

DECISION-MAKER:	LICENSING COMMITTEE		
SUBJECT:	HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLE AND DRIVER CONDITIONS.		
DATE OF DECISION:	6 May 2009		
REPORT OF:	SOLICITOR TO THE COUNCIL		
AUTHOR:	Name:	John Burke	Tel: 023 8083 3206
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STATEMENT OF CONFIDENTIALITY

None

SUMMARY

Members are asked to consider the following additional conditions some of which are consistent with Department for Transport best practice and are believed to be necessary to maintain and improve the standard of both drivers and vehicles.

The vehicle condition revisions flow from the report on Unmet Demand previously considered by the Committee.

- (i) Basic Skills Assessment for all new drivers prior to issue of any licence and the B Tech qualification for Transporting Passengers by Taxi and Private Hire to be passed within the first six months of being licensed for all new drivers. B Tech to be passed within next three years for all existing drivers.
- (ii) Driving assessments for all new drivers and existing drivers in exceptional circumstances.
- (iii) Engine sizes. Remove the 1598cc requirement and amend to 68bhp or equivalent power output.
- (iv) Testing of vehicles. To require all vehicles licensed by the Council to undergo a VOSA MoT test six months after its compliance test or six months before renewal of its licence if it was a brand new vehicle at first licensing
- (v) All vehicles to be maintained in their original specification for the duration of any licence issued.
- (vi) Digital Cameras. As crime and safety are both Government and Council priorities it is proposed that all vehicles are fitted with digital cameras as soon as possible and in any case at the time the current licensed vehicle is replaced.

RECOMMENDATIONS:

- (i) To approve the above additional and/or revised conditions on the basis that they will improve the quality of both vehicles and drivers.
- (ii) That the Solicitor to the Council approve the final wording of those conditions.

REASONS FOR REPORT RECOMMENDATIONS

1. There is an ongoing requirement to ensure that licensed vehicles and driver standards are kept at the highest level. The suite of revised conditions as proposed will significantly improve both areas.

CONSULTATION

2. (i) Consultation was undertaken with Southampton Hackney Association. The TGW Union representatives have indicated that they will present their replies to the Committee on the day. Their responses are attached at Appendix 1.
- (ii) The Licensing Section wrote to all drivers and proprietors with details of the proposals. 41 responses were received and a brief synopsis of those responses is attached at Appendix 2. Additionally, as is now standard practice, the same documents were placed on the Licensing noticeboard on the dedicated public webpage on Cityweb. (A copy of these documents is available in the members' rooms).

ALTERNATIVE OPTIONS CONSIDERED AND REJECTED

3. The revision of any conditions is discretionary. Officers believe they are appropriate for the reasons given hence their recommendation to the Committee.

DETAIL

Basic Skills Assessment for new drivers and B Tech Qualification

4. For some considerable time there has been a view from the trade that many new applicants for Hackney and Private Hire drivers licences have insufficient basic skills (reading, writing and basic communication skills) to carry out their role. By introducing a Basic Skills Assessment for new drivers failings in their skills can be identified and therefore addressed positively through relevant training. That training will in most cases attract external funding and therefore will be free to the applicant.
5. The B Tech qualification is a recognised certificate course which provides the underpinning knowledge for the Road Passenger Vehicle Driving NVQ which is itself an industry recognised qualification. Funding for the NVQ is currently available through Train to Gain and therefore provided the driver meets the relevant criteria then the qualification should be cost neutral.
6. Standards within the trade are currently poor overall and the Licensing team is regularly contacted by the public in this regard. By insisting on the basic skills and B Tech qualification drivers will have a certified knowledge base covering seven major areas as follows:
7.
 - Customer service
 - Equal Opportunities
 - Disability awareness
 - Taxi and Private Hire regulation
 - Taxi and Private Hire safety
 - Carriage of luggage and parcels
 - Basic topography and route planning.

Driving assessments for HCD and PHD applicants.

8. On 23rd August 2006 a report was considered by the Licensing (General) Sub-committee in relation to applicants for HCD and PHD licences to undergo a driving assessment with an Approved Driving Instructor in order to assess their capabilities as drivers. This report was approved in principle with a resolution to consult with the trade and a further detailed report to be submitted to this Committee.
9. The trade has been consulted with and it is agreed that in line with the original report new applicants undergo an assessment prior to the granting of any licence, also that should existing drivers be disqualified under the totting-up procedure or appear before the Committee because of complaints about their driving then they should also be assessed before re-instatement of their licence.
10. To this end, two experienced Driving Instructors have been identified and a procedure devised to incorporate these assessments into the application procedure and the Committee procedure for existing drivers. The protocol to be adopted will ensure that the system is fair and allow for further consideration should there be any conflict between the applicant and the assessor.

Vehicle specifications (Engine Power).

11. Since conditions for vehicles were last considered there have been numerous improvements to engines, their efficiency and EU directives in relation to emissions. The current standard for Southampton Licensed vehicles is that the engine size should be no less than 1598 cc. This is an outdated condition and many vehicles are now produced with smaller engines (between 1200 and 1600 cc) which have power output more than sufficient to allow them to operate as Hackney Carriage and Private Hire Vehicles. An investigation into suitable vehicles has concluded that if an engine power of 68 bhp or equivalent was adopted then more efficient vehicles could be licensed without compromising their ability to carry out their role. There is also the added benefit that many of these vehicles meet the current Euro 4 emissions standard.

Interim testing of licensed vehicles

12. Southampton licensed Hackney Carriage and Private Hire vehicles are currently required to undergo a compliance test, similar to a VOSA MoT test, each year prior to the renewal of the vehicle licence. This test is to ensure that the vehicles are mechanically sound. Many vehicles licensed by the council cover in excess of 50,000 miles each year and on an increasing number of occasions vehicles are being submitted for testing in a very poor condition and in some cases in a condition that leads to the suspension of the licence. A recent check of all cars tested from 1st January 2009 until mid April 2009 reveals that of 341 vehicles tested 194 failed to meet the required standards at the first test. This could be for as little as a bulb not working to major defects such as steering brakes and suspension. It is also a matter of fact that at least 10 vehicles have been suspended with immediate effect by the Licensing Manager following tests as they were dangerous and unsafe to be used on the public highway.

13. Many of the cars licensed are domestic vehicles that in normal circumstances would cover between 12000 and 15000 miles a year over a variety of road conditions. A domestic vehicle requires a VOSA MoT test after three years, in normal circumstances after about 40,000 miles, whereas a Hackney Carriage or Private Hire Vehicle tends to operate in a defined area with a great many “stop-start” journeys across all sorts of road surfaces with numerous traffic calming measures. Licensed vehicles which are brand new at the time of first licensing do not have to undergo a compliance test however they may have already completed in the region of 50,000 miles before they are due a test and it is possible they may have had minimum maintenance.
14. Records show significant mileages on vehicles currently being used. Some examples taken from MOT records are as follows:-
2003 plates- 273,566miles - 232,111 miles – 330,125 miles and a 2002 plate 254,960. At least 50% of vehicles have more than 100,000 miles on the clock.
15. It is for that reason that officers ask members to consider the implementation of an interim VOSA MoT test to be carried out six months after the compliance test or, for vehicles not tested at first licensing six months before their first renewal, to ensure that vehicles are mechanically sound.
16. Consultation has been undertaken with all proprietors with the following result (Please see appendix 3)
17. Trade representatives have asked that these tests are carried out within the city to ensure a consistent approach to testing. Their responses are attached at Appendix 2.

Vehicle specification (visual effect)

18. Over recent years there has been a marked improvement in the standard of vehicles licensed as Hackney Carriages and Private Hire vehicles by Southampton City Council. However there has recently been a tendency for drivers to remove wheel trims and to exchange alloy wheels for steel wheels because of maintenance costs and the cost of run flat tyres. This leaves a number of cars running around with dirty matt black wheels with no wheel trims. These vehicles look scruffy and have the effect of reducing the visual standard of the fleet. A number of vehicles have also had makeshift screens fitted and having an ‘original specification’ condition would help to control unauthorised alterations to licensed vehicles.

Digital Cameras.

19. The Council has for some time been fitting digital cameras to licensed vehicles as part of its strategic approach to reducing crime and disorder and improving driver safety. These cameras have been part funded by contribution from various agencies as part of the Safe City Partnership. To date there are about 110 licensed vehicles with cameras fitted where the proprietor has contributed in the region of £150 plus a fitting charge to obtain the device. The cameras have in the past cost about £625 per unit therefore contribution of about £475 has been obtained from other sources.

20. There is currently only one make of camera approved as fit for purpose which has a specification which meets the police standards for evidence and the images are of a standard suitable to make identification possible. Through negotiation Licensing have managed to secure these cameras at a price of £550 plus VAT. There is a significant cost implication in order to roll this very important safety measure out across the whole fleet. Accordingly, it may take a few years to ensure full coverage depending on external funding streams available as it cannot be funded solely from the Licensing budget.
21. The camera currently available has not only digital image technology but also a voice recording facility. The camera is activated in a number of ways, by the internal light, the meter and also by a panic button. The storage device is a secure hard disc which is only accessible via approved secure software held by the Licensing team and Hampshire Constabulary. No one else has the ability to view any images.
22. Some proprietors have suggested that this is another case of 'Big Brother'. This is simply untrue. What the trade and members can be assured of is that images will only be downloaded where a crime report has been made to the police involving the relevant vehicle or that a member of the public has a specific and recorded complaint against the driver of a specific vehicle.

FINANCIAL/RESOURCE IMPLICATIONS

Capital

23. The only item that will require capital expenditure from the Licensing budget will be the purchase of the CCTV cameras. It is estimated that this can be funded from the Licensing budget over a period of time. External funding will continue to be actively sought where appropriate.

Revenue

24. None. The administration of these new matters will be dealt with as part of the normal business of the Licensing function.

Property

25. No implications

Other

26. None

LEGAL IMPLICATIONS

Statutory power to undertake proposals in the report:

27. Town Police Causes Act 1847 and Local Government (Miscellaneous Provisions) Act 1976

Other Legal Implications:

28. None

POLICY FRAMEWORK IMPLICATIONS

29. None

SUPPORTING DOCUMENTATION

Appendices

1.	Trade Group Consultation
2.	Synopsis of consultation documents

Documents In Members' Rooms

1.	N/A
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Background Documents

Title of Background Paper(s)

Relevant Paragraph of the
Access to Information
Procedure Rules / Schedule
12A allowing document to be
Exempt/Confidential (if
applicable)

1.	Bundle of consultation document replies	Licensing Offices, Southbrook Rise
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Background documents available for inspection at: N/A

FORWARD PLAN No: N/A **KEY DECISION?** N/A

WARDS/COMMUNITIES AFFECTED:	None
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APPENDIX 1
TRADE GROUP CONSULTATIONS

SOUTHAMPTON HACKNEY ASSOCIATION

14th April 2009

Mr Ian Hall
12 Kiln Close
Dibden Purlieu
SOUTHAMPTON
S045 5EU

Telephone (023) 8087 9935
E-Mail ianhalltaxi@sky.com



Southampton City Council
Southbrook Rise
4-8 Millbrook Road East
SOUTHAMPTON
Hampshire S015 1YG

For the attention of Mr Phil Hall – Enforcement Officer

Dear Mr Hall,

I would like to thank you and Mr Black for inviting myself and Vice Chair, Steve Paul (SHA) at the informal consultation meeting held at Southbrook Rise, March 16th 2009 at 9.30 AM.

I have now received Mr Black's letter dated 30th March 2009 with regards to certain matters intending to improve standards and safety for the taxi trade to be considered by the Licensing Committee on the 6th May 2009. In my capacity as Chair of the SHA, I have spoken to many members of our association to obtain their thoughts on these items. The views of the SHA committee are included as well.

With regards to Item 1 B. Tech qualification for all drivers, it is unanimous that all new drivers should complete this exam. There is a mixed response from older more established drivers as to why should we take an examination – 'we know mostly everything!' I have tried to explain that this is not the case quoting to them the situation that happened with the Bournemouth taxi drivers with regards to the court case; I think it would be fair to say that some have never taken an exam of this sort so they are concerned as to what is involved and others are worried about the cost. Hopefully as time goes on, more information will be available to our trade on this subject but all drivers will have to get used to the fact that at some stage if they want to pursue a taxi career, they will have to take this exam.

Item 2 Driver Assessment - A must to improve standards and if a driver has amassed a large number of points, he should also be given a test.

Item 3 Engine Size – The current limit of 2002 is out-dated and it needs to be amended.

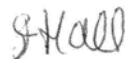
Item 4 Testing of Vehicles – We have had it explained to us in the past why Southampton City Council (Licensing Department) uses First Bus at Portswood for the yearly compliance test. It would appear sometimes that this particular MOT station takes on too much work and the examiners are not always consistent in what vehicles they fail or pass, depending on who the taxi owner might be. It is in our opinion that it may be a good idea to use another MOT testing station as well as Portswood for our yearly compliance test. To introduce twice yearly testing in an effort to improve standards and safety is of paramount importance but surely on a brand new vehicle, the government states that you don't have to have a MOT for 3 years; therefore we feel that the twice yearly test would not be applicable. Surely more roadside checks conducted throughout the year might help solve this problem with VOSA and the police in attendance? If we are to have twice yearly testing, can we not lengthen the period that a saloon car taxi or a purpose built/adapted vehicle can stay on the road?

Item 5 Vehicles Specification – we have no problems with this item.

Item 6 Digital Cameras – This has become a very controversial issue. Although the safety of a night-time driver is very important, we have encountered some questions raised by our members. When you change your taxi it is down to us as individuals to pay to have the camera taken out and re-installed, some drivers are not happy about this. If you are a day taxi driver and you are the only person on the car, you may start and finish off your day with a school run and do a few jobs in between, why should you want a camera fitted? Personally, I have no problem with cameras' but can understand the other drivers' concerns.

As an association we will endeavour to support our members, who are predominantly independent taxi drivers (not on a radio circuit) and will consult and formulate policies with the Licensing Department.

Yours sincerely,



Ian Hall
Chairman of SHA

16, Henry Rd
Southampton
SO15 3HA

10 April 2009

Mr. R. Black

Ref RB/LL

CONSULTATION

Dear Sir,

I am writing for further information on behalf of my members

Regarding your letter dated 30 March 2009;

1] You state that Government has indicated that B Tech Qualifications " will become compulsory for all hackney carriage and private hire drivers by 2011." Please could you refer me to the documentation that this came from. We have searched and can find nothing stating this, and in any case the Government is likely to change next year.

Why do you insist upon a B Tech qualification as opposed to a NVQ?

2] It is obviously the case that lack of enforcement and inadequate topography testing has led to the current situation.

Why do you think that sitting the Institute of Advanced Motorists course is not a better and less costly option for new drivers, and for yourselves?

.3] A comment from a member is " I suppose they want this so that taxi's can speed past queuing traffic to get to waiting customers in the Docks." Seriously though, I'd have thought torque more important. But why is this being raised and could you forward supporting documentation please.

4] Presumably you have analysed accident statistics and other relevant information to come up with this proposal. Again, could you forward details please

5] The state of the roads in Southampton is a major contributing factor to loss of wheel trims etc. because for many years the council has slashed the road maintenance budget.

6] How does this currently work in the city? Could you explain exactly please.

A worry is that more and more they will be used as a spy in the cab and not to prosecute customers



Summary

Dave Griffiths has replied in a letter stating his reservations about this 'consultation.'

To enable us to be in a position to respond properly we need the information requested.

We will be discussing your letter and our presentation to the Licensing Committee at our Branch meeting on Tuesday 21 April, so if it is possible to reply to this letter before then it would be appreciated.

Yours sincerely,

Steve Fricker

Branch Sec Southampton UNITE Cab Branch SE 621

Mr D Griffiths
53 Warren Avenue
Southampton
SO16 6AH

Richard Black
Licensing Officer for Solicitor to the Council
Southampton City Council
Southampton
SO15 1YG

9th April 2009

Dear Mr Black,

Re: Your letter of 30th March 2009 'Consultation' Ref: RB/LL

I do not consider the letter to be very concise. Neither do I consider it to be part of a meaningful consultation exercise between Southampton City Council and interested stakeholders. My reasons for these opinions follow:

Timescale: The period between the receipt of your letter and the completion date 14th April 2009, will not enhance the quality of responses. It does not conveniently allow for trade associations to consult with its members thus enabling a draft response from those associations.

Scope and Impact: Because of the above, your letter does not allow adequate room to influence any decision. Estimated individual costs of the proposals under consideration do not seem to be an integral part of the 'consultation exercise'.

Responses: Meaningful consultation normally takes input from written responses, discussions forums and/or meetings. A summary of the responses should also be made available to interested stakeholders before any further action.

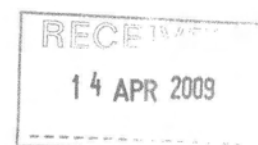
Understanding: Because of the absence of the other avenues of consultation – discussion forums and/or meetings – some of the proposals are unclear and not self-contained and therefore lack transparency and openness.

Finally, I have not submitted a written response to the proposals, as I will make representation to the Licensing Committee on 6th May 2009. Unfortunately – as others may well do the same - this will burden the Licensing Committee's time regarding this 'consultation'.

Yours truly,

Dave Griffiths

Sent Attached to email
Cc. All Members of Licensing Committee and Steve Fricker



SYNOPSIS OF CONSULTATION DOCUMENTS

	Positive	Negative	No Opinion
1. B-Tec Qualification	26 (63%)	12 (30%)	3 (7%)
2. Driver Assessment	31 (76%)	7 (17%)	3 (7%)
3. Engine Capacity	20 (50%)	13 (31%)	8 (1%)
4. Testing of Vehicles	12 (29%)	28 (68%)	1 (3%)

5. Vehicle Specification	23 (56%)	9 (22%)	9 (22%)
6. Cameras	18 (44%)	17 (42%)	6 (14%)

Breakdown of Data

A total of 41 Consultation response forms have been received as of 17th April 2009. The responses have been allocated into 3 categories for recording purposes; Positive, Negative and No opinion. The responses have been analysed to identify any themes that appear among the comments and these are shown below.

1) B-Tec Qualification

Of the 26 positive responses, 10 indicated that although they agreed with the proposal, the B-Tec should only be required for newly licensed drivers, not existing drivers with experience.

Of the 12 negative responses, 4 indicated that they felt it was not necessary for drivers already in the trade. 2 indicated that a training course would be suitable, but that a qualification was too much.

2) Driver Assessment

Of the 7 negative responses, 2 indicated that the time that an applicant has held a full UK driving licence should be increased instead of introducing a driver assessment.

3) Engine Capacity

No common themes have been identified.

4) Testing of Vehicles

Of the 12 positive responses, 3 raised concerns regarding the cost implications associated with a second test.

Of the 28 negative responses, 12 raised concerns regarding the additional cost that would arise.

5) Vehicle Specification

Of the 9 negative responses, 2 were concerned about the cost implications. 4 indicated that this would be restrictive in improving appearance of the vehicles. 1 suggested that there would need to be an exception for wheelchair accessible vehicles as these are not adapted by the manufacturers.

6) Cameras

Of the 18 positive responses, 5 indicated that although they agreed with the proposal, they had concerns over the cost implications, with 3 indicating that it should not be necessary for those doing restricted work only.

Of the 17 negative responses, 5 raised concerns regarding the cost. 7 suggested that it should not be compulsory, but rather be left to the driver's discretion. 2 indicated it would not be needed by drivers working daytime or carrying out restricted work.

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

Mr P Hall
Licensing
Southampton City Council
PO Box 1344
Southampton
SO15 1WQ

23rd April 2009

Dear Phil,

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

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

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

Yours sincerely,
Lee Haynes

1. B. Tech Qualification

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

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

- Raise the profile and professionalism of the industry.
- Provide a more consistent approach to skills development in our industry.
- The opportunity for those who work in the Hackney and PHV industry to improve their skills through nationally recognised vocational qualifications and skills development initiatives.
- Raise standards in the industry resulting in a better quality of service.
-

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

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

For the operator it will:

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

For the driver it will provide:

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

2. Driver Assessment

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

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

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

3. Engine Size

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

4. Testing of Vehicles

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

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

5. Vehicle Specification

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

6. Digital Cameras

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

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

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

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