

Winchester City Council
 City Offices
 Licensing Department
 Colebrook Street
 Winchester
 SO23 9LJ

11 November 2015

Dear Sir / Madam

Re: Review of Private Hire Operator Conditions

We are writing in relation to the review of private hire operator conditions which was considered by the licensing and regulation committee on 8 October 2015. We have outlined collective views and the impact this will have to Hackney & Private Hire licence holders in Winchester.

The terms and conditions that were set prior to Private Hire Operator Conditions were fair and reasonable to licensed drivers in Winchester and provided the general public with a safe and reputable service. The amendment made to the Private Operator Licensing Conditions which we oppose to is that private hire operators are able to subcontract booking to another private hire operator licensed by any district council.

The proposed new conditions will allow private hire operators outside Winchester to subcontract bookings and is likely to cause larger operators to inhibit competition by exerting financial influence over drivers in Winchester. The danger to drivers and the public is that drivers will be recruited, despite Hackney or private hire licence holders in districts which do not have stringent conditions in place. This serves to damage the reputation of Winchester drivers and does nothing to assure the public that they are safe or that they are being provided with value for money, given that operators from outside Winchester will not have knowledge of the local roads, routes or estimated fares.

On the basis that the Deregulation Act 2015 has now been enacted, the safest and most effective course of action for the Council is to ensure that drivers who fulfil a subcontracted booking are licensed by Winchester City Council. This will ensure that the driver fulfilling the booking has passed the mandatory knowledge test and is thereby able to provide the best possible service to customers.

There is also a real and prevalent danger of operators between districts entering into agreements to inhibit competition, which will have the consequence of driving down earnings for drivers who are not party to such agreements. Such agreements will not be subject to checks and balances by any licensing authority and will not, by their nature, have the wider public benefit as their primary purpose. Accordingly, the new guidelines need to include safeguards against such practices, which only seek to harm the public, as well as the reputation of drivers and the licensing authority.

Additional ranks were put in place in Jewry Street, St Georges Street and Upper brook Street, although these are still not sufficient to adequately meet demand. The changes brought about by the 2015 Act only stand to benefit operators and will have no real benefit for drivers or passengers. Consequence of the proposals will allow drivers from outside Winchester to move their business into the area.

Given the Act is already in force, we believe the following amendments would be fair and proportionate in all the circumstances:

Private Hire Operator's Licence Conditions

- Clause 10 – The Operator shall provide a prompt, efficient and reliable service to the public at all reasonable times and at reasonable cost, in particular shall ensure that the hirer is aware of the fare for the journey, or whether it is to be metered and in either case to include any call out or return fee.

- Clause 13 – The Operator shall notify the customer if their booking is to be sub-contracted to another Private Hire Operator and provide the sub-contracted Operator's name and telephone number to the customer, together with details of an alternative Operator licensed by Winchester City Council.
- Clause 20 – The Operator may only sub-contract any accepted booking if the Driver fulfilling the booking is licensed by Winchester City Council.

We trust our position is clear and would welcome an opportunity to discuss our concerns with the Council.
We look forward to hearing from you.

Yours faithfully

Name	Badge number	Private Hire	Hackney	Signature	Date
LIAQUAT HUSSAIN	0941		✓		10/11/15
IMRAN KHAN	0922		✓		12/11/15
HAQOEB SADDIQ	0054		✓		12/11/15
LIAQAT TAJIR	0768	1	✓		12/11/15
SHAHID SALEEM	0907		✓		12/11/15
YASIR PAZIR	097		✓		12/11/15
M. FIAZ	0774		✓		12/11/15
M. MUHTAR	0967		✓		12/11/15
K. HUSSAIN	0297		✓		12/11/15
SAJID KHAN	0915		✓		12/11/15
NADEEM HUSSAIN	947		✓		12/11/15
JALEEL IQBAL	943		✓		12/11/15
Mubasher	863		✓		12-11-15
S. BALAKRISHNAN	628		✓		12/11/2015
SHOUKAT IQBAL	744		✓		12/11/2015
AFTAB RABQUR	696		✓		12/11/2015
AMAR	769		✓		12-11-2015
Mohammed Ismaili	068		✓		12/11/2015
M. A. Sumra	621		✓		12/11/2015
M. N. Khan	015		✓		12/11/15
Khalique Khan	0040		✓		12/11/15
ABDUL ZOLIL	0979		✓		12/11/2015
ZAHED ISLAM	0740		✓		12/11/2015
Mohammed Saadique	0654		✓		13/11/2015
F. A ANSARI	0127		✓		13/11/2015
M. MEHTAB	910		✓		13/11/2015
D. Singh	936		✓		13/11/2015
ABDILAKIM ABDI	129		✓		13/11/15
Sangay Khan	0152		✓		14/11/15
MOHAMMED ARB	908		✓		14-11-15
M. NUS	430		✓		14-11-15
ZAFAR IQBAL	888		✓		14-11-15
M. NAEEM	003		✓		14/11/15
M. Rizwan	0123		✓		14/11/15
SAMIR SUDHAN	0246		✓		14-11-15
YASIR ILYAS	0151		✓		14-11-15
IMRAN KHAN	882		✓		14-11-15
GADUR RAHMAN	0135	✓			14/11/15
SALMAN BOOMRA	0215		✓		14/11/15
STEVE GREEN	902		✓		11/11/15

