, particularly when audio recording is involved."

The ICO added that it had previously issued a preliminary enforcement notice to another local authority, Oxford City Council, after investigating its "similar policy" to one operated in Southampton. Oxford City Council has subsequently "suspended the implementation of the policy,"

Kind regards

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Response - thank you for the email which I will record as formal representations on my decision. You will receive a formal response  
However . My minded to decision is today on the website and you will see that we have clarified the issue of use of CCTV in the circumstances you describe which I think covers your concerns.

Mary Ney

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**SECOND REPRESENTATION**

Thank you and also the my members have said that we simply don't have fundings for all these changes if trade in town it's very low they simply can't afford to keep up with living costs never mind all this many changes.

Regards

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**THIRD REPRESENTATION**

Tuesday 30 June 2015 - From a licensed taxi driver, via telephone conversation with Commissioner Ney

I have spoken to this person who is a taxi driver. This person says the drivers and operators met last night (29 June) and agreed to the indefinite strike and to block the town centre with cars during the rush hours in the morning and evening . The person says not all drivers want them to strike and some spoke against it.

The person says they are now agreeing to have CCTV, but are worried about cost and in particular they are concerned about the additional cost for every time you download falling on them. These points are to be checked with suppliers.

This person also raised the age of vehicles over 10 years, BTEC and when we apply the fitness test whether they will just be revoked.

In the main, this person's queries related more to implementation than policy as such and I explained we had offered to meet with the trade to take stock during the implementation process.

Commissioner Mary Ney

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**FOURTH REPRESENTATION**

Good Afternoon Commissioner Ney,

Thank you for your proposal document which was given to the press yesterday. This has not yet been released online and the media office have confirmed it is not available on the website.

We have given this some thought and would like to discuss some of the finer points and the implementation of the policy to ensure things go smoothly.

We at the association are keeping all channels open and still believe we can come to an amicable resolution. We do not want this issue going on forever. We as drivers are determined to rebuild our taxi trade and get the local economy in Rotherham shining again.

We at the association feel that the finer points need to be discussed in person at a table as soon as possible before the 6th July 2015.

Please could you send us some dates of your availability. This will be in the best interest of all concerned

Thank You

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**FIFTH REPRESENTATION**

Can I ask the Commissioner, has there been Equality Impact Assessment on this policy as part of public sector duty to ensure it does not have negative impact on protected characteristic groups under Equality Act 2010.

Kind regards,

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**SIXTH REPRESENTATION**

Hello Commissioner Ney,

A telephone call from a lady saying she supports the strike and what are we doing to support the taxis who are striking? The lady said not all taxi drivers are bad and it is not fair to class them all the same.

The lady says she was put through to the Licensing Team (could not give me a name of the staff she spoke to) via the switchboard who informed her the strike was nothing to do with them and that it was the Commissioners in London decision.

Thank you

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**SEVENTH REPRESENTATION**

**“Intrusion of Privacy on Social media”**. A they may have different views about anything. That is legal, as long as it does not harm or hurt anyone else. I am secular by faith, however consider this absolutely unfair. I personally have no issues.

**“Would you allow your son or daughter, spouse or partner, mother or father, grandson or granddaughter or any other person for whom you care, to get into a vehicle with this person alone?”**

**The commissioner in charge has to be in her limits.**

It stands derogatory and insulting to all drivers or drivers to be, challenging their integrity and self respect. The commissioners in charge should use safe and official language, not chatting verses. Mind your language please, I am a (xx) years old man and feel offended by your verses, which should not be published.

**Age of the Vehicles for Private Hire:**

In my opinion, any vehicle which passes a MOT is safe enough for anyone. And the company RMBC has employed to conduct the MOT’s is highly controversial. And if the vehicle has passed an MOT, it should be safe for anyone. please read their complaint record as well, by me.

Sincerely,

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**EIGHTH REPRESENTATION**

Hello Commissioner Ney

Operator/taxi driver has telephoned wishing to speak to you before the cooling off period closes. This person did not want to speak to anyone in the Licensing Team.

Person told to put anything in writing to [Commissioners@rotherham.gov.uk](mailto:Commissioners@rotherham.gov.uk) to be considered by yourself.

This person says he is not against CCTV in taxis but is totally dissatisfied at the cost drivers will have to pay for it to be installed £500 - £600.

Thank you

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**NINTH REPRESENTATION**

Hello Commissioner Ney,

E mail submitted (per representation 8 above)

I am writing to voice my opinions on the new legislation in Rotherham about taxis

I am an operator with xx vehicles, I support cctv but I have just found the prices out £500-600 it is a utter disgrace that you expect us to afford this amount of money on top of

buying new vehicles the drivers who work for me cannot afford this and definitely can't afford new vehicles they have no option but to pack in and sign onto the dole.

I do not understand the problem with vehicles that are older than 10 years as long as they pass the compliance tests.

By the end of this consultation you will have ruined my business and also put xx drivers onto job seekers allowance, I was under the understanding the government wanted people off benefits but rmbc are pushing innocent hard working people onto benefits.

Regards

A very unhappy taxi driver

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### **TENTH REPRESENTATION**

To whom it may concern

I am writing this with a concern of my vehicle which is xx years old and is plated by the Council until ....(date) 2016. My concern is can I still use this vehicle till the plate expires in ..(date) 2016 as I will not be able to afford a car under five years old at this present time as this change has happened very suddenly. If it is not possible for me to use my vehicle until the plate expires I will be unemployed, which means I won't be able to provide for my family.

I agree 100% with the cctv cameras as it will keep the driver/public safe. But the reason for a five years old car and to say you can use it for five years till it is ten years old is invalid as taxis only last about three years. So what is the harm in having a seven years old car that has passed its test with the Council till it is ten years old ?

Thanks

### **ELEVENTH REPRESENTATION**

#### **Feedback to RMBC over proposed taxi regulations**

##### 1) Vehicle Age

Whilst I applaud the intention of the council to improve the standard of vehicles in the borough and agree with an intention to have most vehicles less than 5 years old I think the proposed policy here will have several side effects which will have a negative effect of the quality of service to the customer

In my view the age of vehicles in Rotherham has got far worse over the last 15 or so years, I have no idea if the data is still available but a comparison to the period in the late 1990's I'm certain will show vehicles were considerably newer then, every taxi driver in Rotherham would much rather be driving round in a brand new Mercedes! The reason we don't is it isn't cost effective to do so as earnings have decreased, due to both economic conditions and Rotherham Councils disastrous management of both the town and issuing of taxi driving badges to unacceptable people, this had led to too many taxi drivers for the amount of work and people who did a good job have fled the trade in droves as they could simply not earn a living for working a reasonable amount of hours,

everything the council does should include the consideration that to improve the quality of service the earnings, in an often unpleasant and anti social job, have to be appropriate and any policies to improve matters will not work without that consideration

In my view taxi drivers come into the following broad categories

i) Drivers who earn an acceptable (i.e. over the minimum) wage per hour, these drivers usually do the job despite having other employment options, usually this type of person has a bit of a niche they work in, perhaps they have their own small firm with a bit of a loyal customer base, possibly they have a lucrative school run, in my view these drivers are in the minority

ii) Drivers who earn an unacceptable wage but do the job as it suits their personal circumstances despite having other employment options, usually due to the flexible working hours available, perhaps their spouse works unusual hours, maybe they have childcare issues, perhaps they prefer the extended working hours available and have a strong work ethic, meaning a greater wage overall despite less per hour, for some reason they choose to do the job rather than take employment elsewhere at the minimum wage

iii) Drivers who have no other employment options

I would say the drivers in categories i and ii are usually the ones RMBC would want to continue as taxi drivers, they CHOOSE to do the job but have abilities to work elsewhere, this would indicate they work to a reasonable standard but are employable in other professions, the drivers in category iii are much more likely to be the ones who are not of a decent standard, perhaps they have poor education or customer service skills, they drive a taxi as it's a guaranteed job as soon as you get your badge, you just buy a car and rent a radio, However they are far more likely to be the ones who are bad at the job, if they can't get a job elsewhere it will usually be due to their lack of skills, those same lack of skills make them a poor taxi driver

RMBC needs policies which encourage new drivers to enter the trade who are of a good quality, These drivers have to pay around £500 to get a badge plus sit various tests, unless you have a contact who can supply you with employment in category i the standard entry level for such a driver is ii, namely they earn under the minimum wage, Why would such a person enter the taxi trade when they have options elsewhere? When I entered the trade in 1994 I earned over the minimum wage (but worked unsociable hours), The councils altered testing procedure should ensure that far less drivers from category iii will enter the trade, as they will be unable to get a badge, this should mean less drivers on the road, more work per driver and more money per driver, more money per driver will mean more money available to invest in vehicles, if I am earning (say) £9 per hour, it's a relatively simple choice to put (and these are very "rounded" figures) £1 per hour into replacing my vehicle as the regulations insist I need a newer vehicle, Once the new driver testing procedures kick in I believe driver wages will rise and this policy will be achievable, however let's take a driver now.

Taxis drivers usually get "paid" daily, they get their takings and take them home and pay their bills, it can be quite difficult to manage your money in comparison to someone on a monthly wage, if I get paid monthly I get paid on (say) the 10<sup>th</sup> of the month, all my bills go on the 11<sup>th</sup>, what's left is mine to spend, by the end of the month I am skint and scratching for cash until payday, A quick look on ebay would indicate for me to buy a car under 5 years old I would be looking at spending a minimum of £5000, that's for a diesel car with relatively high mileage,

If I am in category i, if I am at the top end of the category I may think ok, I can afford that extra investment, no problem, Rotherham gets a good driver with a newer vehicle, lets say I am at the lower end of the category, I am earning just above the minimum wage, I would suggest that £5000 is roughly double what a driver would pay now for the average taxi of around 8/9 years old,

however they are unlikely to get much in the way of additional years of driving out of that vehicle, at £5000 I am talking a vehicle with similar mileage to a vehicle I can buy that is 3 years older for £2000, Either vehicle is likely to last 2 or 3 years then be worth next to nothing due to excess mileage, This type of person is earning just over the minimum wage, not a fortune, they are unlikely to have £5000 saved up to buy a new vehicle so their options at this point are

1) Borrow the money for a new car, bearing in mind it is very difficult for taxi drivers to get finance at a reasonable rate I would estimate that the extra £3000 investment plus finance on a vehicle that will last 3 years at max will cost a driver around £30 - £40 per week extra, by the time you allow for fuel repairs etc this would mean a driver taking an extra £60 per week (and bearing in mind this is JUST for vehicle replacement costs, not the costs of any of the other measures introduced), Again bearing in mind the driver is likely to working the lucrative shifts already this will probably mean an extra 8 hours on his working day

2) Get a job elsewhere

So if you were in this position which would you do? You only do the job as it offers you a wage just above the minimum, the new regulations mean your wage effectively drops AND you have to find £5000 of investment or take a loan out with bloated repayments due to your trade which, if you break a leg or are unable to work for any reason you have no way of paying, say I contract some medical problem where the council remove my badge, what do I then do about this loan for a car that quickly racks up enough miles to devalue it? Of course you could leave and work elsewhere in an other trade for slightly more money with probably less unsociable hours and far less financial risk.

So exactly the type of driver the council would want to keep driving a taxi is likely to go elsewhere due to the council's policy

Lets look at the other categories, in ii I think it depends on what those circumstances are that cause you to do the job for less money than elsewhere, some people will keep going and grumble, some will leave, it may be that the investment/reduction in wages is still worthwhile for you to work when it suits you or whatever the reason, however it may not and a proportion of these people will leave, again these are people who RMBC should want to keep as taxi drivers

As an aside many Rotherham Drivers have begun working in Sheffield in recent years, they have obtained a Sheffield badge, invested the money to purchase a vehicle under 5 years old and work there, speaking to colleagues in this position to a man they say they are earning far money in Sheffield, Rotherham's vehicle regulations are proposed to become roughly in line with Sheffield's, You can take far more money in Sheffield, If I'm a taxi driver and have the ability to get a Sheffield badge (which is far harder to obtain than Rotherham's) why would I invest the same money in working in Rotherham?

Now, category iii, driver who have no other job option, what will they do? Well they have no other employment options, so they will earn even less per hour than now, find the money and carry on, what else can they do?

So, in my view this policy will remove a large amount of quality drivers from Rotherham into other forms of employment, be it driving in Sheffield or "working at Tesco's" whilst leaving the bad ones intact, I agree that the councils aim should be to have vehicles under 5 years old but at the moment the trade in Rotherham will not sustain this and the "brute force" introduction of this policy will mean a lowering of quality of service due to an increased percentage of poor drivers, Rotherham councils new testing procedure and increased stringency in removing poor quality applicants will, in my view, make this policy viable in a few years time when the number of drivers has decreased due



to the “cutting of the chaff”, however at the moment I believe a compromise is necessary, It should be the councils stated intent to introduce this policy at a period in the future but they need to accept that the trade needs to be in a position to financially support the policy, at the moment, it isn't

What can the council do? Well I think there are 2 things, firstly I think in the short term the “exceptional conditions” rules should be relaxed for vehicles between 5 and 7 years old, in particular the removal of the “full service history” part, in my experience it will be perfectly viable to find a vehicle in this category under 7 years old to a standard that will be acceptable, however finding one with a full service history will be much more difficult, by this age a lot of vehicles will have lost their service history due to change of owner and if the vehicle is maintained properly in future and all other requirements are met only the driver will suffer from the lack of servicing as his vehicle will cost more to maintain and repair, removing this small item opens the 5 to 7 year old section up to a lot more vehicles, means drivers have to make careful effort to find vehicles of a suitable quality but are able to do so at a more reasonable rate, if we assume a driver was going to spend £2000 on a vehicle anyway, a jump to £3000 - £3500 is far less severe and is unlikely to remove people from the trade, along with more stringent testing (see later) I believe this will work in the better interests of the people of Rotherham, The other standards could be relaxed to more “good conditions” than “exceptional”, the policies for 8-10 years old should stay as proposed, if a driver really wants to run a vehicle of that age then I believe those policies are correct, it may be at a later date when the other policies kick in it and wages rise the council can make a 5 year limit work, at present I don't believe it will

The council should remember people don't only have the option of buying a vehicle 5 years or newer, they can leave and the council need to think if their policy is going to benefit overall the public of Rotherham, in my view it isn't, It should be remembered the best way to improve the quality of drivers in Rotherham is to ensure they earn enough money , I believe that the fit and proper person test will go some way towards that but it will take time for the effects of that to come through, There are a raft of other simple methods which the council could employ to help the industry which, mostly through the culture of bullying in RMBC with several councillors having their own little kingdoms where what they say went whatever the evidence to the contrary, have not been employed (best example being use of bus lanes) but they are beyond the scope of this.

### 2) Vehicle Testing

I totally agree with the increased number of tests the council are proposing, I was one of several members of the trade who objected to the reduction in number of tests for older vehicles for exactly the reason it would reduce standards, My only concern here is the reason the council reduced the number of tests was the inability of Kier (May Gurney at the time) to cope with the volume of tests, In my view RMBC need to have a policy in place and agreed with Kier whereas people booking a new vehicle in for test can do within 3 days, people booking an annual test or “intermediate” test can get a booking within 14 days of applying, This is quite viable for Kier to do, they already have “relief” testers who work shifts on other jobs at the same building and in busy periods they could be moved onto working the taxi bay in the evenings, When the rules were altered previously this was not seriously considered despite being my suggestion due to problems at Kiers end regarding working hours and willingness of staff etc, to ensure there is no adverse effects on the taxi trade due to their inability to cope, this new policy should not be in place until RMBC are certain increased volume can be tolerated, If Kier are unable to accommodate this then the council need to look at alternative contractors, this needs to be sorted BEFORE the policy is imposed, incidentally the wording in the policy still reads as if vehicles are to have 6 monthly tests

I also believe RMBC are nowhere near strict enough on drivers who do not maintain their vehicles, all that happens if they fail their test with a dangerous fault is they get their plate removed, come

back a week later with the fault fixed and get their plate back, there is no punishment for the fact that they have been running the public around in a dangerous vehicle for a period of time

With this in mind I think the testing procedure needs reforming in the following way, the options for a vehicle should be expanded to

- a) Pass – self explanatory
- b) Fail on minor fault
- c) Fail on Dangerous fault
- d) Fail on Unacceptably dangerous fault

a and b are as now, however I believe the tester needs to decide if a dangerous fault is due to unacceptably poor maintenance and has posed a threat to the public for a period so, for example, if I present a vehicle with a lump of metal in a tyre that will be a dangerous fault, its something that is dangerous and needs the plate removing but its reasonable to say that isn't necessarily due to poor maintenance, perhaps if a tyre is only just under the wear limit (borderline) it should also fall into this category If I present a vehicle with metal and cords poking through I have clearly been driving that vehicle taking passengers in a seriously unroadworthy state for some time, that should class as an unacceptably dangerous fault, Other examples may be that a ball joint which is borderline would be dangerous, one that is hanging off be unacceptably dangerous, another example would be if I have new brake discs fitted but the balance is out the tester may decide that is dangerous and remove the plate but its certainly not due to a lack of maintainance, If the brake discs are exceptionally thin and grating badly it is, i.e. the level of unacceptability be judged by the tester, I am not a mechanic but I am sure the testers will be able to give feedback on where the line should be and many similar examples

The principle here should be that if a vehicle fails on one dangerous fault then it has the plate removed and has to go for retest as now with no further penalty, the council accepts the vehicle has been maintained and perhaps the driver has missed something or its beyond his reasonable control etc, the vehicle needs removing from the road until fixed but no further punishment needs applying

However if a vehicle fails on a larger number of dangerous faults or one unacceptably dangerous fault the driver should receive further punishment, 1) Once the vehicle has been repaired and the plate restored the vehicle is required to report for another "intermediate" test in a months time at the drivers expense, this is to be in addition to the current tests and 2) The vehicle owners taxi licence be endorsed with points under the new system

This will encourage far greater routine maintenance as there is now a punishment should a vehicle be presented in a completely unacceptable condition, at present there is none, in my view this would do far more than the age policy to improve vehicle standards

### 3) CCTV

Once again I wholeheartedly endorse the inclusion of CCTV in taxis, however I believe the 24 hour recording policy is flawed for 2 reasons, In addition I don't believe enough information has been given for people to have a reasonable view of this, who will have access to the footage? Under what circumstances will it be viewed? How long will it be kept? For example if the Police only have access to it with regards to complaints that is one thing, if they are to be allowed it to view to LOOK for offences, that is another, We've all seen Police Camera action on TV, I doubt 3 hours of footage of me picking my nose will be that entertaining but I certainly don't want it on there? Could it end up on there? Will licensing have access to it and under what circumstances? This information

should be available, who has access? under what circumstances do they have access? How long will it be retained?

1) A large majority of drivers use their vehicle as a personal vehicle as well, the standard of vehicles improves as a result as the driver doesn't also have to run a separate vehicle so keeps his cost down and is much more likely to have pride in his vehicle, I think the council needs to respect the privacy of the driver in his personal vehicle whilst weighing up the risk of abuse against victims of CSE, A driver understandably wouldn't want to be recorded in his own private time with his family, would you like a camera in your front room with recordings of your daily life available to the police and licensing authorities whilst you do your shopping etc?

2) I believe the 24 hour recording will have a negative effect for victims of CSE, The Jay report indicates a lot of victims initially met their abusers in taxis, often whilst contracts were being completed from children's homes etc, My opinion is that if CCTV were recording whilst the driver was working these incidents would have been recorded, usually these victims were picked up again later in circumstances where the driver was not working, quite often also in a taxi, when the abuse cycle began, lets move those circumstances to the rules of 24hr CCTV, the abuser meets his victim whilst doing a taxi job, that's recorded, he then arranges to collect the victim again later, do the council seriously think that driver is going to go back and collect a victim in a vehicle which he knows is recording him 24 hours a day? He will simply go in another vehicle so the 24hr CCTV is simply forcing him to expand the number of vehicles he uses to facilitate the abuse; I cannot imagine anyone stupid enough to go back in a vehicle with CCTV to commit such an act

However by forcing the abuser in another vehicle this has created problems for any investigation of the offence, instead of a victim saying they were always transported in a taxi (and having a central base for potential forensic evidence) they will now have been transported in a range of cars, this is far more difficult for the police to investigate than one vehicle with great big taxi signs on it that stand out a mile, In addition if the police are monitoring the victim or abuser it will be far easier for them to track the victim/abuser in a single taxi rather than a range of vehicles

The 24 hour CCTV will simply move abusers around into other vehicles making it harder for police and victims to collate evidence; it won't stop "out of hours" exploitation at all.

In my view the council need to be looking at ways of recording both audio and video whilst the driver is working and having a facility for anyone in the vehicle to begin recording at any time, this way if an abuser picks a victim up the victim has an option of setting recording equipment in motion without the perpetrator knowing

So I would propose here that drivers have an option for the CCTV to be linked to their meter, all hackney carriage and the majority of larger private hire firms have meters, as soon as the meter is switched on it triggers the CCTV to begin recording, the CCTV records until a period of 90mins after the meter is turned off, this means that the driver cannot just turn the CCTV off when it suits him, he has to have finished work 90 mins before the CCTV turns off, There should also be buttons in the back of vehicles and passenger seats which, when pressed, begin recording, the presence of these buttons should be well publicised as panic buttons that run 24 hours a day so anyone in a taxi can press this button and be recorded whether the meter is on or not, possibly for a longer period, the driver should be unable to see whether the equipment is recording if these buttons are pressed so no reprisals on victims, in my view this is far more likely to prevent crime and abuse as i) audio recording can take place whenever video recording is as it is no longer 24 hours and ii) The driver is far less likely to move exploitation into another vehicle for fear of being recorded, the actual presence of CCTV will not record exploitation, other than the early stages when a driver meets his victim whilst picking them up as a taxi customer, it will move it, my proposals make it far more likely that exploitation be recorded, it encourages any abusers to remain in the taxi "out of hours",

as they believe its is safe to do so, but gives a victim the chance to record it, other than that the abuse will simply be moved into a vehicle where it will not be recorded

It may be this option is only available to companies with meters, possibly the council may wish to offer the current proposal of 24 hr recording to companies without meters or make the fitting of meters compulsorily, I have no idea why compulsorily fitting of meters hasn't been approved anyway as I believe that is a way to improve customer service,

To add a bit of perspective to this, despite the vast vast majority of taxi drivers doing a good job we are being asked to have our work monitored, I think it should be noted that RMBC was considered "unfit for purpose" and the leader of the council, a man who ran our town for years, Roger Stone, called "delusional", There has been news, which I believe to be accurate, that 300 people could potentially be charged with CSE offences in Rotherham, it specifically says that 2 of them are (possibly former) councillors, the mayor was arrested and resigned the other year, surely people who have run Rotherham Council also have a case to answer here? If taxi drivers have to have CCTV why don't councillors, council officials and even commissioners? Surely if there had been CCTV if the offices of Roger Stone it would have caught some of the lack of fitness for purpose far earlier? If it had been in the offices of those councillors who are suspected of CSE then it may have helped stop them and help their victims, so why is there no proposal for CCTV for councillors? I have to say if Commissioner Ney and the Business Development manager (who I have no reason to believe are doing anything other than an excellent job – but then again they have no reason to believe I am doing anything other than an excellent job!) agree to have CCTV in their offices I would have far less concerns about this, Its only a fiver a month and on their wages they can afford that! In fact if they also agree to have it in their own personal cars for 12 months invading their private time (after all the offences of the 2 suspected councillors are unlikely to have been restricted to their offices) I will stump up the extra fiver for cameras myself!!! That said I also have no wish to watch the Business Development manager picking his nose for 3 hours on Police Camera Action either!!

#### 4. Qualifications

I agree with the imposition of qualifications for drivers; however a lot of drivers already have the NVQ qualification and a direct solution for this needs to be offered for it to be upgraded to the BTEC, i.e. take x qualification and that is satisfactory as an upgrade, the language is non specific and it's not even clear if there is a suitable qualification to upgrade, just you have to obtain a suitable qualification, tell us what it is!

#### 5. Limousines

Whilst it says in the regulations that limousines have to have a Private Hire test the council need to commit to this properly, Limousines openly advertise despite very few of them being licensed and the council need to crack down on this.