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[via email]

13 September 2018

Dear Cathryn,

Thank you for the invitation to input into the B&NES taxi policy consultation 2018.

Recent advances in technology have brought considerable improvements to the private hire industry for passengers, drivers, operators and regulators alike. We welcome the opportunity to review conditions and ensure future regulation allows for further innovation and improvement.

In regards to the *Private Hire Operator's General Conditions* we would kindly ask you to consider the following:

Complaints reporting

- Addition of complainant's contact details to be collected with each record. This will enable the council to follow up directly with any complainant for further information. It will also give operators a legal basis on which to share this data with the council, which should minimise the occasions on which a formal data request must be made.
- Addition of 'discrimination' to be included into mandatory complaint type reporting.
- Consideration of a maximum 72 hour window to report complaints to council. This allows for a reasonable period to validate an ambiguous or spurious complaint and collate beneficial intelligence to assist with the handling of the complaint.

In regards to the *Proposals for Private Hire Driver's General Conditions & Hackney Carriage Driver Byelaws* we would kindly ask you to consider the following:

Decoupling Private Hire Driver Licence from Hackney Carriage Driver Licence

- The recent advances in technology within the private hire industry have made it a more appealing prospect for a more diverse group of applicants. This includes;
 - people who feel safer not having to handle cash (and thus be a target for theft),
 - people who feel safer carrying passengers who are not anonymous (with Uber each hirer has had their phone number, email address and credit card validated)
 - people who can be their own boss and build their work around things like childcare, study or creating their own business