

Dear Brighton & Hove City Council, Hackney Carriage Office.

We, **Brighton and Hove Taxi, Private Hire and Operators Trade Forum-BTPOTDF-**

1-Brighton and Hove Middle East Taxi Forum.

2-Arab Taxi Association.

3-Brighton Station Association.

4-Afghan Taxi Forum.

5-UTDA

6-BSTF.

7-BSF(Cabbies Corner).

8-Radio Cabs.

9-StreamLine.

10-City Cabs.

11-Taxi 4You.

12- Independent Hackney.

13-Brighton Uber Drivers.

are writing to express my deep concern and disappointment regarding the proposed Penalty Points System applying to the taxi drivers in Brighton and Hove.

We believe the Proposal could cause significant challenges and hardships for many hardworking taxi drivers in our community.

While We understand the importance of maintaining high standards and ensuring passenger safety, We believe that the proposed penalty points system may be excessively punitive and does not take into account the unique circumstances that taxi drivers often face. As members of our local community, taxi drivers provide an essential service, and they play a crucial role in our city's transportation network. Our concerns and those of many others in our community are as follows:

1. Driver Shortage: We are facing a shortage of new taxi drivers joining the Brighton & Hove taxi trade (they prefer to join Uber with fewer rules), and imposing penalty points could discourage individuals from entering or staying in the profession.

2. Unfairness: With the cross borders being in place, the Hackney Carriage officers have no enforcement powers over any cars coming from outside the city, allowing these outside drivers to get away with violations BH drivers will be punished for. This is unfair, and this proposal will only create more resentment towards the outside-the-city drivers, conflict and unfair treatment for the local taxis. This can also lead to disappointed customers who might think it is BH drivers who provided dissatisfactory service, when in reality it was out-of-city drivers.

3. Privacy infringement: Under the Proposal, the officers can stop any BH Hackney / Private Hire car at any time. However, as per the vehicle insurance, our cars can be used for private use (time with our families etc) and the vehicle can get messy (we might eat there or move furniture etc). During this time we are private citizens, and should be treated as such.

4. **Complex Violations:** Some violations by taxi drivers may involve complex circumstances or disputes, that are better addressed through arbitration or mediation, rather than a straightforward penalty points system.
5. **Economic Impact:** Considering the current economic impact on taxi drivers and the Council itself, The Proposal will cost money to implement, plus the excessive use of penalty points could lead to financial hardship for drivers.
6. **Focus on Core Issues:** The Council may prioritise addressing more significant issues in the taxi industry, such as safety concerns, vehicle standards, or customer service, and may choose to allocate resources accordingly.
7. **Enhancing vehicle standards:** By applying a Vehicle suitability test every 6 months, rather than waiting for the driver to commit an offence and issuing him a penalty point.
8. **It is already implemented in British Law:** If a driver commits a driving offence, he will be issued with penalty points by the Police and if it is serious, the driver will lose his driving licence and the taxi licence at the same time.
9. **Blue Book:** Brighton and Hove taxi trade rule book, aka 'The Blue Book' already requires a high level of performance from the Taxi Drivers, which sets us apart from the rest of the UK.
10. **Monitoring and Improvement:** The Council may opt for continuous monitoring and improvement programs for taxi services, where they work closely with drivers to identify and rectify issues without resorting to penalty points.
11. **Educate and do not prosecute:** Educating taxi drivers effectively through training courses, communication, online seminars and support as prevention, instead of waiting until the driver makes a mistake to be prosecuted.
12. **Inconsistent Enforcement:** The current application of penalty points (as per the Blue Book) appears to be inconsistent and sometimes arbitrary. Drivers often receive points for minor infractions that do not necessarily pose a threat to passenger safety.
13. **Viability:** There have been no viability studies or any statistical figures that have been raised by the Council to reflect that we have a problem that warrants this proposal.
14. **Increased anxiety and stress:** as professional drivers who spend our work shift behind the wheel, we already face more pressure than regular drivers; we ferry rowdy, drunk or ill passengers in all weather conditions, day or night, as well as navigating traffic and ever-changing roadworks. Coming to work worrying about

receiving penalty points would make drivers more anxious and stressed, and this could lead to more accidents.

Due to all the above We would like to voice my rejection to the above proposal.

Date: 1st Dec. 2023

Name: Ahmed Abuorof (Chairman) **BTPOTDF**

Brighton and Hove Taxi, Private Hire and Operators Trade Forum

Signed:

A handwritten signature in blue ink, appearing to read 'Ahmed Abuorof', written over a set of horizontal lines.

