

Appendix 1 - Consultation Responses

6 responses were received in response to the consultation.

Question 1: Do you believe that the new policy is proportionate and practical for ensuring passenger, driver and other road users' safety?

Responses: Strongly Agree: 2
Agree: 2
Neutral: 2
Disagree: 0
Strongly disagree: 0

Question 2: What aspects of the Policy do you think will have a positive impact and why?

Responses: "Anything that raises the standards of both drivers fitness and suitability and conduct and vehicle safety in my view will have a positive impact on both passengers and drivers and will be good for business competition."

"The majority of the conditions have remained the same with some additional suggestions from WG"

"N/A"

"N/A"

" "

"Good balance between passenger safety and operator conditions"

Question 3: What aspects of the Policy do you think will have a negative impact and why?

Responses: "N/A"

"Bearing in mind that Ceredigion County Council has declared that there is a climate emergency, it's surprising to see within the Policy that it states that the Council does not currently enforce a Vehicle Emissions policy. Whilst Welsh Government has ditched its plans to make all taxis electric by 2028, Ceredigion Council should consider what measures/policies it could potentially adopt to make the taxi trade in Ceredigion greener in order to contribute to the Ceredigion Green and Blue Infrastructure Strategy."

"I am unable to see any aspect of the Policy having a negative impact on the safety of travelling passengers or licensed drivers."

"N/A"

" "

"None"

Question 4: The Council propose that it will not licence any vehicle to be used as a hackney carriage or private hire vehicle if it has been rated as a Category A, Category B, Category C, Category D or Category S Salvaged vehicle (write off). Do you agree with this proposal?

Responses: Yes: 5
No: 1

Question 5: If you answered No, please explain your answer and include any further information or proposal below.

Responses: Vehicles with certain categories (s and n) can be repaired to a point of near new condition that causes no issues with the vehicle.

Question 6: The Council will not renew any licence to use a vehicle as a hackney carriage or private hire vehicle if the relevant vehicle has been become rated as a Category A, Category B, Category C, Category D or Category S Salvaged vehicle (write-off for insurance purposes) after the date on which the vehicle was first licensed by the Council. Vehicles rated as a Category N Salvaged vehicle (insurance write-off) may be re-licensed provided the applicant or owner has provided an appropriate engineer's report (approved by the Licensing Authority) which verifies the standard of repairs. Do you agree with this proposal?

Responses: Yes: 4
No: 2

Question 7: If you answered No, please explain your answer and include any further information or proposal below.

Responses: "If vehicle is repaired to a high standard I see no reason why the license should not be renewed."

"Whilst I can see why this is suggested as some defects can be very minor; from the LA's perspective, licensees will rely on LA officers to provide the details of an appropriate engineer. LA Officers are not qualified to issue this advice."

Question 8: Do you think that this new Policy will enhance the service that our Taxi trade provides to their customers / passengers?

Responses: Strongly agree: 2
Agree: 3
Neutral: 1
Disagree: 0
Strongly disagree: 0

Question 9: If you disagree or strongly disagree, what would you recommend and why?

Responses: No responses were received.

Question 10: Do you think that this new Policy will enhance the safety of travelling passengers?

Responses: Strongly agree: 2
Agree: 3
Neutral: 1
Disagree: 0
Strongly disagree: 0

Question 11: **If you disagree or strongly disagree, what would you recommend and why?**

Responses: No responses were received.

Question 12: **Do you think the new Policy will enable better employment opportunities?**

Responses: Strongly agree: 2
Agree: 1
Neutral: 3
Disagree: 0
Strongly disagree: 0

Question 13: **If you disagree or strongly disagree, what would you recommend and why?**

Responses: No responses were received.

Question 14: **Do you think the new Policy supports a sustainable, green and well-connected community?**

Responses: Strongly Agree: 1
Agree: 0
Neutral: 4
Disagree: 1
Strongly disagree: 0

Question 15: **If you disagree or strongly disagree, what would you recommend and why?**

Responses: Only one aspect I think supports this agenda - the vehicle age policy contained in the Policy.

Question 16: **If you own a Taxi business or are a Taxi driver licensed by Ceredigion, how will this new Policy affect you? We would appreciate your input whether it is positive or negative. If you are not a Taxi business or driver licensed by this Authority then please skip to the next question.**

Responses: No responses were received.

Question 17: **Do you think the Policy and attached Conditions are inclusive?**

Responses: Strongly agree: 1
Agree: 3
Neutral: 2
Disagree: 0
Strongly disagree: 0

Question 18: **If you disagree or strongly disagree, what would you recommend and why?**

Responses: No responses were received.

Question 19: What effect do you believe that this Policy will have on the Welsh language?

Responses: Very positive: 1
Positive: 0
Neutral: 5
Negative: 0
Very negative: 0

Question 20: If you chose negative or very negative, what would you recommend and why?

Responses: No responses were received.

Question 21: Do you have any suggestions we can make to improve the new Policy or Conditions?

Responses: "I would suggest the same as other counties, if a vehicle is in good condition inside and out, and passes 2 mot tests per year, the vehicle should be able to be licensed as long as it meets the conditions"

"The Institute of Licensing has just recently published its latest version of the Guidance on determining the suitability of applicants and licensees in the hackney carriage and private hire industry (Suitability Guidance (2024)). Replace the 2018 guidance in Appendix 3 with the 2024 version."

"Not to adopt the CCTV policy (reasons below)

It needs to be made clear that taximeters must be used for ALL journeys, and that GPS tracking systems such as Phantom etc are NOT substitutes for a fully calibrated taximeter.

Suggest that Private Hire operators must have a physical base within Ceredigion and which must provide a seated waiting area for customers. This is to ensure that Cloud based operators, which are notoriously difficult if not impossible to enforce are not able to take advantage of loopholes that enable surcharges, failure to provide employment rights, and offer an unreliable service."

Question 22: Do you have any further comments to make regarding the new Policy?

Responses: "Questions rather than comments for consideration:
1. Does the Council have sufficient resources within the Licensing Service/Team to inspect and enforce all the new provisions in this policy? and
2. Do Licensing Officers have the necessary knowledge and skills to assess the suitability and specification of vehicle CCTV, vehicle dashcams that the taxi trade will install?"

"1. "In the event that an applicant is not able to obtain a certificate of good conduct, they should not progress with their application and should contact the licensing authority for further information." Such as? What is the LA supposed to tell the applicant?

2. After the adoption of any new policy existing licenses have to be reviewed. As new applicants for HC/PHV licence now require DBS - does this apply to existing licensees or will they need to submit a DBS with their renewal application? Will this open LA up to litigation as they have already been deemed fit & proper.

3. Annex 12: The LA will permit CCTV on a voluntary basis yet Annex 12 specifies the requirements of CCTV. Whilst the installation of CCTV will benefit passenger AND driver safety, the onus should not be on officers of the Council to approve CCTV makes/models or enforce specific requirements when this role is already fulfilled by the ICO. "A signed statement of compliance from the

company providing the CCTV system, must be provided confirming that the system meets the required specification detailed in this policy." I cannot envision any manufacturer providing this, and licensees will struggle to obtain this document. The WG CCTV Policy states that the LA should be the data controller, meaning that CCC will be legally responsible for every CCTV system and its compliance with GDPR. All CCTV must be installed by a "council approved contractor" - how will the LA approve CCTV installers? will this be subject to procurement procedures? Who in the LA has the experience or knowledge to approve a suitable contractor?
 4. Annex 13: VPIS: As per CCTV; the onus should not be on specific LAs where the governance is already covered by the ICO. Breaches of the requirements could be relayed by inspecting officers to the ICO."

Equality Monitoring

Age **What is your age group?**
 Under 16: 0
 16-24: 0
 25-44: 3
 45-64: 3
 65+: 0
 Prefer not to say: 0

Gender **What is your gender?**
 Male: 3
 Female: 3
 Non-binary: 0
 Trans-gender: 0
 I prefer to use another term: 0
 I prefer not to say: 0

Sexual Orientation: **Which of the following options best describes how you think of yourself?**
 Heterosexual / Straight: 6
 Bisexual: 0
 Gay, Lesbian or Queer: 0
 Another sexual orientation: 0
 Prefer not to say: 0
 Other: 0

National identity: **How would you describe your national identity?**
 British: 1
 Welsh: 3
 English: 0
 Scottish: 1
 Irish: 0
 Northern Irish:
 Cornish: 0
 Preer not to say: 1
 Other: 0

Race: **What is your ethnic group? Choose one option that best describes your ethnic group or background.**
 White: 4
 Mixed or Multiple Ethnicity: 0
 Asian, Asian British or Asian Welsh: 0
 Gypsy Travellers: 0
 Black, Black British, Black Welsh, African or Caribbean: 0
 Prefer not to say: 2
 Other: 0

Religion: What is your religion or belief?

Christian: 3
Buddhist: 0
Hindu: 0
Jewish: 0
Muslim: 0
Sikh: 0
No religion: 2
I prefer not to say: 1
Other: 0

Armed Forces Have you previously served in the UK Armed Forces? (current serving members should tick 'no')

Yes, in the Regular Armed Forces: 0
Yes, in the Reserve Armed Forces: 0
No: 6
I prefer not to say: 0

Disability: Do have a long term physical or mental health condition or illness that reduces your ability to carry out day-to-day activities?

Yes, my day-to-day activities are limited a lot: 0
Yes, my day-to-day activities are limited a little: 0
No: 6
I prefer not to say: 0

Language: What is your preferred language:

Welsh: 0
English: 5
Prefer not to say: 1
Other: 0

Language: Can you understand, speak, read or write Welsh? (Multiple choice available)

Understand spoken Welsh: 2
Write Welsh: 3
Speak Welsh: 3
Read Welsh: 3
None of the above: 2
Prefer not to say: 0