



Baroness Kramer

Cc'd

Ministers, MP's, Lords

Suzy Lamplugh Trust, Police Commissioners, ACPO, LGA

Dear Minister,

**Re: Deregulation Bill "Taxi & Private Hire" Clauses**

On behalf of the members of the nationally acknowledged Stakeholders Group, the Meeting of Minds, we would like to thank the Minister and all those involved with the removal of clause 10 of the Bill due to the obvious safety issues which became apparent during the progress of the Deregulation Bill. However, we do have to say that we still have the same level of concern with regard to the remaining clause 12 of the Bill.

We note that the Local Government Association (LGA) has put forward to the House of Lords, for the noble Lords' consideration, a number of additional clauses to the Deregulation Bill. These clauses have been directly taken from the legislative proposals drafted by the Law Commission (LC). These proposals arose from some three years of detailed consultation and investigation of taxi and private hire matters, unlike clauses 10 to 12 of the Deregulation Bill which were not derived from effective and full consultation. *Copies of these proposed additional clauses are attached.*

We bring these matters to your attention because the Commission clearly recognised that there were inherent dangers in some of their proposals, and most sensibly, in drafting the Commission's Taxis and Private Hire Vehicles Bill in May 2014, added the attached clauses to ensure that the proposed changes could be brought in safely. In the absence of these safeguards the safety of the public could well be severely compromised. Clearly the possible effects of implementing clause 12 demonstrate the vital need for additional protective measures to be included to ensure safety whenever resultant legislation passes through Parliament.

As a major Stakeholder Group in the industry we wish to publically record our opposition to clause 12 being taken forward in its present form by a responsible Government. We believe unanimously that the additional public safety clauses are essential if clause 12 is to be enacted without serious risk to the public at large.

In the alternative and, given the time left to complete the Deregulation Bill, it would perhaps be much more prudent in the interests of the travelling public to withdraw clause 12 until such time as the Law Commission's full Bill can be brought forward in legislation. We believe that

the level of concern about public safety which led to the removal of clause 10 is equally applicable to the current clause 12.

The reason clause 10 was dropped was because the Government failed to publish an Impact Assessment until 8 months after the reforms were proposed. The taxi and private hire vehicle (minicab) reforms were added to the Deregulation Bill in March 2014. But the Government didn't publish an impact assessment on their rushed and risky reforms until Labour asked for one on the 1 October 2014. It confirmed that the reform 'could lead to an increase in illegal use of licensed vehicles.'

Clause 12 "Allowing private hire operators to sub-contract bookings to operators licensed in a different district" is no different to clause 10 because the control of booking a private hire operator would be lost and therefore the customer could be totally placed in the hands of a stranger. Also by being able to pass jobs from one operator to another, the role of the local licensing enforcement would become impossible because currently only the licensing officers from a licensing authority area have the power to take enforcement action against their licensed vehicles and drivers.

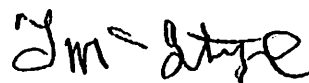
We therefore formally and publicly request that the Minister acknowledges these concerns and withdraws the current clause 12.

Yours faithfully,



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John Thompson NALEO



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Tommy McIntyre UNITE the UNION



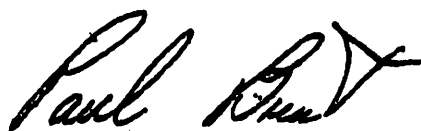
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Steve Garelick GMB



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Paul Brent National Taxi Association