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Dear Tim & Brighton and Hove City Councilors,

On behalf of the large number of GMB members, working in Brighton & Hove as taxi and private hire proprietors, I write to you in relation to the recent taxi unmet demand survey (carried out on behalf of Brighton & Hove City Council by Halcrow), its subsequent findings, the recently held trade meeting, and the forthcoming committee meeting which will consider the findings of the survey.

I would like to explain that in my role as the GMB PDB National (Provincial) Hackney Carriage & Private Hire Secretary; I have travelled the length and breadth of England and Wales supporting our membership. During this time I have witnessed this scenario of Councilors considering the findings of such reports many times, and I wish to make sure that every Councilor within our city is aware of the responsibility that lies upon their shoulders when considering the way forward in these turbulent economic times.

Without going into too much of the history of legislation and government 'best practice guidance', in respect of the Taxi and Private hire industry, a short time line in chronological order is listed below:

1985: Conservative Government Deregulate the Provincial Taxi Industry.

1985: Lobbying on behalf of the Taxi Industry by Trade Unions resulted in an amendment being added to the above legislation, allowing local authorities to limit the number of taxis 'if there is no significant unmet demand', which resulted in this being considered done by conducting an un-met demand survey, which would allow local authorities to defend themselves should they be legally challenged.

2003: Labour Government commission the Office of fair trading (OFT) to investigate the Taxi Industry. The result of their investigations stated that market forces should determine the number of Taxis that would operate in each licensing authority.

2003: The Government Passenger Select Committee at the time were given the task of considering this report and found that the OFT report was statistically flawed and failed to provide any empirical evidence to support its findings in recommending the abolition of taxi restrictions, and it's view that fares would decrease should taxi restrictions end. The OFT replied to the committee rejecting those criticisms.

2003: Government Best Practice Guidance, issued by the Labour Government, stated that in their opinion entry into the taxi industry should not be restricted, and best practise should be to allow market forces to determine the number of taxis operating within each licensing authority. However, the report also stated that local authorities could still limit the number of taxis if it was their opinion that it was best to do so, as local government would be in the best position to judge that.

Since this time further restrictions have been placed on local authorities to pressure them into complying with this government's policy, and out of approximately 343 local authorities only 81 continue to restrict the number of Taxi licenses.

I would like to take this opportunity to inform you of recent developments in Bracknell Forest and Southend-on-Sea, where the GMB has a large number of members in each area. Both areas have recently taken the decision to re-limit the number taxi licenses.

Bracknell Forest has limited for the first time and Southend-on-Sea has decided to continue to limit. The respected councils, both Conservative controlled, worked with the GMB and came to these decisions by accepting that their local taxi drivers were suffering due to the current economic climate.

They accepted that it was their responsibility to support their taxi drivers by providing an economic working environment that would enable the drivers to provide a safe professional service to their local visitors and residents.

The GMB Professional Drivers Section has thousands of members nationally, and the policy of our National Organising Committee, which represents these members, is that of opposing market forces in our industry. As a Trade Union we cannot support the policy of this government that leaves our members working in excess of 70 hours a week to support their families, because there are too many taxis for the level of work available, a policy that encourages drivers to work these hours regardless to the health & safety of both passengers and drivers.

There are numerous cases around the country of drivers being involved in accidents due to working excessive hours, in Sheffield recently one driver sadly was involved in a fatal RTA after taking one more job after working for 14 hours. This was the result of market forces.

LIMATATION OF TAXI LICENCES IN BRIGHTON & HOVE

In our local unmet demand survey it clearly states that at this moment in time there is no significant unmet demand for taxi services. Our membership therefore insists that our council continues to support the limitation of taxi licenses within Brighton & Hove, and continues to support the managed growth policy which has been in place for many years, issuing 5 plates per year until the next un-met demand survey. The GMB would expect these licenses to have the same license conditions placed upon them as before, in as much that they must work on a taxi company to assist with the unmet demand for the service provision to wheelchair user.

SERVICE PROVISION TO WHEELCHAIR USERS

The GMB has great concerns regarding this issue, surveys in 2003, 2006 and this latest version all indicate that the service provision to wheelchair users is getting worse, instead of improving. Our membership is of the opinion that not only has the council let down these people but has failed in its moral duty of care to take steps to assist these people.

It is also our members opinion that the responsibility to provide a service to wheelchair users lies with all sides of the trade, which include Hackney Carriage, Private Hire, and Taxi companies. The GMB would therefore like to suggest the following initiatives:

1.

1. I recently wrote to our council asking what procedures were in place to ensure, on Health & Safety grounds, that training was provided to drivers of wheelchair accessible vehicles (WAVs). I asked this question as it is our member's opinion that drivers of WAVs are reluctant to do a WAV job as they are either unsure, or have had no training in how to use the vehicle equipment. I was informed it was not the responsibility of our local Hackney Carriage Office.

On behalf of our members I would like to suggest that this council takes responsibility to ensure that all drivers of WAVs are fully knowledgeable of how to use the equipment, action such as this would improve vastly the service to WAV users.

I would also suggest on behalf of our members that a condition of license is placed upon a Hackney Carriage vehicle license which states that the proprietor is responsible for the training in the use of the wheelchair car equipment. Alternately the council could issue a separate drivers badge for WAV vehicles, and could insist that the driver concerned demonstrates the use of the equipment of the vehicle type he is driving.

2. The un-met demand for the service provision for wheelchair users is mainly via bookings with Taxi companies. Our members would like to suggest that initiatives are put into place to ensure that Taxi companies provide a service to wheelchair users, and these are our member's suggestions.
 - a. Operator licenses have the following conditions placed upon them. By April 2010 all operators within Brighton & Hove must have 20% of their fleet wheelchair accessible. By April 2011 all operators must have 25% of their fleet wheelchair accessible. By April 2012 30% of their fleet must be wheelchair accessible.
3. Currently there are some 500 private hire cars of which less than 10% are wheelchair accessible. The ratio of Private Hire cars being wheelchair accessible is the main problem with the provision of service to wheelchair users. Our membership therefore suggests that a condition be placed upon all new private hire vehicle licenses, being issued after April 1st 2010, requiring the vehicles to be wheelchair accessible. This would allow the private hire fleet to provide a service with 450 saloon cars adequately catering for the ambient disabled, and put into place a system which will provide an improved service in the future for wheelchair users.
4. Other incentives to encourage drivers to acquire wheelchair cars could be to reduce the licensing fees for WAV vehicles by 75%, and pass the costs to saloon car vehicle fees.
5. The council could provide business receipt cards, out of the hackney carriage budget, for WAV drivers, and produce a directory of drivers contact details, of those drivers which volunteer, for disabled groups to distribute.
6. The council could provide free Private Hire operators licenses to individual Private Hire WAV proprietors to encourage them to provide a service directly to WAV users.

CONCLUSION

The Brighton and Hove GMB Taxi and Private Hire section are firmly of the view that something must be done to bring the level of service, offered to wheelchair bound customers, in line to the service offered to more able bodied customers. Wheelchair bound customers have had to suffer long waits and poor service for far too long. This must end.

Our suggestions above are radical, but they are needed, and needed urgently. We believe our proposals share the burden between all sections of the taxi and private hire trade. The time has come to end this discrimination.

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