

Dear Oliver and Tony

Please find below the response from senior trade representatives. You should also have related responses from Malcolm Reeve, James Button and Roland Pelly, which can be resent if by chance they haven't been received.

**REVIEW OF UDC's TAXI LICENSING POLICIES:
Report to Licensing and Environmental Health Committee, 27 November 2018**

EXTRACTS

Background Papers

10. The Law Commission Report has been kicked into touch by this government. The Institute of Licensing Guidance has NOT been adopted by this government. The most current - and massive - piece of work commissioned by the Minister of State for Transport was completed in October 2018. The NPHTA, of which ULODA and many operators and proprietors are members, was represented on the DfT's Task and Finish group by Donna Short, its Director. As she has so pertinently said this month in mirroring the trade's view:

10.1. Would it not be more sensible for your council to hold off bringing out this rather lengthy ... policy document until such time as the Minister's response to the Task and Finish report is made known? The DfT has indicated that it could be any time now.

Impact

11. Communication/consultation. The 5 Dec email from the Licensing Team enclosing a brief summary of the proposals was sent to operators and proprietors with the bold request: "Please ensure this message is cascaded to all of your drivers." The NPHTA's Director, Donna Short, makes the following valid point:

11.1. That council of yours should be sending this consultation out DIRECT to every single licence holder in the district, not expecting the operators to pass it round to the drivers. I would refer you back to ... the Sardar v Watford case.

Situation

12. "...the authority currently requires all applicants to pass a medical, have their DVLA licences checked and have an enhanced criminal record check. All drivers are also subject to right to work checks....."

12.1. What evidence is there that the council's existing processes are not fit for purpose?

12.2. What is driving the need stated to see them improved?

12.3. An officer said in a minuted meeting with us "there have been legislative changes with safeguarding etc." What are they, please?

13. "The current UDC policy and application criteria were last revised in April 2016."

13.1. How did the council come to the conclusion that "matters relating to public safety and safeguarding were not being adequately addressed"?

13.2. What evidence of complaints do UDC have about CSE and safeguarding issues, and over what period?

14. ".....no training is offered to, or required of, either new applicants or renewing drivers."

14.1. ULODA is committed to best practice in education and training throughout the trade. Its services are promoted in its marketing statement: UNITING THE TRADE THROUGH EDUCATION, INFORMATION and COMPLIANCE. May we participate in planning and delivering training, please?

14.2. Some of the trade's larger operators have professional and effective training for their drivers - to ensure competence and compliance. How is the council proposing to make use of such established training going forward?

15. New driver training and testing

16. "New applicants attend a full day's training course to include training in customer service, driver safety, relevant legislation, disability awareness, safeguarding and other key information required to be a competent driver."

16.1. What evidence is there that this training has worked elsewhere? In which local authority areas, please?

17. "Applicants for dual/combined driver licences will be subject to additional geographic test of their knowledge of the district as they are available for immediate hire."

17.1. Schools contract drivers and taxi drivers are very different. The proposed training will have a negative effect on school driver applicants. It's difficult enough already to recruit in sufficient numbers. Such applicants do not need to learn different routes or how to give change.

17.2. Shouldn't schools contract drivers be given training specific to their needs e.g. using the passenger assistant model used by larger operators such as 24x7 and accredited/approved by Essex County Council? Additional material can be added as required in co-operation with UDC.

17.3. The trade has suggested in meetings with officers that serious consideration be given to introducing a restricted licence for schools contract drivers using the model adopted by local authorities such as Reading, Gravesham and Medway. Leading solicitors in transport licensing confirm that such a licence is NOT illegal or against the spirit of the legislation as it has been interpreted. Differentiation will be of great help to the trade.

22. "Many other local authorities already require applicants to arrange, at their own cost, training in disability awareness."

22.1. What evidence is there in Essex and counties such as Cambridgeshire, Suffolk and Herts that other LAs require such training?

"The proposal is that Watford Borough Council ... are contracted to supply bespoke training ..."

23.1. Why Watford? Have other training providers, locally or nationally, been considered and evaluated?

23.2. Have UDC done a proper procurement assessment of potential suppliers? Does this accord with commercial contract law?

24. "Watford will provide trainers that have wide experience of licensing and enforcement of taxis. This is considered a key factor ..."

24.1. What evidence is there of the "success of the courses delivered elsewhere"? Has a proper impact assessment been done?

27. "The cost to the applicant of the training would be ... "

27.1. This would be another cost - and another hurdle - which could put people off from applying in the first place or withdraw from the application process.

30. "The training course has proved most successful in other areas where the number of attendees has been capped at 16."

30.1. How has this success been measured? With a suitable impact assessment?

30.1. What evidence is there from trainer feedback?

30.2. What evidence is there from attendee feedback?

33. Update course for existing licensed drivers at renewal

37. "The authority would update the training regularly."

37.1. If UDC "owns" and accredits the training, who will be responsible for updating it, and how often?

37.1. and at whose cost?

38. "... the imposition of the requirement to have completed the update course by the date of renewal is logistically challenging ..."

38.1. The choice of word ("imposition") is noted.

38.2. The option could/should be explored of training events local to licence holders in addition to selected Uttlesford venues.

41. Suitability Policy

43. "Since the initial drafting of a Suitability Policy, the I...o...L issued its Draft Guidance ."

43.1. Having compared and contrasted the two documents in detail, we note that more than 120 of the 140 or so paragraphs are identical. We must challenge how thorough the council's process has been in order to recommend the IoL document almost in its entirety.

43.2. We must ask for a detailed justification of the proposed new sanctions in every individual instance. These seem disproportionately harsh.

43.3. There are three new paragraphs (4.41, 4.42 and 4.43) in the UDC document which list sanctions for licence holders with Motoring Convictions. Why have they been added, and what is the justification for the sanctions?

43.4. Has a compare and contrast exercise been done with other local authorities in Essex, and counties including Cambridgeshire, Suffolk and Herts, on the Suitability Policy? We believe such an analysis will assist in the determination of suitability criteria particularly, in the light of likely LA cluster arrangements and the development of national minimum standards.

48. "It is suggested that decision making under the suitability policy is delegated to officer level."

48.1. Is it intended to replace the current Licensing Panel? If so, it is a laudable objective, although the "informal" interview/words of advice approach to individual licence holders is one we hope will continue in appropriate circumstances. We need further clarification from the council on this, please, along with a clear protocol so that the operator and the individual who is subject to questions about fitness and propriety can easily understand the process. This has been a regular complaint from individuals requiring advice from operators and ULODA.

48.2. Is it intended that there be no visible role for the council's solicitor in the process? It is suggested that he/she be made aware of a meeting and thus be available for consultation on technical/legal issues arising during it.

48.3. We think it appropriate that minutes - and the decision - be recorded as they are currently, particularly in the event of any appeal.

48.3. It is also suggested that in the absence of the Chairman and Lead Licensing Officer, a decision on fitness and propriety should be taken by the Vice Chairman or three accredited committee members and an officer of similar seniority or above, though exceptionally a Licensing or Enforcement Officer may be considered appropriate in consultation with the council's solicitor.

48.4. The individual subject to questions must be given the right to be accompanied or represented as at present at any meeting with the council.

50. Driver Proficiency

52. " passing a driving test equivalent to the now defunct DSA test be a requirement of every new applicant."

52.1. What evidence is there of other LAs in Essex and neighbouring counties using such a driving proficiency test?

52.2. and what are the measures of success?

53. ".... imposition of a driving proficiency test....."

53.1. The use of the word "imposition" is again noted.

53.2. Does the model of other LAs using national and local test providers work well? What is the evidence?

59. " ... most authorities have increased the period that an applicant must have held a driving licence to between 3 - 5 years."

59.1. Most? Have other LAs in Essex, Cambridgeshire, Suffolk and Herts imposed such a requirement?

60. "... applicants must be over the age of 21 "

60.1. The trade considers this unfair, prohibitive and inappropriate. It is NOT a requirement in the similarly regulated environment for PSV drivers. Some of them are sons or daughters of local coach and bus operators who are proud to have personally trained - and accredited - them to take the public wheel as competent drivers from the age of 18. LGMPA sets the minimum experience level for drivers at 12 months.

61. Vehicle Age and Emissions Policy

61.1. The trade delegation believes there is no need for vehicle age to be included as a criterion in the policy. Vehicle emissions and condition are the key requirements. Please note: this reinforces the point made in the meeting with officers on 11 January.

81. Licensing Standards for Hackney Carriages and Private Hire Vehicles

81.1. We are challenging the inclusion of engine size in the proposed policy. The Licensing and Environmental Health Committee removed it when Smart Cars were first licensed by the council.

90. Types of vehicles that will be licensed:

90.1. We would like E7 vehicles to be specified.

91. "Left-hand drive vehicles will not be suitable for licensing on safety grounds...."

91.1. Do other LAs in Essex and neighbouring counties license left-hand drive vehicles?

91.2. We would like to revisit the matter with officers.

96. Conditions for vehicles, drivers and operators licences

101.3) "...Hackney Carriages are not required to use the meter for journeys other than those that start and end in the District."

101.1. What is the justification for this proposal, please?

103. "Many Private Hire vehicles never work within the District ..."

. "Four conditions have been added requiring operators to provide information ... on a quarterly basis...." (103.8)

103.1. These requirements seem to the trade to be disproportionately onerous. Will the council please justify them afresh?

Risk Analysis

107. "Mitigating actions: Members adopt the recommend changes and updates to current UDC policy and procedures."

107.1. In order to meet the stated aspirations of the committee's Chairman to have short documentation, we propose that a member of the trade work in a joint working party with the Licensing Consultant and UDC officers in the delivery of the best outcome for the council and stakeholders.

107.2. In this process we will together identify areas in the current "green book" which have been outside the scope of this review, by order of the Chairman. These include - importantly - CCTV in vehicles, a mysterious omission given its valued contribution to public and driver safety, as highlighted by ULODA's Honorary President during the trade's statements to the committee in 2018.

Many thanks in advance for dealing with these challenges, questions, observations and proposals from trade representatives. We are grateful to you for receiving them in a spirit of mutual co-operation and commitment to the cause of developing communication and proper consultation.

We hope to have the opportunity of further "informal forums" in the coming weeks with officers in the best interests of "task and finish".

Kind regards

**Andy Mahoney, Managing Director, 24x7
Robert Sinnott, Managing Director, ACME Transport
Richard Ellis, Managing Director, Barnston Luxury Travel
Barry Drinkwater, Chairman, ULODA
Doug Perry, Hon President, ULODA**

30 January, 2019

RESPONSE:

Points 10 & 10.1

The taxi industry as a whole has been waiting for new guidance and legislation for a number of years. The Government response to the Task and Finish Group has now been published and the only matter which has really been progressed is that a consultation has been opened on draft statutory guidance.

To wait an undefined period of time for Central Government to resolve the issues with taxi legislation is not prudent. Matters such as safe guarding cannot and should not wait. Some of the proposed policy changes relate to matters covered by the task and finish group and are reflected in the draft statutory guidance so UDC will be ahead of the curve with these matters compared to other Local Authorities that have ignored them.

Point 11 & 11.1

We believe this point has been adequately covered during trade meetings. The method of consultation has been used on a number of occasions before and neither ULODA nor individuals in the taxi trade have objected. UDC believes that the methods used to communicate the consultation and the length of consultation itself are adequate and that no individual has been disadvantaged.

Points 12-12.3

UDC commissioned an audit of its taxi licensing service to give it assurance that it was carrying out all steps necessary to fulfil its role of ensuring public safety. This process included discussions with the trade and their concerns were reflected in the outcomes. The proposals put forward seek to raise the bar and ensure due diligence with regards to the statutory responsibility placed on UDC. The consequences of waiting until there is evidence of a problem before doing something has been reported in the press on a number of occasions in recent years. The changes to safeguarding etc. references the various reports and findings that have come out of the issues that have been reported nationally such as Rotherham, Oxford, etc. Although there have been no specific legislative changes in relation to safeguarding in taxi licensing the whole view and seriousness of the approach that has been taken has changed over recent years. The gravity of failing to ensure that appropriate measures are in place to check fitness and priority are clear for all to see.

Points 13-13.2

Please see the answer above. The policies were audited and lessons learned by other authorities pointed to there being more that UDC could do to ensure public safety. As detailed above, waiting for complaints before taking appropriate action to prevent potential harm, means that the measures are already too late.

Points 14-14.2

ULODA's commitment to best practice in education and training throughout the trade is to be applauded. As part of this consultation input was welcomed regarding the content of the proposed training course. It is not clear from your response exactly how ULODA would like to participate? If you have any specific proposals then please put them forward.

Ultimately as the regulator it is for UDC to decide the content of any training but we have openly consulted with ULODA and the rest of the licensed trade and will continue to do so.

As part of the consultation all operators were contacted for details of any training they provide to drivers. The responses varied from no training being provided, to requesting drivers to read the company safe guarding policy, to customer service training only, etc. None of the responses supplied contained sufficient detail regarding the provided training for them to be given consideration for integration into the proposed training course. The only way for UDC to ensure that a consistent level of training is delivered and maintained to its licensed trade is stipulate the training that must be attended and the testing to ensure understanding.

UDC has been conscious to try to avoid duplication of training and adding additional costs onto the licensed trade. However with no consistency regarding training between operators or between different education authorities it has not proved possible to make use of the established training you refer to. Therefore it has fallen to UDC to set the standard for training in consultation with stake holders.

In a response to the consultation from the Integrated Passenger Transport Unit at Essex County Council they stated that "*it is felt that the training will drive an improvement in standards*" and that "*the suggested new training is a really positive step forward in that the training is proposed to includes CSE and safeguarding*".

Points 15, 16 & 16.1

There is much evidence that training has improved the standards amongst members of the licensed trade in a number of areas. The benefit of and need for training is recognised nationally and most recently in the Draft DFT guidance “Taxi and Private Hire Vehicle Licensing: Protecting Users”.

2.29 It is important to remember that any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. That is not however to suggest that licences should be automatically revoked overnight, for example if a vehicle specification is changed it is proportionate to allow those that would not meet the criteria to have the opportunity to adapt or change their vehicle. The same pragmatic approach should be taken to driver licence changes - if requirements are changed to include a training course or qualification, a reasonable time should be allowed for this to be undertaken or gained. The implementation schedule of any changes that affect current licence holders must be transparent and communicated promptly and clearly.

2.72 It is the Department’s recommendation that licensing authorities provide safeguarding advice and guidance to the trade and that taxi and PHV drivers are required to undertake safeguarding training.

2.76 Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation.

Points 17-17.3

UDC has considered the submissions from the trade regarding issuing a school contract only restricted private hire driver and vehicle licences. The authority believes that this could have implications with regards to public safety and as therefore decided that this is not an option that will be taken. One of the responses to the consultation from Roland Pelly states that the legality or not of such a licence has not been tested in court, it is therefore a matter of legal opinion rather than fact.

Once a Private Hire driver’s licence is issued then that driver has the ability to carry out any type of private hire work for any Uttlesford licensed operator and as such should be trained in all appropriate areas. There is no proposal to require private hire drivers to take and pass a geographical knowledge test or in how to give change. The proposals do include a basic arithmetic test as part of the test of fitness and propriety but applicants should be able to pass this without the need for additional training.

It is not the intention of any of the proposals to limit suitable people’s ability to enter the licensed trade. UDC are trying to diligently fulfil its statutory obligations to ensure public safety and the passengers on school runs are amongst the most vulnerable in society so should be afforded the most protection.

With regards to your comments about the training provided by 24X7 which you state is accredited/approved by Essex County Council we have requested the details of this training so that its content can be considered and the details we have been provided are below:

Please find below the training that a school driver would receive much of it is the passenger assistant training through the Essex DVD and Monkey Puzzle

Emergency Aid Training (first aid)

Passenger Awareness training

Responsibility Training

Passenger Safety training

Step on Training

Passenger Lift Training

Wheelchair securing training

One to training for medical needs

Parental meet and greet observation awareness

Midas training where deemed necessary

Whilst UDC applaud any operator that is providing training to its drivers but without further details of what the training involves it is difficult for UDC to evaluate how in depth that training is. Much of the above seems dependant on the individual needs of specific contracts. As detailed above UDC has received a response from Essex County Council to the current proposals and they believe that the proposed training will improve standards.

The training course, if approved and implemented, will have its content regularly reviewed so the trade will have an opportunity to feed in their thoughts and ideas at these times.

Points 22-22.1

Please refer to the response given to Points 15, 16 & 16.1 and the extracts from the draft Guidance being consulted on by the DfT with regards to the need for training in disability awareness which UDC answers the question regarding the need to evidence which authorities provide training.

Points 23.1-23.2

The report details a proposal in consideration of a course that is currently being delivered and fits with what the authority is seeking to achieve. No contract has been entered into and the final provider of any training has not been decided. UDC appreciates ULODA's concern regarding legal compliance but this is a matter for the authority and does not form part of the consultation.

Points 24-24.1

It is unclear how the extract from the report relates to the question. UDC believes that it is vitally important that any training is provided by trainers that have an in depth knowledge of taxi licensing rather than using a trainer that simply knows the training material to be delivered. This will allow both those people new to the trade and existing drivers to ask questions outside of the training material and receive accurate answers.

The success of courses elsewhere is only of limited relevance to the bespoke course that it is proposed to deliver to applicants and existing drivers. UDC will set its own key performance indicators for the training, if approved, and these will help to measure the success of the course.

Points 27-27.1

It is correct that there is a cost to an applicant or existing driver to attending the training and obtaining a licence. The licence that will subsequently be granted is likely to last for three years (although a shorter licence can be granted where appropriate). Dividing the approximate costs detailed in the report over that three year duration it is likely to cost a new applicant £35.00 per annum and an existing driver £25.00 per annum which although an increase should not preclude people from entering the trade. The draft DfT guidance advises Local Authorities to implement training so it is clear that central government do not believe that it is a 'hurdle' but a necessity for those wishing to enter or remain in the trade.

Points 30-30.2

These questions can again be related back to the draft DfT guidance but for clarity East Herts and Watford, two Local Authorities, providing this type of training measure its success in a number of ways:

- Levels of compliance;
- Levels of complaints;
- Levels of engagement with the trade;
- Number of safeguarding matters or similar reported by drivers;
- Attendees feedback;
- Decrease in the number of abandoned applications.

Anecdotally the trainer for both authorities has generally reported that the course has been received well with even longstanding members of the licensed trade commenting that they had learnt something new from the update course.

Points 37-37.1

The intervals for review and update of the course will not be set until the decision has been taken regarding the implementation or not of training. The cost of the administration work will be borne by the licence trade and will be built into the fees appropriately.

Points 38-38.2

UDC is considering holding training days in a variety of locations within the District. It is not feasible for UDC to consider other training venues across the country, if that is what is being suggested, and it is not deemed unreasonable to expect applicants and existing licence holders to visit the District once every three years to attend a course.

Point 41-48.4

As ULODA will be aware during the review of taxi licensing which ended in early 2018 a draft suitability policy was proposed then. Following this the IOL issued the draft guidance on suitability and the authority reviewed both documents in detail. The IOL guidance has been produced by the Institute of Licensing working

in partnership with the Local Government Association (LGA), Lawyers in Local Government (LLG) and the National Association of Licensing and Enforcement Officers (NALEO), following widespread consultation.

The role of a suitability policy is to help ensure public safety and it was felt that either would help UDC to achieve this. Having compared the two documents it was the authority's belief that the IOL draft suitability policy was the best solution for what the authority was seeking to achieve.

The justification requested is that detailed above and we do not propose to go through every individual point and justify it as the response will be the same for each. Your response says that you believe that these all seem disproportionately harsh but this statement is not evidenced. The authority has carefully considered the standards that it believes should be set to ensure the public are protected and then consulted on that matter. The recent draft guidance being consulted on by the DfT details time periods that should be taken as a minimum period before a licence is granted following conviction. These reflect the periods within the proposed suitability policy.

Your response does not make any suggestion of how the policy should, in ULODA's opinion, be amended.

The additional paragraphs that you reference have been added as UDC believes that these are necessary to ensure public safety. This demonstrates the careful consideration that was given to the IOL draft document and shows that where UDC thought the draft could be improved it has done so.

Whilst benchmarking is a useful tool it is not a way in which an authority should set its policy. UDC would welcome national minimum standards and the LGA have been pushing for this for a number of years but it has not happened. In the Government's recent response to the report of the task and finish group on taxi and private hire licensing the government say:

The Government agrees that there should be national minimum standards for Taxi and PHV licensing, and will take forward legislation when time allows to enable these.

Authorities with a responsibility for public safety should not sit and wait for the Government to bring in new legislation and must take the actions it sees fit to fulfil that responsibility.

It is not the intention of the delegation to replace the Licensing & Environmental Health Committee. UDC has listened to the comments ULODA and others have made regarding clarity of process when fitness and propriety is being considered and the proposed change is partially as a result of these. If it is decided to delegate decision making then clear guidance will be issued by the authority so that all parties understand the processes to be followed and the interactions that will be had.

Legal advice will always be sought by decision makers of all levels when appropriate.

Paragraph 50-59.1

I would refer to the earlier response regarding the matter of bench marking. UDC has proposed changes to its licensing policy and regime that it deems appropriate to best ensure public safety. If other authorities do not take the same steps or have lower standards then this is a matter for them to consider.

Your comments regarding the period of time that a driving licence must be held and the age an applicant must be are noted. The justification for new applicants taking a driving test is detailed in the report. The authority considers this a suitable standard to ensure that applicants are fit and proper to drive the public safely. Holding a drivers licence for a number of years does not mean that a person is necessarily a safe driver. That person may not have driven a vehicle since passing their test or may simply never have been caught driving dangerously. A driving test is similar to an MOT in that it only shows the standard checked to on that particular day.

Asking applicants to pass this higher standard of driving test, or an existing driver passing the test following the imposition of a number of penalty points on their DVLA driving licence, is a better indication of fitness and propriety than simply having a drivers licence. You have referenced the legislation in your response and stated that this is the 'minimum standard' which is a point UDC agrees. However, UDC believes that a higher standard is appropriate to ensure public safety and the legislation allows this standard to be set locally.

With regards to the minimum age for applicants being set at 21 years of age it has been noted that this has a similar affect to requiring a number of years driving experience. As such to avoid any duplication or confusion UDC will remove this proposal for a minimum age for applicants.

Paragraphs 61-61.1

UDC agrees with this point and proposes to remove the age part of the proposed vehicle policy.

There is no proposal to include an engine size but following early discussions with the trade a proposed engine power output was suggested. In the age of hybrid and electric vehicles this was to help accommodate vehicles regardless of the fuel on which they run. As the Committee had already removed the minimum engine capacity requirement the proposal for a minimum power output has been removed.

Paragraphs 90-91.2

We agree to add E7 vehicles.

With regards to left-hand drive vehicles this has been covered in the response to James Button made on behalf of 24X7:

Passengers in the rear of a vehicle have the option to exit the vehicle from either side but this does not apply to the front seat passenger in a left hand drive vehicle who must always leave the vehicle from the offside. Equally important but not originally detailed in the paragraph is the safety implications for a left hand drive vehicle pulling away or overtaking. The driver is not seated in the best position to ensure that these manoeuvres are carried out safely so they have public safety implications.

Again as this is a policy so applications for left hand drive vehicles would be accepted and would be considered on their own merits. UDC has amended the wording in an attempt to make the reasons for the policy clearer.

I refer you to the previous responses regarding bench marking and its relative value. There is no detail in the response regarding why ULODA wish to revisit this point or a suggested amendment. Merely having a policy that states UDC will not licence left hand drive vehicles does not preclude individuals from making applications. Each case would be considered on its own merits and if an applicant was able to demonstrate good reasons for departing from the policy the authority could grant a licence.

Paragraph 96-103.1

This is not a proposal. Hackney carriages are legally required to use the meter for journey's that start and end within the District. However, if a journey either starts or ends outside of the District then a driver can negotiate a fare with the passenger if they wish.

The information that is being requested has implications for public safety as detailed in the report. All the information detailed should already be held by all of the operators licensed by UDC and they would be required to produce it with 24 hours upon request by an authorised officer. UDC seeks this information so that the authority can better ensure public safety. The trade have commented on a number of occasions that there is not enough enforcement and by operators providing the requested information UDC can target its resources where they are most needed.

Paragraphs 107-107.2

Prior to and during the consultation period meetings were held with the trade so that UDC could consider stakeholders opinions. We believe that this has been beneficial and shaped the final proposals going before the Licensing & Environmental Health Committee. It is important to understand that UDC's role in the taxi licensing regime is as the regulator and as such it may not always be possible to find common ground with all stake holders. UDC will continue to engage with and listen to the trade but the consultation around the current proposals is now closed.

UDC appreciates that there are still areas of its taxi policy that need attention and the current proposals are the first wave. These particular matters were chosen to be dealt with first as they were considered to be the most pressing for review. Whilst we consider CCTV to be an important issue ensuring that individuals driving licensed vehicles are fit and proper is paramount to ensuring public safety. UDC would welcome any proposals for further review of the remaining policies in relation to taxi licensing.