

Q6: Reasons for supporting the introduction of a penalty point scheme

Of those that answered **YES** to Q5 as to whether the scheme would help drive up standards 19 provided additional information in support of the scheme

The standards have dropped amongst taxi drivers and vehicles I see loads of private hire cars around Sutton with no signage on I think 1 of the reasons is that drivers work for more than 1 firm	
If drivers get penalty points against them it should make them react in the right way and get them to make sure there car is up to the standards required	Hopefully the introduction of the scheme will lead to an improvement of standards
As the drivers are not upholding standards.	
It will improve the environment & driver will keep there cab in better condition	
Judging by the statistics quoted in the introduction it will combat blatant non compliance and ignorance of the regulations.	
There is very little incentive currently for compliance - this needs to change	
Requires an incentive to ensure compliance and the current system is not fit for purpose	
Improved compliance	
We need high standards and currently we are not there. These taxis represent Birmingham -often the first impression that visitors get of Birmingham and there are taxis that are failing us all.	
Yes, I think it would tackle rogue license holders that do not abide by the law. As a passenger in these vehicles I know some of the vehicles do not meet legal requirements and for public safety it needs to be addressed.	
It will weed out the dregs of drivers from other licensed councils who Birmingham companies have working for them. They pay nothing to BCC but are working with no regulation	This Scheme will not apply to drivers that are not licensed by Birmingham City Council as we have no enforcement powers to control them unless they
Drivers will behave in a more professional manner, but at the same time it should apply to any driver working in Bham regardless of licensing authority, as if its only Bham drivers that will make them apply for an out of town badge to avoid Bham licensing conditions!!	
Yes, but only if they are applied to taxi drivers operating in the city.	

A penalty point system will gradually build up a picture of a driver's suitability to be licensed.	commit offences
The infringements can be dealt with as they happen , which helps budgeting for the owner.	
You are enforcing this on drivers obviously this would meet your standards. .not helping them through other means.most drivers over 50 years old .do they really need more conditions enforced upon them.thats my opinion.	
I like the pun. And attitudes need to favour life rather than commerce, cutting corners frowned upon.	
Driver don't like picking up wheelchair user, only a few will pick so I welcome any changes, this will in courage driver to read the re hand book. Driver also don't like card payment they only want cash and this means I have to come out the taxis in my wheelchair to take cash out the bank and I'm not happy about doing this. Has I like to keep a eye on my spending.	We regularly deal with drivers not picking up wheel chair users. Credit card payments are subject to a separate report
if governance is in place. New books supplied when they are having new license for taxi and ensure they don't get lost. Its picking up the cars that are not registered that will slip through the net. good to read what you will have on the list. I was interested to read that not assisting with luggage is on the list. no tax driver in the last 5 years has offered to put the luggage in the boot - they just open and then I have had to pick up and struggle to get into boot.	We will deal with these as and when they are discovered/reported
As in the attached paper the reasons stated are compelling	

Q6: Reasons for **not** supporting the introduction of a penalty point scheme

Of those that answered **NO** to Q5 as to whether the scheme would help drive up standards 18 provided additional information for why the scheme should not be introduced.

<p>Because there are in proportion more phv and hcv operating in the city of Birmingham from neighboring and as far reaching councils as Nottingham under the cross border flag that this system will and can be challenged as unfair and unrepresentative of the actual on street trade that pick up the people you are trying to safeguard “. We want residents and visitors to the City to feel safe when they use a hackney carriages or private hire vehicles so it is crucial that standards of licensed drivers and vehicles are consistently high“</p> <p>Also does a no smoking sign or a non carriage of a fare card compromise safety???</p>	<p>This Scheme will not apply to drivers that are not licensed by Birmingham City Council as we have no enforcement powers to control them unless they commit offences.</p> <p>However just because drivers could get a badge/plate elsewhere is not a reason to not expect high standards from our drivers.</p>
<p>If a penalty system gets introduced drivers will get a licence from another borough and continue to work here instead of penalizing drivers council should help the drivers</p>	
<p>I would be more concerned about the out of town drivers ! If it comes in I will get plated in Walsall or Wolverhampton where you have no jurisdiction and carry on working in Birmingham and Birmingham city council loses yet more money !!!</p>	
<p>Drivers can easily license vehicle with another council.</p>	
<p>There are outside drivers in Birmingham without there conditions of licence so what's the point of having conditions of licence its joke</p>	
<p>There are drivers from other boroughs working on Birmingham without conditions of licence pirating and flooded Birmingham and you are thinking points what a joke</p>	
<p>There are far too many out of town plated cars operating in Birmingham for this to have any effect on the standards of vehicles and drivers. For the council to bring this in maybe seen as a slur on Birmingham plated vehicles when you will have no control on vehicles plated in Solihull, Wolverhampton, Sandwell, Walsall who are freely working for Birmingham registered private hire company's, not to mention out of town Hackney Carriage vehicles working in the private hire sector. If Uber wasn't enough now we have to put up with greedy Operators cashing in by opening dummy offices in out of town areas. No problem with Birmingham registered Uber, but I do think that they should be Uber and Uber alone, not working 30 hours for Uber and then working 30 hours for a private hire company.</p>	
<p>To many out of area cars plated working in brim which you have no</p>	

authority over	
I think, instead of putting heart and soul into this, BCC should have teams out 24 hrs looking for and prosecuting pirates and touts. Many have no identity stickers. Their plates are propped in rear window and many are smoking in their vehicles. I believe the general public are far more at risk travelling in unlicensed, uninsured vehicles, driven by only God knows who. BCC although meaning we'll, should get their priorities right.	This would require lots of extra resource/staff which the drivers would ultimately pay for
Having stickers missing fRon the screen or door Stickers missing from the side doors Door plate missing Bulb blown Badge missing DOES NOT improve passenger safety The majority of the items found are minor infractions and accumulating 12 points on minor infractions doesn't make you and unsafe driver focus instead on drivers knowing English to communicate with passengers Driver hygiene Quality of driving Age of car	Whilst we agree they might be minor, they do give an indication of the drivers attitude to maintaining his vehicle
I cannot comment as there has been no clarification on how many points would be penalised exactly and for what point... this is very vague and lacks detail. Too harsh point system can affect livelihood shouldn't result in such a harsh outcome	
I believe existing standards and legislation is effective in taking defective vehicles off the road.	This is not evidenced by the vehicles we are stopping during exercises
As private hire driver view the competition for work is higher than usual and that will push the drivers them self to keep up with a standard Level of drivers and vehicles. And I can see that many drivers are changing thier cars to a better one in order to give better service for customers .	
What difference will it make. They already have conditions they should adhere to.	
You are phasing out older cabs soon anyway ; so this is unnecessary work that council wants to create for itself and hence waste of extra resources. Stringent MOT testing and random checks are doing the	

job. So please keep it that way.	
Not at all. The drivers are already professional people. We deal with the elderly and disabled. We also deal with drunken people, violent and abusive customers all the time. Why does the council want to treat us like spoiled kids. My son is 24 years old we as drivers are mature people.	
To police this you would have to go back to the old system when if you had a Birmingham office you only have Birmingham plated driver not a number of other council plated drivers working from same office because the base has operators licences in other council dummy offices	Unfortunately we cannot amend the legislation that allows this.
Some drivers. Wear. Shorts. Sandals. Trainers tee shirts. Some drivers. Look dirty. Their cabs are dirty. I always wear Shoes. As clean shirt. Every day and trousers the council should go round the ranks. And check. At times the council is to. PCs at times	

Q8: Are there any specific issues you would like to see added? - Are there any specific issues you would like to see added

<p>Yes make it enforceable over every single authority vehicle that operates in Birmingham.</p> <p>Also all BCC enforcement officers should have an approved and accredited VOSA qualification to give them the authority</p> <p>Also every council has its own standard regards livery and other compliance materials therefore how will you educate the public as you conveniently use as the drive behind this initiative</p> <p>Lastly where will the admin staff come from as current staff numbers are insufficient to cope with current systems in place</p>	<p>This Scheme will not apply to drivers that are not licensed by Birmingham City Council as we have no enforcement powers to control them unless they commit offences. Unfortunately we cannot amend the legislation that</p>
There should be no out of town vehicles working in Birmingham full stop	
Out of area vehicles shouldn't be allowed to work in Birmingham	
It's been a nightmare. Looking in city centre. All the taxi working. Are from Wolverhampton. How come Birmingham City Council. Can't do	

anything.	allows this. However just because drivers could get a badge/plate elsewhere is not a reason to not expect high standards from our drivers.
Out of town drivers should drive and behave in the same professional manner as @bcc licensed drivers. Many of non Bham drivers dont know how to follow the highway code and i will provide evidence if necessary	
Yes there is, I would like a return to how it used to be when Birmingham private hire companies hired Birmingham registered vehicles to work in their area who have a vast knowledge of the environment that they serve. Really fed up of customers telling me that their last driver didn't have any knowledge of the area he was working. You know as well as I do that customer satisfaction is the number one priority, and I strongly feel that the number of out of town vehicles operating for Birmingham private hire companies is bringing down the once highly regarded private hire service that we provide, and also in the bigger picture makes Birmingham Licensing look bad. Ask anybody who uses out of town Uber or non Birmingham registered vehicles their number one complaint it would be that they don't know where they're going. Is this how Birmingham Licensing wants to be represented. Please remember that when someone gets into a vehicle late at night they want to feel confident that the driver knows where he's going, which also makes the passenger feel safer. Sorry to rant on but the points I have raised are personal to me because they are affecting my standard of living, it's a tough environment that we operate in and I as would many others would applaud you if you could fight our corner with everything in your power. We pay good money to licensing, they don't. I work for Star Cars who in my eyes rub my face in the mire every time I pay my rent, they have so many out of town vehicles taking money which I think should for Birmingham registered vehicles.	
As above standards have dropped due to bases with other council licenses so called dommy offices where phones are diverted drivers not working in there licensed council working in birmngham	
To many out of town driver working in Birmingham look on face book other social media about bad drivers other council ie Wolverhampton And many more Uber have not done trade any good you all should know this it makes me wonder have you got your finger on the pulse	
Proper and meaningful enforcement on the streets.	Extra enforcement to tackle plying for hire is
Stop pirating and then focus on other things	
Put pressure on pirating and other issues example drivers parking on	

zig zag on broad street where is a public safety if I park on red rout on Stratford rd I'll get ticket which I had in past so I guess I'm easy target	being considered but this will inevitably have cost implications.
Most taxis ply for hire and don't care if they get caught	
As above	
Stronger penalties for non compliance	We think the proposed penalties are strong enough
None, current stop checks are effective.	
Uniform should be compulsory for private hire as well as Hackney Carriage.	The City Council has no intention of introducing uniform for drivers
In fact there is . Yes it is essential that the safety of puplic is important in this matter But I didn't see any thing been done to the safety of the drivers. ...	We agree that driver safety is important
Yes why don't you put a system in place to help the hard working taxi drivers and provide help to all the drivers who suffer daily problems on the road from customers. Just this week a driver was sprayed with some substance on his face but hey to the council this is ok let drivers suffer more.	
Standards to cleanliness	This is covered
Assuming that there is, or will be, active community Speedwatch groups providing reports to the police that such reports should be taken into account by the licensing authority. This is of importance given the current roll out of 20MPH in the City.	We feel the police are best placed to deal with speeding.
Yes - poor parking and poor driving should also be added to this scheme... there is a particular problem with Hackney Carriages and Private Hire vehicles stopping in Mandatory cycle lanes which is illegal and should be enforced.	Parking enforcement deals with these issues, but we do

	<p>speaking with drivers following complaints from the public.</p>
The proposed expiry of penalty points after 1 year is overly lenient	
Courtesy, decency, common sense, and safety to be encouraged; supportive legislation, e.g. some converse Awards scheme? Versus incomes in a tough, aggressive market; go figure.	
Read answer in question 5, above for more information	
I think that license holders should carry documentation about the vehicle they drive to collect passengers if passengers requested such documentation.	We cannot see what benefit this would provide to passengers
I think you have covered everything I can think of.	
<p>'Customer complaints upheld,' I have had reason to complain about a driver (albeit one licensed by Solihull) but received no notification of an outcome. I think drivers' standards of customer service would be improved if there were minor penalty points attached to customer complaints.</p> <p>If cash payments are expected then drivers should carry an appropriate float of change. I have had a journey end with me having to pay £10 to a driver for a £5 journey as he had no change. Since that time I have only used Uber taxis.</p>	We generally notify our customers of the outcome of their complaints, we cannot comment on Solihull's procedures.

Q9: Are there any specific issues you think should be removed?

There were 19 responses to this question, however 8 of those responded with "no".

Yes all of it the current system works just fine	If the current system worked then we would not have considered this
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<p>The door stick on door plates are overkill as you CANNOT mistake a private hire car for a private car with the plates on the rear and also as most companies now use the same system as UBER where by the passenger has details of the car and driver sent them beforehand technology has made the side plates obsolete</p> <p>Also the fact most other councils that now operate within Birmingham DO NOT display or have side plates</p>	Signage was subject to separate consultation
<p>I agree that there should be some monitoring taking place but needs to be thought through more carefully. As this could affect some very good drivers who are on the whole dedicated and who generally abide by rules and may accidentally have made an error.</p>	Those drivers that comply and only make an odd error would not be penalised
<p>Stop checks should be carried out on all vehicles on the roads, as there are a huge amount of vehicles without insurance, tax and MOT.</p> <p>We should be focusing on all road users without singling out public transport.</p>	This is not within our remit
Private Hire vehicles from different city councils should not be allowed to operate in Birmingham.	See above responses regarding out of town vehicles
All the cross border should be stop <input type="checkbox"/> .	
<p>If my other concerns are not addressed it is victimisation of Birmingham drivers</p> <p>This also applies to the emissions problem how can Birmingham police it with all out of town drivers in Birmingham greasy bases cashing in not looking at quality just money Birmingham needs to get a grip</p>	
Out of town cars	
Pirating parking on taxi ranks no one cares what's happening in city	These are areas we concentrate our enforcement on
Drivers queuing up on Broad street for longer than 10 minutes on double yellow lines or anywhere in city centre for more than 10 minutes	
No, quite impressed really. I imagine policing it will be fun.	
No I think the proposals are along the right path.	
Read answer in question 5, for more information	

Q10: Are there any specific issues you think should be amended?

There were 19 responses to this question however 6 responded with “no”.

Points should not be accumulated to affect license that's not right as could destroy families! This is about people's livelihood... especially as not directly rising from harm to society or customers... Maybe introduce a reward system for those that always do the right thing instead and get more motivated and these would be incentives....	
Yes pirating and touting outside clubs	We already target these areas, but have no control over the penalties issued by the courts
Tougher sentence on pirating	
Out of town drivers should have to undergo a practical driving test if working in Birmingham and should be able to speak basic English	We cannot enforce this
Drivers should not be allowed to have an Uber pad and a private hire pda	We believe this would be a restriction on trade
The proposed expiry of penalty points after 1 year is overly lenient	
ditto.	
not taking part in certain training e.g. cse training if training is a requirement by law they should attend	
Needs to go back to the old system and the points system would work As it is we all might as well go and get Wolverhampton badge and plate and all these rules will not apply to us then	
Driver driving pass wheelchair users, A : because the don't want to get out the sit and B: because they say wheelchair user mean they have to get all their safety seatbelt out and the don't have them that	We deal with all complaints about this and

day as they forgot to put them back in there taxis. And C; because wheelchair user take longer to get into their taxis.	take appropriate whenever possible
As above	
The points given in some instances are very harsh and should be reduced.	

Q11: Do you have any further comments you wish to make in regard to the proposed scheme?

There were 17 responses to this question, two had nothing further to add.

Waste of time eradicate pirating before you do anything else waste of tax payers money this proposal	
The scheme is a total waste of time and should be scrapped.	
I would like to know why you are doing this I think it's a great idea however you can only enforce it on Birmingham licenced vehicle s and not the hundreds of other vehicles that are licenced els where	See answers above
Birmingham council should be responsible for Birmingham drivers so how can you enforce this scheme on outside plated drivers working for Birmingham companies??	
Bases should be birmingham plated only no dummy office set up in councils where phones are diverted to Birmingham office where other plated drivers don't work in there licensed council Just work in Birmingham and don't pay any money to birmingham council crazy	
Penalising birmingham drivers	
All drivers working in Bham should be able to speak English and should be able to follow the highway code regardless of licensing authority	We already test our drivers but cannot comment on other authority's procedures.
I appreciate the initiative.	

<p>Admirable start, heart's in the right place, unusually well written for BCC (couple of typos), but administratively unproven and variable in practice; reactionary rather than progressive, because unsupported by clear long-term public transport policy.</p> <p>I must declare an interest, I appreciate the rare car and travel by bicycle.</p>	
<p>Every hackney Carriage should prominently display a number for text complaints and an email address for email complaints to License Enforcement for use by passengers and members of the public. These complaints should be investigated by monitoring staff</p>	<p>We are looking at ways to do this inside the vehicle; All complaints are investigated</p>
<p>Driving offences should also lead to penalty points in this scheme - this would drive up driving standards amongst drivers who are on the road for much of the day improving road safety. This is because there would be an increased incentive to drive legally and safely.</p>	<p>Driving offences must be notified to the Licensing Office</p>
<p>Please read question 9, and question 5 you will then read all my comments.</p>	
<p>I drive a x reg taxi. Manual. I spent. £2500. On it last year. It is a tx1. A great taxi I will spend anther. £2500 this year. People. Love the tx cab they hate vans. You,should. Be keeping. All the. Tx. On the road</p>	
<p>will the records be electronic rather than paper - so the breaches can be added to the right driver/taxi. maybe an app for their phones and a sticky label tick - to be put in the front window if passed.</p>	<p>Yes the records will be electronic</p>
<p>No mention is made of a timetable of inspection or enforcement targets. The consultation mentions that, "since April 2017...approximately 30% of private hire vehicles and 70% of Hackney Carriage vehicles are fully compliant with the conditions of licence during stop check exercises". Hopefully 100% compliance is the aim and it would be great if the public could see the Licensing section publish results of enforcement published regularly rather than see 'bad news articles' in the press.</p> <p>Public transport and logistics companies publish safety statistics and maintain management reporting to show standards of driving including infringement of legal and company standards. PHV and HC driver statistics should be available to the public.</p>	<p>100% compliance is the aim.</p> <p>We will consider publishing the results of</p>

Response to RMT letter of objection.

We do not believe there is any double jeopardy in the introduction of this scheme. It is right that drivers are penalised for offences, but the role of the committee is to consider the drivers fitness, not reconsider those offences.

It cannot be assumed that because of difficulties experienced in Leicester that the same will happen in Birmingham. The scheme is not the same and whilst there may have been difficulties in Leicester following the introduction of the scheme, it is still in place.

It is not the Councils' remit to protect the trade. Our remit is to licence the trade and protect the public through that licensing process. It is agreed that there have been a number of issues within the trade recently; these are likely only to be solved through national legislation, which at present is not on the horizon.

Enforcement exercises could be increased but this would require investing in more staff to be on the streets for longer hours, the cost of which would ultimately be passed onto drivers through increased licensing fees.

Finally we do not believe the demands on drivers by the introduction of this scheme are either unattainable or overly burdensome. Drivers should maintain the vehicles they carry the public around in; they also agree to certain conditions when issued with a licence, but regular exercises indicate that neither of this is not the case.

This scheme will encourage those drivers that choose not to comply to change their behaviour, while at the same time not impacting on those drivers that already take a pride in their vehicles and its maintenance.