



**Brighton & Hove  
City Council**

**LICENSING PANEL  
(NON LICENSING ACT 2003 FUNCTIONS)  
ADDENDUM**

**10.00AM MONDAY, 23 APRIL 2018**

**COUNCIL CHAMBER, HOVE TOWN HALL**





## **ADDENDUM**

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# LICENSING PANEL (NON LICENSING ACT 2003 FUNCTIONS) INDEX OF REPRESENTATIONS RECEIVED

**23 April 2018**

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	<b><u>LETTERS OF OBJECTION</u></b>		
3 - 312	Individual letters setting out objections to the application	Individually signed letters setting out objections to the application  Note: Newspaper article "Daily Mail", March 8, 2018, on Page 16)	Pro-forma standard letters
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319 - 340	GMB Southern Region , Brighton & Hove Taxi Section	Letter on behalf of their members	GMB Southern Region , Brighton & Hove Taxi Section
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347 - 368	Transport for London	Letter detailing their decision not to grant Uber London Limited (ULL) a London PHV	Transport for London

		Licence beyond 30 September 2017	
369 - 390	Brighton & Hove Streamline	Letter on behalf of Brighton & Hove Streamline.  <b>Note:</b> This letter should be read in conjunction with Annex 3 which is a separate supplement to these papers	Brighton & Hove Streamline Signed on behalf of:  Brighton & Hove Streamline; Brighton & Hove Radio Cabs; The Southern Taxis Group Ltd (City Cabs Brighton Ltd)
391 - 406	Unite, the Union	Letter on behalf of Unite Members	Unite, the Union
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	<b><u>LETTERS OF SUPPORT</u></b>		
409 - 468	Individual letters in support of the application	Individually signed letters in expressing support for the application	Individual letters of support for the application

	<b>Annexe to Appendix C</b>		
469 - 504	Brighton & Hove Streamline  Transport for London	Additional letters from Brighton & Hove Streamline and Transport for London	Brighton and Hove Streamline  Transport for London

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)

March 2018

Dear Sir

Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully

DAVID EDWARD SPOKES

[Full name of sender]

[Badge Number]

484



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

Brighton & Hove City Council

21 MAR 2018

Health, Safety & Licensing

March 2018

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Yours faithfully

[Full name of sender]

[Badge Number]

ALLEN JAMES BOSTOCK  
4649





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March 2018

Dear Sir

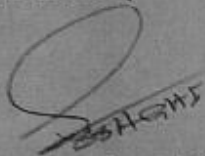
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Yours faithfully



[Full name of sender]

[Badge Number]

ALIREZA NIKKHAEI - ESWCWA  
7142



-----Original Message-----

From: ali abunadir

Sent: 13 March 2018 02:56

To: Jim Whitelegg

Subject: Renewal of Uber's Private Hire Operator's Licence

Dear Sirs

Re: Renewal of Uber's Private Hire Operator's Licence

My name is ALI ALIDRESSI  
Hove City Council

I am writing to you as a driver licensed by Brighton and

For the reasons set out in numerous emails circulated by the local Licensed Operators and unions since the renewal of Uber's Private Hire Operator's Licence las November, we oppose its renewal due on 4 May 2018.

I have been provided with copies of the written submissions made by the local Licensed Operators and those of the unions and support and endorse the points raised by them in opposing the renewal of Uber's Private Hire Operator's Licence.

I also support fully the representations made by the Operators and local unions with regard to the process for the public hearing in that it lacks openness, fairness and transparency.

[In addition, I would also submit that.....

Please acknowledge safe receipt of this [letter/email] and confirm that it will be placed before the Licensing Panel at the public hearing to be held on 23 April 2018.

Yours faithfully



> -----Original Message-----  
> From: Ahmad Moradi  
> Sent: 14 March 2018 16:36  
> To: Jim Whitelegg  
> Subject: Re: Renewal of Uber's Private Hire Operator's Licence  
>  
> Dear Sirs  
>  
> Re: Renewal of Uber's Private Hire Operator's Licence  
>  
> My name is Ahmad Farid Moradi I am writing to you as a driver licensed by Brighton and Hove City Council  
>  
> For the reasons set out in numerous emails circulated by the local Licensed Operators, independent representatives and unions since the renewal of Uber's Private Hire Operator's Licence last November, we oppose its renewal due on 4 May 2018.  
>  
> I have been provided with copies of the written submissions made by the local Licensed Operators, independent representatives and those of the unions and support and endorse the points raised by them in opposing the renewal of Uber's Private Hire Operator's Licence.  
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>  
>  
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>  
> Thanks  
> Moradi



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Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)

March 2018

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Yours faithfully

[Full name of sender]

[Badge Number]

ADRIANO D'ANGIOLO  
7024





-----Original Message-----

From: ayhan oghan  
Sent: 12 March 2018 20:56  
To: Jim Whitelegg  
Subject:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2nd Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
jim.whitelegg@brighton-hove.gcsx.gov.uk

[Date] 12/03/18

Dear Sirs

Re: Renewal of Uber's Private Hire Operator's Licence

My name is Ayhan Oghan I am writing to you as a driver licensed by Brighton and Hove City Council

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[In addition, I would also submit that.....

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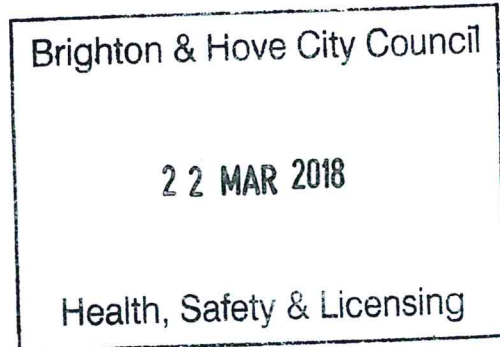
Yours faithfully



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Yours faithfully

[Full name of sender] GARY MACTON  
[Badge Number] 8281



(To be received at BHHC by 23 March 2018 at the latest.)

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Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

A handwritten signature in black ink, appearing to read "Grant Cooper".

[Full name of sender]

[Badge Number]

36 72

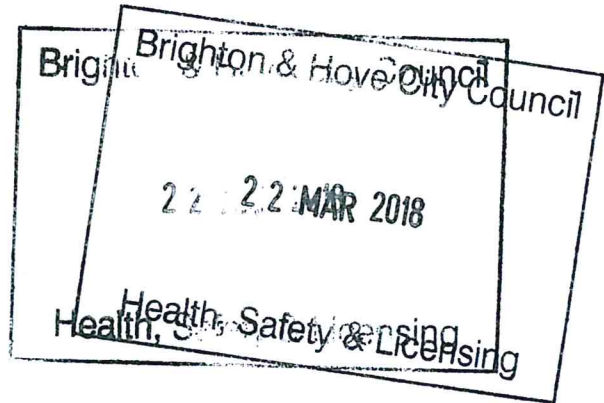
GRANT-COOPER



(To be received at BHHC by 23 March 2018 at the latest.)

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Yours faithfully

[Full name of sender]  
[Badge Number]

7136

GEOFFREY NORMAN LARGE  
32 MILLERS ROAD  
BRIGHTON  
BN1 5NQ

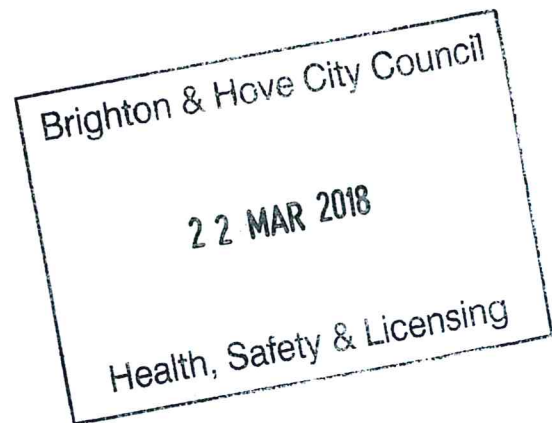




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19 March 2018

Dear Sir

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A handwritten signature in black ink, appearing to read "Dan Bell".

[Full name of sender]

[Badge Number]

8086



(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
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22 March 2018

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[Full name and address (of sender)]

[Badge Number]

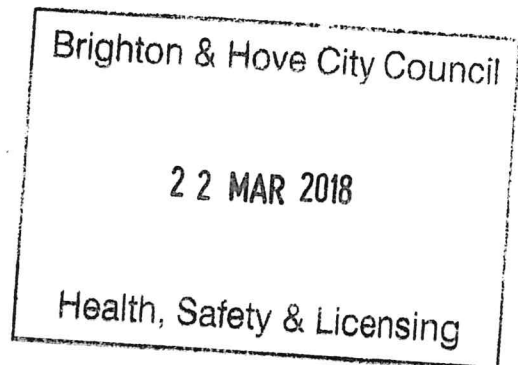
FERNANDO DAVID AGUIAR  
12, PACIFIC HEIGHTS  
SALTDAN  
BRIGHTON  
BN2 8AX  
BADGE N° : 4722



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Yours faithfully

A handwritten signature in black ink, appearing to be "Graham Bates".

[Full name of sender] *GRAHAM BATES*

[Badge Number] *BADGE 6146*

ADDRESS:

*10 BEDDINGHAM GARDENS*

*CLYDE*

*LEWES*

*BN8 6SB*

*BRIGHTON TAXI DRIVER FOR 26 YEARS.*



To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
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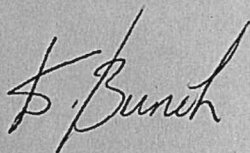
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[Full name of sender]

Danny Bunch

[Badge Number]

P/H. 833

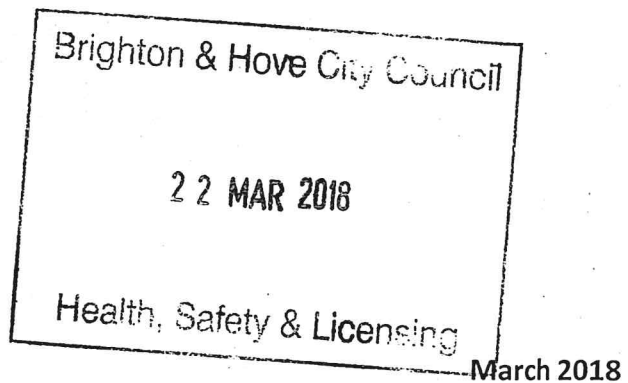




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Yours faithfully

[Full name of sender]

MR. G. BECKMAN

[Badge Number]

979

by Tom  
Rawstone

**N**IGHT-TIME and a 14-year-old girl climbs into a waiting cab. As the vehicle heads across South London to her suburban family home, she and the 35-year-old driver, Spyros Ntounis, begin chatting.

He offers her chewing gum and asks what she has been up to and how old she is. Next, he gives her his telephone number, saying if she ever needs a lift, she should call him. He gets her to text him there and then, so he can save her number.

Ntounis then tells the girl she is 'hot' and that she has 'nice lips'.

She is alarmed that a man old enough to be her father is talking to her in this way and her unease grows as he slows the car to a 5mph crawl.

He said he wanted to spend more time with me, she later recalled.

Finally arriving home, the girl ran inside. But the next morning, she received the first of several messages.

Ntounis asked if she was 'OK' before, recently, offering to 'give her lessons' in anything she wanted. He lied, saying he was 26, and asked if he had 'passed the age test', then tried to persuade her to meet him. 'I would love it,' he wrote.

Worried, the girl told her parents about the unwanted advances. They called the police. Ntounis was arrested and, following a trial at Kingston Crown Court a few weeks ago, he was convicted of attempting to groom an underage girl. He could face jail when sentenced this month.

A lucky escape, one might conclude. But the details of this case should ring further alarm bells — because Ntounis was a driver for Uber, the controversial company behind the hugely popular taxi-hailing app, even though he had a criminal conviction for dishonesty and had been accused of sexually harassing other passengers.

In the months before the incident with the teenage girl, three other women had separately complained to Uber about his inappropriate behaviour.

It was claimed he told the first he felt 'horny', while starting an 'inappropriate' conversation with the second one, whom he stared at continuously as he drove.

And the day before picking up the 14-year-old, he had asked a third woman if he could 'satisfy her needs'.

**W**HAT'S more, Ntounis's case is not a one-off. On the same day that he was found guilty, Shahid Qureshi, another Uber driver, was convicted at Inner London Crown Court of two counts of sexual assault. The first related to a woman he groped in 2016; the second to a 16-year-old exchange student.

His initial victim had complained to Uber, who had not reported the matter to police — leaving him free to carry on working.

Both of these cases will fuel concerns about how Uber operates.

According to a company rule, under-18s should not travel alone in Uber cars.

'Drivers are not supposed to pick up people under 18 — but, say they get a job and the fare's under 18. What do they do?' asks Steve McNamara, general secretary of the Licensed Taxi Drivers Association and a vocal opponent of Uber. 'Of course, they take it.'

He adds: 'The reason Uber is so popular is because it's so cheap. So, rather than get out of bed in the middle of the night to pick up their daughter from her mate's, parents send an Uber. But people are sacrificing common sense for a pound or two. Why would you put your 16-year-old daughter in a stranger's car?'

Of course, coming from a 'rival' organisation, such words could be sour grapes.

Because since Uber launched here in 2012, it has proved a huge hit — one that has severely dented the income of other taxi

Picture: GETTY (POSED BY MODEL)



Many parents now rely on the taxi app to avoid all that late-night ferrying. But two recent convictions raise a disturbing question...

# Should you ever put your teenage daughter in an Uber?

drivers and cab firms. Uber customers download a smartphone app with which they can hail a minicab. A nearby driver is automatically summoned, often making it quicker, easier and cheaper than phoning a minicab or hailing a taxi.

In London, the number of Uber vehicles exceeds the 24,000 black cabs — and Uber now has more than 40,000 drivers across some 40 UK towns and cities.

But the issue of passenger safety remains. Figures last year suggested that sex attacks involving Uber drivers could be running at almost one a week and, last August, it emerged that police had written to Transport for London (TfL), the authority responsible for licensing private hire drivers in the Capital, to express concerns the company

was 'covering up' sex attacks to protect its reputation.

There was more drama last September when TfL stripped Uber of its license, for not being a 'fit and proper' company.

Uber is appealing the decision and is allowed to continue operating in London during the appeal process.

Last month, it vowed to proactively report complaints to police and to set up a 24-hour hotline for passengers.

Of course, for some, that may be too little, too late.

The Mail has established that, in the case of Ntounis, female passengers had complained to Uber about him in October and November 2016 and again on April 21 last year. He picked up the 14-year-old girl the day after the third complaint. Asked if they

had alerted police to the earlier complaints, an Uber spokesman said they hadn't, but had 'warned' Ntounis. He was suspended only after police alerted them to his arrest for the incident with the 14-year-old.

The Mail can also reveal that Ntounis had been licensed as a private hire driver by TfL in September 2014. The following month, he was convicted of dishonesty and given a 12-month jail sentence, suspended for 24 months. TfL was not informed of this. Had they known, they would have reviewed his licence. A TfL spokesman said they would have expected to learn of the conviction from the police or Uber.

In the case of 42-year-old Shahid Qureshi, he picked up a Japanese exchange student at Heathrow Airport on July 30 last



**GUILTY: Driver Spyros Ntounis will be sentenced this month**

year. While registered as a driver with Uber, on the day in question, he was working for another private cab firm.

The married father-of-four insisted she sat in the front, then groped and kissed her. When she said: 'We don't do this in Japan,' he replied: 'This is England.' The driver continued to pester her for sex on messaging app WhatsApp after he dropped her off.

Reported to police, Qureshi was arrested. Detectives then found out he also worked for Uber and asked the company to reveal any other allegations against him.

It was only then that they learnt of an incident in September 2016, when Qureshi had put his hand on a female passenger's thigh.

**T**HE Uber spokesman initially accepted that they had received a complaint from the passenger, but that the driver touched her hand, not her thigh. As a result, Qureshi was warned about his inappropriate behaviour. The spokesman added that, had they known the full story, 'it is very likely he would have been removed from the app'.

But, pushed for further details, Uber subsequently admitted that the report had related to Qureshi touching the woman's thigh, as well as her hand.

After details of this incident were revealed to police by Uber, Qureshi was arrested and charged with a second count of assault.

The Mail has also established that Qureshi had a previous conviction for harassment in 2011, when he kissed and grabbed a colleague while working as a healthcare professional.

This was flagged up to TfL when he applied for a licence in 2014. While he was warned about his future behaviour, the conviction was considered spent and he was granted the licence.

Qureshi, who has lived in Britain for 15 years, was convicted of two counts of sexual assault and jailed for 12 months.

Commenting on the two cases, Uber said: 'We welcome the convictions of these two drivers. Every driver who uses Uber in the UK has been licensed for private hire by a local authority, which includes going through an enhanced background check.'

'Any previous offences would appear in those background checks as part of the licensing process and are only shown to the licensing authority. Every trip on our app is tracked by GPS and we have supported the police in helping to bring these two licensed drivers to justice.'

Siwan Hayward, TfL's head of transport policing, added: 'We take all allegations against licensed taxi and private hire drivers extremely seriously. As soon as we were made aware of

**TURN TO NEXT PAGE.**

> From: Imants Gailans [mailto:imantsgailans@gmail.com]  
> Sent: 23 March 2018 12:51  
> To: Jim Whitelegg  
> Subject: Against Uber renewal

Dear Jim, I'm requesting against Uber renewal license, because we have in Brighton and Hove hire standard of taxi service. All taxi drivers was studying very hard to get the license and fit our cars with Cctv. What we can see from Uber side. Cars from everywhere, many cars has no signs, just badge behind tinting witch can't see or pice of paper with Nr. of course no Cctv. If they can work without nolidge, signs and Cctv that why I had to pay so hire amount to fallow the strict council rules. Also I saw many many Uber drivers sleep in they cars, drive wrong way on the one way road and aggressive driving. What about pollution and traffic when we have so many additional cars from every where? I'm fill that taxi business is destroyed and we have big mess in our City.

Kind Regards  
Imants Gailans  
Badge Nr 6343



From: Hussain Razak  
Sent: Thursday, March 22, 2018 01:47 PM  
To: Jim Whitelegg  
Cc: Moose  
Subject: RE: Renewal of Uber's Private Hire Operator's Licence on 4 May 2018

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
ADDRESS Brighton and Hove City Council  
2nd Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
EMAIL

22nd March 2018

Dear Sir,

RE: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully,

Muhammed Hussain Razak

BADGE NUMBER 7088



From: jay singleton  
Sent: 22 March 2018 15:03  
To: Jim Whitelegg  
Subject: Re : Renewal of of Uber's private hire operators license, 4th may 2018

I am writing to you as a taxi/ private hire driver licensed by Brighton and Hove City Council.  
For the reasons set out in numerous emails circulated by the local licensed operators and fellow members of the Taxi Trade Forum since the renewal of Uber's private hire operators licence last November, I oppose its renewal due on 4th May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove streamline, Brighton and Hove radio cabs and Brighton and Hove city cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove .

Yours faithfully  
James Singleton  
Badge 7109





> -----Original Message-----  
> From: Ivan Georgiev  
> Sent: 12 March 2018 21:52  
> To: Jim Whitelegg  
> Subject: Renewal of Uber's Private Hire Operator's Licence  
>  
>  
> 12/03/2018  
>  
> Dear Sirs  
>  
> My name is Ivan Georgiev  
> I am writing to you as a driver licensed by Brighton and Hove City Council  
>  
> For the reasons set out in numerous emails circulated by the local Licensed Operators and unions since the renewal of Uber's Private Hire Operator's Licence las November, we oppose its renewal due on 4 May 2018.  
>  
> I have been provided with copies of the written submissions made by the local Licensed Operators and those of the unions and support and endorse the points raised by them in opposing the renewal of Uber's Private Hire Operator's Licence.  
>  
> I also support fully the representations made by the Operators and local unions with regard to the process for the public hearing in that it lacks openness, fairness and transparency.  
>  
> In addition, I would also submit that for all the years I've been a taxi driver I've always tried to obey all the rules and serve the public in the best possible way as taking all the wheelchair jobs as soon as I can,helping elderly people and investing in my career as buying my own taxi,after that purchasing a brand new wheelchair accessible vehicle and at the same time witnessing(on the very first evening they started their licence) all the Uber drivers coming from out of town licensed saloon cars and start taking customers it's just doesn't look fare to me  
> I'm hoping if a little support from you as our council which I got licensed from as I haven't felt any so far  
>  
>  
>  
>  
> Please acknowledge safe receipt of this [letter/email] and confirm that it will be placed before the Licensing Panel at the public hearing to be held on 23 April 2018.  
>  
> Yours faithfully Ivan Georgiev  
> Hackney Carriage driver  
> Owner of plate 207



**From:** John Moore  
**Sent:** 18 March 2018 17:16  
**To:** Jim Whitelegg  
**Subject:** Uber

**Jim Whitelegg**  
**Licensing Manager**  
**Brighton and Hove City Council**  
**2<sup>nd</sup> Floor**  
**Bartholomew House**  
**Bartholomew Square**  
**Brighton**  
**BN1 1JP**  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)

**March 2018**

Dear Sir

**Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018**

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

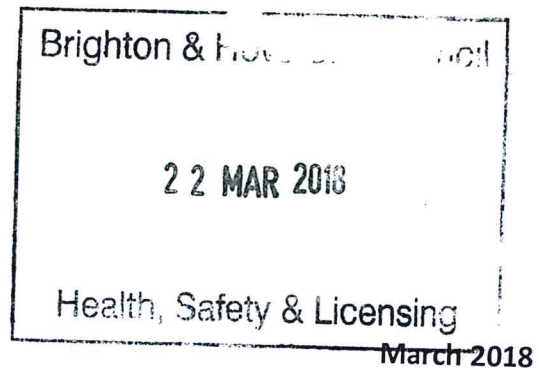
Yours faithfully  
John Moore  
Ph 1258



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)



Dear Sir

**Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018**

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully

[Full name of sender]  
[Badge Number]

Jeremy Gray. Badge #: 4203.  
Vehicle #: 772.

PS. On a personal note: I do hope that you will take the number of representations into account.  
Thank you.



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

**Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018**

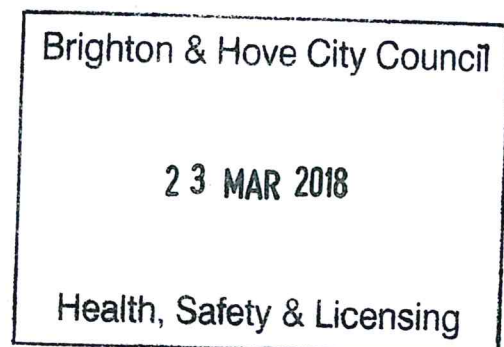
I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully

[Full name of sender] *John Henry Lockhart*  
[Badge Number] *2741*







> -----Original Message-----  
> From: Mehmet Bilge  
> Sent: 13 March 2018 00:04  
> To: Jim Whitelegg  
> Subject: Hire Operator's Licence  
>  
>  
> 13/03/18  
>  
> Dear Sirs  
>  
> Re: Renewal of Uber's Private Hire Operator's Licence  
>  
> My name is Mehmet S. Bilge. I am writing to you as a driver licensed by Brighton  
and Hove City Council  
>  
> For the reasons set out in numerous emails circulated by the local Licensed Operators and unions  
since the renewal of Uber's Private Hire Operator's Licence last November, we oppose its renewal  
due on 4 May 2018.  
>  
> I have been provided with copies of the written submissions made by the local Licensed Operators  
and those of the unions and support and endorse the points raised by them in opposing the renewal  
of Uber's Private Hire Operator's Licence.  
>  
> I also support fully the representations made by the Operators and local unions with regard to the  
process for the public hearing in that it lacks openness, fairness and transparency.  
>  
>  
> Please acknowledge safe receipt of this [letter/email] and confirm that it will be placed before the  
Licensing Panel at the public hearing to be held on 23 April 2018.  
>  
> Yours faithfully  
>  
> Mehmet S. Bilge



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)

19 March 2018

Dear Sir

**Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018**

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully



KEVIN THOMAS

[Full name of sender]

[Badge Number] 4871



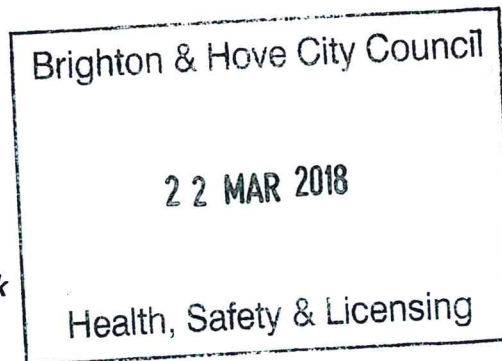
> -----Original Message-----  
> From: Michael Watts  
> Sent: 12 March 2018 22:04  
> To: Jim Whitelegg  
> Subject: Renewal of Uber private hire operator's licence  
>  
> 12/3/2018  
>  
> Dear Sirs  
>  
> Re: Renewal of Uber's Private Hire Operator's Licence  
>  
> My name is Mike Watts I am writing to you as a driver licensed by Brighton and  
Hove City Council  
>  
> For the reasons set out in numerous emails circulated by the local Licensed Operators and unions  
since the renewal of Uber's Private Hire Operator's Licence las November, we oppose its renewal  
due on 4 May 2018.  
>  
> I have been provided with copies of the written submissions made by the local Licensed Operators  
and those of the unions and support and endorse the points raised by them in opposing the renewal  
of Uber's Private Hire Operator's Licence.  
>  
> I also support fully the representations made by the Operators and local unions with regard to the  
process for the public hearing in that it lacks openness, fairness and transparency.  
>  
>  
>  
> Please acknowledge safe receipt of this [letter/email] and confirm that it will be placed before the  
Licensing Panel at the public hearing to be held on 23 April 2018.  
>  
> Yours faithfully  
>  
> Mike Watts



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)



March 2018

Dear Sir

**Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018**

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully

[Full name of sender]

[Badge Number]

MR. MICHAEL CORNISH

DRIVER BADGE:- 3685

Vehicle:- 544

Brighton + Hove City Cabs





(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)

March 2018

Dear Sir

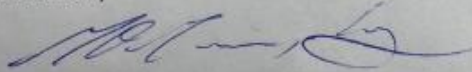
**Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018**

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully



[Full name of sender]

MILES MURPHY

[Badge Number]

8319



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 201

Dear Sir

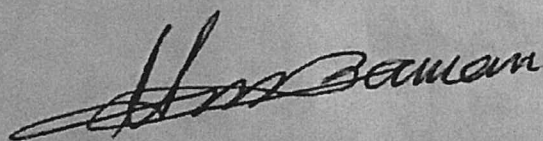
**Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018**

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully



[Full name of sender]

MOHAMMED MUSLEHUZ ZAMAI

[Badge Number]

3758



From: Nabil Eshag  
Sent: 14 March 2018 17:18  
To: Jim Whitelegg  
Subject:

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2nd Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
jim.whitelegg@brighton-hove.gcsx.gov.uk

[Date]

Dear Sirs

Re: Renewal of Uber's Private Hire Operator's Licence

My name is Nabil Eshag  
I am writing to you as a driver licensed by Brighton and Hove City Council

For the reasons set out in numerous emails circulated by the local Licensed Operators, independent representatives and unions since the renewal of Uber's Private Hire Operator's Licence last November, we oppose its renewal due on 4 May 2018.

I have been provided with copies of the written submissions made by the local Licensed Operators, independent representatives and those of the unions and support and endorse the points raised by them in opposing the renewal of Uber's Private Hire Operator's Licence.

I also support fully the representations made by the Operators independent representatives and local unions with regard to the process for the public hearing in that it lacks openness, fairness and transparency.

[In addition, I would also submit that.....

Please acknowledge safe receipt of this [letter/email] and confirm that it will be placed before the Licensing Panel at the public hearing to be held on 23 April 2018.

Yours faithfully  
N Eshag



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)

19<sup>th</sup> March 2018

Dear Sir

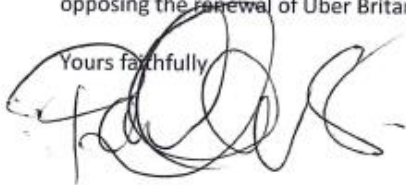
**Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018**

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully



[Full name of sender]

[Badge Number]

PAUL MURRAY  
3150

Forwarded document 2018032310000011.pdf - Add to basket





(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully

PAUL GANDY  
1306

[Full name of sender]  
[Badge Number]



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)

March 2018

Dear Sir

Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council. *LSWDS DISTRICT COUNCIL*

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully

[Full name of sender]

*PAUL CHAMBERS*

[Badge Number]

*184 L.D.C.*



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)

March 2018

Dear Sir:

**Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018**

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully



[Full name of sender] PAUL MILLINGTON

[Badge Number] 128



> -----Original Message-----  
> From: shafig shakir  
> Sent: 12 March 2018 21:58  
> To: Jim Whitelegg  
> Subject: Über renewal  
>  
>  
>  
>  
>  
>  
> Dear Sir  
>  
> Re: Renewal of Uber's Private Hire Operator's Licence  
>  
> My name is Shafig Shakir I am writing to you as a driver licensed by Brighton and Hove City Council  
>  
> For the reasons set out in numerous emails circulated by the local Licensed Operators and unions  
since the renewal of Uber's Private Hire Operator's Licence last November, we oppose its renewal  
due on 4 May 2018.  
>  
> I have been provided with copies of the written submissions made by the local Licensed Operators  
and those of the unions and support and endorse the points raised by them in opposing the renewal  
of Uber's Private Hire Operator's Licence.  
>  
> I also support fully the representations made by the Operators and local unions with regard to the  
process for the public hearing in that it lacks openness, fairness and transparency.  
>  
>  
>  
>  
> Please acknowledge safe receipt of this [letter/email] and confirm that it will be placed before the  
Licensing Panel at the public hearing to be held on 23 April 2018.  
>  
> Yours faithfully  
>  
> Shafig Shakir





(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)

March 2018

Dear Sir

Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully

[Full name of sender]  
[Badge Number]

Senn Carey  
5335



**From:** John Moore  
**Sent:** 18 March 2018 17:30  
**To:** Jim Whitelegg  
**Subject:** Uber

**March 2018**

Dear Sir

**Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018**

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully  
Steve waters  
3151



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

**Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018**

I am writing to you as a Taxi/Private Hire driver licensed by Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local Licensed Operators and fellow members of the Taxi Trade Forum since the renewal of Uber's Private Hire Operator's Licence last November, I oppose its renewal due on 4 May 2018.

I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully

SHAHAB KHALAF

[Full name of sender]  
[Badge Number] 2675



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

Brighton & Hove City Council

22 MAR 2018

Health, Safety & Licensing

March 2018

Dear Sir

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Yours faithfully

[Full name of sender]

[Badge Number]

Miss SAMIRA NAJihi  
(156)

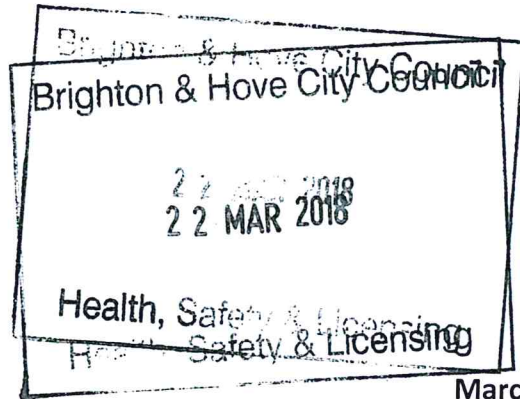




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March 2018

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Yours faithfully

*T.D. Scharu*

[Full name of sender]

[Badge Number]

*2352*



-----Original Message-----

From: Yousef H S Navard  
Sent: 12 March 2018 20:49  
To: Jim Whitelegg  
Subject: Uber License Renewal

Date : 12/03/2018

Dear Sirs,

Re: Renewal of Uber's Private Hire Operator's Licence

My name is Yousef H.S Navard I am writing to you as a driver licensed by Brighton and Hove City Council

For the reasons set out in numerous emails circulated by the local Licensed Operators and unions since the renewal of Uber's Private Hire Operator's Licence las November, we oppose its renewal due on 4 May 2018.

I have been provided with copies of the written submissions made by the local Licensed Operators and those of the unions and support and endorse the points raised by them in opposing the renewal of Uber's Private Hire Operator's Licence.

I also support fully the representations made by the Operators and local unions with regard to the process for the public hearing in that it lacks openness, fairness and transparency.

Please acknowledge safe receipt of this email and confirm that it will be placed before the Licensing Panel at the public hearing to be held on 23 April 2018.

Yours faithfully  
Yousef H.S Navard



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
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March 2018

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Yours faithfully

[Full name of sender]

PETER LOWE

[Badge Number]

1295

ADDRESS :

[Redacted address block]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
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Yours faithfully

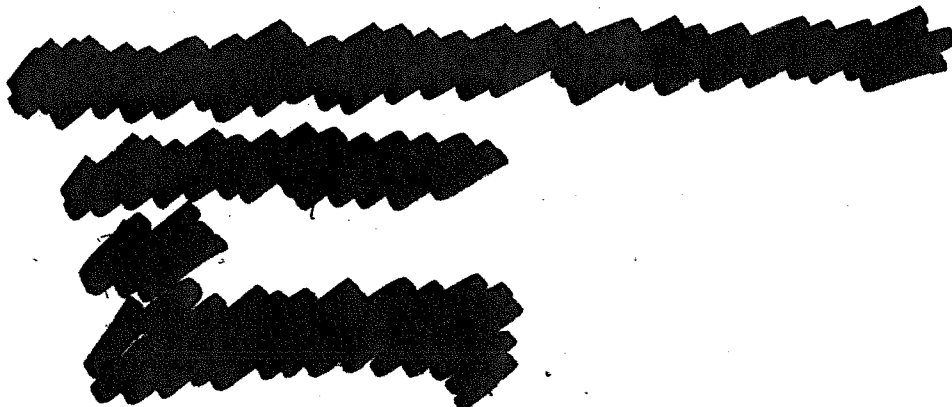


[Full name of sender]

[Badge Number]

3131

ADDRESS :



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS :

ROYAL MIAH

8185

[Redacted Address]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

[Full name of sender]

S. SHIHAR

[Badge Number]

U192

ADDRESS:

[Redacted address]



(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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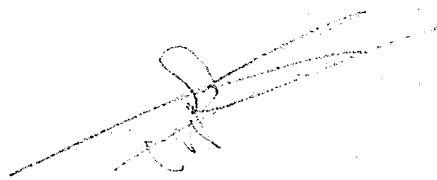
Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS:

*Michael Armes*  
7210  

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

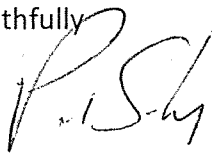
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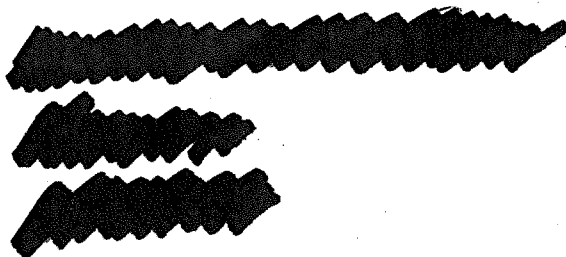


[Full name of sender]

[Badge Number]

234 678

ADDRESS :



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Jim Whitelegg  
Licensing Manager  
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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS:

5282  
A - NAIT-HAMOU

[Redacted signature block]

(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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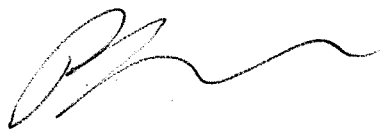
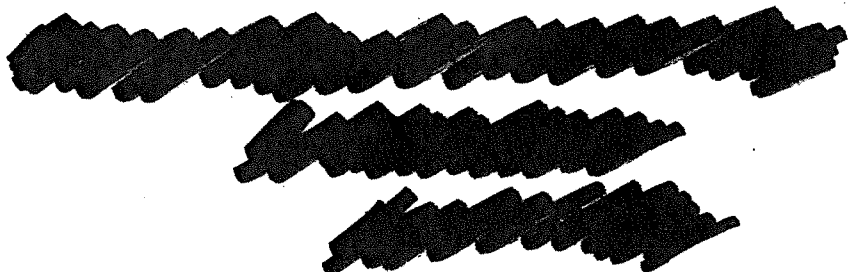
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[Full name of sender]

[Badge Number]

ADDRESS :

  
P. HANN 6160  


(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS:

4865

William Berry

[Redacted signature block]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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[Full name of sender]

[Badge Number]

ADDRESS:

TOMOR H H MITA  
120

[Redacted address block]

(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
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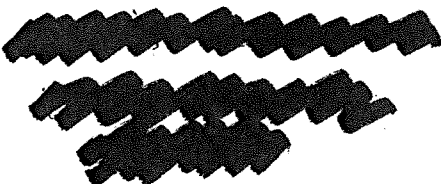
Yours faithfully



[Full name of sender]

[Badge Number]

ADDRESS: ATEEQ-UR REHMAN



Badge Number: - 8393

(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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Yours faithfully



[Full name of sender]

[Badge Number]

ADDRESS:

GEORGEY HUTTON  
5157





(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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Yours faithfully

[Full name of sender]

[Badge Number] 8041

ADDRESS: MR DABIR MIAH

  
*Dabir*

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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[Full name of sender]

[Badge Number]

ADDRESS:

DENISE ALLEN



BADGE 3667.

(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

W Lester

[Full name of sender]

[Badge Number]

ADDRESS :

Warren Lester

Badge 5006

[Redacted address line 1]

[Redacted address line 2]

[Redacted address line 3]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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Yours faithfully



[Full name of sender]

SIK HUNG CHENG

[Badge Number]

5073

ADDRESS:



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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March 2018

Dear Sir

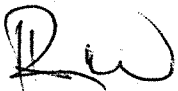
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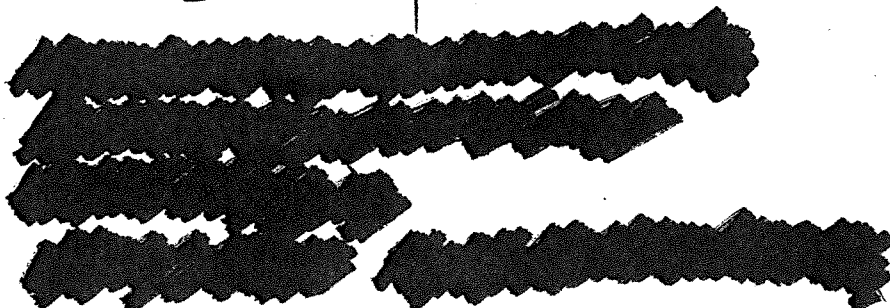


[Full name of sender]

[Badge Number]

ADDRESS:

LINCOLN RUWONIA  
5001



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS :

RACHID IZABILA  
8242

[Redacted address]

(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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[Full name of sender]

*Van Mucca*

[Badge Number]

*5052*

ADDRESS :



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

**Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018**

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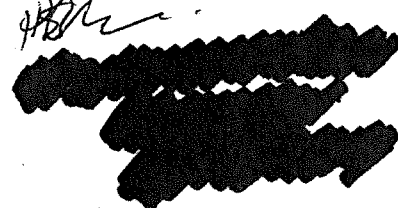
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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS :

PAUL BAKER.  
  




(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Yours faithfully

[Full name of sender] *RAJAB HAQ*

[Badge Number] *8316*

ADDRESS :

*[Redacted Address]*

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS:

IQBAL HOSSAIN

6166

[Redacted address]

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Licensing Manager  
Brighton and Hove City Council  
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Yours faithfully

E.W

[Full name of sender] ELIAS TUFFA

[Badge Number] 8253

ADDRESS :

[Redacted Address]

(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
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March 2018

Dear Sir

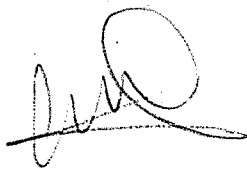
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[Full name of sender]

[Badge Number]

82 66

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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS :

DANIEL WILLIAMS  
7045.

[Redacted address block]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

*V. M. Nicken*

[Full name of sender]

[Badge Number]

ADDRESS:

[REDACTED ADDRESS]

BADGEN 3806

VADIVEL - M. NICKEN

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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Yours faithfully

[Full name of sender] HAMZA MENTOURI  
[Badge Number] 7074

ADDRESS :

[Redacted address block]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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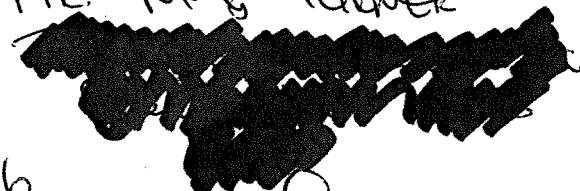
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[Full name of sender]

[Badge Number]

ADDRESS :

MR. M. G. TURNER  
  
1016  
M. G. Turner



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Licensing Manager  
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March 2018

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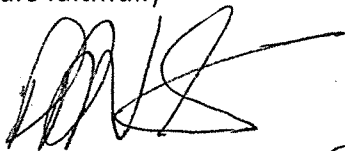
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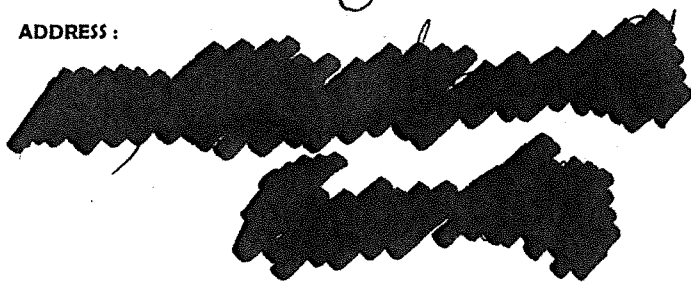


[Full name of sender]

[Badge Number]

5068

ADDRESS:



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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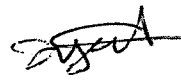
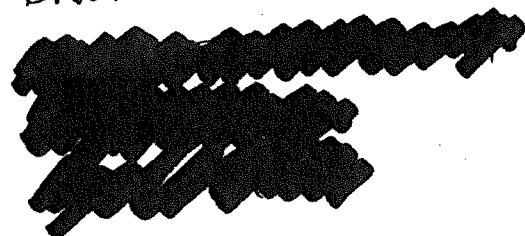
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[Full name of sender]

[Badge Number]

ADDRESS :

  
MR. MOZLISA SYED  
DRIVER NO: 5382  


(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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[Full name of sender]

[Badge Number]

ADDRESS:

SILVESTER JUHASZ  
8139

[Redacted address]

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2<sup>nd</sup> Floor  
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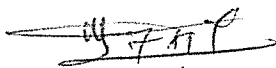
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[Full name of sender]

Sidik Lekbir-Bakdoun

[Badge Number]

8048

ADDRESS:



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
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2<sup>nd</sup> Floor  
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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS:

Stefan Brown

[Redacted address line]

[Redacted address line]

4442

[Handwritten signature]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
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2<sup>nd</sup> Floor  
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Yours faithfully

*SIMON PATRICK CRONIN*

[Full name of sender]

[Badge Number] *HQ53.*

ADDRESS:





(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
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2<sup>nd</sup> Floor  
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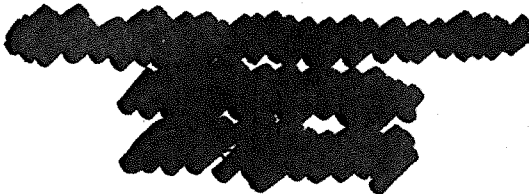
Yours faithfully



[Full name of sender] NEIL BARDEN

[Badge Number] ~~158~~ 5154

ADDRESS :



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[Full name of sender]

PLAMEN BORISOV KOUTZAROV

[Badge Number]

ADDRESS:

[Redacted Address]

B.A. 6306



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

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Licensing Manager  
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2<sup>nd</sup> Floor  
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[Full name of sender]

[Badge Number]

ADDRESS:

CHLOE SMITH

3420



[Redacted address line 1]

[Redacted address line 2]

[Redacted address line 3]

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MR. D. CREWE

[Full name of sender]

[Badge Number]

4713

ADDRESS:

[Redacted address block]

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Jim Whitelegg  
Licensing Manager  
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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS:

EMILE - WAD

8204

[Redacted address block]

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[Full name of sender]

[Badge Number]

1317

ADDRESS :

S. Gadsden



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2<sup>nd</sup> Floor  
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Yours faithfully

[Full name of sender]

TOWY MCCORMICK

[Badge Number]

720

ADDRESS:

[Redacted address]

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS :

AHMED RAMAZANI

7067

*Ahmed*

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS:

*TYRONE BEANE*

*227*

*927*

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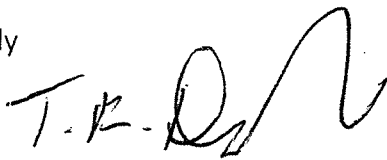
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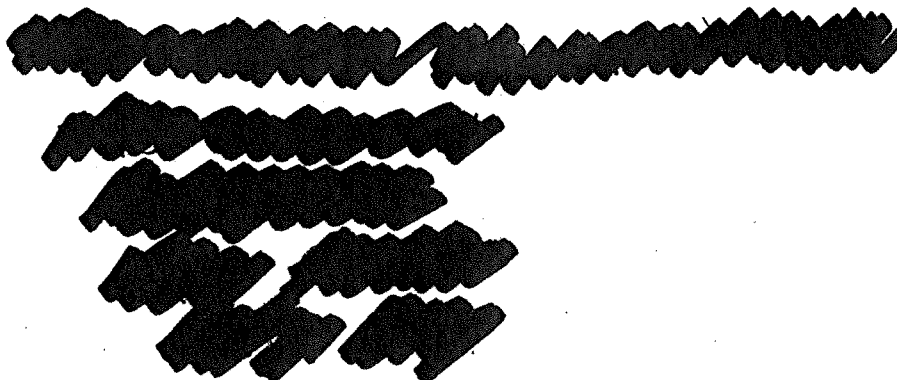


[Full name of sender]

[Badge Number]

T. E. DEVLIN  
3694

ADDRESS:





(To be received at BHHC by 23 March 2018 at the latest.)

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Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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*I T O S L*

[Full name of sender]

[Badge Number]

ADDRESS :

[Redacted signature and address block]

*[Handwritten signature]*

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[Badge Number]

ADDRESS:

4872  
[Redacted Address]

[Handwritten Signature]

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Licensing Manager  
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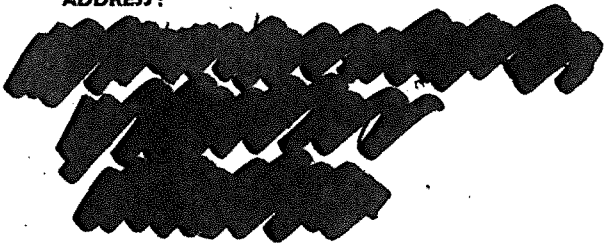
Yours faithfully



[Full name of sender]

[Badge Number]

ADDRESS:



7086

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Yours faithfully

[Full name of sender]

*Mohammed Al-ajam*

[Badge Number]

7132

ADDRESS :

[Redacted address]

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Jim Whitelegg  
Licensing Manager  
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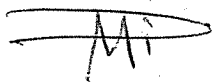
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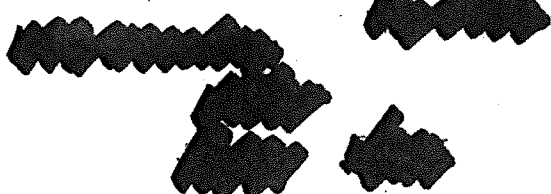
[Full name of sender]

Michael Thomas

[Badge Number]

6092

ADDRESS:



(To be received at BHHC by 23 March 2018 at the latest.)

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Licensing Manager  
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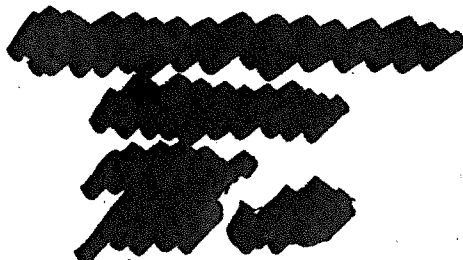
[Full name of sender]

RAHDA MURDAY

[Badge Number]

2187

ADDRESS :



(To be received at BHHC by 23 March 2018 at the latest.)

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Licensing Manager  
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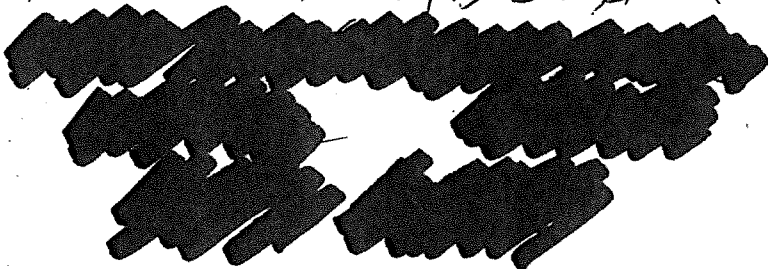
[Full name of sender]

[Badge Number]

4518

ADDRESS:

MOHAMED ABDUSAM



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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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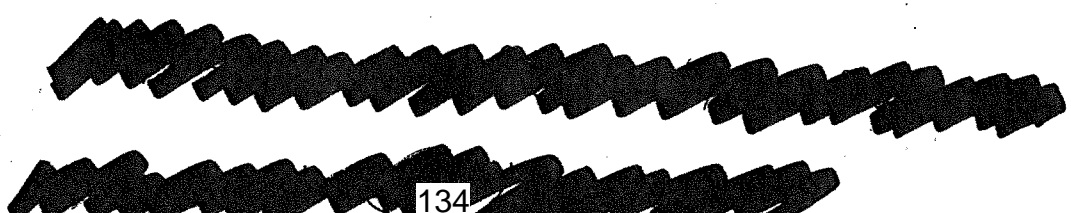
[Badge Number]

ADDRESS :

J. DARRING

918 CAR

BRIDGE 713





(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
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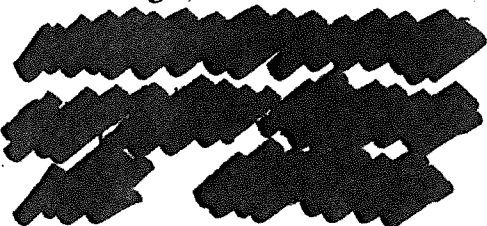
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[Full name of sender] *ASIF KHAW*

[Badge Number] *8269*

ADDRESS: *8*



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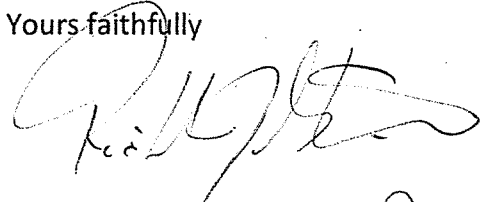
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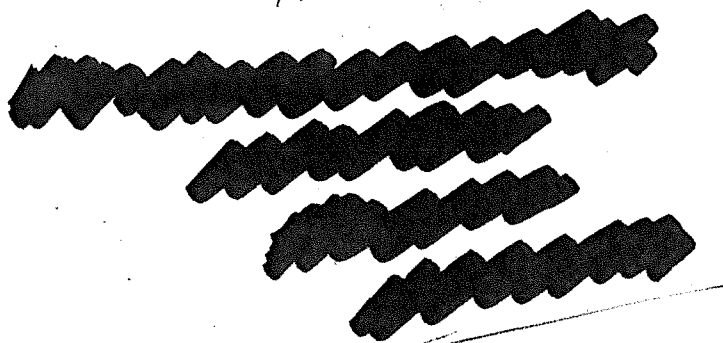


[Full name of sender]

[Badge Number]

ADDRESS:

RICHARD JAMES STARNET  
928



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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[Full name of sender]  
[Badge Number]

ANDREAS LOITZM  
8318

ADDRESS:

[Redacted address block]

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[Full name of sender]

DURIM GJOZI

[Badge Number]

4884

ADDRESS:

[Redacted address]

*Q*

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[Full name of sender]

PIOTR BOAUMIL

[Badge Number]

5276

ADDRESS:

[Redacted address block]

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[Full name of sender]

[Badge Number]

NABIL 12 iDi  
6220

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[Badge Number]

ADDRESS:

QIANG GUAN  
7016

[Redacted address]

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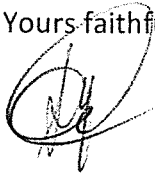
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[Full name of sender]

S. SHARJEEL

[Badge Number]

8217

ADDRESS :





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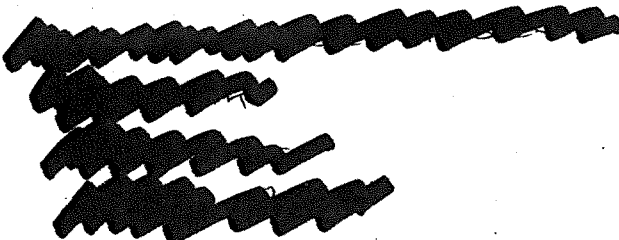
[Full name of sender]

MATTHEW TURNER

[Badge Number]

4681

ADDRESS:



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Jim Whitelegg  
Licensing Manager  
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Yours faithfully

ADIL MOHARRIB  
ADIL MOHARRIB

[Full name of sender]

[Badge Number]

ADDRESS:

[Redacted address]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

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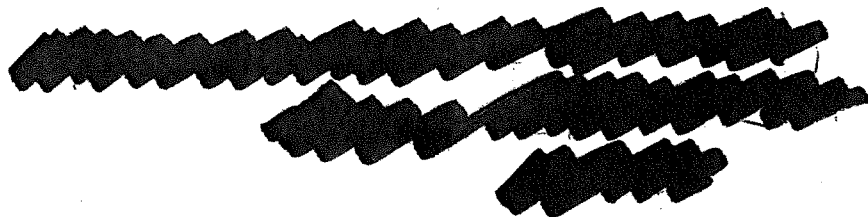


[Full name of sender]

[Badge Number]

3609

ADDRESS:



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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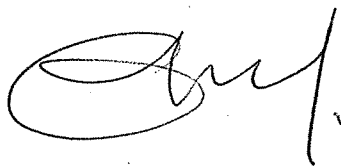
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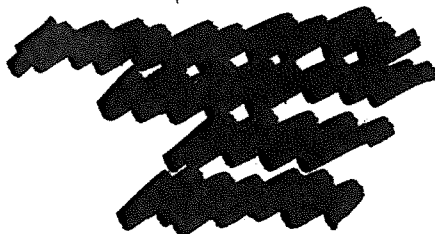
[Full name of sender]

[Badge Number]

ADDRESS:

Jim Whitelegg

7023



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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[Full name of sender]

[Badge Number]

Grigore Triboi  
8300

ADDRESS:

[Redacted address]

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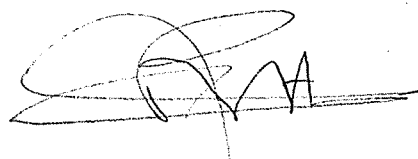
[Full name of sender]

[Badge Number]

ADDRESS:

MOHAMED RACHID OUACHAN

4575



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Licensing Manager  
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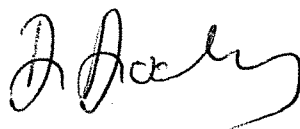
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D C DOCHERTY

[Full name of sender]

[Badge Number]

ADDRESS :



Badge 6 222



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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS :

SANDRA FURNER

~~XXXXXXXXXXXXXXXXXXXX~~  
~~XXXXXXXXXXXXXXXXXXXX~~

BADGE 3607

(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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Brighton  
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*jim.whitelegg@brighton-hove.gcsx.gov.uk*

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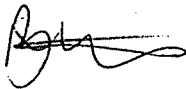
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Yours faithfully



[Full name of sender] MITICA FLORIAN BATENARU  
[Badge Number] 6332

ADDRESS:



(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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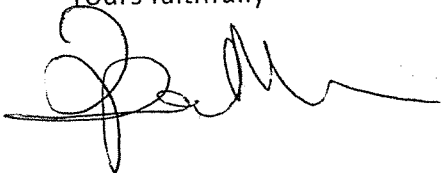
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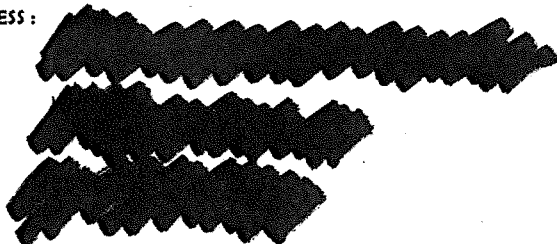
Yours faithfully



[Full name of sender]

[Badge Number] 3230

ADDRESS :



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Licensing Manager  
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[Badge Number]

JACEK DZIK  
7031

ADDRESS:

[Redacted address]

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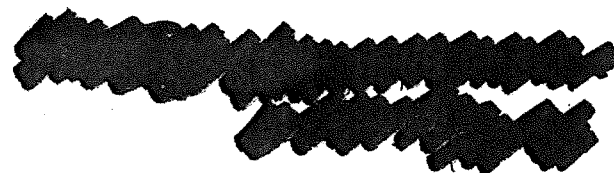
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ADDRESS:

168  
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[Full name of sender] Crosby Gilmore  
[Badge Number] 4686

ADDRESS: 

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Jim Whitelegg  
Licensing Manager  
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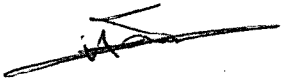
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[Full name of sender]

[Badge Number]

ADDRESS :

  
HANI HAKEEM  
676

[Redacted address block]

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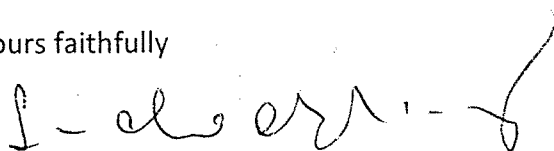
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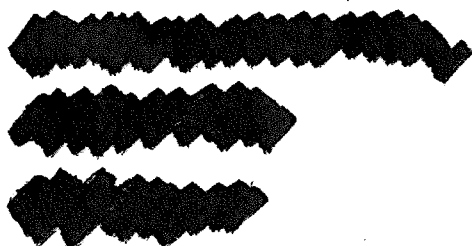
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[Full name of sender] **MARIAV SUCHODOLINSKA**  
[Badge Number] **6234**

ADDRESS:





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Jim Whitelegg  
Licensing Manager  
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[Full name of sender]

[Badge Number]

ADDRESS:

Mr ABDELKIR BADORI  
3453

[Redacted address block]

[Handwritten signature]

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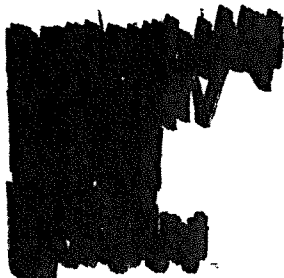
[Full name of sender]

STEPHEN ANDREW WESTALL

[Badge Number]

4655

ADDRESS:



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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[Full name of sender]

[Badge Number] 3239

ADDRESS:

monir Boshara 3239  
  
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*Matt Honeyer*

[Full name of sender]

[Badge Number]

8157

ADDRESS :

[Redacted address block]

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Jim Whitelegg  
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[Full name of sender]

[Badge Number]

ADDRESS :

IAN SATU

B057

[Redacted Address]

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[Badge Number]

ADDRESS:

ATIF ESHAG

8160

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Licensing Manager  
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ROBERT JOACHIMAK  
*R. Joachim*

[Full name of sender]

[Badge Number]

7034

ADDRESS :

[Redacted address block]

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*Min B*

= 4888

[Full name of sender]

[Badge Number]

ADDRESS :

[Redacted signature and address]



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Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

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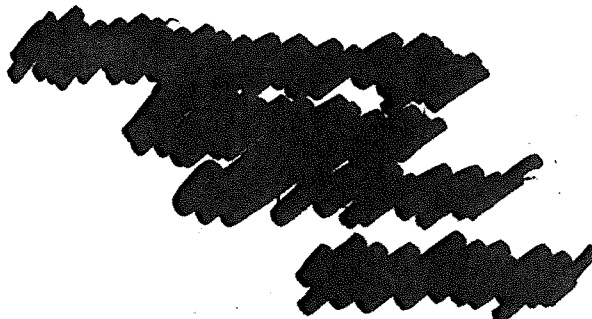
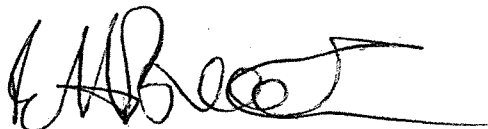
Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS:

BENJAMIN BREEDS  
1031



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS:

YOUSIF BASALIOS  
6268

[Redacted address]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

[Full name of sender]

[Badge Number]

7044

ADDRESS:

MR. JILL R RAHAMAN

[Redacted address]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Dear Sir

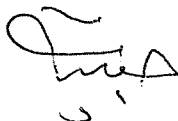
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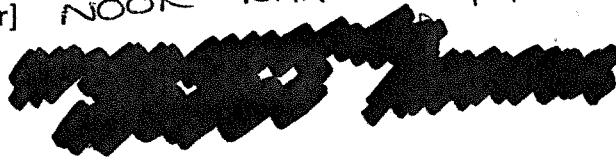


[Full name of sender]

[Badge Number]

ADDRESS:

NOOR KHAN . 4430



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Brighton and Hove City Council  
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Yours faithfully

[Full name of sender] **MAGDI WADIE**  
[Badge Number] **8208**

ADDRESS: 

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS:

[Redacted address block]

*T. Norman*

1366

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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March 2018

Dear Sir

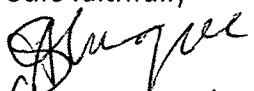
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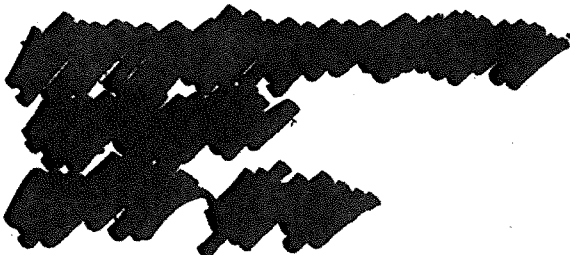
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Yours faithfully

  
(SYED AZIZUL HAQUE)  
[Full name of sender] Badge no 7086  
[Badge Number]

ADDRESS :



(To be received at BHHC by 23 March 2018 at the latest.)

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Licensing Manager  
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Yours faithfully

[Full name of sender] *Stephen Ross*  
[Badge Number] *3147*

ADDRESS:

[Redacted address block]



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Jim Whitelegg  
Licensing Manager  
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Yours faithfully

[Full name of sender]

[Badge Number]

BRIAN PATTENDEN  
1305

ADDRESS:

[Redacted address]

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Jim Whitelegg  
Licensing Manager  
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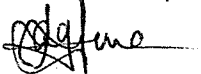
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A212 MUNIM

[Full name of sender]

[Badge Number] 6267

ADDRESS:



(To be received at BHHC by 23 March 2018 at the latest.)

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Licensing Manager  
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[Full name of sender]

[Badge Number]

ADDRESS:

KURZAWA PARIKUSZ  
4600



(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
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Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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*David H*

[Full name of sender]

[Badge Number]

ADDRESS :

1 LAUSKA RUZANA

4990

[Redacted address]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
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[Full name of sender]

[Badge Number]

ADDRESS :

*BH Reynolds*



*225 - 306*

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

[Full name of sender]

SHOEBUR MALIK

[Badge Number]

8192

ADDRESS:

[REDACTED ADDRESS]

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Jim Whitelegg  
Licensing Manager  
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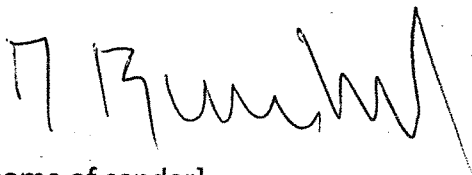
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[Full name of sender]

[Badge Number]

ADDRESS:

D. BRESKAC

[Redacted address]

Badge NO: 2479

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Licensing Manager  
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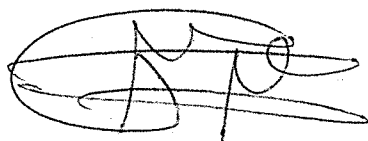
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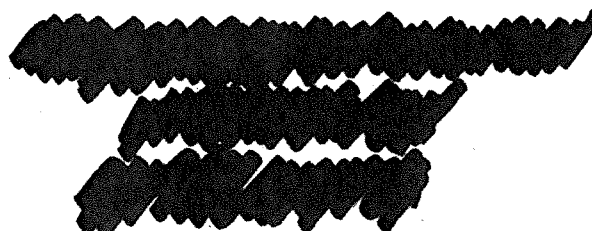
[Full name of sender]

[Badge Number]

ADDRESS :



OMAR ZEGMOU





(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

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Licensing Manager  
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[Full name of sender]

BRIAN WOOLLEY.

[Badge Number]

5474.

ADDRESS :

[Redacted address block]

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Licensing Manager  
Brighton and Hove City Council  
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Yours faithfully

[Full name of sender] *Feras Nassour*  
[Badge Number] *5223*

ADDRESS:

*[Redacted address]*

*[Signature]*

(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS :

S. Barrell  
No. 308

[Redacted signature]

(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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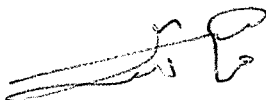
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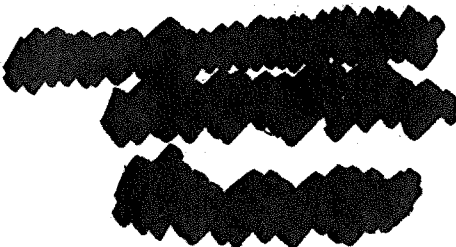
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[Full name of sender]

[Badge Number] 6205

ADDRESS:



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Licensing Manager  
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2<sup>nd</sup> Floor  
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Yours faithfully

R. makaram

[Full name of sender] Kurelous makaram  
[Badge Number] 7081

ADDRESS :

[Redacted address block]

(To be received at BHHC by 23 March 2018 at the latest.)

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Licensing Manager  
Brighton and Hove City Council  
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[Full name of sender] *ALFONSO RUBILEAO*

[Badge Number] *4422*

ADDRESS:



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

6348

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

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FERDI HOXHA

[Full name of sender]

[Badge Number]

6348

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[Redacted address block]

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Yours faithfully



[Full name of sender] *MUNIM MIAH*  
[Badge Number] *8199*

ADDRESS:





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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
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Yours faithfully

*ELBOYORIC*

[Full name of sender]

[Badge Number]

ADDRESS:

*Abdelhakim ELBOYORIC*

*[Redacted Address]*

*BN- 5446*

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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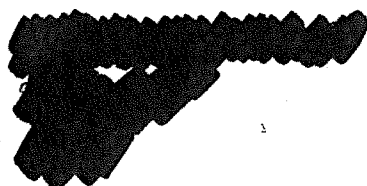
*Sebastian Piray*

[Full name of sender]

[Badge Number]

ADDRESS :

8022



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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

[Full name of sender]  
[Badge Number]

ADDRESS :

RAED HEZAM  
*R. Hezam*

P.H 832  




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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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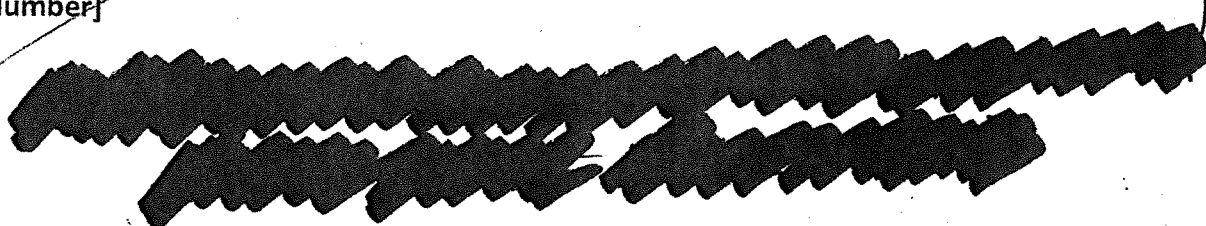
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[Full name of sender]

[Badge Number]

ADDRESS:

*Jim Whitelegg*  
*TARI INKLO 4263 BAT NR*  


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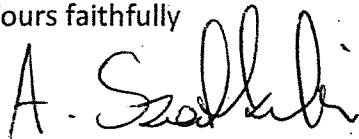
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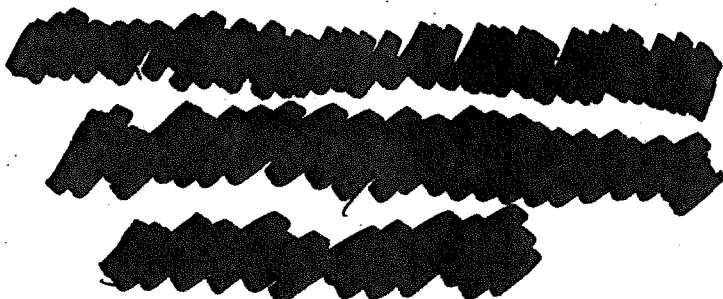


[Full name of sender]

[Badge Number]

8190

ADDRESS :



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[Full name of sender]

[Badge Number]

ADDRESS:

MD. MAHABUB KABIR,  
6241

[Redacted address block]

(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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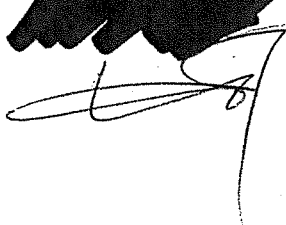
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[Full name of sender]

[Badge Number] 4693

ADDRESS:

[Redacted address block]  




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Licensing Manager  
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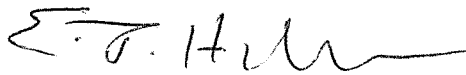
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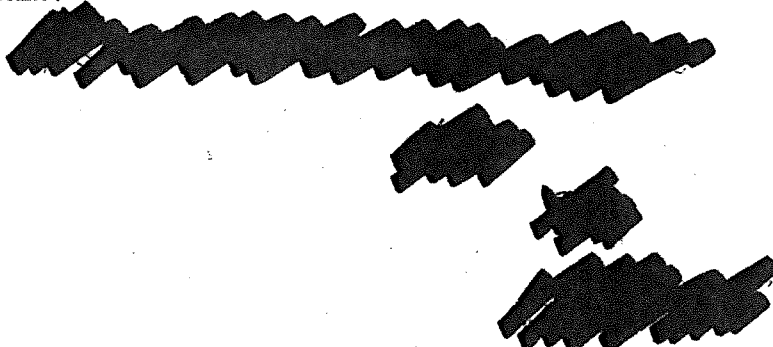


[Full name of sender]

[Badge Number]

EDWARD JAMES HILLIER  
1218

ADDRESS:



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

[Full name of sender]

[Badge Number]

ADDRESS:

Bradley M Sweeney  


4054

B. M Sweeney

(To be received at BHHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

[Full name of sender] NISAR FAROOQ I

[Badge Number] 5128

ADDRESS:

[Redacted address]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

[Full name of sender] KEVIN HUTCHESON  
[Badge Number] 8133

ADDRESS :

[Redacted address]

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Jim Whitelegg  
Licensing Manager  
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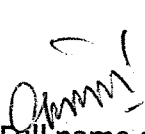
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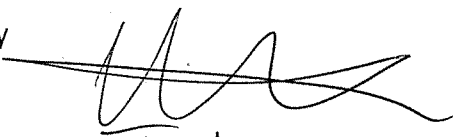
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Ivan Todorov Georgiev

[Full name of sender]

[Badge Number]

6173

[REDACTED]

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*Nick Adams*

[Full name of sender]

[Badge Number]

3641





(To be received at BHHC by 23 March 2018 at the latest.)

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[Full name of sender] ABDUL MUHIT KAYES  
[Badge Number] 3696

(To be received at BHHC by 23 March 2018 at the latest.)

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Brighton and Hove City Council  
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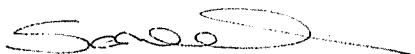
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[Full name of sender]

[Badge Number] 4640



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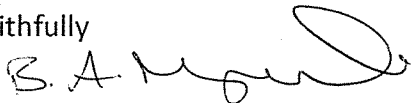
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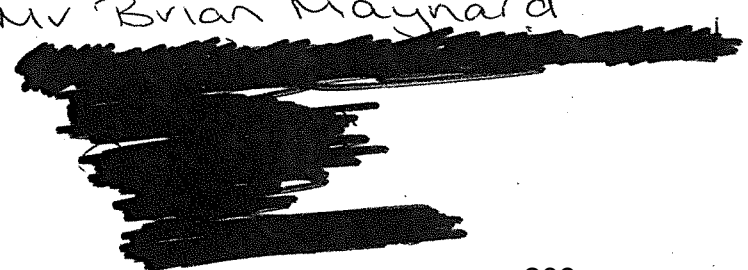
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[Full name of sender]

[Badge Number] 1608

*Mr Brian Maynard*



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

PAUL WHITE 6032

Full name of sender

Badge Number

[REDACTED]

(To be received at BHHC by 23 March 2018 at the latest.)

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Full name of sender

  
DAVID SMITH

Badge Number

915, [REDACTED]  
[REDACTED]  
[REDACTED]

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Yours faithfully

Full name of sender **GUIDO GIURI**  
Badge Number **3501**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

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Yours faithfully

*A. B. Akweli*

Full name of sender

Badge Number

*Hackney Badge-6278*

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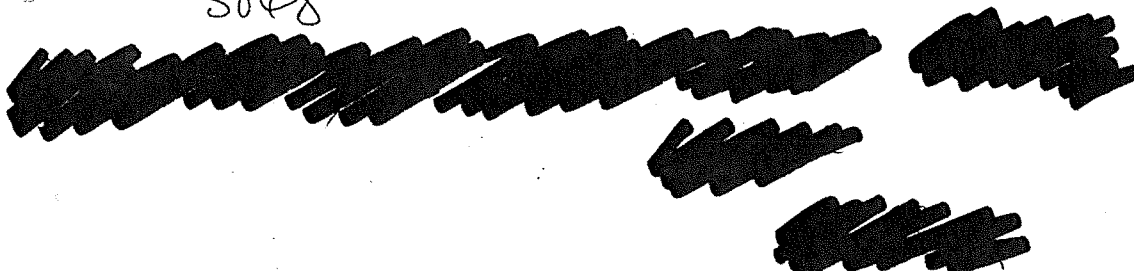
Yours faithfully



Full name of sender

Badge Number

3648 S. ADDERTON





(To be received at BHHC by 23 March 2018 at the latest.)

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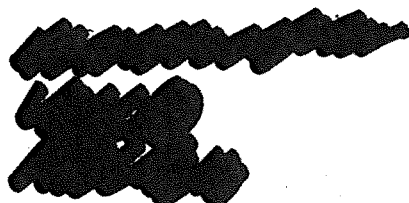


Full name of sender

KELVIN FRANCIS JONES

Badge Number

3248



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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*M Denton* 4285

Full name of sender  
Badge Number



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Full name of sender

Badge Number

KARL ARTHUR 4534



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Yours faithfully

*J. Gearing*

Full name of sender JANET GEARING  
Badge Number 2529

[Redacted signature area]

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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Full name of sender

MARTIN CHISWICK

Badge Number

2106



(To be received at BHHC by 23 March 2018 at the latest.)

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Licensing Manager  
Brighton and Hove City Council  
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Full name of sender PHILIP SHEER  
Badge Number 35.



(To be received at BHHC by 23 March 2018 at the latest.)

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Licensing Manager  
Brighton and Hove City Council  
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Bartholomew Square  
Brighton  
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March 2018

Dear Sir

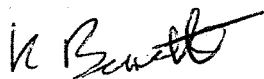
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Yours faithfully



Full name of sender **KEITH BARNETT**  
Badge Number **2273**



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Brighton  
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March 2018

Dear Sir

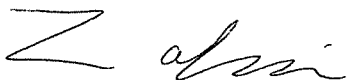
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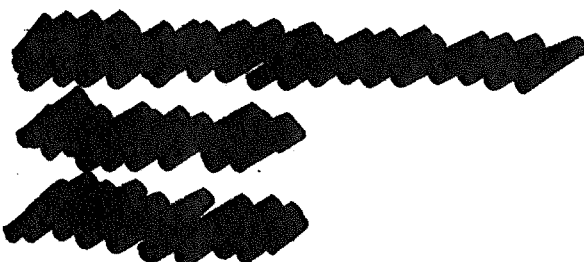
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Yours faithfully



Full name of sender ZAKARIA BUSHARA  
Badge Number 5459





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Jim Whitelegg  
Licensing Manager  
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March 2018

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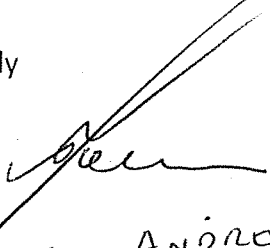
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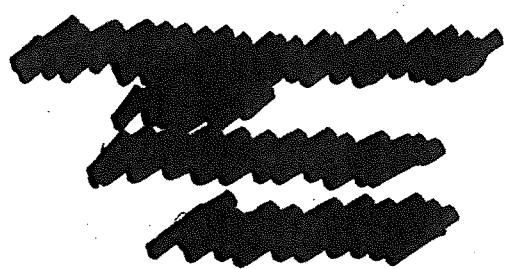


Full name of sender

ANDREW BRIAN MAIDLOW

Badge Number

575



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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Full name of sender

Badge Number P943.

BADIUL ALAM



(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
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2<sup>nd</sup> Floor  
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March 2018

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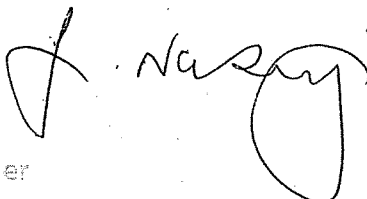
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 F. NASIRY

Full name of sender

Badge Number

4343

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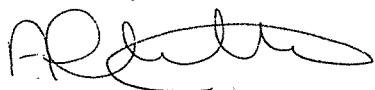
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Full name of sender ANDREW CHARALAMBOUS

Badge Number 6110



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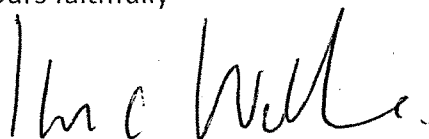
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Full name of sender

Badge Number

332



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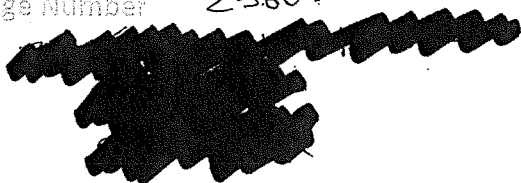
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Full name of sender GARRY CLIFFORD LORD  
Badge Number 2566



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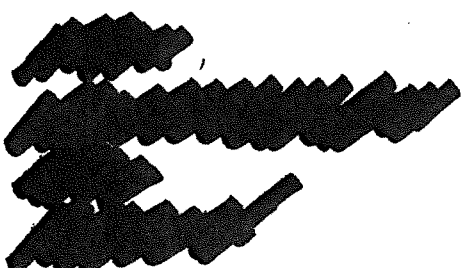
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[Full name of sender]

[Badge Number]

*Romany Mikhael*  
*5021*



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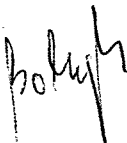
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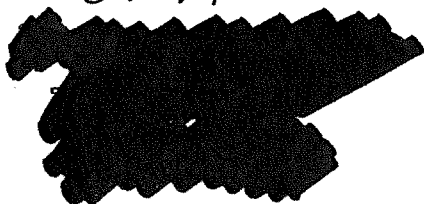
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[Full name of sender]

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ROMAN BOLCZYK  
B197





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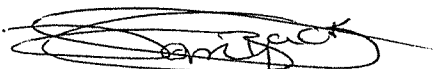
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Full name of sender    **MR TERRY BACK**  
Badge Number        **3530**

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Licensing Manager  
Brighton and Hove City Council  
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[Full name of sender]

[Badge Number]

AUGUST MEACHELL  
7081



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Licensing Manager  
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LUKASZ KANONIAK

4835

Full name of sender  
Badge Number

72 POYNINGS DRIVE

BN3 8GW



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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

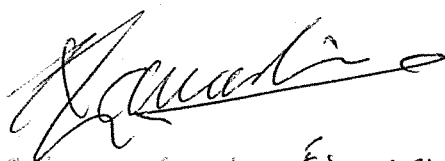
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Yours faithfully



Full name of sender

Badge Number

EDWARD KAMALIAN  
2321

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

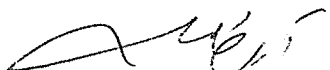
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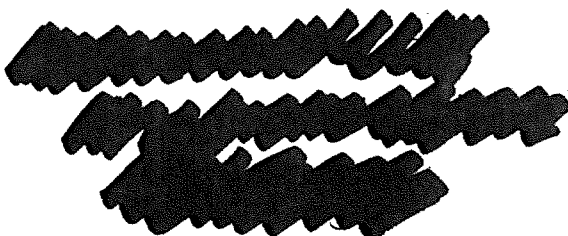


Full name of sender

Karim Khalil Elbayouk

Badge Number

5303



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
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Yours faithfully



Full name of sender

Badge Number

*F.W. KEABLE*

*402*



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

[Full name of sender]

[Badge Number]

PAWEŁ GŁOWNIAK  
618

[Redacted signature block]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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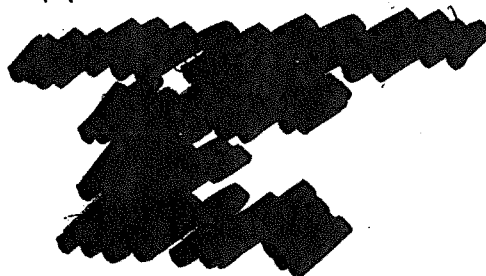
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Yours faithfully

Full name of sender  
Badge Number

Albashir Mussa  
7101





(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Brighton  
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Yours faithfully

MR MONIR MIAH

Full name of sender

Badge Number

BADGE 3628

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Brighton  
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Yours faithfully



BHPCW No 1956

Full name of sender

Badge Number



(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Yours faithfully

*W. Clements*

Full name of sender  
Badge Number

*WILLIAM CLEMENTS*

*4313*

~~XXXXXXXXXXXXXXXXXXXX~~  
~~XXXXXXXXXXXXXXXXXXXX~~  
~~XXXXXXXXXXXXXXXXXXXX~~

(To be received at BHHC by 23 March 2018 at the latest.)

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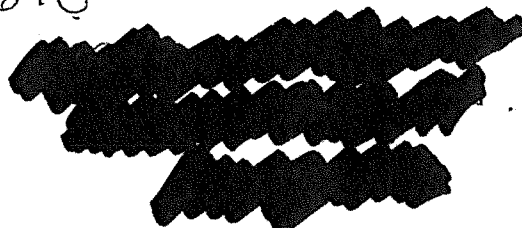


Full name of sender

Badge Number

DAVID TILBURY-STENNING

670



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
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March 2018

Dear Sir

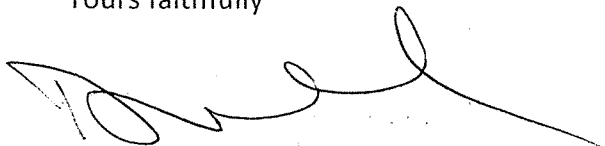
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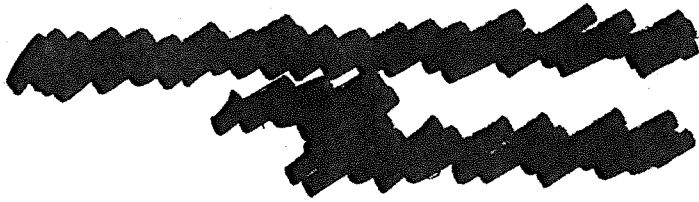
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Full name of sender  
Badge Number

ANNA ORCITARA  
1100



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Yours faithfully



Full name of sender

Badge Number

PHILIP LYNCH  
1357



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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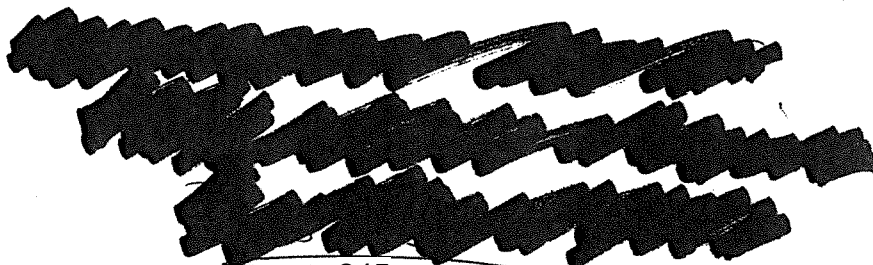


Full name of sender

MR. GRAHAM GUNN

Badge Number

1660



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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March 2018

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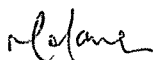
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Full name of sender

Badge Number

MARC DAVID MANTON PLATE 10





(To be received at BHHC by 23 March 2018 at the latest.)

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Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Full name of sender  
Badge Number

SHAMAL ADNAN IMAD  
7121

[Redacted signature area]

[Redacted address area]

[Handwritten signature]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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LUKASZ DOMINIK 6180



Full name of sender

Badge number

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Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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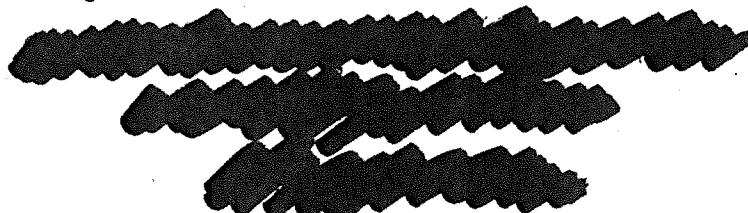
Yours faithfully



Full name of sender

Badge Number

4485



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
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*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

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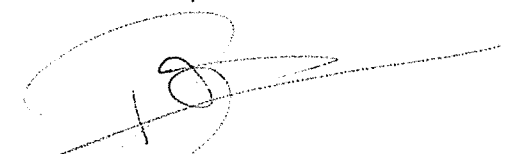
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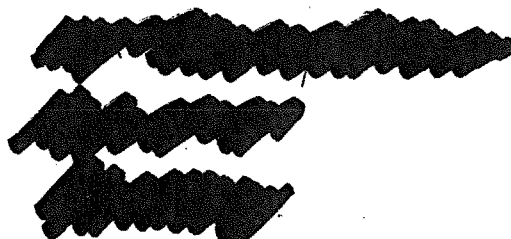
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Yours faithfully



Full name of sender PAUL WARDLE  
Badge Number 2493



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Yours faithfully

Full name of sender *Jeffrey Howell*  
Badge Number *229*

*[Redacted signature]*

(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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March 2018

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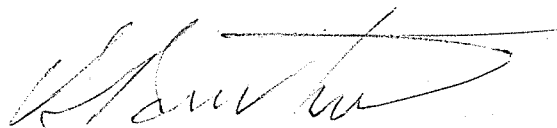
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Full name of sender

Badge Number

Anthony Butenshaw

80



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

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Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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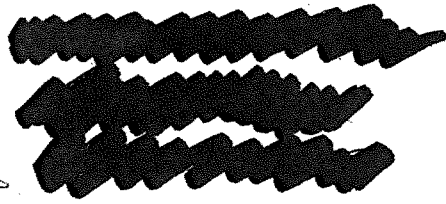
KM ALLOCK



Full name of sender

Badge Number 3545

P489



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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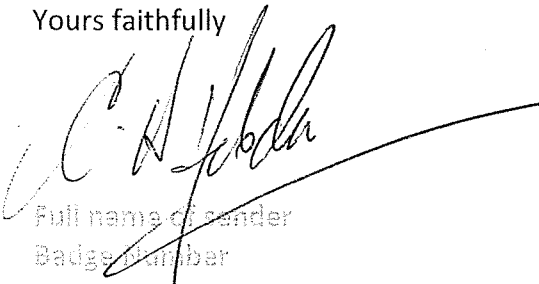
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Yours faithfully

  
Full name of sender  
Badge number

C. A. HODSON.

1074.





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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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Yours faithfully

  
Full name of sender Lubinsz Paweliec  
Badge Number 6005  


(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

**Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018**

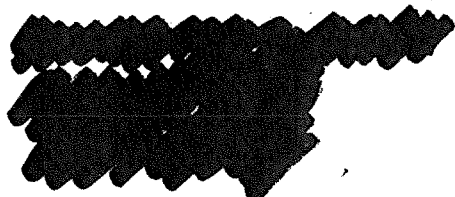
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I totally support the representations being made by the operators, namely Brighton and Hove Streamline, Brighton and Hove Radio Cabs and Brighton and Hove City Cabs in opposing the renewal of Uber Britannia's licence here in Brighton and Hove.

Yours faithfully

Mr. Mohammad Simah  
For Name of Sender  
Badge Number 409

A large, irregular black redaction mark covering the signature area of the letter.

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
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Yours faithfully

Full name of sender  
Badge Number

FIRAS J SLAYMAN  
6290

A large, dark, irregular redacted area covering the signature and any text below it.

F. Slayman  
20/3/18

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
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Yours faithfully



Full name of sender

A HELLIWELL

Badge Number

2217



(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
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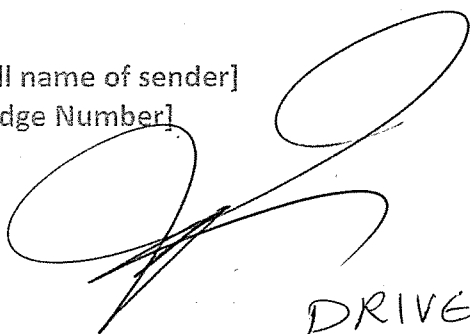
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Yours faithfully

MEHRDAD KAIVANPOR

[Full name of sender]

[Badge Number]



DRIVER 6201

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

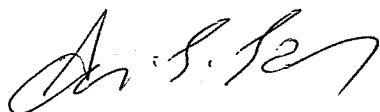
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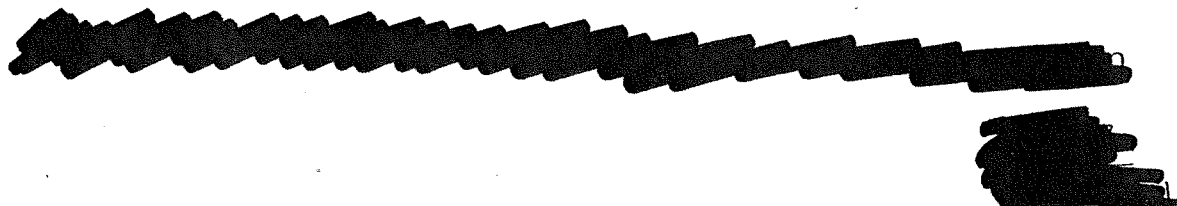
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Yours faithfully



[Full name of sender] SERHAT SAN  
[Badge Number] 5384



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

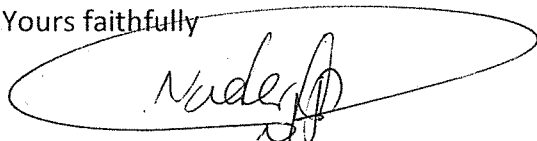
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Yours faithfully

A handwritten signature in black ink, which appears to read 'Nader', is enclosed within a hand-drawn oval. Below the signature, there are some small, illegible handwritten marks.

[Full name of sender]

[Badge Number]

NADER POUR MOHAMMADI  
6209

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
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Yours faithfully



[Full name of sender]

PAUL BUTOK

[Badge Number]

101







(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

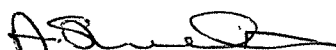
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Yours faithfully



Full name of sender

Badge Number 36



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully

ROD PUNTER 5198  


[Full name of sender]

[Badge Number]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Yours faithfully



Full name of sender

MIHMOD MEHBUB ALHARAH

Badge Number

5065



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
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March 2018

Dear Sir

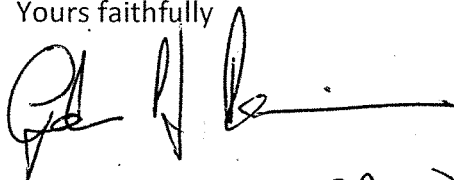
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Yours faithfully



Full name of sender

GPT DAVIS

Badge Number

484 (26 years)



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Full name of sender

Badge Number

478



(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
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Yours faithfully

Full name of sender  
Badge Number

7059  
SLAWOMIR TALOWSKI  
7059

[Redacted signature block]

(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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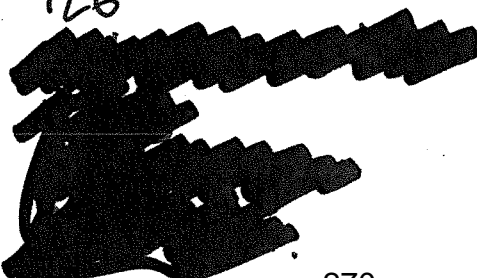


Full name of sender

G. LINTON

Badge Number

726





(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Yours faithfully

*Tomaz Daniele*

Full name of sender

Badge Number

6140

[Redacted signature block]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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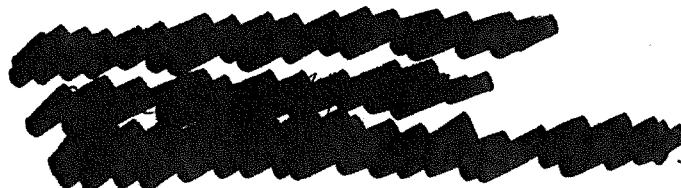
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Yours faithfully



Full name of sender NEIL ANTHONY COLE  
Badge Number 6179



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Brighton  
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Yours faithfully

Damon Pollard 4817.

Full name of sender  
Badge Number

[Redacted signature and badge number]

(To be received at BHHC by 23 March 2018 at the latest.)

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Licensing Manager  
Brighton and Hove City Council  
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Yours faithfully



[Full name of sender] JOHN STREETER

[Badge Number] 1623



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Yours faithfully

Full name of sender

Badge Number ~~138~~ 2219

*M. A. M. AYNARD*

M. A. M. AYNARD



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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Yours faithfully

Full name of sender  
Badge Number

S. STRUTT

[REDACTED]

BADGE N<sup>o</sup> 6046

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Bontose Klein



Full name of sender

Badge Number

6269

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
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March 2018

Dear Sir

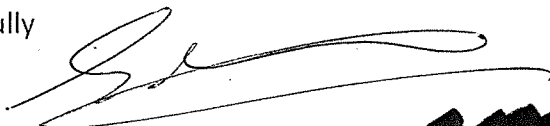
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6334

Full name of sender

Sadge Number



(To be received at BHHC by 23 March 2018 at the latest.)

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Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Brighton  
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*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

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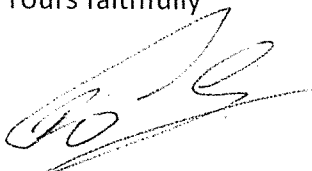
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Full name of sender  
Badge Number

MR R. Smart,  
2333



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Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

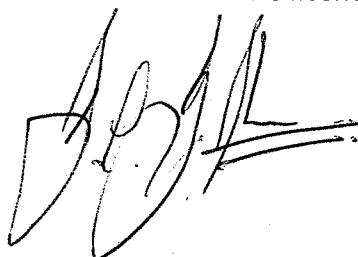
Re: Renewal of Uber's Private Hire Operator's Licence, 4 May 2018

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Yours faithfully



Full name of sender

Badge Number

IAN. C. JEFFERY

131.



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

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Yours faithfully



Full name of sender  
Badge Number

KEVIN SIMMONDS -

5393



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)

March 2018

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Yours faithfully

*Mark Tudwell*

[Full name of sender]

[Badge Number]

125155

[Redacted signature area]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

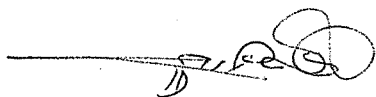
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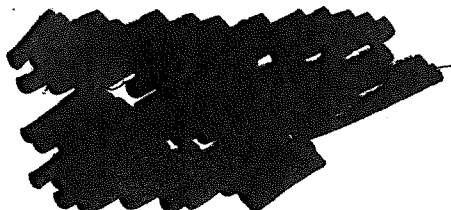
Yours faithfully



[Full name of sender]

[Badge Number] (6037)

ABDELKADER HIWEDI



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

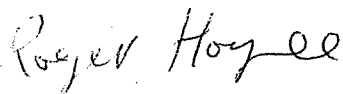
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Yours faithfully



Full name of sender **ROGER HOYEE**  
Badge Number **4174**

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)

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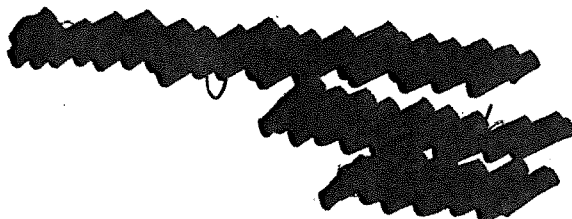
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Yours faithfully

*Brian Paul Carter Blowers*

Full name of sender *Brian Paul Carter Blowers*  
Badge Number *4764*



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
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Yours faithfully



Full name of sender

Badge Number

TREVOR McElroy, BAN  
0719



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)

March 2018

Dear Sir

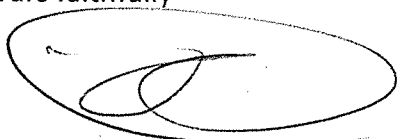
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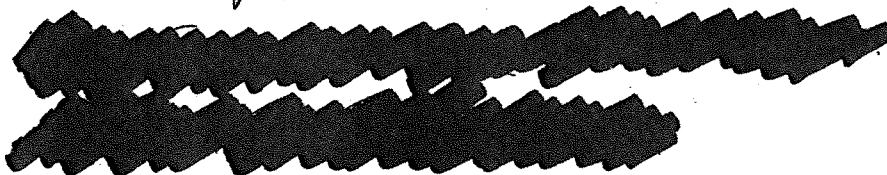


Full name of sender

Justin Cole

Badge Number

P230



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
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Yours faithfully



Full name of sender  
Badge Number

2328

R. L. L. L.



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

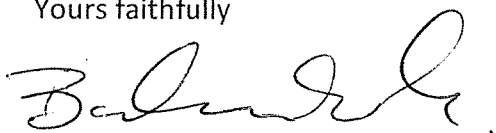
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Yours faithfully



Full name of sender

Mario

Badge Number

BARTNICKI

3643



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
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Yours faithfully

Full name of sender COLIN MARCHANT  
Badge Number 88 536

[REDACTED]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
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*[jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk)*

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Yours faithfully

ABDUL JALIL

Full name of sender

Badge Number

4367

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

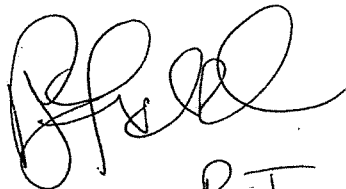
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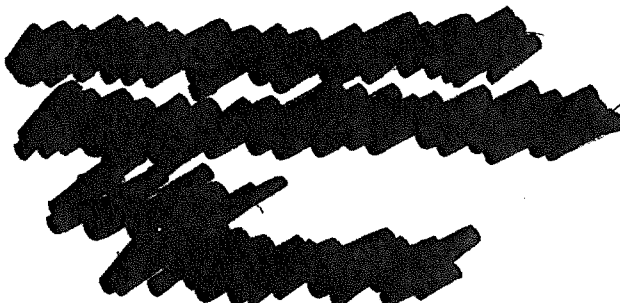
Yours faithfully



P.J. FRANKLIN

Full name of sender

Badge Number



Bno 12925 No 2622

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
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Yours faithfully

*Alison*

*Badge No 2078.*

Full name of sender  
Badge Number

[Redacted signature and badge number]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
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March 2018

Dear Sir

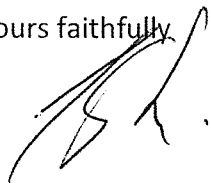
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Yours faithfully



Full name of sender  
Badge Number

BADGE NO 2413  
LAWRENCE SKUA





**To be sent via email or post to:**

March 2018

Dear Sir

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Yours faithfully

P. G. LOVEGROVE  
P. G. Lovegrove  
Full name of sender PETER LOVEGROVE  
Badge Number 650

[REDACTED]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
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Yours faithfully



Full name of sender

Badge Number

A. K. ISFAHAN  
2698

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Brighton  
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Yours faithfully

Full name of sender

Badge Number  
Plate n 451

Daniel Healy

[Redacted signature]

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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Full name of sender

Badge Number

Atileza - Atiyali



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

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Licensing Manager  
Brighton and Hove City Council  
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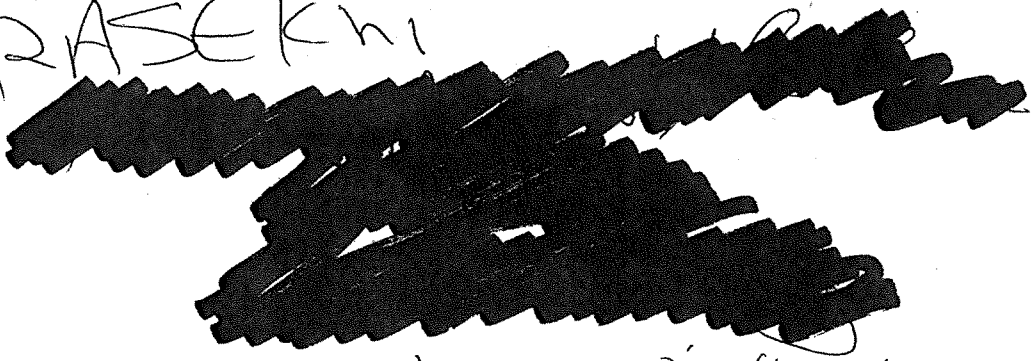
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Yours faithfully

E. RASEKNI

Full name of sender  
Badge Number

  
Badge no 494  
plate 2301  
299

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
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March 2018

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Yours faithfully

*A M Kage*

Full name of sender  
Badge Number

Badge NO: 3696

~~XXXXXXXXXXXXXXXXXXXX~~  
~~XXXXXXXXXXXXXXXXXXXX~~  
~~XXXXXXXXXXXXXXXXXXXX~~

(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
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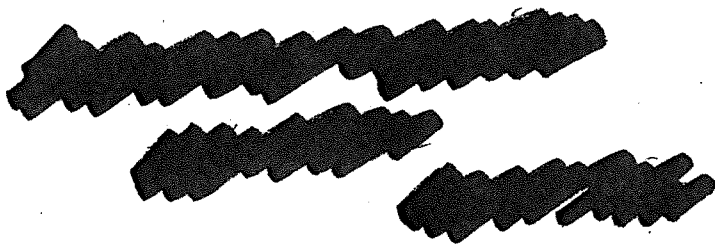
Yours faithfully



Full name of sender

Badge Number

3894



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
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Yours faithfully

Full name of sender  
Badge Number

422

[Redacted signature area]



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
2<sup>nd</sup> Floor  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP  
*jim.whitelegg@brighton-hove.gcsx.gov.uk*

March 2018

Dear Sir

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Yours faithfully

MC BENTOUAT

Full name of sender  
Badge Number

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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March 2018

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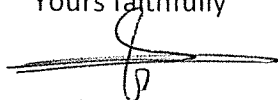
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*yousefzi Mohammed Saleem*

Full name of sender

Badge Number



4379

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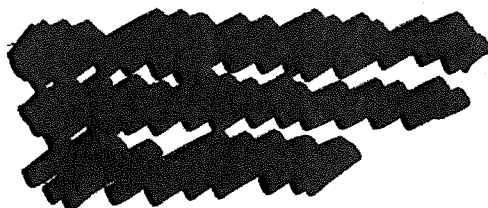
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Full name of sender

Badge Number

MR PHILIP RAYMOND JOHNSON  
3374



(To be received at BHHC by 23 March 2018 at the latest.)

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Yours faithfully

*Dydia KARA*

Full name of sender

Badge Number

*6242*

*[Redacted signature]*

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Licensing Manager  
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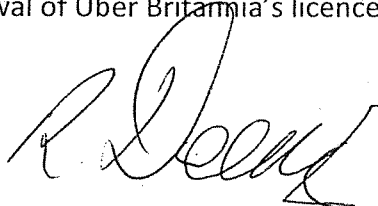
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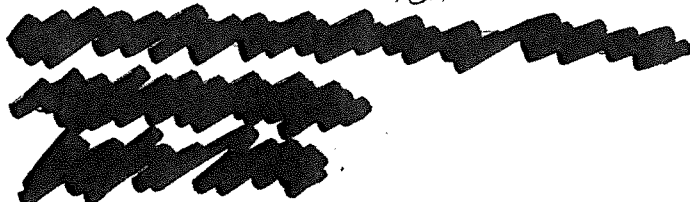
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Full name of sender  
Badge Number

ROBERT DEERING  
BADGE 658



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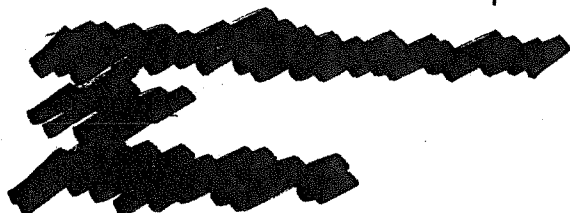
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Full name of sender  
Badge Number

HANI MAHMOUD  
739



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Licensing Manager  
Brighton and Hove City Council  
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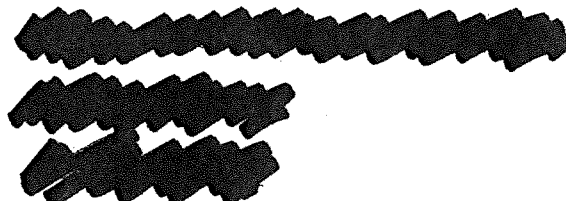
Full name of sender

ANDREW DAVID BEDFORD

Badge Number

~~6350~~

8224



(To be received at BHHC by 23 March 2018 at the latest.)

To be sent via email or post to:

Jim Whitelegg  
Licensing Manager  
Brighton and Hove City Council  
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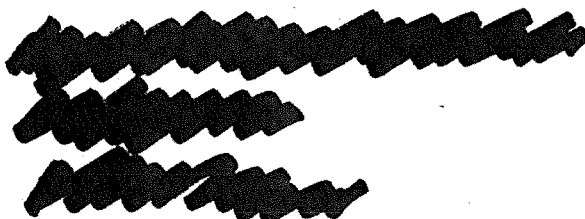


Full name of sender

BRIAN DAVID DRAY

Badge Number

2578





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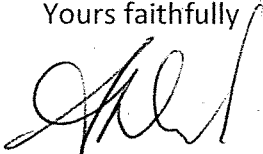
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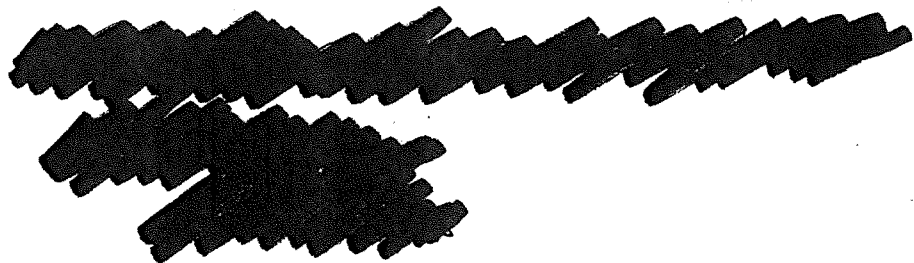


Full name of sender

ALLEN SICKS

Badge Number

P/H 220





**Objection by Campaign Against Unlawful Taxis In Our Nation Limited  
to the requested renewal  
by Uber Britannia Limited  
of a private hire operator's licence**

Campaign Against Unlawful Taxis In Our Nation Limited (CAUTION) objects to the requested renewal by Uber Britannia Limited (UBL) of a private hire operator's licence on the following grounds:

**Booking process**

Customer bookings are not accepted by UBL at its Brighton licensed operating centre (as specified in UBL's operator's licence as being the only place at which it may make provision for the invitation or acceptance of bookings for a private hire vehicle), but by drivers using the Uber driver app.

Whilst this contention has been made many times before in relation to statements made by senior Uber personnel to courts in the UK and Canada<sup>1</sup>, Transport for London (TFL) has now revealed<sup>2</sup> that in an IT systems architecture report it commissioned from Deloitte UK in relation to Uber London Limited<sup>3</sup> (ULL) (the sister company to UBL that uses the same platform and technology), the customer

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<sup>1</sup> Edmonton (City) v Uber Canada Inc, 2015 ABQB 214; City of Toronto v Uber Canada Inc et al, 2015 ONSC 3572; Transport for London v Uber London Limited and Others [2015] EWHC 2918 (Admin); and Aslam and Others v Uber BV and Others [2016] UKET 2202551/2015, [2016] EW Misc B68(ET).

<sup>2</sup> Letter from Transport for London to Uber Britannia Limited, dated 22 September 2017, detailing the decision and reasons for refusing to renew ULL's London private hire vehicle operator's licence.

See LTDA website @

<https://www.ltda.co.uk/assets/files/downloads/TfL%20licensing%20decision%20letter.pdf>

<sup>3</sup> Letter from TFL to ULL, 22/09/2017, paras 19-21.

booking is accepted by the driver and not ULL<sup>4</sup> (and by analogy, as ULL and UBL use the same IT system, this must also be the case in relation to UBL too).

## **Dishonesty**

By virtue of the false statements and declaration made by UBL that it operated (or would operate) in accordance with the law (ie, as a licensed operator it would accept bookings at its specified operating centre in Brighton and dispatch work to drivers) in its original application and subsequent renewal application(s) and / or in response to specific questions that have since been posed by the Council, UBL has obtained licences by deception<sup>5</sup>.

As a direct consequence of UBL fraudulently obtaining a private hire operator's licence<sup>6</sup> and its illegal booking process<sup>7</sup>, every UBL driver has acted illegally by either accepting bookings as if they were an operator<sup>8</sup>, but without holding a private hire operator's licence, or by e-hailing<sup>9</sup>. Whichever the courts finally determine this to be, the result is that drivers' insurance will probably have been invalidated as a result of the driver (albeit unknowingly) not acting in accordance with the law<sup>10</sup>.

## **Greyball and Ripley software**

In order to frustrate regulatory oversight and / or investigation into its operational arrangements, Uber Technologies Inc (UTI) (the ultimate parent company in the USA of Uber entities across the world) developed software including, but not necessarily limited to, Greyball<sup>11</sup> (software that deceived regulators and law

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<sup>4</sup> Letter from TFL to ULL, 20/09/2017, paras 20, 21 &70(a).

<sup>5</sup> Now an offence of 'fraud by false representation' under the Fraud Act 2006, s 2.

<sup>6</sup> It being assumed that Brighton & Hove City Council would not have granted or renewed a private hire operator's licence if it had known or had reason to suspect that UBL was not accepting and then dispatching bookings to its drivers.

<sup>7</sup> Letter from TFL to ULL, 20/09/2017, paras 20, 21 &70(a).

<sup>8</sup> 'Operate' is defined by the Local Government (Miscellaneous Provisions) Act 1976, s 80(1). It being an offence under the LG(MP)A 1976, s 46(1)(d) for a person to 'operate' any vehicle as a private hire vehicle without having a current licence under section 55 of the Act.

<sup>9</sup> Plying for hire without a licence is an offence under the Town Police Clauses Act 1847, s 45.

<sup>10</sup> Using a vehicle to ply for hire that is not insured for public hire is an offence under the Road Traffic Act 1988, s 143.

<sup>11</sup> The New York Times, 03/03/2017 @ <https://www.nytimes.com/2017/03/03/technology/uber-greyball-program-evade-authorities.html>; and The Guardian, 04/03/2017 @ <https://www.theguardian.com/technology/2017/mar/03/uber-secret-program-greyball-resignation-ed-baker>

enforcement officials as to the availability of Uber vehicles) and Ripley<sup>12</sup> (software that enable UTI to remotely wipe servers in the event of Uber premises being raided, as they have been many times in Amsterdam, Brussels, Hong Kong and Paris<sup>13</sup>, to prevent evidence being secured of Uber's operational arrangements).

Whilst such software was developed by UTI and not ULL or UBL, it is clear from the TFL refusal letter, dated 22 September 2017, that Greyball was available for use in the UK<sup>14</sup> and that Ms Joanna Bertram, Uber's Regional Manager for Northern Europe (which included ULL and UBL) had it at her disposal and was, at the very least, a party to correspondence about its use in other jurisdictions for which she had personal responsibility<sup>15</sup>.

The TFL letter does not refer to Ripley, because its existence had not been discovered by the date of TFL's refusal letter<sup>16</sup>.

Although Ms Bertram has publicly resigned from her position with Uber<sup>17</sup>, as have many others including its former Chief Executive Officer and Co-founder Travis Kalanick<sup>18</sup>, it is respectfully submitted that the whole organisation is not a fit and proper person to hold an operator's licence.

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<sup>12</sup> Bloomberg Businessweek, 11/01/2018 @ <https://www.bloomberg.com/news/articles/2018-01-11/uber-s-secret-tool-for-keeping-the-cops-in-the-dark>; and The Guardian, 11/01/2018 @ <https://www.theguardian.com/technology/2018/jan/11/uber-developed-secret-system-to-lock-down-staff-computers-in-a-police-raid>

<sup>13</sup> Bloomberg Businessweek, 11/01/2018, para 9 @ <https://www.bloomberg.com/news/articles/2018-01-11/uber-s-secret-tool-for-keeping-the-cops-in-the-dark>

<sup>14</sup> Letter from TFL to ULL, 22/09/2017, paras 26-52.

<sup>15</sup> Letter from TFL to ULL, 22/09/2017, paras 31-52.

<sup>16</sup> News of the existence (and use of) the Ripley software was made by Bloomberg Businessweek on 11/01/2018. See <https://www.bloomberg.com/news/articles/2018-01-11/uber-s-secret-tool-for-keeping-the-cops-in-the-dark> and <http://uk.businessinsider.com/report-uber-system-disrupted-government-investigations-2018-1>

<sup>17</sup> Letter from TFL to ULL, 22/09/2017, para 43; The Guardian, 02/10/2017 @ <https://www.theguardian.com/technology/2017/oct/02/uber-uk-london-licence-jo-bertram-dara-khosrowshahi>; The Telegraph, 02/10/2017 @ <http://www.telegraph.co.uk/technology/2017/10/02/uber-uk-boss-quits-amid-london-licence-ban/>; Financial Times, 02/10/2017 @ <https://www.ft.com/content/f73aa638-a786-11e7-ab55-27219df83c97>

<sup>18</sup> The New York Times, 21/06/2017 @ <https://www.nytimes.com/2017/06/21/technology/uber-ceo-travis-kalanick.html>; BBC News, 21/06/2017 at <http://www.bbc.co.uk/news/business-40351859>; The Guardian, 21/06/2017 @ <https://www.theguardian.com/technology/2017/jun/20/uber-ceo-travis-kalanick-resigns>; and The Telegraph, 21/06/2017 @ <http://www.telegraph.co.uk/technology/2017/06/21/uber-boss-travis-kalanick-resigns-ceo/>

## Data protection breach

Uber's servers have been hacked and personal data of drivers and customers stolen on at least three occasions (once in 2014<sup>19</sup> and twice in 2016<sup>20</sup>).

On at least the two occasions in 2016, Uber paid ransoms to the hackers<sup>21</sup>.

Whilst Uber may not have acted irresponsibly in relation to its data security arrangements, on each of the three occasions it is now known that there have been data breaches, Uber did not promptly report the breaches to regulators (and may not have reported them at all) or provide information to their drivers or customers so that they could take steps to protect themselves from identity or conventional fraud<sup>22</sup>.

It has been reported that the 2016 data breaches involved 57 million customers and drivers<sup>23</sup> of which Uber has admitted that 2.7 million were people in the UK<sup>24</sup>.

Despite more than two months having elapsed since these data breaches were exposed in the media<sup>25</sup>, Uber (whether that be UTI or UBL) seems to have failed to take any steps whatsoever to contact those affected, despite the Information Commissioner's Office (ICO) stating that Uber should do as long ago as 22 November 2017<sup>26</sup>.

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<sup>19</sup> Los Angeles Times, 27/02/2015 @ <http://www.latimes.com/business/technology/la-fi-tn-uber-data-breach-20150227-story.html>

<sup>20</sup> BBC News, 22/22/2017 @ <http://www.bbc.co.uk/news/technology-42075306>; Information Commissioner's Office (ICO), 22/11/2017 & 29/11/2017 @ <https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2017/11/latest-ico-statement-on-uber-data-breach/>

<sup>21</sup> Bloomberg, 21/11/2017 @ <https://www.bloomberg.com/news/articles/2017-11-21/uber-concealed-cyberattack-that-exposed-57-million-people-s-data>

<sup>22</sup> Ibid 19-21.

<sup>23</sup> Ibid 19-21.

<sup>24</sup> Ibid 19-21.

<sup>25</sup> Ibid 19-21.

<sup>26</sup> Information Commissioner's Office (ICO), 22/11/2017, 5.35pm @ <https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2017/11/latest-ico-statement-on-uber-data-breach/>

## Rotten to the core

In *R v Knightsbridge Crown Court ex parte International Sporting Club (London) Limited and Another*<sup>27</sup> the Divisional Court said:

We have no hesitation in saying that past misconduct by the licence holder will in every case be a relevant consideration to take into account when considering whether to cancel a licence. The weight to be accorded to it will vary according to the circumstances of the case. There may well be cases in which the wrongdoing of the company licence holder has been so flagrant and so well publicised that no amount of restructuring can restore confidence in it as a fit and proper person to hold a licence; it will stand condemned in the public mind as a person unfit to hold a licence and public confidence in the licensing justices would be gravely shaken by allowing it to continue to run a casino.

Whilst not all Uber's current reputational issues would ordinarily be relevant licensing considerations, the number and range of the issues currently facing the company are:

- Sexism and sexual harassment<sup>28</sup>
- Tracking user's phones for five minutes after they leave the car<sup>29</sup>
- Uber employees spied on ex-partners, politicians and celebrities<sup>30</sup>
- Failure to report serious criminal offences to police, including sex attacks by drivers<sup>31</sup>
- Driver employment status<sup>32</sup>

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<sup>27</sup> [1981] 3 WLR 640, [1982] QB 304

<sup>28</sup> The Guardian, 07/06/2017 @ <https://www.theguardian.com/technology/2017/jun/06/uber-fires-employees-sexual-harassment-investigation>; and The Guardian, 12/06/2017 @ <https://www.theguardian.com/technology/2017/jun/12/uber-silent-travis-kalanick-future-adopts-holder-proposals>;

<sup>29</sup> The Guardian, 29/08/2017 @ <https://www.theguardian.com/technology/2017/aug/29/uber-u-turn-tracking-users-after-trip-ended-app-user-privacy-new-ceo>

<sup>30</sup> The Guardian, 13/12/2017 @ <https://www.theguardian.com/technology/2016/dec/13/uber-employees-spying-ex-partners-politicians-beyonce>

<sup>31</sup> Letter from TFL to ULL, 22/09/2017, paras 54-58

<sup>32</sup> *Aslam and Others v Uber BV and Others* [2016] UKET 2202551/2015, [2016] EW Misc B68(ET); The Guardian, 19/04/2017 @ <https://www.theguardian.com/technology/2017/apr/19/uber-appeal-uk-employment-ruling-drivers-working-rights>

- Bribery law violation investigation<sup>33</sup>
- Appeal against TFL's refusal to renew ULL's London private hire operator's licence<sup>34</sup>
- Appeal against the City of York Council's decision to refuse to renew its private hire operator's licence because of: (i) the unreported data breach concerning 57 million driver and customer records; and (ii) the increased level of complaints, which indicates a lack of proper management of drivers by UBL<sup>35</sup>

Although Uber has many loyal users of its services, it has growing numbers of detractors, including many who were previously loyal users of its services. It is submitted that, despite having some loyal users, Uber in the UK, particularly ULL and UBL, stands condemned in the public mind and public confidence in Brighton & Hove City Council as a licensing authority would be gravely shaken if it did not refuse to renew UBL's licence.

In all the circumstances and applying the principles enunciated by the Divisional Court<sup>36</sup>, UBL in its own right and as part of UTI, is not a fit and proper person to be licensed and its application to renew its private hire operator's licence should be refused.

**David B Wilson**  
**Company Secretary and Licensing Consultant**  
**Campaign Against Unlawful Taxis In Our Nation Limited**

---

<sup>33</sup> Reuters, 29/08/2017 @ <https://www.reuters.com/article/us-uber-probe/u-s-probes-uber-for-possible-bribery-law-violations-idUSKCN1B92TG>

<sup>34</sup> Letter from Transport for London to Uber Britannia Limited, dated 22 September 2017, detailing the decision and reasons for refusing to renew ULL's London private hire vehicle operator's licence. See LTDA website @ <https://www.ltda.co.uk/assets/files/downloads/TfL%20licensing%20decision%20letter.pdf>

<sup>35</sup> City of York Council, Minutes of the Meeting of the Gambling, Licensing & Regulatory Committee, 12/12/2017 @ <http://democracy.york.gov.uk/mgAi.aspx?ID=47421> and webcast @ [https://www.york.gov.uk/info/20241/webcasts/2082/webcasts\\_of\\_gambling\\_licensing\\_and\\_regulatory\\_committee\\_meetings](https://www.york.gov.uk/info/20241/webcasts/2082/webcasts_of_gambling_licensing_and_regulatory_committee_meetings); BBC News, 12/12/2017 @ <http://www.bbc.co.uk/news/uk-england-york-north-yorkshire-42328380>

<sup>36</sup> R v Knightsbridge Crown Court ex parte International Sporting Club (London) Limited and Another [1981] 3 WLR 640, [1982] QB 304





Brighton & Hove City Council  
Town Hall  
Norton Road  
Hove

March 22 2018

### **Uber Brighton & Hove Operators Licence Renewal April 23 / May 4 2018**

*As instructed this document has not been provided to Licensing Committee Councillors nor released to the public prior to the official publication by Brighton & Hove City Council as dated. Permission is granted to the council for the publication of this document for the BHCC Agenda Pack for the renewal of the Brighton & Hove Uber Operator Licence. Permission for the publication of this document by other parties is also granted.*

The GMB Brighton & Hove Taxi Section does not object to any Operator operating in the city on competition grounds providing that such an Operator is 'Fit and Proper'.

The following points are raised with concerns about standards for Uber to be considered as being 'Fit and Proper' to be granted a Brighton & Hove Operators Licence.

- 1: Breach of Data – Failing to inform Brighton & Hove Account customers**
- 2: Wheelchair Accessibility – Insincere Undertakings/Lip Service - Uber Assist**
- 3: Uber Regions – The action plan to reinvent the UK Licensing Authority Areas**
- 4: Uber App /Uber Model – 'Peer to Peer' System**
- 5: Uber Terms of Conditions - Unfit conditions to hold a B&H Operators Licence**
- 6: Uber accused of silencing women who claim sexual assault by drivers**  
**The Guardian – March 16 2018**

### **Additional Information**

- 7: Conditions Imposed by the Council in 2017 for the granting of a six month licence.**
- 8: TfL Report – Cross Border Hiring Concerns – Calls for Legislation change to the Deregulation Act 2015 - "This is the single largest risk to Policing nationally" Metropolitan Police Service 2017**

**This document contains 18 questions for 'The Panel' from the GMB Brighton & Hove Taxi Section which require a full response.**

**A compiled list of these 18 questions is also provided under Appendix for easy access.**



## 1: Breach of Data – Brighton & Hove Uber Account Holder Not Informed

Uber applied for the renewal of the Brighton & Hove Operators Licence on **September 20 2017**.

It was reported on **November 22 2017** that 57 million Uber accounts has been hacked in **2016**.

**“Firm paid hackers \$100,000 to delete data and keep breach quiet”**

**“Chief security officer Joe Sullivan fired for concealing October 2016 breach”**

*The Guardian* <https://tinyurl.com/uber-hacked1>

It was also reported on November 29 2017 that 2.7 million Uber account holders in the UK had their details hacked in 2016 with Uber failing to report this matter to the respective regulatory authorities and account holders.

**“A hack on Uber users’ data affected 2,700,000 people in the UK, the company has confirmed. In late 2016, data on riders was compromised – including their names, email addresses and phone numbers.”**

*Metro.co.uk* <https://tinyurl.com/uber-hacked2>

No company is immune from hacking/cyber attacks but all companies have a legal and moral duty to inform account holders of any Data Breach for those customers to take appropriate action.

The emphasis here is on Uber failing to alert Uber Brighton and Hove account customers in 2016. However quite ironically Uber was immediately able to drum up a massive petition against TfL within hours of the London licence being refused in 2017 so we know Uber can act when it is in its own interest.

It would naturally be the case that Brighton & Hove Uber account holders would have been affected considering that Uber had previously stated that thousands of people in the city had downloaded the Uber App in 2016. The BBC reported the following statement from Uber in October 2015:

*“In a statement, Uber said it was looking forward “to offering a safe, reliable and affordable choice”. “Over 85,000 people in the area have downloaded and opened the app in the last few months so we’re really excited about the potential.”* <https://tinyurl.com/uber-app-download>

**On December 12 2017 York Council refused to renew the Uber York Operator Licence based on the Breach of Data which affected York users of the App.**

York Councillors considered Uber’s failure to act in a proper way was irresponsible enough to consider Uber not to be ‘Fit and Proper’ to hold a York Licence.

### **Gerald Gouriet QC – Licensing Lawyer – York City Council Uber Operator Licence Refusal**

“After deliberating in open session, York’s Regulatory and Licensing Committee refused (by majority) to renew UBL’s York PHV operator’s licence under section 62(1)(b) LGMPA 1976, namely “conduct on the part of the operator which appears to the district council to render him unfit to hold an operator’s licence.” The committee’s reasons may be summarised –

- The failure by Uber to inform the relevant authorities until November 2017 of a serious data breach that occurred in 2016 (and which affected York users of the Uber App) rendered UBL unfit to hold a PHV operator’s licence.

- The increasing number of complaints received by York Council about private hire vehicles operated by UBL and driving in York gave rise to concerns about the proper management by UBL of its drivers.

<http://licensing-lawyer.co.uk/uber-withdraw-appeal>

### **Uber York Appeal**

Uber launched an Appeal against the York refusal but as of March 15 2018 it has been confirmed that Uber has now dropped the Appeal. It would appear that either Uber finally accepted York Council's considered status of it not being 'Fit and Proper' or considered it unwise for a court to confirm that the York Licensing Committee Councillors were correct in their decision.

### **The Application Form – September 20 2017**

The September 20 2017 Application is shown as being in the name Rob Van De Waude – Director – Aalsmeer – The Netherlands

### **The Brighton & Hove Operators application requirements states:**

*"Give details of all Convictions (whether or not spent), Cautions, Conditional Cautions, Community Resolutions, Anti Social Behaviour Orders, Criminal Behaviour Orders, County Court and High Court Injunctions, including Injunctions to prevent nuisance and annoyance or Fixed Penalty Notices (personally or business related) recorded against you **and any Pending Proceedings.**"*

The question has to be that Mr Rob van der Woude as a Director would have been fully aware of the very serious 2016 Uber Breach of Data which may have affected Brighton & Hove Uber account holders and of any possible Pending Proceedings but did not alert inform the council of this.

**The Information Commissioners Office and the governments National Cyber Security Centre are stated to be investigating the impact on UK customers** <https://tinyurl.com/ico-uber>

*"The ICO said the way in which Uber dealt with a major data breach has raised **"huge concerns"** over the company's data protection policies and ethics.*

*The UK's data regulation body said concealing a data breach should come with a much larger fine than the standard penalties imposed on organisations that fail to sufficiently protect their customers' data. Uber is alleged to have paid the hackers \$100,000 not to mention it had hacked the taxi booking app's systems, according to Bloomberg.*

*"It's always the company's responsibility to identify when UK citizens have been affected as part of a data breach and take steps to reduce any harm to consumers," ICO deputy commissioner James Dipple-Johnstone said in a statement.*

***"If UK citizens were affected then we should have been notified so that we could assess and verify the impact on people whose data was exposed."***

**Uber London is registered as Data Controller with the ICO but Uber Britannia is not. The Brighton & Hove Uber Application Form is applied for under Uber Britannia so what excludes Uber Britannia from registering as a Data Controller to protect Brighton & Hove Uber account holders?**

On Friday March 16 2018 the National Lottery immediately issued a warning to affected Account holders of a possible Breach of Data and also alerted the media

*“Important player notice As part of our regular security monitoring, we have seen some suspicious activity on a very small number of players’ accounts. We have directly contacted those players whose accounts have been affected. We are advising players to change their password as a precaution, particularly if they use the same password across multiple websites.”*

**If the National Lottery organisation had waited until over a year to announce the breach of data and only after paying a hacker ransom money it would be expected that the licence to operate would be removed and a heavily fine imposed.**

#### **GMB Conclusion**

It is very clear that Uber did not undertake the responsibility of informing its UK account holders of the Breach of Data which would have included Uber account holders in Brighton & Hove which renders it as being not ‘Fit and Proper’ to hold a Brighton & Hove Operators Licence.

#### **Question 1a for The Panel**

**With Uber failing to inform UK account holders of the Breach of Data which would have affected Brighton & Hove Uber account holders in 2016 would The Panel agree with York Council that Uber is not ‘Fit and Proper’ to hold a B&H Operator Licence?**

#### **Question 1b for The Panel**

**As the B&H Operator Licence has been applied for under ‘Uber Britannia’ why doesn’t ‘Uber Britannia’ hold a ‘Data Controller’ licence unless it is not ‘Uber Britannia’ that processes the recording of bookings/contracts for the protection on Brighton & Hove Uber account holders?**

#### **Question 1c for The Panel**

**As Uber Britannia is named on the Uber Brighton & Hove Operator Application/Renewal form which does not hold a Data Controller licence would The Panel consider it irresponsible to grant the licence?**

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## 2: Wheelchair Accessibility - Insincere Undertakings/Lip Service - Uber Assist

### Under the Brighton & Hove Procedure for Licensing a Private Hire Operator in the Application Form it states:

**1.3** Brighton & Hove city Council are subject to duties under the Equalities Act 2010 which includes the duties to eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Act. In relation to the Hackney Carriage and Private Hire as the licensing authority we are wishing to ensure that the needs and the requirements of those with a disability are being acknowledged and met.

**1.4** To ensure disabled passengers in wheelchairs receive an equal service any Operator operating 100 or more vehicles must ensure that at least 20% of their vehicles are wheelchair accessible.

It is not accepted that Uber does not have to comply with 1.4 on the basis that it has swamped the city with hundred of TfL and other Local Authority private hire vehicles and hackney carriages from all over the UK to predominantly work in the city. Despite these resources and being valued in the billions...Uber has not shown any willingness to the council to provide any wheelchair accessible service to the public in Brighton & Hove. This is the complete opposite to the way that the local companies have operated by supplying WAV's upon demand after having worked with the council for many years to provide equal access to the public in the city. It is known that at least one local company actually subsidises the cost for drivers to provide WAV's to ensure that the service is there on demand. However...this company does not have the billions that Uber has.



### Broken Undertakings – Lip Service: Uber Initial Application October 19 2015

Uber has failed to undertake **any** provision of wheelchair accessible vehicles as stated at the 'Panel Meeting' of the initial Uber Operator Application in 2015 despite ironically flooding the city with ph vehicles and hackney carriages from all over the UK.

At the initial Operators Licence Application at the Licensing Panel on October 19 2015 chaired by Councillor Mo Marsh...with Councillor Lizzie Deane and Council Dee Simpson the following was stated by Uber:

**Uber** :Just a slightly general observation as that one of the key things that the UK has is different licensing requirements in different licensing regimes and so Uber obviously accords with the licensing regime depending on the different city. So I think part of what we would try to get at to at the discussion of the 'grace period' earlier if I can delve back into that..

**MM**: Yes...Let's assume I asked you a question about that because I would done.. grace period and deferral

**Uber**: I think it relates to some of the on requirement on drivers as well. The difference is that Uber obviously doesn't operate in Brighton at the moment and compared with Streamline cars for instance we dont have a number of drivers who can provide you with a percentage of cars that are wheelchair accessible because we dont have any cars or drivers because we dont operate yet in Brighton. What I think Matthew was trying to get at was that there is a difference between what Uber is now that is in Brighton which is just an office and an application and what we will be when we launch. And so the provision of the licence and conditions and adherence to the Blue Book we will absolutely do 100%..it's just that we dont do that yet.....

**MM:**.... You would be prepared to adhere to every bit in our Blue Book is that what I just heard.

**Uber:** We are not asking for any special dispensations we are asking for licence granted the conditions that would normally apply.

**MM:** Which are in here..ok thank you..whether that's answered the grace period or not ..**Uber:** The point on the grace period is that we are not asking for a grace period..all I am sort of saying is that there is a difference what we will be like by the time we launch. **By the time we launch we will have cars and the question like "How many wheelchair accessible vehicles you have on your platform that will be a legitimate question when we have drivers but we dont have any drivers.**

See Video of meeting discussing WAV's to validate transcript <https://tinyurl.com/uber-wav>

### **The Minutes of the Uber Initial Application October 19 2015**

7.36 Councillors Deane and Simson referred to the arrangements to be made when calling up an Uber vehicle. It was confirmed that vehicles could not be ordered in advance. In terms of the requirements to conform with Disability Discrimination Act it was explained that although as a new operator Uber would not have wheelchair accessible vehicles, (WAVs), they would, once they began operation and reached the level at which that was required.

2. Disability issues. The Panel had concerns in relation to the provision of wheel chair accessible vehicles (WAV) but were also re-assured by the fact that the applicants detailed the arrangements in place for passengers who were blind or deaf and their willingness to meet all of the conditions required of other operators as set out in the "Blue Book". The lack of clarity around WAV was important in terms of 'the level playing ground' principle, which was deemed important by all parties and this had had some impact on its decision. It was important to contextualise this. Brighton and Hove was proud of the strides it had made to support its public sector equalities duties. This could not have been achieved without the strong commitment of the established large operators. **The Panel noted that the small operators did not (or more correctly could not) provide the same high level of WAV's that the other operators did. It would be inconsistent to expect Uber to match the established operators at the outset, but as they grew the Panel would expect that this would become a greater responsibility.** Whilst, it could be argued that this had nothing to do with the fit and proper test, clearly, it was is a factor both in working practice and the Blue Book. Given the parties all accepted the Blue Book as

**At the time of the meeting Uber undertook to only use Brighton & Hove Licensed vehicles giving the impression their Brighton & Hove fleet would grow over time which would be considered as a 'Statement of Influence' or what it more commonly known as 'Uber Speak'.**

**In reality Uber has not greatly grown its Brighton & Hove fleet but instead brought in TfL and other out-of-town ph vehicles so on this basis why would Uber be remotely interested in enlarging its Brighton & Hove fleet to be encumbered with the responsibility of providing WAV's in the city for disabled passengers? It could be regarded as advantageous to have a lower size fleet of Brighton & Hove licensed private hire cars to avoid the responsibility of providing WAV's.**

## Uber Assist?

It is very clear that **UberASSIST** has nothing at all to do with wheelchair accessibility and effectively covers what Brighton & Hove taxi/private hire driver are currently doing as standard which is offering assistance to those who require it for whatever needs and abilities that is normally expected of every taxi and private hire driver licensed by the council as standard practice.

**UberASSIST** is nothing more than a pseudo system brought in by Uber to try and hoodwink local authorities into believing this as Uber addressing full wheelchair needs. No council should be fooled by this.

Even in its rudimental function **UberAssit** is rarely available in Brighton & Hove as shown by the Uber App after many days and many hours of viewing the App for **UberAssist** availability.

## GMB Conclusion

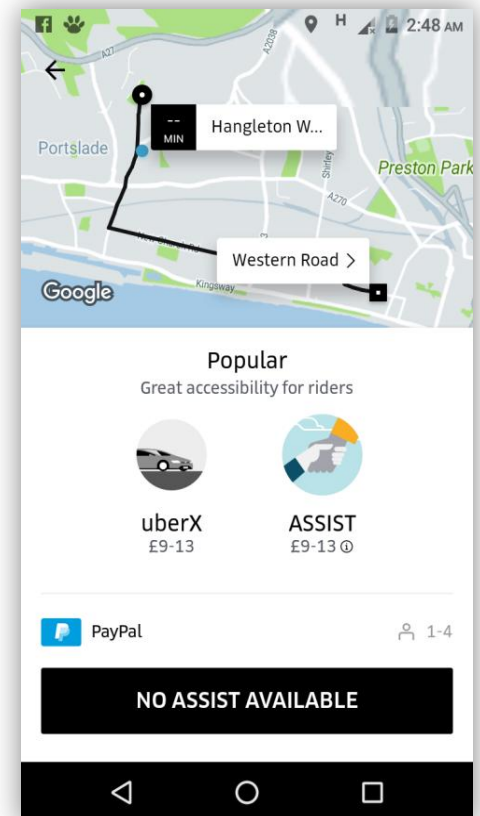
Despite being licensed since 2015 Uber does not cater for wheelchair users in the city in any shape or form despite having access to thousands of private hire cars that it encourages to predominantly work in the city from all over the country and has shown no commitment or willingness to the council to provide WAV's. We consider that as Uber has been so unwilling to commit to provide a proper WAV facility in the city that it should rename this 'service' as '**UberResist.**'

Uber cannot even be included in the WAV element of the 2018 Unmet Demand Survey where test calls are made to Operators to assess WAV provision because Uber has no capability to provide the technical means of simple communication for a proper WAV service.

On this basis we consider Uber not 'Fit and Proper' to be granted an Operator Licence.

## Question 2 for The Panel – Provision of WAV's

Despite bringing in hundreds of ph cars and hackney carriages from all over the UK and being valued in the billions would you agree that by now after being licensed since 2015 it would be expected of Uber to have introduced a proper WAV service like the local companies supply?





### 3: Uber Regions – The action plan to reinvent the wheel/UK Licensing Authority Areas and Legislation

It is quite astonishing the Uber has now taken its next stage of its UK takeover by creating fantasy 'Uber Regions' to reinvent the UK Licensing Authority areas by dividing the UK into nine 'Regional' areas. This can only be seen as an attempt by Uber to create extraordinary larger licensing areas to try to change national Legislation via 'Uber Stealth' See shaded UK for 'South East Region'

Uber justifies this on their website as follows:

*"Uber now operates in more than 40 towns and cities across the UK, with tens of thousands of drivers and millions of riders using our app every week."*

*"While cross-border driving is something the law allows for and is common in private hire journeys across England and Wales, we've heard from local licensing authorities that the way our app works can make it hard for them to oversee what some drivers are doing in their jurisdiction."*

**Comment:** We are very pleased that Uber has admitted that its business model has caused a great deal of concern and unnecessary work for local councils and has let down the public by encouraging ph drivers to work outside their Local Authority licensing area well away from any respective Enforcement. Examples of which have been abundant in the city where out-of-town ph do whatever they want with no control whatsoever and where no reciprocal Enforcement has been achieved apart from with Adur. Even Lewes DC refused such concordat arrangements.

*"That's why next month we are making a significant change which will mean drivers will only be able to use our app within the **region** where they are licensed as a private hire driver."*

**Comment:** This is 'Uber Speak' by appearing to limit ph drivers to the area or as Uber calls "Region" that can be worked. However the new 'Uber Regions' will still cause exactly the same issues and concerns as before so nothing has changed. Uber probably sat around a big table with a dozen lawyers to drum up a way of creating 'smoke and mirrors' to try and fool local councillors.

*"For example, a driver licensed by Leeds City Council would still be able to do trips with Uber in Wakefield, Bradford or anywhere else in the Yorkshire **region**\*, but not in Manchester, Birmingham or anywhere outside the Yorkshire region. A driver will still be free to choose where they want to drive, but to do so they will need to be licensed by an authority within the **region**\* where they want to drive."*

**Comment;** "A driver will still be to choose where they want to drive..." Exactly.. so nothing has changed.

*"While we will of course keep everything under review we believe this change strikes the right balance for the drivers, riders and cities we serve".*





**Comment: Uber will do whatever it wants to serve its own purpose.**

*"It will help local licensing authorities tackle the challenge they currently face in regulating drivers in their area when they are licensed in another part of the country; passengers will still be able to take affordable long distance trips (such as to and from airports, hospitals or back home after a night out in the city centre); and drivers will be able to carry out those longer trips without being forced to drive back without a fare paying passenger."*

**Comment: The last statement is extremely arrogant and ignores the strong feelings of the Local Government Association of the dangers of cross-border hiring which is fully supported by the and has attempted to reinvent Legislation.**

**How would the council feel if Uber attempted to change the Legislation and local bylaws on the provisions and conditions of alcohol licenses/ licensed premises?**

**TfL has recently provided a document on the issues of cross border hiring which contains police warnings of the dangers it imposes. See Item 8**

**No one should be in any doubt that Uber has not created these 'UK Uber Regions' to satisfy local councils. Uber has done this in an attempt to create new Legislation of larger licensing areas to suit it needs and wants. This is a smoke and mirrors attempt to appease local councillors which we sincerely hope that local councillors from all over the UK will be not be fooled by.**

**Uber holds an Operator Licence in Reigate & Banstead. However R&B licensed ph drivers have actually been told they will no longer receive work in their own licensing authority after June as it will become a Region of London to be served by TfL ph. We hope that Reigate and Banstead council will view this new Uber system with disdain. We understand that this is also being applied to other areas as well.**

#### **Uber TfL Private Hire Vehicles Geo-Fencing**

Uber has now geo-fenced TfL private hire cars from working in the city which **may appear** to be a step forward to alleviate the massive problem of such cars predominantly working in the city. This was announced to take place as of March 14 2018. The day before this Uber drivers held a protest by Brighton Station.

However this is far from the case as the trade has witnessed many TfL ph appearing to be 'working' in the city since March 14 and right up unto the date of this document March 22 2018. Reports of which have been supplied to the council. Uber has since denied that this is the case. We have provided evidence of a known Uber ph driver/vehicle which is registered as a TfL ph vehicle which Uber claimed is licensed by Lewes DC. Like Brighton & Hove Lewes DC does not allow dual plating so something appears to be amiss. As of the date of this document we are awaiting an update on this matter.

#### **Brighton & Hove – The new 'Uber South East Region'**

Uber has now placed Brighton & Hove at the heart of the '**South East Region**' which from the information we have been given stretches from Southampton all away along the south coast although full details are very scant and we await full confirmation. So although we will no longer apparently see TfL cars working in the city we have already seen a massive influx of other out-of-town ph vehicles from all over the so called '**South East Region**' working in the city. How does this equate to the Uber supposed 'sympathetic' statement of:

*“....we’ve heard from local licensing authorities that the way our app works can make it hard for them to oversee what some drivers are doing in their jurisdiction.”*

Far from making it easier for councils Uber are actually encouraging out-of-town ph to head to ‘Honey Pot’ areas to ‘Tout for Hire’. Is this the action of a ‘Fit and Proper’ Operator?

We are very interested to know what Brighton & Hove Councillors think of this?

### **Uber Drive in Brighton Via Lewes**

More importantly a quick look at the Uber website shows that Uber are giving instructions.. albeit by stealth... to go and get licensed in Lewes to work in Brighton detailing that it is cheaper and quicker to go this way:

### **Uber Website - Popular Jurisdictions - Brighton** <https://tinyurl.com/uber-brighton-lewes>

*“Set out below is a list of the local council authorities where many Uber partner-drivers have chosen to obtain their private hire driver licence in the UK.*

*The time and costs required to obtain a licence vary by council, as shown by the estimates set out below. Please note that the estimated times listed below, whilst generally accurate in our experience, are indicative only and are subject to change depending on current levels of demand.”*

#### **Brighton & Hove**

Total estimated cost of obtaining a PHDL: £1112  
Total estimated time to obtain a PHDL: 40 weeks

Total estimated cost of obtaining a PHVL: £134  
Total estimated time to obtain a PHVL: 2 weeks

#### **Lewes**

Total estimated cost of obtaining a PHDL: £422  
Total estimated time to obtain a PHDL: 8 weeks

Total estimated cost of obtaining a PHVL: £186  
Total estimated time to obtain a PHVL: 2 Weeks

Why would anyone bother to undertake the professional approach expected by Brighton & Hove Council to endure the investment in time and dedication in achieving the local ‘Knowledge Test’ to avoid reliance on a SatNav as all the existing Brighton & Hove drivers have when it is far easier and quicker to get a Lewes licence to predominantly work in Brighton & Hove?

### **Council Fees**

There is also the economic factor of less licence fees being paid to the council to run an efficient Taxi & Private Hire department for officer wages and Enforcement as people chose to licence in Lewes to predominantly work in Brighton & Hove.

Effectively the city will see a gradual decline in drivers licensed by Brighton and Hove Council and an increase of Lewes DC private hire vehicles predominantly working in the city...which will also mean a gradual decline in the standards expected. Will the council have to drop the level of conditions for licensing ph driver/vehicles forced by Uber stealth?

Why would anyone bother to have expensive council controlled CCTV or even bother to have to adhere to all the conditions of licensing in the ‘Blue Book’ which is there to protect the public when it is far easier and quicker to get a Lewes licence? In fact we have no doubt that some existing B&H licensed drivers will now obtain Lewes DC licences and drive Lewes DC licensed vehicles to predominantly work in the city.

**Lewes District Council has now announced the following on its website**

**“Due to an increase in demand it is currently taking us around two weeks to respond to taxi licence applications.”**

**GMB Conclusion**

Uber has now taken on the role of defining new and larger areas of licensing despite being fully aware of the major issues that it causes for local licensing authorities. Uber has shown its capability of geo-fencing areas for specific cars/drivers yet refuses to cooperate to restrict ph vehicles/hackney carriages to their own licensing area and instead has created fantasy ‘Uber Regions’.

Instead it openly encourages drivers to predominantly work and sit around waiting for jobs in areas they are not licensed in. **The GMB has labelled this as “Touting for Hire”.**

The council will recall that Uber actually encouraged B&H Uber ph to remove all identity and as a consequence a proper ‘Exemption Policy’ was proposed by the GMB which was fully supported by the trade which the council acted on. The council will also recall that Uber attempted to remove the ‘Knowledge Test’ for private hire drivers but thankfully this was rejected by the trade and local councillors..

However... the B&H trade still have serious issue of out-of-town cars which carry no markings working under Uber where drivers of such cars are removing identification details illegally which the trade endeavours to report to its respective Licensing Authority. In the month of March 2018 this specific issue has escalated. The public and the trade can no longer identify where a ph car is from or in the worst case scenario whether the cars and drivers are in fact licensed This means the trade is spending time identifying the licensing area and contacting the relevant authority to protect the public. Wolverhampton ph have been the worst offenders where Wolverhampton Licensing has acknowledged this issue. It is now the ‘Wild West’ in the city caused by Uber.

We consider this activity to be a high risk to the public in Brighton & Hove as identification of ph vehicles is essential to protect the public.

On this basis we consider Uber not to be ‘Fit and Proper’ to hold a Brighton & Hove Operators Licence.

**Question 3a for The Panel – Uber ‘Regions’**

**What does The Panel think of the new ‘Uber Regions’ created by Uber?**

**Question 3b for The Panel – Uber ‘Regions’**

**As Uber has clearly demonstrated the ability to ‘Geo-Fence’ then would The Panel expect Uber to do this to keep licensed private hire cars within their own licensing authority for the protection of the public?**

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#### 4: The Uber App – Uber Mode – ‘Peer to Peer’ System

Currently Uber holds no licence in London since TfL refused to grant one but continues to function as normal pending the Appeal. The function of the App is the same as used under the 1998 London Private Hire Act as it is under The Miscellaneous Provisions Act 1976 whereby all bookings must be accepted and recorded by an Operator in the ‘First Instance’ and then dispatched to the driver in the ‘Second Instance’. No legal entity can deny this is the case.

One of the reported reasons as to why TfL did not grant the licence is due to functionality of the Uber App. TfL contracted a company called ‘Deloitte’ which we understand has carried out a forensic technical examination of the App but unfortunately due to the Appeal process no details have been released by TfL on that report.

BHCC sought to gain information from TfL for the reasons of the refusal which of course TfL refused to reveal as there is a pending Appeal.

However one can only presume that TfL has an extremely good case against the legality of the App where the argument has always stated that the App is illegal as it connects the driver directly with the customer **before** being recorded as a booking with the Operator. Effectively this is a ‘Peer to Peer’ service with the driver accepting the booking in the ‘First Instance’ of the process.

Uber has no facility to accept any booking unless the driver accepts the booking/contract in the ‘First Instance’.

In the case of Uber... ‘Back-Filling’ of a booking in the ‘Second Instance’ of the process is undertaken through the process of recording the job against the appropriate Licensing Authority of the vehicle having already undertaken the job.... in the ‘First Instance’.

This is no different to a ph being hailed in the street and the driver then getting the office/operator to record the job which is illegal under both the London Private Hire Act 1998 and the Local Miscellaneous Act 1976 despite however much Uber or its legal representatives may deny it.

It is challenged to Uber that it has no knowledge whatsoever as to what car of whatever licensing authority a booking/contract is issued to until the driver accepts the booking/contract in the ‘First Instance’. Until it knows this factor it cannot accept the booking/contract... and when it does know that factor it does this in the ‘Second Instance’.

The trade has been told that the council considers that the App is legal but despite requests for proof of the evaluation and conclusion no evidence has been provided to the trade and as such we continue to state that the App is not legal to function in Brighton & Hove as it contravenes the ‘Brighton & Hove Blue Handbook for Hackney Carriage, Private Hire Driver, Vehicles and Operators.’ **Section 169 – Immediate Hire.** (see further down)

**Ex-Uber Director Jo Bertram stated at the Yaseen Aslam v Uber Employment Tribunal on July 7 2016**

*“45. ULL is responsible for accepting the booking made by a Passenger, as holder of the operator licence. However, at the point that a request is made by a Passenger, there is no obligation to provide a vehicle”*

**This is clearly because Uber has no facility to place a recorded booking into the Uber**

**system in the 'First Instance' unlike other Operators in the city who fully accept bookings into their respective systems in the first instance.. even via their own company Apps**

*"A booking is not accepted by ULL until a driver has confirmed they are available and willing to take it."*

**This is a clear admission that no recorded booking is made with Uber in the 'First Instance' until a driver accepts the job because it is a 'Peer to Peer' service connecting the customer directly to the driver.**

*"Confirmation and acceptance then takes place by ULL almost simultaneously"*

**This is a clear admission that Uber 'Back Fills' the booking in the second instance only after the job has been taken by the driver in the first instance.**

*"5.3 Once a request is made and ULL has confirmed the driver is available to take the booking, ULL accepts the booking on behalf of the Driver...."*

**Again...this is a clear and absolute admission that Uber 'Back Fills' the booking in the second instance only after the job has been taken by the driver in the first instance who has been put into direct contact with the customer instead of the operator giving the booking to the driver first**

**It is vitally important to note that the 'Blue Book' clearly states:**

#### **169. Immediate Hire**

Any private hire vehicle must not be used for immediate hire while that vehicle is on a road or other public place, except where such offer is first communicated by the operator to the driver by telephone or by apparatus for wireless telegraphy fitted to that **vehicle and the driver has no knowledge of such offer prior to such communication.**

On this basis the Uber App clearly breaches the conditions of the 'Blue Book' and as such Brighton and Hove council should not grant Uber an Operators Licence.

It is very important to note that Milton Keynes V Skyline Taxis case in June 2017 that uses the icabbee system which found in favour of Skyline Taxis was based on an entirely different principle compared to the working of the Uber App. <https://tinyurl.com/skylinetaxis>

#### **GMB Conclusion**

We consider the Uber App contravenes the Miscellaneous Provisions Act 1976 that by virtue of the Act an Operators Licence is required for the acceptance of bookings in the first instance and not for the purpose of back-filling bookings **after** a booking has been accepted by the driver who has taken the booking in the first instance. This is much the same as a ph driver being approached in the street for hire.. the driver accepting it.. and only then booking the job in with the operator The Uber App connects the driver directly with the customer giving prior knowledge of the booking before the Uber system is able to record the booking.

The Brighton & Hove Blue Book under **Section 169 – Immediate Hire** fully explains this.

**Question 4a for The Panel – The Uber App**

Will The Panel make a statement to the trade that it categorically guarantees the Uber App is 100% legal for the purpose and use for a Brighton & Hove Private Hire Operator following the councils own forensic examination of the app based on the councils process of due diligence as the licensing authority ensuring that it legally complies with Legislation and does not contravene Section 169 of the 'Brighton & Hove Blue Handbook for Hackney Carriage, Private Hire Drivers, Vehicles and Operators 4<sup>th</sup> Edition' by acting as a 'Peer to Peer' system whereby the driver accepts the booking/contract in the 'First Instance'?

**Question 4b for The Panel – The Uber App**

If The Panel states that the Uber App is 100% legal but the Deloitte report as commissioned by TfL reveals that it is not will Brighton & Hove City Council compensate the local taxi/private hire trade for losses incurred due to the council incorrectly licensing Uber as an Operator?

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**5: Uber Terms of Conditions - Unfit 'Conditions of Use' to hold a B&H Operators Licence**

**Uber Terms and Conditions – March 14 2018**

**<https://www.uber.com/legal/terms/gb/>**

**4. YOUR TRANSPORTATION CONTRACT WITH A TRANSPORTATION PROVIDER.**

Uber UK is not a Transportation Provider and does not provide transportation services. Transportation services are provided to you under a contract (the "**Transportation Contract**") between you and the Transportation Provider that is identified to you in the booking confirmation provided by Uber UK.

The Transportation Provider may be licensed in an area other than where the booking is requested or the transportation services are provided.

Uber UK is not a party to the Transportation Contract and acts as a disclosed agent for the Transportation Provider in communicating the Transportation Provider's agreement to enter into the Transportation Contract.

**Question 5a for The Panel - Uber ToC**

If Uber is not a party to the 'Transportation Contract' then which party accepts the contract? Is this the 'Transportation Provider' which is the driver that is accepting the contract in the 'First Instance'?

**Question 5b for The Panel - Uber ToC**

If it is the driver (Transport Provider) then please confirm that this is legal as it is the requirement of the Licensed Operator to accept the contract of hire in the 'First Instance' and not the driver?

## Part 2 – Terms of Use

These Terms of Use (“*Terms*”) apply to your visit to and your use of the Website and the Uber App as well as to all other information, recommendations and/or services provided to you on or through the Website and the Uber App, but for the avoidance of doubt these User Terms do not apply to the Booking Services defined and described in Part 1 above. However, defined terms used in this Part 2 shall have the meaning given in Part 1 unless otherwise specified.

### 1. Contractual Relationship

These Terms in Part 2 govern the access or use by you, an individual, from within any country in the world (excluding the United States and its territories and possessions and Mainland China) of applications (including the Uber App), websites, content, products, and services (the “*Services*”) made available by Uber B.V., a private limited liability company established in the Netherlands, having its offices at Mr. Treublaan 7, 1097 DP, Amsterdam, the Netherlands, registered at the Amsterdam Chamber of Commerce under number 56317441 (“*Uber*”). In relation to PHV Bookings, the Services enable you to access the Booking Services provided by Uber UK described in Part 1 above but, for the avoidance of doubt these Terms do not apply to the Booking Services defined and described in Part 1 above.

### **Question 5c for The Panel – Uber ToC**

**Is it Uber B.V that records all the booking or Uber Britannia the Licensed Operator?**

### **Question 5d for The Panel – Uber ToC**

**If it is Uber B.V then Uber B.V must surely hold the Operator Licence and not Uber Britannia?**

PLEASE READ THESE TERMS CAREFULLY BEFORE ACCESSING OR USING THE SERVICES.

Your access and use of the Services constitutes your agreement to be bound by these Terms, which establishes a contractual relationship between you and Uber. If you do not agree to these Terms, you may not access or use the Services. These Terms expressly supersede prior agreements or arrangements with you. Uber may terminate these Terms or any Services with respect to you, or generally cease offering or deny access to the Services or any portion thereof, at any time for any reason. Uber will provide you with as much notice as it reasonably can of such termination, cessation or denial, being at least 24 hours notice. However, Uber reserves the right to terminate these Terms or any Services with respect to you, or generally cease offering or deny access to the Services or any portion thereof, immediately at any time without notice if (i) you are in breach of these Terms, (ii) it is impractical to give such notice in the circumstances, or (iii) in Uber’s opinion, any delay in such termination would expose Uber or a third party to significant risk of harm or damage.

### 2. The Services

The Services constitute a technology platform that enables users of Uber’s mobile applications or websites provided as part of the Services (each, an “*Application*”) to pre-book and schedule transportation, logistics, delivery, and/or vendor services with independent third party providers of such services, including independent third party transportation providers (including Transportation Providers as defined in Part 1), independent third party logistics and/or delivery providers under agreement with Uber or certain of Uber’s affiliates, and/or independent vendors such as restaurants (“*Third Party Providers*”). Unless otherwise agreed by Uber in a separate written agreement with you, the Services are made available solely for your personal, non-commercial use. YOU ACKNOWLEDGE THAT UBER DOES NOT PROVIDE TRANSPORTATION, LOGISTICS, DELIVERY OR VENDOR SERVICES OR FUNCTION AS A TRANSPORTATION PROVIDER OR CARRIER AND THAT ALL SUCH TRANSPORTATION, LOGISTICS, DELIVERY AND VENDOR SERVICES ARE PROVIDED BY INDEPENDENT THIRD PARTY CONTRACTORS WHO ARE NOT EMPLOYED BY UBER OR ANY OF ITS AFFILIATES.

### **Question 5e for The Panel – Uber ToC**

**If Uber does not provide ‘Transportation Services’ then why is Uber applying for an Operators Licence for the transportation of the public in Brighton & Hove?**

## 5. Disclaimers; Limitation of Liability; Indemnity.

### DISCLAIMER.

THE SERVICES ARE PROVIDED "AS IS" AND "AS AVAILABLE." UBER DISCLAIMS ALL REPRESENTATIONS AND WARRANTIES, EXPRESS, IMPLIED OR STATUTORY, NOT EXPRESSLY SET OUT IN THESE TERMS, INCLUDING THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE AND NON-INFRINGEMENT. IN ADDITION, UBER MAKES NO REPRESENTATION, WARRANTY, OR GUARANTEE REGARDING THE RELIABILITY, TIMELINESS, QUALITY, SUITABILITY OR AVAILABILITY OF THE SERVICES OR ANY SERVICES OR GOODS REQUESTED THROUGH THE USE OF THE SERVICES, OR THAT THE SERVICES WILL BE UNINTERRUPTED OR ERROR-FREE. UBER DOES NOT GUARANTEE THE QUALITY, SUITABILITY, SAFETY OR ABILITY OF THIRD PARTY PROVIDERS. YOU AGREE THAT THE ENTIRE RISK ARISING OUT OF YOUR USE OF THE SERVICES, AND ANY SERVICE OR GOOD REQUESTED IN CONNECTION THEREWITH, REMAINS SOLELY WITH YOU, TO THE MAXIMUM EXTENT PERMITTED UNDER APPLICABLE LAW.

### Question 5f for The Panel – Uber ToC

**Would The Panel agree that the disclaimers go directly against the required responsibility expected of a Brighton & Hove Licensed Operator where Uber distances itself from any accountability where it specifically states the following and thus renders itself as not being 'Fit and Proper' to hold a BHCC Operators Licence?**

***"UBER DOES NOT GUARANTEE THE QUALITY, SUITABILITY, SAFETY OR ABILITY OF THIRD PARTY PROVIDERS. YOU AGREE THAT THE ENTIRE RISK ARISING OUT OF YOUR USE OF THE SERVICES"***

### GMB Conclusion:

The GMB considers that the Uber Terms of Conditions do not comply with that of the responsibilities of a Licensed Brighton & Hove Operator which renders Uber as not being 'Fit and Proper' to hold the Licence.

## **6: Uber accused of silencing women who claim sexual assault by drivers**

**The Guardian – March 16 2018** <https://tinyurl.com/uber-accused>

**"Court records reveal company says women must settle through arbitration, a move critics say stops the public from learning of rapes"**

*"Uber is trying to force women who say they were sexually assaulted by drivers to resolve their claims behind closed doors rather than in the courts, a move that critics say silences victims and shields the company from public scrutiny."*

*Court records in a California class-action lawsuit revealed that the ride-sharing firm has argued that female passengers who speak up about being raped in an Uber must individually settle their cases through arbitration, a private process that often results in confidentiality agreements.*

*Nine women from across the US have joined the case, seeking to represent all women who have been assaulted or experienced violence in Uber cars in hopes of pushing the corporation to reform and better protect passengers. Uber, however, has filed a motion arguing that the riders agreed to privately arbitrate all disputes when they signed up for the ride-share service and thus have no right to file a lawsuit.*

*Uber's lawyers are relying on a legal mechanism that has faced intense scrutiny in Silicon Valley over the last year as the #MeToo movement has shone a light on sexual misconduct in US workplaces and in Hollywood. Arbitration clauses have prevented victims of sexual harassment and discrimination from moving forward with lawsuits, allowing companies to avoid public trials, and critics say it makes it easier for serial offenders to keep their jobs and target new victims.*



*Susan Fowler, the former Uber engineer whose viral account of sexual harassment sparked a reckoning about abuse in the male-dominated tech industry, has pushed for an end to arbitration agreements. In December, Microsoft became the first high-profile tech company to announce it would eliminate forced arbitration, recognizing that the “silencing of people’s voices” can perpetuate sexual misconduct.*

*“Our clients deserve a trial,” said Jeanne M Christensen, one of the class-action attorneys who filed a motion on Thursday fighting Uber’s efforts to push the women into arbitration. “The goal is to force Uber to acknowledge that this is happening and to do something about it.”*

*Christensen argued that arbitration prevents the public from learning about the frequency and severity of rapes and assaults by Uber drivers and inevitably results in non-disclosure agreements that silence the women, making it less likely that other victims will speak up.*

*In the case of one plaintiff from Miami, an Uber driver carried the intoxicated passenger into her home when he dropped her off and raped her, according to the complaint. A Los Angeles driver allegedly assaulted another plaintiff who fell asleep in his car. A 26-year-old plaintiff from San Francisco said an Uber driver pushed his way into her apartment building and groped her.*

*The women are “horrified and shocked that this is what happened to them, and they are also horrified that people aren’t talking about it, and that Uber has been fairly successful at keeping it out of the news”, said Christensen.*

*An Uber representative said in an email: “The allegations brought forth in this case are important to us and we take them very seriously. Arbitration is the appropriate venue for this case because it allows the plaintiffs to publicly speak out as much as they want and have control over their individual privacy at the same time.”*

*The representative did not, however, respond to questions about whether Uber’s arbitration settlement agreements allow the women to speak out or if they include standard confidentiality clauses. Christensen also noted that the women already have control over their privacy – they are listed as “Jane Does” in the suit.*

*Veena Dubal, an associate law professor at the University of California, Hastings, who has advocated for Uber drivers’ rights, said she has interviewed drivers who have filed claims against the company and were subsequently unable to speak to her due to settlement agreements.*

*People involved in class-action suits against Uber “want the public and the state and Uber to recognize that their experiences are not random”, said Dubal. “They are the result of a structural problem ... They want Uber to make changes.”*

*Female drivers have also repeatedly accused Uber of failing them when they are assaulted, and advocates said the arbitration agreements can make it hard for them to seek justice.*

*“Uber has an interest in removing these cases from the public eye,” said Bryant Greening, an attorney with LegalRideshare, which represents Uber riders and drivers. “It’s despicable ... It’s a public safety issue and it’s an issue that’s relevant to our community.”*

### **Question 6a for The Panel – Uber Silencing Women – The Guardian**

**Does The Panel consider that this Uber Policy on treating women with total disrespect for the basic human rights acceptable?**

### **Question 6b for The Panel – Uber Silencing Women – The Guardian**

**Would The Panel agree that such a distasteful Uber Policy renders Uber not to be ‘Fit and Proper’ to hold a Brighton & Hove Operators Licence?**

**GMB Conclusion**

It is incomprehensible that Uber...being a global organisation... has such a policy for such despicable crimes against women.

No doubt Uber UK lawyers and Brighton & Hove City Council legal services will argue that this has happened in the USA and not relevant to the UK

We would also believe that Brighton & Hove City Legal Services will also defend Uber UK as a separate entity.

However Uber is a global brand and the original Brighton & Hove Uber Operators Licence in 2015 was applied for by the following in 2015 USA residents:

Karen Walker – San Francisco USA and Brent Callinicos – Atherton USA

The 2017 Uber renewal Application was applied for by:

Rob Van De Waude – Director – Aalsmeer – The Netherlands

This clearly shows that Uber is one global entity.

On the basis of the Uber Policy as stated in The Guardian and other media outlets we consider Uber not to be 'Fit and Proper' to hold a Brighton and Hove Operators Licence.

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## **7: Conditions Imposed for Uber B&H Operators Licence on November 2 2017**

In the letter from Jo Player –BHCC on November 2 2017 the following conditions were given and accepted by Fred Jones of Uber

### **3. Proposed new Operator condition:**

*'When a booking is made under Uber Britannia Limited's Brighton and Hove operating licence, the booking confirmation and receipt provided to a passenger will identify that the driver is licensed by Brighton & Hove City Council.'*

## **Question 7a for The Panel: BHCC Conditions Imposed**

### **Has this condition been actioned by Uber to date?**

However ....it must be noted that this condition was weak and badly written as it did not address the situation where the customer has booked a car in the city where Uber uses ph vehicles from all over the UK thus not presenting the customer with clear and transparent information as to what authority the vehicle being sent is licensed to.

Under the proposal as written Uber were only obliged to inform the customer that the driver is licensed by Brighton & Hove City Council if.. and only if.. the customer is sent one. There is no obligation to inform anyone using Uber in the city that the vehicle being sent is NOT licensed by BHCC.

We believe that this condition as written was pointless and achieved nothing. Nonetheless it needs to be confirmed that this has now been implemented.

**4. Proposed new Operator condition:**

*Uber Britannia Ltd must ensure that 100% of Brighton & Hove licensed drivers have undergone disability equality training to help them serve disabled people or passengers with an access need.*

*Summary*

**Question 7b for The Panel – BHCC Conditions Imposed**

**Has this condition been actioned by Uber to date?**

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**Additional Information****8: TfL Document****London Taxi and Private Hire Cross Border Hiring – Proposals for Legislative Change**

Its has been a great relief that TfL has produced such a document..

We will not place the entire contents here but the document fully recognises the repercussions of the Deregulation Act 2015 which caused chaos for the trade and local authorities and makes some very good proposals to bring this chaos to an end primarily that any

“In November 2017, the Metropolitan Police Service submitted a paper to the Working Group and gave verbal evidence to the group in December. In their submission on cross border hiring they state that: **“This is the single largest risk to Policing nationally”**.

“To address the issue of cross border hiring we recommend the following package of changes be progressed together:

1. Introduction of a start or finish requirement, meaning that all taxi and private hire journeys either start or end in the area in which the driver and vehicle (and operator in respect of private hire) are licensed.”

This has been fully supported by Brighton & Hove City Council

The document clearly throws the activity of Uber in encouraging cross-border hiring and lays pale the Uber statement:

*While cross-border driving is something the law allows for and is common in private hire journeys across England and Wales, we’ve heard from local licensing authorities that the way our app works can make it hard for them to oversee what some drivers are doing in their jurisdiction.*

*That’s why next month we are making a significant change which will mean drivers will only be able to use our app within the region \* where they are licensed as a private hire driver.*

Therefore the council should question Uber on its attitude to actively encouraging cross-border hiring where it has been the principle agitator of the chaos.

## **GMB Summary**

Brighton & Hove City Council has a duty to protect Brighton & Hove users of hackney carriage taxis and private hire vehicles under the control of Licensed Operators in the city.

On the information provided in this document the GMB Brighton & Hove Taxi Sections considers that Uber is not 'Fit and Proper' to hold a Brighton and Hove Operator Licence and the council should refuse to neither re-licence or grant a short term licence based on the following reasons:

- Its attitude on the 'Data Breach' for the protection of Brighton & Hove Uber account holders
- Its disregard to the public on WAV provision.
- It's attempt to reinvent licensing areas with its introduction of fantasy 'Uber Regions'.
- The Uber App which an illegal 'Peer to Peer' service for the purpose of use under a 'Brighton & Hove Operator Licence' in contravention the 'Blue Book' Condition 169 – Immediate Hire
- The 'Terms of Conditions' which are unacceptable for a responsible Brighton & Hove Operator Licence holder.
- It's disgraceful attitude towards silencing women who have had crimes committed against them as reported in the media.

Importantly the council should fully take into consider that the 'Uber York Appeal' for the refusal to grant a licence was withdrawn.

The GMB Brighton & Hove Section seeks a full response from The Panel for all Questions listed.

Andrew Peters  
Secretary GMB Brighton & Hove Taxi Section  
March 22 2018



March 22 2018

## **Appendix**

### **Uber Brighton & Hove Operator Licence Renewal – Licensing Panel Questions**

This document contains questions for 'The Panel' that the GMB Brighton & Hove Taxi Section requires a full response to.

#### **Question 1a for The Panel**

With Uber failing to inform UK account holders of the Breach of Data which would have affected Brighton & Hove Uber account holders in 2016 would The Panel agree with York Council that Uber is not 'Fit and Proper' to hold a B&H Operator Licence?

#### **Question 1b for The Panel**

As the B&H Operator Licence has been applied for under 'Uber Britannia' why doesn't 'Uber Britannia' hold a 'Data Controller' licence unless it is not 'Uber Britannia' that processes the recording of bookings/contracts?

#### **Question 1c for The Panel**

As Uber Britannia is named on the Uber Brighton & Hove Operator Application/Renewal form which does not hold a Data Controller licence would The Panel consider it irresponsible to grant the licence?

#### **Question 2 for The Panel: Provision of WAV's**

Despite bringing in hundreds of ph cars and hackney carriages from all over the UK and being valued in the billions would you agree that by now after being licensed since 2015 it would be expected of Uber to have introduced a proper WAV service like the local companies supply?

#### **Question 3a for The Panel – Uber 'Regions'**

What does The Panel think of the new 'Uber Regions' created by Uber?

#### **Question 3a for The Panel – Uber 'Regions'**

As Uber has clearly demonstrated the ability to 'Geo-Fence' then would The Panel expect Uber to do this to keep licensed private hire cars within their own licensing authority for the protection of the public?

#### **Question 4a for The Panel – The Uber App**

Will The Panel make a statement to the trade that it categorically guarantees the Uber App is 100% legal for the purpose and use for a Brighton & Hove Private Hire Operator following the councils own forensic examination of the app based on the councils process of due diligence as the licensing authority ensuring that it legally complies with Legislation and does not contravene Section 169 of the 'Brighton & Hove Blue Handbook for Hackney Carriage, Private Hire Drivers, Vehicles and Operators 4<sup>th</sup> Edition' by acting as a 'Peer to Peer' system whereby the driver accepts the booking/contract in the 'First' Instance.

**Question 4b for The Panel – The Uber App**

If The Panel states that the Uber App is 100% legal but the Deloitte report as commissioned by TfL reveals that it is not will Brighton & Hove City Council compensate the local taxi/private hire trade for losses incurred due to the council licensing Uber as an Operator?

**Question 5a for The Panel - Uber ToC**

If Uber is not a party to the 'Transportation Contract' then which party accepts the contract? Is this the 'Transportation Provider' which is the driver that is accepting the contract in the 'First Instance'?

**Question 5b for The Panel - Uber ToC**

If it is the driver (Transport Provider) then please confirm that this is legal as it is the requirement of the Licensed Operator to accept the contract of hire in the 'First Instance' and not the driver?

**Question 5c for The Panel – Uber ToC**

Is it Uber B.V that records all the booking or Uber Britannia the Licensed Operator?

**Question 5d for The Panel – Uber ToC**

If it is Uber B.V then Uber B.V must surely hold the Operator Licence and not Uber Britannia?

**Question 5e for The Panel – Uber ToC**

If Uber does not provide 'Transportation Services' then why is Uber applying for an Operators Licence for the transportation of the public in Brighton & Hove?

**Question 5f for The Panel – Uber ToC**

Would The Panel agree that the disclaimers go directly against the required responsibility expected of a Brighton & Hove Licensed Operator where Uber distances itself from any accountability where it specifically states the following and thus renders itself as not being 'Fit and Proper' to hold a BHCC Operators Licence?

*"UBER DOES NOT GUARANTEE THE QUALITY, SUITABILITY, SAFETY OR ABILITY OF THIRD PARTY PROVIDERS. YOU AGREE THAT THE ENTIRE RISK ARISING OUT OF YOUR USE OF THE SERVICES"*

**Question 6a for The Panel – Uber Silencing Women – The Guardian**

Does The Panel consider that this Uber Policy on treating women with total disrespect for the basic human rights acceptable.

**Question 6b for The Panel – Uber Silencing Women – The Guardian**

Would The Panel agree that such a distasteful Uber Policy renders Uber not to be 'Fit and Proper' to hold a Brighton & Hove Operators Licence?

**Question 7a for The Panel - BHCC Conditions Imposed**

Has this condition been actioned by Uber to date?

**Question 7b for The Panel – BHCC Conditions Imposed**

Has this condition been actioned by Uber to date?

End

**From:** George Beresford  
**Sent:** 19 March 2018 21:34  
**To:** Jim Whitelegg  
**Subject:** Uber relicense

Dear Licensing Panel

My name is George Beresford. I am the representative for Independent Taxis Drivers. This document is for, and on behalf of those drivers.

After having UBL (Uber Britannia Limited) operate in Brighton for more than 18 months now, I'd like to present the issues that have arisen in this short time.

- UBL have software (Greyball & Ripley) to help evade compliance. This software has been found to be used on more than one occasion in the UK. I am aware that UBL have promised they won't use it in Brighton. They also promised they would only use Brighton & Hove cars in Brighton, however, we are all aware that this is not the case.
- On their initial licence application they stated they would only use Brighton & Hove (B&H) licensed drivers, as we are all aware that is not the case, and when questioned on this, they claim they do only use B&H drivers on their operator's licence. This is not what we all had in mind and I'm sure the council agree.
- I constantly receive screen shots of Uber's proposed routes, which show convoluted routes. I know if I were to take customers the long way round I would be answerable. This however is not the drivers' wrong doing, this is UBL taking money from your rate payers' pockets unnecessarily. I realise there is a possibility that no complaints have reached the HCO from the general public, but does that make it right? Surely if BHCC are aware of this problem not being a one off, should you not be bringing UBL to task?
- Lack of insurance and the use of on off hire and reward insurance, where drivers leave the hire and reward off so as to save money, is an ongoing issue. This problem was unheard of before UBL began operating here. I feel sure in stating that on off hire and reward insurance is not used by any B&H driver.
- You should all be aware of the amount of drivers that are sleeping in their cars night in and night out. This is well-documented and still an on-going problem, creating both public hygiene and safety issues.
- UBL have put in new measures for driver-safe working hours. All drivers can work for 12 hours booked in to jobs. This means those hours are only counted from accepting the job until the passenger is at their destination.

For me to work 12 hours under this module, I could be on the road for over 30 hours without taking a break. I feel UBL are trying to make the public believe they are doing the right thing but the truth is, they still have a public safety issue here.

- Over 10 months ago, UBL told the trade and BHCC they would geo-fence all the ranks so to bring an end to the frequent abuse of our ranks by their out of town PHVs ( Private Hire Vehicles). This issue causes great animosity within the trade. I can safely report we are still waiting for UBL to fulfil this promise and photographic and complaints to the HCO can be provided upon request.
- UBL claimed that their B&H drivers were having their vehicles vandalised so they had actively encouraged drivers to remove all livery light box and even private hire plates, before the much appreciated new bylaws started in January. I witnessed B&H drivers new to UBL on day one, working without livery etc. These drivers and cars were brand new to Uber so I fail to see how they had suffered vandalism. I can only suggest that UBL prefer their PHVs to have no markings, then it is difficult to have compliance enforced on them. Also adding to this point, we find a lot of Uber's out of town cars have removed their PH plates; also TfL cars removing their roundels. Again, photographs and complaints to TfL can be provided. Unfortunately we can only complain to TfL on this matter as they are the only district to provide a vehicle registration number check facility. Our HCO, although aware of this epidemic problem, state that if it is not one of their PHVs, they are unable to do anything. I feel this is a massive issue that could have potentially devastating problems, yet the HCO believe they have no duty of care. I assume going out with the traffic police more frequently is difficult to organise.
- On the 14/03/18 Uber dissected the country into 9 areas, this was after over 18 months of asking them to geo-fence Brighton and Hove. They managed to fence an area that will still allow PHVs from New Forest, over 80 miles away, Slough, 70 miles away and Dover, over 100 miles away. Therefore this strategy will not bring to an end, the cross-border hiring issues.
- As we wave good bye to most of the TfL cars, we say hello to new cars from other areas, meaning the congestion and pollution levels that BHCC are struggling to bring into line with EU guidelines will undoubtedly remain high. A recent study showed that since the rise of ride-hailing apps, 60% of the journeys taken, the passenger would have used a different mode of transport pre, the ride-hailing app. The alternatives being: bus, bike or walk. This research can be bolstered by the fact that TfL lost £1.1bn this last year, due to the lack of people using the tube or bus. Give UBL a licence and



it could be our bus company having to pull its services, leaving the vulnerable without any mode of transport.

I now have several questions that I wish to be put to UBL:

- When applying for your last operator's licence, did you inform BHCC of the data breach you had incurred? If not, can you explain why?
- Uber is known to spend lots of money on lobbying. Did any arm or subsidiary of Uber, lobby MPs for the change in legislation in the cross-border hiring law, pre 2015?
- If Uber has no involvement in the contract between the customer and the driver of the vehicle, who accepts the booking?
- If Uber accepts the booking, how does it have no involvement in the contract between the customer and the driver?
- If Uber considers that a driver accepts the booking, does it accept that the driver must also hold a Private Hire Operator's licence to accept bookings?
- If this is the case, what steps will Uber do to ensure that all bookings are only given to licensed operators?

I thank you all in advance for taking the time to read my document and hope we achieve a more favourable outcome.

Yours Faithfully



**From:** PH Association  
**Sent:** Thursday, March 22, 2018 06:14 PM  
**To:** HCO; Jim Whitelegg  
**Subject:** Uber Operator's License Renewal

Dear Sir,

On behalf of the Brighton and Hove Private Hire Association can I formally object to the renewal of Uber's operator license.

The B&H PHA fully support the representations sent in from Streamline Taxis, City Cabs and Radio Cabs, alongside the views being expressed by a number of B&H taxi trade groups opposing the renewal of Uber's operator's license.

There are just three issues we would be grateful that licensing councillors hearing the application for renewal could also consider.

1. When the council originally granted Uber an operator's license in Brighton and Hove, in October 2015, Uber was having an exchange of correspondence with Transport for London ( please see attached letter dated September 2017 where TfL deemed Uber not fit and proper to hold an operator's license in London). In that letter TfL concluded that Uber had given them materially false and misleading answers. We ask councillors if they would have deemed Uber to be a fit and proper operator in B&H if they had been aware of that correspondence at that time?
2. In November 2016 the council renewed Uber's Brighton and Hove operator's license. At that time Uber were concealing a huge data hack of 57,000,000 customers and drivers details from not only those 57,000,000 individuals concerned, but from the proper authorities, in breach of numerous laws. Clearly those authorities are investigating and will report back in due course, but had the council been aware of the concealment of the data breach, and the subsequent payment to the hackers to delete the information, would the council have deemed Uber fit and proper to have their operator's license renewed at that time?
3. In November 2017 the council renewed Uber's Brighton and Hove operator's license for six months. Shortly after that renewal TfL agreed to publish their letter to Uber where they deemed Uber not to be fit and proper to have an operator's license in London. In that letter TfL were minded to think that Uber's business model did not comply with the 1998 London PH Act. This was following an IT architect review by Deloitte, and conflicting comments made by Uber reps in court. Also in that letter TfL accused Uber of having used 'unacceptable and inappropriate' processes to assess the medical fitness of 800 prospective drivers, of not reporting allegations of serious criminal offences by its drivers to the Metropolitan Police, and that Uber's then senior management were aware that Greyball technology was being considered as a means of evading regulatory enforcement. Again we ask councillors if they were aware in November 2017 of those details, would they have renewed Uber's operator's license?

Many thanks,  
Mark Durell

Brighton and Hove Private Hire Association 63, Queens Road Brighton BN1 3XD





22 September 2017

Mr Tom Elvidge  
General Manager  
Uber London Limited  
Aldgate Tower  
First Floor  
2 Leman Street  
London, E1 8FA

Helen Chapman  
General Manager  
Taxi & Private Hire  
Transport for London

2<sup>nd</sup> Floor, Zone 2G2,  
230 Blackfriars Road,  
SE1 8NW

Dear Mr Elvidge

## **Application for the renewal of a Private Hire Vehicle Operator's Licence**

We write further to Uber London Limited's (ULL) application for the renewal of a London Private Hire Vehicle (PHV) Operator's Licence, which we received on 18 August 2017.

We have carefully considered ULL's application, together with the results of the enquiries that have been undertaken over the past four months and other relevant material available to us.

For the reasons set out below, Transport for London (TfL) is not satisfied that ULL is a fit and proper person to hold a licence. As such, TfL has decided not to grant ULL a London PHV Operator's Licence to extend beyond 30 September 2017.

We are currently considering whether ULL's business model complies with the statutory framework, in certain key respects. TfL is currently minded to conclude that it does not. We have written to you separately about this matter.

In summary, the reasons for our decision are as follows. It is considered that each of these reasons, on their own, provide a sufficient basis to reach the view that ULL is not fit and proper:

- a) It is considered that ULL misled TfL in correspondence in 2014 as to the process by which bookings are accepted through the Uber app. In particular, ULL provided a false picture of the order in which various steps take place, when a booking is being accepted. TfL had asked ULL to explain its systems, and had been clear that we would rely on their answers when determining the lawfulness of their operating model. Whether or not the false information provided by ULL was determinative of the lawfulness of ULL's

model (a matter we address in separate correspondence), TfL considers that ULL's answers were materially false and misleading;

- b) ULL had available to it for use in London a piece of software known as 'Greyball'. Greyball can be deployed for a variety of legitimate purposes, though some companies within the Uber group have used it for the purposes of evading regulatory enforcement in other jurisdictions. TfL has corresponded extensively on this question with ULL. ULL has said that it has not been used for this purpose in London. However, we do not consider that ULL have been open and transparent with TfL about Greyball despite having been given ample opportunity by TfL to state its position clearly. In particular the extent to which those responsible for Uber's operations in London were aware or involved with decisions about its use in other jurisdictions. What information TfL now has about Greyball (and the involvement of ULL's senior staff in its possible use elsewhere) has only come to light following repeated questioning from TfL;
- c) ULL has demonstrated a lack of corporate responsibility in relation to a number of other issues which have potential public safety implications and which are detailed below.

Full reasons for our decision not to grant ULL a London PHV Operator's Licence are set out below:

**'Fit and proper person': s. 3 of the Private Hire Vehicles (London) Act 1998 ("the 1998 Act")**

1. Section 3(3) of the 1998 Act sets out the requirements that must be satisfied before TfL, as the licensing authority, can (and must) grant a licence. These include the requirement that the applicant is a "fit and proper person" and such further requirements as TfL may prescribe. The phrase "fit and proper" is used in a number of statutory contexts, but its meaning is context-specific: a person who may be "fit and proper" for the purposes of one licensing regime may not be for the purposes of another. The Courts have confirmed that licensing authorities may take into account "anything which a reasonable and fair-minded decision maker, acting in good faith and with proper regard to the interests both of the public and the applicant, could properly think it right to rely on."

**The 2014 Correspondence About the Acceptance of Bookings**

2. In 2014, in the course of correspondence with ULL, TfL asked ULL a series of specific and detailed questions about its booking process, as part of an investigation into the way in which ULL operated. In a letter dated 28 February 2014, TfL asked ULL specifically for data flows

associated with the booking process, starting with the process initiation by the passenger using the App. TfL also asked for details of the timing and extent of any information flow from consumer/app to back-end servers/booking engines to any intermediary servers and through to end driver/app. As TfL made clear in that letter, its previous questions to ULL and its follow-up letter of 8 April 2014, its concern was to clarify whether ULL, Uber BV (another entity within the Uber group of companies) or Uber's partner drivers were accepting bookings or making provision for the invitation and acceptance of bookings.

3. In response by letter dated 17 March 2014, ULL said that, in its view, it was accepting bookings. ULL described the process flow as follows:
  - a) Client (ULL referred to a passenger as a "client") requests a vehicle using the Uber app installed on a smartphone. The client's smartphone forwards the client's requested pick-up location, based on satellite GPS signals, to Uber London Limited's dispatch server.
  - b) Client request is accepted by the dispatch server.
  - c) The dispatch server selects an available licensed PHV driver and forwards details of client request to such licensed PHV driver.
  - d) Licensed PHV driver travels to requested pick up location, collects the client seeking transportation and completes journey.
  - e) At the conclusion of the trip, the driver terminates the trip. The driver's smartphone sends details of the route and drop off location, based on satellite GPS signals, back to the dispatch server, which triggers the calculation of the fare.
  - f) Both the driver smartphone and the client smartphone receive the details of the trip including the total amount charged and the route.
4. ULL also said that it retains full control of all dispatches, including the ability to contact the driver and the rider, the ability to cancel the request at any point before dispatch and to terminate a pick-up prior to the trip commencing. It said that it had full responsibility for the data stored on the dispatch servers. ULL concluded: "Uber London is not sub-contracting bookings, but is arranging for drivers (a few of whom hold an Operator's License of their own) to discharge a booking already accepted by Uber London Ltd. As you state in your letter, this is permissible."
5. ULL explained the process of accepting bookings once again, in a letter dated 17 June 2014:
  - a) GPS data is sent from the smartphones provided by ULL to its PHV drivers to our cloud servers, which in turn transmit such data to potential passengers, who access that data through the Uber App installed on their own smartphones... The data shows the potential passengers the location of vehicles in relation to

the potential passenger's own location, and gives an approximate time for the closest Uber vehicle to arrive at the potential passenger's pick-up location.

- b) If the passenger wishes to book a vehicle he does so through his GPS-enabled smartphone installed with the Uber App. The passenger can also use the Uber App to ask for a quote before making the booking. The customer's booking pick-up location is transmitted through the customer's GPS-enabled smartphone installed with the Uber App to ULL's licensed operating centre which is using hosted IT infrastructure, where it is accepted and logged on ULL's systems. It is instantaneously sent to the relevant driver. Also at the same time, ULL's systems will respond to the passenger by transmitting data held on its servers giving the driver's name, car type and registration.
- c) It is accepted that receipt and acceptance by ULL of the passenger's booking takes place at the same time as the relevant driver is notified of the booking. That is an inevitable consequence of the technology used. It does not alter the fact that ULL accepts the booking on behalf of the driver, evidences that acceptance by recording it and confirms such acceptance by arranging for details of the relevant driver to be communicated to the passenger. It is also relevant here that ULL can and occasionally does refuse bookings.

- 6. At that time, following careful consideration and based on the information provided by ULL, TfL concluded that ULL (not any other entity and not its drivers) was accepting bookings for the purposes of s. 2 of the 1998 Act.

**The 'taximeter litigation': *Transport for London v Uber London Limited, Licensed Taxi Drivers Association, Licensed Private Hire Car Association* – 2015**

- 7. Around the same time, a separate dispute arose concerning whether or not ULL's partner driver vehicles are "equipped" with a "taximeter" in breach of the prohibition in section 11 of the 1998 Act. In order to obtain a clear answer to that question, TfL issued Part 8 proceedings seeking declaratory relief, naming ULL, the Licensed Private Hire Car Association (LPHCA) and London Taxi Driver's Association (LTDA) as defendants. In his judgement of 16 October 2015, Ouseley J set out his understanding of the process by which ULL accepted bookings. Those facts were not in dispute; his description was largely taken from ULL's skeleton argument, supported by ULL's evidence. The relevant paragraph of the judgment describes the bookings process as follows:

"12. When booking, the customer can choose a particular type of vehicle. The nearest vehicle of that type available for hire will be shown on the Smartphone screen. The customer then indicates precisely where they want to be picked up, and clicks "request" to



make the booking. Uber accepts the booking and Uber's servers in the United States locate the nearest available vehicle of the type requested by the customer. The servers then send the accepted booking to the Smartphone of the nearest driver, who has 15 seconds to accept the booking. If he does not accept it, the server sends the booking to the Smartphone of the driver of the next nearest vehicle to the customer. When the driver takes on the booking, he is sent all the relevant details including the location. He can contact the customer via the Driver App but not via the customer's mobile number. The customer is sent also by the Customer App details of the driver, car and estimated time of arrival." (emphasis added)

8. In its evidence to the Court, ULL had stated that it accepted booking requests before they were allocated to the nearest driver. The relevant paragraphs of the statement are:

"30. ... The customer then clicks "request" to make their booking. ULL accepts the booking and Uber's servers locate the nearest available vehicle of the type requested by the customer. The servers do this by reviewing all of the GPS coordinates of the relevant vehicle type using signals sent from the drivers' smartphones to the servers.

31. Uber's servers will then send the accepted booking on to the smartphone of the driver of the vehicle closest to the customer. That driver has 15 seconds to agree to take the booking. If a driver declines or does not respond within 15 seconds, the servers will send the booking to the smartphone of the next nearest vehicle to the customer. When a driver takes on a booking, he is sent all the relevant details..." (emphasis added)

9. The booking process described in these Court proceedings was consistent with the description provided by ULL to TfL in the course of the 2014 correspondence. In short, ULL clearly represented that it accepts the booking first, before then allocating it to the closest available driver.
10. Over the course of 2016, two separate public statements by companies within the Uber group, which cast some doubt on ULL's statements in the 2014 correspondence and the Taximeter litigation, came to TfL's attention.

## The Employment Tribunal dispute: *Aslam v Uber London Limited* – 2016

11. First, in 2016, Ms Bertram, the Regional General Manager for Northern Europe, gave evidence to the Employment Tribunal in a case concerning whether or not ULL's drivers were workers, for the purposes of European law. Her evidence described the booking process in terms that suggested the booking is not accepted by ULL until a driver has confirmed that they are available and willing to take the journey; confirmation to the customer and acceptance by ULL take place almost simultaneously and after that point. Her evidence was:

"45. ULL is responsible for accepting the booking made by a Passenger, as holder of the operating licence. However, at the point that a request is made by a Passenger, there is no obligation to provide a vehicle. As I explain below, the booking is accepted by ULL as the relevant private hire vehicle operator and allocated to the Driver. A booking is not accepted by ULL until a Driver has confirmed that they are available and willing to take it. Confirmation and acceptance then takes place by ULL almost simultaneously. A Driver is entirely free to make themselves available to provide the transportation services or not, which is described in further detail below. As such, the Operator Licence has no impact upon the freedom a Driver has when using the platform...

53. Once a request is made, and ULL has confirmed a Driver is available to accept the booking, ULL accepts the booking on behalf of that Driver...

60. ULL will receive a booking request from a Passenger. ULL will make this request visible on the Driver's smartphone, together with the first name and rating of the passenger. It is then the Driver's decision whether or not to confirm their availability and willingness to take the trip. If they do chose to take the trip, they will touch to confirm to ULL that they are available and willing to take the trip. Having done so, ULL accept and confirm the booking to the passenger on behalf of the Driver, and almost simultaneously and instantaneously allocate the trip to the Driver." (emphasis added)

12. This description is materially different from that given to TfL in the 2014 Correspondence. Whereas previously ULL had stated that it accepted the bookings first, before allocating them to a driver, in the Employment Tribunal it asserted that a booking is not accepted until a driver is available to take it. It may be noted that acceptance of a booking by ULL independently of and prior to any engagement by the driver would tend to support an argument that it is ULL, and not the driver, which accepts the booking. Conversely, acceptance by the driver in the first instance – and by ULL only thereafter – would tend to support an

argument that the drivers are independent contractors, rather than workers.

**The Canadian proceedings: *City of Ontario v Uber Canada Inc., Uber BV and Rasier Operations BV***

13. Secondly, in mid-2016 TfL became aware of a judgement of the Superior Court of Justice in Ontario in *City of Ontario v Uber Canada Inc., Uber BV and Rasier Operations BV*. In Ontario, the local regulatory requirements require a booking to be accepted by a driver, in direct contrast to the position in London. The Judge described Uber Canada as a “super-charged directory assistance service” and recorded Uber Canada’s evidence as being that “Uber adopts a passive, purely mechanical (if sophisticated) role in enabling the two protagonists (driver and passenger) ultimately to connect with each other and form an agreement and is not a party to the underlying agreement when formed.” Uber’s evidence was that:

“A trip is the result of a request made by a passenger using the Rider App and accepted by a driver using the Driver App. None of the respondents [the local Uber company] nor any of their employees or agents accepts calls or requests from passengers for the purposes of arranging transportation, nor does any of them dispatch drivers to passengers. ... the driver has sole and complete discretion over whether to receive, accept or reject requests.” (emphasis added)

14. A review of the judgment raised further questions for TfL. In particular: was the booking process in London different from that in Ontario? Or had Uber presented the same booking process differently in different jurisdictions, in order to satisfy the licensing authorities that they satisfied the different requirements of the local licensing regimes?
15. Prompted by the matters identified above, TfL entered into a further round of correspondence with ULL concerning its booking processes in 2016 and began its own investigation in 2017.

**The 2016-17 correspondence and TfL’s Investigation**

16. TfL sought an explanation from ULL about the apparent discrepancy between Uber’s evidence in Canada and ULL’s description of the mechanism whereby bookings are accepted in London. In particular, TfL enquired whether the booking process was the same in both locations.

17. ULL explained in a letter dated 7 October 2016 that the software underlying the app is the [REDACTED] but the [REDACTED]

18. In November 2016, TfL staff attended a meeting at ULL's offices and ULL presented a slide deck setting out the process by which bookings are accepted. The slide deck explained the booking process as follows:

- a) Rider (ULL describe a passenger as a "rider") makes a booking request for pickup using the Uber app to describe the preferred location
- b) Uber identifies most appropriate driver for the booking request and system communicates the booking request via the app
- c) Driver confirms he/she is able to complete the booking by tapping the driver app
- d) Booking is accepted and recorded by ULL
- e) Details of the booking are sent to both the rider and driver
- f) Rider completes trip. The full booking record is stored by Uber London.

ULL provided a data download from the system with timestamps which showed [REDACTED] between driver confirming the request, and ULL accepting the booking.

19. TfL wrote to ULL on 16 May 2017, requesting permission for an IT systems architect to visit ULL and review the manner in which the technology and booking process works. TfL considered that the information provided by the systems architect would provide it with further clarity and enable it to understand the booking process better. In particular, it would assist in clarifying at which stage a booking is accepted and by which party to the transaction. TfL appointed Deloitte UK to carry out the IT systems architect review and Deloitte visited ULL between 25 July and 4 August 2017. Deloitte produced a report dated 7 August 2017 which details ULL's technology and booking process.

20. The process flows showing the booking process are on page 19 of the report. In summary, a booking is made in the following way:

- a) A request is made by a rider using the Rider App. The system searches available drivers who are online, eligible and meet certain criteria such as estimated time of arrival (ETA). The system decides whether there are appropriate drivers to fulfil the request and notifies the rider of the ETA to pick up.
- b) The system checks whether surge pricing is valid at the pick-up point, calculates the trip fare estimate and the ETA and this is displayed on the Rider App.

- c) The Rider confirms the request and the system chooses the most appropriate driver based upon locally configured rules. The driver has 15 seconds to confirm the trip by tapping their device.
- d) When the driver 'accepts' the trip, ULL 'accepts' the trip automatically in the system and a booking record is stored in the ULL database. The system provides the rider with the relevant details of the driver name, photo, rating, ETA.

21. The IT architect review has provided TfL with a much clearer understanding of the booking process. Contrary to ULL's explanations of the booking process to TfL in the 2014 Correspondence and to the High Court in the Taximeter challenge, it is clear that ULL's system automatically 'accepts' the booking only after a driver has 'accepted' the trip. If the first driver to whom a booking is offered rejects the trip, it is then forwarded to the next available driver. ULL's prior assertions, that the dispatch servers arranged for drivers to discharge a booking already accepted by ULL, and that receipt and acceptance by ULL of the passenger's booking takes place at the same time as the relevant driver is notified of the booking, were false.

22. In a letter dated 30 June 2017, TfL sought clarification from ULL about whether it had changed its position on the booking process. ULL responded as follows in a letter dated 14 July 2017:

"In correspondence with TfL in 2014, our description provided to you of the booking process was much more generic. At the time, Uber was only operating in London in the UK and the correspondence was not focused upon the timing of acceptance in the way discussions have been in previous months. The emphasis of that exchange was confirming that ULL, and not anyone else, accepts bookings for the purposes of the 1998 Act and we did not go into the level of detail which we have done since corresponding on this from 2016 onwards. To the extent that our lack of precision has caused any confusion or difficulties, please accept our apology ... The detailed process is as has been described to you most recently and in the meeting we held in November 2016. This has been consistently described elsewhere, for example to various licensing authorities across England and Wales and in the witness statement I provided in the Aslam v ULL employment tribunal case."

23. We consider that this explanation is unconvincing. The correspondence in 2014 was extensive and detailed. TfL made specific requests for information about the booking process, pursuant to its concern to identify which party was accepting the booking (ULL, Uber BV or the drivers). Furthermore, ULL was clear and precise as to the 'chronology' of the acceptance process: its answers did not "lack

precision”; on the contrary, they were precise, but false. The same is true of the evidence it provided in the Taximeter case.

24. ULL asserts that its answers in 2014 were influenced by the fact that Uber was only operating in London at the time and not other areas of the UK. It is not clear how the fact that Uber is operating elsewhere in the UK changes or affects the way in which bookings are accepted. ULL gave a further explanation in its letter of 2 September 2017 and said that, when the system was only being used in London, it would only identify London licences at the stages described in paragraph 20(a) and (c) above. The letter states that ULL’s position on acceptance of bookings has not changed. It says that it has always strived to be clear that it is ULL which accepts the booking, and that this has always been and remains the case. ULL accepts in its letter of 2 September 2017 that the process described in 2014 “did not fully explain the process for checking which individual driver could complete the booking prior to acceptance, although it is obviously the case that such a step is necessary given that booking details are only provided to a single identified driver at the time of acceptance.” The letter also states:

“... ULL can only accept a booking once it has established that a particular driver is available – a driver could be logged on the app but not necessarily available for the booking. As the drivers available for any particular booking request may now be from more than one licensing jurisdiction, we have highlighted this step in the flow to you, ...

For the avoidance of doubt, we are not saying anything ‘different’ nor has the way bookings are accepted in London changed. Acceptance occurs once a driver has confirmed availability for the booking.”

25. We do not consider it is correct to say that nothing has changed in ULL’s explanation. Nor is it the case that the current explanation is ‘fuller’ and, for that reason, more accurate or complete. ULL’s presentation of its processes in 2014 was full, but false in a material respect. TfL considers that this is relevant to whether or not ULL is a ‘fit and proper person’ to hold a licence.

#### **Further matters relevant to TfL’s decision**

##### ***Greyball Technology***

26. In March 2017 it came to TfL’s attention through press reports that Uber had developed a piece of software known as “Greyball”. The press reported that this technology was developed to root out and target people that Uber considered were using the service inappropriately. It had been used to identify and circumvent the



enforcement activities of officials who were responsible for regulating Uber's businesses.

27. In essence, Greyball enables Uber to provide its customers with a modified view of its services. An Uber customer typically sees a 'standard' view of the app. However, Greyball can be used to display different or modified views, depending on the user. A 'Greyball' tag is applied to a particular customer account and, as a result, the standard view is hidden from them. The customer will not ordinarily be aware that they have been tagged, or that they are seeing a modified view of the app. The news coverage suggested that Uber had identified local law-enforcement officials via various means, and then excluded them from making effective use of its services via the use of Greyball.
28. ULL did not proactively contact TfL regarding Greyball technology, either before or after its possible use as a means of evading regulatory enforcement had been publicised. TfL initiated correspondence on 17 March 2017 and has written to ULL repeatedly seeking information on the use of Greyball in London, whether the technology formed part of the user system capable for use in London and the extent to which the program has been used in London and elsewhere around the world.
29. Ms Bertram, on behalf of ULL, initially replied on 24 March 2017 stating that Uber was undertaking a global investigation into the use of Greyball and expressed confidence that the investigation would not reveal any instances of Greyball being used for identifying and evading officials with responsibility for the regulation of Uber in London. The response did not directly answer TfL's questions in its letter of 17 March 2017.
30. On 16 May 2017, TfL wrote to ULL regarding its application for an operator's licence. The letter included five specific questions regarding the use of Greyball technology. ULL responded on 18 May 2017 with limited responses to the questions posed in relation to use of Greyball technology. On 26 May 2017, TfL sent ULL notice of its decision on ULL's application for an operator's licence (a grant of a short four month licence). This letter included six specific questions about Greyball.
31. On 30 June 2017, Jenner & Block ('JB') wrote to TfL advising that they were engaged by Uber to conduct an investigation into the use of Greyball technology in different markets worldwide. This was primarily to investigate whether Greyball was used to interfere with or impede regulatory enforcement. The letter stated that JB's investigation determined that the only use of Greyball technology in London involved its use for internal testing of new services purposes prior to launch. By way of example, a new service might be visible only to ULL employees, enabling them to test the service, before it was made available via the ordinary 'view'. The letter specified that five senior Uber officials were

interviewed as part of the investigation. No detail was provided of these interviews or of the interviewees.

32. TfL sent a further letter on 20 July 2017 requesting information on the extent of JB's investigation and the knowledge of those senior officials of the use of Greyball technology for the aforementioned purposes in other jurisdictions, in particular Ms Bertram and Rob van der Woude, who was a Director of ULL.

33. On 4 August, ULL responded and, on the same day, TfL also received a separate response from JB. ULL stated that "Jenner & Block's investigations into other jurisdictions have identified some evidence that certain of the five personnel you [TfL] identify in your letter, who are involved in the ULL business but have a wider, international role, have been exposed to communications regarding the use or potential use of Greyball technology outside the UK in a way that could have impeded or interfered with regulatory or law enforcement".

34. ULL stated that it would be amending its constitutional and corporate governance arrangements to include establishing a PHV Operator Committee chaired by an independent non-executive director which would be responsible for oversight of ULL's licensed activities.

35. After further correspondence, JB provided a key identifying the senior officials referenced in its letter of 4 August 2017. This revealed that Ms Bertram was aware of the use of Greyball technology being contemplated in a manner that could have had the effect of interfering with or impeding regulatory enforcement in markets outside the UK. The letter of 4 August 2017 stated that on a 'handful of occasions' in 2015, Ms Bertram was party to initial discussions to that effect.

36. JB's letter of 4 August 2017 stated that Mr van der Woude was not aware of the use of Greyball technology being used in other jurisdictions other than for legitimate business purposes prior to March 2017. However, he did have authority to authorise the use of Greyball technology in other jurisdictions by virtue of his position within the Uber group.

37. TfL sent a further letter on 22 August 2017 to ULL seeking information on which jurisdictions Ms Bertram has operational responsibility for and the directorships held by Mr van der Woude. TfL also sought information about any instances of misuse of Greyball technology for the purposes of interfering with or impeding regulatory enforcement which has taken place in those jurisdictions. Given ULL's vague statements regarding Ms Bertram's discussions on a 'handful of occasions', TfL also sought further information on this.

38. JB replied on 27 August 2017 and stated that Ms Bertram has additional operational responsibilities [REDACTED]



Mr van der Woude is a director of over Uber companies.

39. JB informed TfL that it had conducted investigations into certain of Uber's markets in the US and the UK. They had conducted "only limited investigations concerning markets for which Person C [Ms Bertram] has accountability for operational decisions and certain of the markets where the operating companies are those of which Person E [Mr van der Woude] is a director". No reliable conclusions had been formed as to the potential use of Greyball technology for the purposes of interfering with or impeding regulatory enforcement in those jurisdictions outside the UK and Ireland. However, it "is a possibility in [REDACTED] jurisdictions outside of the UK and Ireland".
40. No detail is provided about [REDACTED] jurisdictions' despite TfL requesting comprehensive answers. Such investigations outside the US and UK might conceivably cover jurisdictions for which Ms Bertram has operational responsibility for or where Mr van de Woude is a director. JB and ULL have declined to provide such information.
41. The letter further explained that Ms Bertram was party to email correspondence in 2015 which contemplated the possible use of Greyball technology as a means of addressing what "appeared to be potentially inappropriate action by local law enforcement". Details of these communications, the allegedly inappropriate action of local law enforcement, and the other parties to the correspondence have not been provided. JB also failed again to provide details of which jurisdictions these communications applied to, although it does not assert that the discussions related to a jurisdiction which is not under Ms Bertram's operational control.
42. We do not accept the assertions in ULL's and JB's letters that the aforementioned actions by senior officials have had, or will have no impact on ULL's performance of its licensed activity and are accordingly irrelevant to whether ULL is a fit and proper person to hold a licence in London.
43. Ms Bertram was the nominated representative on ULL's licence applications in 2012. On 18 August 2017, Ms Bertram was appointed as a Director of ULL and was the nominated representative of the licence on ULL's licence application made to TfL on the same date. However, on 31 August 2017 ULL wrote to advise that she was stepping down; that she had resigned as a Director of ULL on 30 August 2017; and that, although she will continue to have operational responsibility elsewhere within the Uber group of companies, she will no longer be engaged at ULL by 17 September 2017 (prior to the expiry of the existing licence).
44. We consider that Ms Bertram's conduct – in particular her correspondence with TfL – has been unsatisfactory and unhelpful. Ms

Bertram was the Regional General Manager for Northern Europe and was plainly of sufficient seniority to be regarded as a directing mind of ULL. She first wrote to TfL regarding Greyball on 24 March 2017. Some four months later, TfL has now been informed – after having to enquire repeatedly on this topic – that Ms. Bertram was party to correspondence relating to the use of Greyball technology to evade enforcement in other jurisdictions for which she had personal responsibility. Within days of ULL identifying these facts, even though ULL had appointed Ms Bertram as a Director on 18 August 2017, in its letter of 31 August 2017, ULL informed TfL that Ms Bertram had moved on from her role, with an accelerated transition in the United Kingdom and had resigned on 30 August 2017.

45. It is clear from the correspondence received about Greyball that Uber employees in other jurisdictions escalated concerns direct to senior management (including Ms Bertram) regarding allegedly inappropriate action by local law enforcement. The use of Greyball technology was considered a means of addressing these incidents. These discussions took place in 2015, some two years before Uber globally committed to no longer use Greyball for the purposes of evading or impeding regulatory enforcement.

46. The responses of both ULL and JB have been limited and dilatory. Despite several requests for comprehensive information, JB's final letter simply alludes to the possibility of [REDACTED] other [REDACTED] jurisdictions' where Greyball technology might have been used for the aforementioned purposes. It can only be assumed that the [REDACTED] 'relevant jurisdictions' which JB allude to might cover areas for which Ms Bertram had operational responsibility.

47. It is a matter which goes to ULL's fitness to be a licence holder that one of its directing minds knew about the potential and practice for Greyball technology to be used in other markets to impede regulatory enforcement, and in particular that she was party to correspondence about the use of Greyball for that purpose in areas under her operational responsibility. After TfL sought detailed information on this question ULL has failed to respond proactively and provide TfL with sufficient detail to comprehensively assess and understand the scope of this possible issue and its relevance to this jurisdiction.

48. In the absence of any other explanation, TfL infers that ULL's new corporate governance arrangements have been implemented at least in part as a result of the further enquiries made by TfL. We also surmise that the significant changes to the directorship of ULL were also at least in part the result of these enquiries concerning Greyball. ULL's correspondence has not been frank or open (as we would expect between an operator and the licensor/regulator). Furthermore, ULL appears to have recognised that its historic systems and conduct were not satisfactory.

49. Mr van der Woude was a director of ULL until 18 August 2017 when he resigned. ULL informed TfL of his resignation in its letter of 31 August 2017 and confirmed he has no operational responsibility for the London operation. He remains a director of over [REDACTED] other Uber companies. Despite requests for comprehensive information, JB have declined to provide specific information about investigations on use of Greyball technology in jurisdictions for which Mr van de Woude is a director. It can only be assumed that the [REDACTED] 'relevant jurisdictions' which JB allude to might cover areas for which he is a director. We note that press reports refer to the possible use of Greyball technology to impede regulatory enforcement in Australia and South Korea. Mr van de Woude is a director of Uber Australia Pty Ltd and Uber Korea Holdings LLC.
50. It is relevant to ULL's fitness to be a licence holder that its previous director holds directorships in other countries where there is a possibility that Greyball technology has been used for the purposes of interfering with or impeding regulatory enforcement. It has been admitted by ULL that Mr van de Woude had authority to authorise the use of Greyball technology in other jurisdictions by virtue of his position within the Uber group.
51. Although Ms Bertram and Mr van der Woude are no longer Directors of ULL, TfL remains concerned as to ULL's lack of candour in relation to the enquiries made concerning the use of Greyball technology, much of which was provided by JB and Helen Fletcher (Legal Director) on behalf of ULL. As explained in paragraphs 30, 39 and 40 above, there remain gaps and unanswered questions, which means that the full extent of the use of Greyball technology has not fully been addressed by ULL regardless of the identity of the senior management involved. We are also concerned that the changes to governance arrangements and senior management have only been made as a result of the pressure placed on ULL through our correspondence, and not through a desire to ensure that ULL is acting appropriately.
52. In conclusion, while we have been given assurances by ULL that it has not deployed the use of Greyball technology in London for the purposes of evading or interfering with regulation, the same cannot be said of other jurisdictions in which senior members of ULL had responsibility. It has taken extensive correspondence with ULL and JB and there remains a lack of transparency in certain areas. The changes made by ULL with regards to senior ULL officials and the implementation of a strict governance process appear to have been made to satisfy TfL as to their fitness and propriety at the point in time when we are considering their licence application. We consider that this is relevant to ULL's fitness and propriety in at least three respects:
- a) ULL's failure to correspond with TfL in an open, frank and transparent manner on important questions of legitimate interest to TfL as regulator;

- b) The historic conduct of senior staff within ULL who were aware that Greyball technology was being considered as a means of evading regulatory enforcement in jurisdictions for which they had direct responsibility;
- c) ULL's 'reactive' approach, which appears to be driven (at least in part) by TfL's persistence and enquiries.

## Corporate responsibility

53. TfL is concerned about a number of ULL's activities and conduct which have an impact on the safety and security of the public and demonstrate a lack of corporate responsibility, and cumulatively, demonstrate that ULL is not fit to hold a PHV operator's licence based on a lack of corporate responsibility. Examples are provided below.

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### *Safety and criminal behaviour reporting*

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54. On 12 April 2017, the Metropolitan Police wrote to TfL and set out its concerns that ULL had not reported allegations of serious criminal offences by its drivers, and that such behaviour was unacceptable. The Police referred to circumstances in which a driver had committed two sexual offences, neither of which were reported to the Police by ULL. References were also made to several other reports of criminal offences made by passengers to ULL but were not reported directly to the police. In relation to two public order offences, the letter said that the delay in reporting meant that no action could be taken as the period in which proceedings could be brought in the Magistrates' Court had expired. The letter noted that ULL was proactive in reporting lower level document frauds to the Police (as well as to TfL). The letter explained that there were two concerns, firstly that it seems ULL decides what to report; less serious matters / less damaging to reputation over serious offences; and secondly by not reporting to the police promptly ULL allows situations to develop that affect the security and safety of the public. TfL wrote to ULL on 28 July 2017 and sought its response to the Metropolitan Police's letter.
55. ULL stated in its reply of 8 August 2017 that proactive reporting to the police is a sensitive area and that it tries to balance its regulatory and privacy obligations. The letter states that ULL's general policy is that the choice of whether to make a police report is that of the victim, but where appropriate, it will encourage a Rider to report an incident to the police. It reports issues of fraud to the Police because it is the victim. It also states that it complies with its legal obligations to report incidents involving deactivation of a driver to TfL.
56. ULL also set out a number of other activities that it undertakes in relation to collaborative working with the police including a dedicated Law Enforcement Response Team which is responsible for working

directly with the police and other law enforcement agencies to support investigations about incidents involving a partner-driver, or rider on and off the Uber app, a dedicated Law Enforcement Portal, as well as giving examples of ULL's collaboration with the police during terrorist incidents.

57. With regard to the alleged sexual assaults referred to by the police, ULL provided details to TfL of its decision to dismiss the driver on 21 May 2016. Upon notification, TfL immediately suspended the driver on 23 May and notified the police on the same day. Further information was requested from ULL to assist TfL's investigation. However, despite the seriousness of this matter and the need to obtain information urgently, it was necessary to ask ULL to provide the information more than once. It is expected that a responsible operator would respond immediately in respect of matters of public safety to ensure that it can take necessary action against the driver. ULL's approach falls below this expectation.
58. The handling of the matters raised in the letter from the police gives concern to TfL about the importance which ULL attaches to the safety of its passengers. Without these issues being brought to our attention by third parties, such as the police, TfL would not be aware of ULL's approach to these matters. TfL has considered ULL's response and remains concerned about ULL's approach.

#### *Push Doctor*

59. ULL confirmed that between 22 August 2016 and 23 September 2016 it conducted a trial of Push Doctor, an online GP service that is designed to perform medical checks. ULL stated in its letter dated 14 July 2017 that the service was trialled in an attempt "to make use of an innovative solution to save applicants for a private hire driver's licence both time and money". As TfL did not accept medical reports received from driver applicants that had been issued by Push Doctor, ULL ceased directing their drivers to this service.
60. PHV drivers must be medically fit in order to be granted a licence. This means meeting the DVLA Group 2 medical standards which are the same standards applied to other professional drivers such as HGV drivers. Driver applicants are requested to undergo a medical examination with a qualified medical practitioner who has access to their full medical records. The doctor then completes a medical form, which is submitted to TfL. The DVLA is legally responsible for deciding if a person is medically unfit to drive. TfL, using our Occupational Health department, which employs medical experts, assess the contents of the medical form and determine whether the applicant meets DVLA Group 2 medical standards. As part of the medical examination, registered medical practitioners are required to provide information on the form such as the applicant's blood pressure and eyesight. A satisfactory and reliable examination of those kinds would



require an examination in person. Information on existing medical conditions is also required.

61. The medical fitness of PHV drivers is of paramount importance for the public safety of passengers and other road users. The DVLA standards emphasise that safe driving requires the involvement of vision, visuospatial perception, hearing, attention/concentration, memory, insight/understanding, judgement, adaptive strategies, good reaction time, planning/organisation, ability to self-monitor, sensation, muscle power/control and coordination. Injury or disease may affect any one or more of these abilities.
62. We consider that it is obvious that a comprehensive medical examination of the type required for a PHV licence applicant must be conducted in person. ULL's introduction and promotion of a service whereby prospective PHV drivers were medically examined via video link was unacceptable and inappropriate. Approximately 800 applications from new and existing applicants had undergone a medical assessment with Push Doctor via video link. Dealing with these applications caused additional pressure to the licensing system in order to ensure that proper medical assessments were carried out.
63. ULL's letter of 14 July 2017 states that ULL ceased promoting the service once TfL rejected those applications which included medical checks obtained through Push Doctor. While that is true, ULL only did so following an intervention from TfL. Encouraging drivers to undergo medical assessments which are clearly and obviously unsatisfactory demonstrates a lack of regard to public safety and security which gives TfL cause for concern.

*Enhanced criminal records certificates*

64. Applicants for a private hire vehicle driver's licence must obtain an enhanced criminal records certificate (ECRC) from the Disclosure and Barring Service (DBS) which discloses details of any spent convictions or cautions. There are important public protection reasons for this.
65. TfL is a registered body that has statutory powers to apply for ECRCs for applicants of PHV driver's licences. In 2011, TfL appointed another registered body, GBGroup, to obtain ECRCs for PHV applicants on its behalf. TfL's policy at the time was that it would consider ECRCs which have been obtained as part of the recruitment process for another job, provided the ECRC had been issued in the past three months with the same level of checks as required by TfL.
66. In its letter of 14 July 2017, ULL explained that "From March 2015 until recently, ULL suggested the service provider Onfido to those persons enquiring via Uber's 'Ignition' programme to obtain a DBS as part of their Private Hire licence application." TfL's initial position was that it would accept ECRCs which had been obtained by Onfido in

accordance with its policy that it would accept ECRCs for other roles which are no older than three months.

67. However, in late 2016, the DBS highlighted an issue with Onfido obtaining ECRCs, as they were not doing so on behalf of TfL. The DBS, therefore, questioned whether they had legal powers obtain them. Following correspondence with DBS, TfL has adopted a new policy on accepting ECRCs which have not been obtained by GBGroup.

68. During the course of correspondence between TfL and Onfido, Onfido confirmed that its identification checks of drivers were undertaken by ULL. This raised concerns for TfL as to the reliance that it could place on the ECRCs obtained. Checking the identification of the applicant for an ECRC is a crucial element of the ECRC process. ULL was not in a position to conduct those checks independently. TfL has concerns about any private hire operator conducting identification checks as part of the DBS process as we are keen to ensure impartiality. In a letter dated 2 September 2017, ULL stated that "Onfido has provided training to 16 Uber representatives in the DBS application process and requirements in order to enable them to check applicant documents prior to the application being submitted and has advised as to the types of documents which are accepted by the DBS for the purposes of their background check".

69. TfL considers that it is a vital part of the ECRC process that - in order to ensure the accuracy and integrity of the results - identification checks should be carried out independently. A prospective employer (or partner) cannot provide that independent checking service as it compromises the reliance upon which TfL as regulator can place on the results. ULL's approach in arranging for its staff to undertake such checks was unacceptable and demonstrates a lack of regard to the safety and security of passengers. TfL does not consider that ULL took into account the safety of the public using its services when it encouraged drivers and made arrangements for ECRCs to be obtained by Onfido.

## **Conclusions**

70. TfL has concluded that ULL is not a fit and proper person to hold a PHV operator's licence for each of the following reasons:

- a) ULL's provision of materially false information about its booking acceptance process in 2014 and 2015, as compared to the reality as explained in later correspondence and clarified by the IT Architect's Investigation. ULL has attempted to play down the changes. It says that it has not misled TfL and has been consistent in its explanation of the process. However, the evidence shows that this is incorrect. ULL's description of its processes in 2014 was misleading on a material point. (TfL is

currently minded to think the point is determinative, and that ULL's current operating model is accordingly unlawful, but the provision of materially false information is relevant to ULL's fitness and propriety irrespective of this point.) Either ULL knew that the information provided was misleading, or it did not understand its own systems sufficiently (despite assertions to the contrary). In either case, we consider that this is sufficient to undermine ULL's fitness to hold a London PHV Operator's Licence. It is essential, in the interests of protecting the public, that TfL can be satisfied that licensed operators provide accurate, full and frank information that TfL can rely on. The fact that TfL is unable to do so gives us serious concerns.

- b) ULL's responses in relation to Greyball. TfL has had to engage in extensive correspondence to obtain the (still incomplete) information that it has now. There remain questions about the extent to which, how often and where ULL Directors and Senior Managers were aware of the possible use of Greyball to evade regulatory enforcement in other jurisdictions. More importantly, ULL's responses to TfL's questions were partial and/or incomplete. TfL has had to repeatedly pursue and probe ULL on this issue in order to obtain the (still incomplete) picture that it now has. This undermines TfL's confidence in ULL, and in its approach towards its regulator. Consistent with its conduct in relation to other issues, ULL's response to TfL's enquiries has been entirely 'reactive' and the changes to its regulatory systems are not sufficient to give TfL confidence about its fitness and propriety.
- c) ULL's approach to the safety and security of the public, including its approach to reporting serious criminal incidents, and the use of Push Doctor and Onfido, gives TfL serious concerns about its apparent lack of regard to the safety of its customers, such that TfL concludes that it is not fit and proper to hold a licence.

### **Right of Appeal**

ULL may appeal our decision, information on how to do this is enclosed with this letter, please read the notice entitled 'Right of Appeal'.

Section 26(1) of the Act states:

"If any decision of the [licensing authority] 1 against which a right of appeal is conferred by this Act—

- (a) involves the execution of any work or the taking of any action;



(b) makes it unlawful for any person to carry on a business which he was lawfully carrying on at the time of the decision,

the decision shall not take effect until the time for appealing has expired or (where an appeal is brought) until the appeal is disposed of or withdrawn.”

We consider that the purpose of section 26(1), read in context, is to allow an existing licensee such as ULL, whose application for renewal of its licence is refused, to continue to carry on business until such time as its appeal is disposed of or withdrawn. It follows that, where (as here) the decision in question is a decision not to renew a licence, the effect of s. 26 is to treat that decision – for the period until the appeal is disposed of or withdrawn – as if it had been a decision to renew.

#### **Additional Information**

If you have any further queries regarding this decision, please contact us via the details contained at the top of this letter. It is important you quote your reference number in all communication with us.

Yours sincerely



Helen Chapman  
**General Manager**  
**Taxi and Private Hire**



Brighton, Thursday 22 March 2018

Jim Whitelegg  
Licensing Manager  
Hackney Carriage Office  
Brighton and Hove City Council  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JE

Brighton & Hove City Council

22 MAR 2018

Health, Safety & Licensing

To be delivered by hand (and email to: [jim.whitelegg@brighton-hove.gcsx.gov.uk](mailto:jim.whitelegg@brighton-hove.gcsx.gov.uk))

Dear Sir

**Written Submissions Opposing the Renewal of Uber's Private Hire Operator's Licence –  
Public Meeting 23 April 2018**

1. These are written submissions on behalf of a long-established group of taxi and private hire operators based in the city of Brighton and Hove, namely:
  - a. Brighton and Hove Streamline Ltd;
  - b. Brighton and Hove Radio Cabs Ltd; and
  - c. The Southern Taxis Group Ltd.
2. For ease of reference, they are collectively described in this document as (the **"Undersigned"**) Consistent with the approach adopted in October 2017, the Undersigned express the strongly-held view that Uber Britannia Ltd (the **"Applicant"**) is not a fit and proper person to be awarded a licence (an **"Operator's Licence"**) under section 55 of the Local Government (Miscellaneous Provisions) Act 1976 (the **"Act"**).

3. These written submissions address, principally, the following matters:
- a. The fairness of the procedure previously adopted by Brighton and Hove City Council (“BHCC”) in relation to the granting of Operator’s Licences to the Applicant.
  - b. The relevant legal provisions.
  - c. Who is the Applicant and what does it do?
  - d. The stance adopted by the Applicant and other Uber Group companies.
  - e. The Applicant’s approach to disclosing relevant information.
  - f. The impact on the effectiveness and relevance of the Blue Book.
  - g. The proposed public meeting.
  - h. The conditions imposed on the Applicant.

#### **The fairness of the procedure adopted by BHCC**

4. It is understood that the Applicant is inviting BHCC to grant a renewal of its Operator’s Licence. That Licence was granted by a decision reflected in a letter dated 2 November 2017 and for a period of six months. The Operator’s Licence was made subject to four conditions, each of which was proposed by the Applicant itself.
5. The Undersigned contend at the outset of these submissions that the procedure followed in October and November 2017 was manifestly flawed, grossly unfair to those who participated in the process and led BHCC into making a decision which was legally erroneous.
6. As early as 25 August 2017, the Undersigned are aware that Cllr Lee Wares wrote to BHCC requesting that a public meeting be scheduled for the determination of the Applicant’s application for a renewal of its Operator’s Licence in October/November 2017.

7. On 8 September 2017, BHCC responded to Cllr Wares indicating that a public meeting was not required. The letter stated as follows:

*“We will clarify with the trade the objections which they raise, either directly or through yourself, and invite them to expand upon them and this will meet the criteria in our view for all matters to be put before the decision makers. A lot of the issues focus upon the operating systems of Uber, many of which have been dealt with repeatedly and it may be that if further clarification is sought from Uber, this will be commercially sensitive information, which should not be the subject of public debate. We undertake to provide reasons and deal with the complaints raised which **will make this a clear and transparent process**. We also note that at any point, if the licence is renewed and significant concerns are raised, the Council retains the right to take further action.”*

8. The Undersigned submitted a detailed letter, dated 3 October 2017, setting out their objections to the renewal of the Applicant’s Operator’s Licence, in accordance with a timetable set out by BHCC. A copy of that letter is appended to these submissions.
9. After the decision had been taken to provide the Applicant with a renewed Operator’s Licence, the Undersigned pressed BHCC for disclosure of a number of documents relating to this decision. BHCC’s response to those requests revealed that those who took the decision to renew the Applicant’s Operator’s Licence had been provided with a document titled, “Uber Briefing Document for Officers and Members” (the “**Briefing Document**”). This document, understood to have been drafted by Mr Simon Court, a Senior Lawyer at BHCC, refers to arguments raised by the Undersigned in their letter of 3 October 2017 and purports to advise “Officers and Members”. In reality, the Briefing Document consisted principally of subjective comment on the merits of those arguments.

10. The Undersigned are not clear what weight was attributed to the Briefing Document by those who ultimately renewed the Applicant's Operator's Licence. The Undersigned are deeply concerned at the lack of critical analysis within the Briefing Document, the bold and unsupported conclusions reached in the Briefing Document and the remarkable failure on the part of BHCC to offer the Undersigned a right of reply to it.
11. This approach, compounded by the failure to determine the application at a public meeting, represented a significant departure from the "*clear and transparent process*" promised by BHCC in its letter to Cllr Wares on 8 September 2017. The decision was taken in private and misinformed by undisclosed, private and deeply controversial legal advice. BHCC will no doubt be aware that Birmingham City Council recently renewed an Operator's Licence it had granted to the Applicant in private and this understandably caused considerable disquiet in that city.
12. The Undersigned firmly maintain that, had a clear, informed and transparent process been adopted in October 2017, BHCC might very well not have renewed the Applicant's Operator's Licence on that occasion.
13. The Undersigned welcome the decision to hold a public meeting for the determination of this application for renewal, although they have expressed concerns in correspondence concerning the manner in which it will take place. Those making the decision are respectfully invited to approach the issues raised in these submissions with fresh and open minds and not to be influenced by the earlier, tainted decision.
14. Furthermore, in order to ensure that the public meeting proceeds in a manner which is fair to all participants, BHCC is respectfully asked to obtain independent legal advice, from external lawyers with experience in this field, in advance of that meeting and to disclose it on 5 April 2018 to those who have filed written submissions.

### The relevant legal provisions

15. As before, the Undersigned implore BHCC to apply the well-known legal test on the granting of Operator's Licence with precision. The Undersigned remain deeply concerned that, when issues relating to the Applicant, and Uber more generally arise, a tendency towards elision and paraphrasing can sometimes be evident. The Undersigned were surprised and disappointed to read Mr Court declare the legislation in this area as "*archaic*" and "*not fit for purpose*" in the Briefing Document. The Act remains good law and any decisions on its reform should be made by Parliament. BHCC has no alternative but to follow the law.

16. Section 55(1)(a) of the Act states (emphasis added):

*(1) Subject to the provisions of this Part of this Act, a district council shall, on receipt of an application from any person for the grant to that person of a licence to operate private hire vehicles grant to that person an operator's licence:*

*Provided that a district council shall not grant a licence unless they are satisfied*

*(a) that the applicant is a fit and proper person **to hold an operator's licence.***

17. The Undersigned emphasise these words because they consider that the approach BHCC took to the granting of the Applicant's Operator's Licence in 2015 and subsequently has failed adequately to take these words into account.

18. As a matter of language, a person or company might very well be a *'fit and proper person'* in the more general sense of the expression; whilst being a wholly unsuitable person to hold an Operator's Licence. By way of illustration, a person with a long-standing and exemplary record of service to the community, but who has no experience or expertise in the operation of private hire vehicles, might well fall into this category.
19. Before any determination can be made as to whether an applicant is a fit and proper person to hold an Operator's Licence, it is essential first to understand who that applicant is.
20. This issue was raised by the Undersigned in October 2017 but was inadequately addressed by Mr Court in the Briefing Document, under a heading, "Are they an operator or not?"
21. In October 2017, the Undersigned urged BHCC properly to consider whether the Applicant met the statutory test and not any other entity or, worse still, some vague notion of what "Uber" might be. In spite of that warning, Mr Court made no attempt to identify what the Applicant actually did by way of operating private hire vehicles, made reference to a completely inapposite analogy, and grouped an unknown number of entities and concepts together using terms such as "Uber" and "they".
22. To avoid a recurrence of this confusion, the Undersigned here dedicate a specific section to the question of the identity and function of the Applicant.



### Who is the Applicant and what does it do?

23. The Undersigned have received a copy of an application form headed “Application for a private hire operator licence” which is dated 20 September 2017 and appears to have been received by BHCC on 9 October 2017 (the “**Application Form**”). It is understood that this was the document by which the Applicant formally requested the Operator’s Licence which it currently holds. It is the most recent such document available to the Undersigned at the time of writing.
24. The Applicant is identified as Uber Britannia Ltd, with its registered office given as Aldgate Tower First Floor, 2 Leman Street, London, E1 8FA. This information is consistent with a company registered at Companies House under company number 08823469. The Application Form asked the Applicant to name all of its directors and Mr Rob Van Der Woude, based at an address in the Netherlands, and described as a Tax Consultant at Ernst & Young was identified. The record at Companies House indicates that Mr Van Der Woude resigned as a Director on 18 October 2017 and the Applicant’s board now consists of three Directors:
- a. Thomas Elvidge;
  - b. Frederick Jones; and
  - c. Lauren Powers-Freeling.
25. The Application Form identifies the address from which the Applicant intends to operate private hire vehicles as Workshop 30, 30 Grand Parade, Brighton, BN2 9QA (the “**Brighton Premises**”). In their written submissions provided in October 2017, the Undersigned respectfully invited BHCC to investigate what, if any, activities are conducted by the Applicant at this address as part of the renewal process.

26. The Applicant states in its submissions that BHCC has carried out inspections of the Brighton Premises on a number of occasions. The Undersigned have not been provided with the reports of any of those inspections and no detail has ever been provided concerning what activity actually takes place there.
27. As the Applicant has asked BHCC to grant it an Operator's Licence, it properly falls on BHCC to give some consideration to the question of whether the Applicant is, in any proper sense, an operator of private hire vehicles.
28. Section 46(1)(d) of the Act states:

*Except as authorised by this Part of this Act*

*(d) no person shall in a controlled district operate any vehicle as a private hire vehicle without having a current licence under section 55 of this Act*

29. The term 'operate' in this context refers back to the definition in section 80 of the Act:

*"operate" means in the course of business to make provision for the invitation or acceptance of bookings for a private hire vehicle.*

30. The Undersigned stress again that, when considering these tests, the focus has to be on the Applicant, i.e. the company which operates under company number 08823469 and not to fall into the error made by Mr Court in the Briefing Document in conflating the Applicant with vague concepts of what BHCC might understand "Uber" to mean.
31. The Applicant's own submissions are revealing on this point. Parts of this document have been redacted without explanation. Whilst this is plainly unsatisfactory, there appears to be sufficient information provided about the Applicant's working practices to determine without any doubt that it is not an operator of private hire vehicles.
32. It is to be remembered that the Uber platform operates on an app which both customers and drivers can download onto their mobile devices. When a customer

opens his or her device, a number of vehicles are displayed as operating in the nearby area. Because of the interpretation adopted by the Applicant and its related companies of the decision in *Adur D.C. v Fry*<sup>1</sup>, it is apparent that the vehicles displayed on that consumer's app consisted of a mixture of vehicles licensed by BHCC and driving under the Applicant's banner, vehicles licensed by other (non-London) licensing authorities and driving under the Applicant's banner, and (at least prior to 14 March 2018) vehicles licensed by TfL and driving under the banner of Uber London Limited ("ULL").

33. It is to be remembered that ULL is an entirely different legal entity to the Applicant and is registered at Companies House under a different company number, 08014782. At page 9 of its submissions in October 2017, the Applicant says as follows:

*"As set out in the Terms & Conditions for riders: "Your PHV Booking will be accepted and allocated to a Transportation Provider by Uber UK as holder of the relevant operator's licence. You should be aware that the Transportation Provider to which your PHV Booking is allocated and who provides the Transportation Services may be licensed in an area other than where the booking is requested or the Transportation Services are provided." Uber London Limited holds an operator licence for London, and accepts the bookings for TfL-licensed drivers under that licence. Uber Britannia Limited holds the operator licences elsewhere in England and Wales – including for Brighton & Hove – and accepts the booking under the applicable private hire operator licence.*

*When the booking request is allocated to a partner-driver who holds private hire vehicle and driver licences with Brighton & Hove, Uber Britannia Limited will accept the booking under its BHCC operator licence. The booking record is created electronically when the booking is accepted by Uber Britannia Limited."*

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<sup>1</sup> [1997] R.T.R. 257

34. The next sentence has been redacted from the Undersigned. It is instructive to note that the Terms & Conditions to which reference is made by the Applicant define Uber UK as follows:

*"Uber UK" shall mean each of Uber London, Uber Britannia, Uber NIR and Uber Scot.*

35. The Applicant's own evidence, therefore, is that an app, provided not by the Applicant but by Uber B.V., yet another company, based in the Netherlands, informs customers of the presence of drivers in their vicinity. The customer makes a request for a vehicle and the app alerts those drivers to the fact that a request has been made. Where, by happenstance, the request is accepted by a driver licensed by BHCC, the operator is deemed to be the Applicant. Where, at least prior to 14 March 2018, the request was accepted by a driver licensed by TfL, the operator was deemed to be ULL. This deeming process, or "*allocation*" as it is described in the Terms & Conditions cited by the Applicant, occurs either after the fare is accepted by the individual driver or at an identical time.
36. This is entirely consistent with the findings of a report by Deloitte UK, commissioned by TfL to investigate the mechanics of the booking process used by ULL. Those findings apply equally to the Applicant as they do to ULL.
37. In light of this fact, it is plainly nonsensical to suggest that the Applicant plays any function whatsoever in the operation of private hire vehicles at any time prior to the acceptance of a fare by an individual driver. How then, it is said that the Applicant, "*make[s] provision for the invitation or acceptance of bookings for a private hire vehicle*" within the scope of section 80 of the Act is not at all clear to the Undersigned. Whatever work is subsequently carried out by the Applicant, whether at the Brighton Premises or otherwise, in relation to these fares, it cannot properly be the invitation or acceptance of bookings of private hire vehicles.

38. Mr Court circumvents this problem in the Briefing Document by asking himself the wrong question. There is plainly scope within the model identified for somebody, be they an individual or a company, registered in the U.K. or otherwise, to be an operator of private hire vehicles. Indeed, if nobody was undertaking the task of providing for the invitation and acceptance of vehicles, the model would collapse completely. It is thus correct but irrelevant when Mr Court states, “*there is no meaningful argument against Uber being an operator.*” The only relevant consideration here for BHCC is whether **the Applicant** is an operator of private hire vehicles. The Undersigned consider it is apparent that it is not.
39. It is not for BHCC or the Undersigned to speculate on the motivations behind the complex corporate structure by which the Uber Group of companies operates. All that is relevant to ask is whether the Applicant named on the Application Form is a fit and proper person (natural or legal) to operate private hire vehicles. For that question to be answered positively, the Applicant must at the very least show that it undertakes the tasks for which it seeks a licence. It has conspicuously failed to do so.

#### **The stance adopted by the Applicant and other Uber Group companies**

40. The Undersigned recognise, without hesitation, that Mr Court did not have access to the full decision letter of TfL dated 22 September 2017 when he came to produce the Briefing Document. In the Briefing Document, Mr Court identified four criticisms understood to have been made of ULL by TfL and purported to distinguish them from the position of the Applicant and BHCC.
41. The TfL decision letter of 22 September 2017 (a complete copy of which is appended to these submissions) identified a fifth criticism which is very plainly relevant to the question of the assessment of whether the Applicant is a fit and proper person and about which the Briefing Document is silent. TfL said as follows:

*“It is considered that ULL misled TfL in correspondence in 2014 as to the process by which bookings are accepted through the Uber app. In particular, ULL provided a false picture of the order in which various steps take place,*

*when a booking is being accepted. TfL had asked ULL to explain its systems, and had been clear that we would rely on their answers when determining the lawfulness of their operating model. Whether or not the false information provided by ULL was determinative of the lawfulness of ULL's model (a matter we address in separate correspondence), TfL considers that ULL's answers were materially false and misleading."*

42. In their letter of October 2017, the Undersigned also sought to demonstrate how the stance adopted by the Applicant as to how its booking process evolved between 2014 and 2017, including quoting at length from the Terms and Conditions in force at different times. They made the same points in similar detail in written submissions to TfL before September 2017. Put simply, whilst BHCC disregarded those observations and renewed the Applicant's licence, TfL took them seriously and declined to renew ULL's licence.
43. When similar arguments were presented to York City Council in December 2017, concerning the Applicant (i.e. not ULL) they too concluded that the Applicant was not a fit and proper person. This difference of both approach and outcome is stark and inexcusable. It is respectfully submitted that TfL and York City Council have taken these concerns on board and acted accordingly. Thus far, BHCC has not.
44. The Undersigned strenuously request that BHCC gives careful consideration to paragraphs 1 to 24 of TfL's decision letter of 22 September 2017 and to their letter of 3 October 2017.
45. The system by which the Uber Group provides services is both innovative and complex. It is an international organisation which draws heavily upon modern technology and the internet which transcends both licensing borders and even national borders. These features necessarily mean that many of the steps involved in the provision of those services are either virtual in their nature or at least substantially different from steps ordinarily associated with the operation of private hire vehicles.

46. These features afford the Uber Group a certain degree of flexibility as to how they characterise the legal effect of those steps. What both TfL and the Undersigned have observed is that companies such as ULL and the Applicant have gone to great lengths to characterise those activities in different ways at different times to suit the specific interests of the Group at that time.
47. In particular, where ULL or the Applicant seek to obtain a licence to operate from a licensing authority, they have been quick to emphasise the positive and active nature of their work. Where, in matters such as the *Aslam v Uber Britannia Limited (and ors)*<sup>2</sup> employment law dispute, they instead sought to emphasise the passive nature of their work and corporate structure.
48. When TfL drew this approach to the attention of ULL, it offered an explanation which was described by the authority as “*unconvincing*”.
49. BHCC was wrong in October/November 2017 to disregard these observations of the Undersigned and it is only proper that it should now, at last, heed these concerns and challenge the Applicant in much the same way as TfL challenged ULL on this issue.

#### **The Applicant’s approach to disclosing relevant information**

50. It is respectfully submitted that the Applicant and other Uber Group companies have displayed a troubling tendency to withhold adverse but relevant information from the authorities which regulate it.
51. A stark recent example of this arose recently when in 2014 and again (twice) in 2016, Uber’s worldwide servers were attacked by hackers who stole personal data of up to 57 million customers and 600,000 drivers. This is a matter of public record and, it is submitted, it is highly likely that a number of those customers used drivers operating

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<sup>2</sup> [2017] I.R.L.R. 4

under the auspices of the Applicant. It may indeed be the case that customers from the Brighton & Hove area had their personal details stolen.

52. In December 2017, City of York Council concluded that Uber had not notified the relevant authorities of this breach until November 2017, some 18 months after it first became aware of it. This was a fundamental reason why City of York Council found that the Applicant (the same company as here) was not a fit and proper person to hold an Operator's Licence.
53. A fit and proper person in the position of the Applicant would have notified all those who had awarded it an Operator's Licence, including BHCC, as soon as it discovered that customer data had been compromised. In the event that, as assumed, the Applicant failed to notify BHCC of the breach before November 2017, it is respectfully submitted that BHCC should join York in concluding that the Applicant is not a fit and proper person to hold an Operator's Licence.

#### **Cross-border issues and the announcement by Uber on geo-fencing**

54. An issue which has severely impacted both the private-hire trade in Brighton & Hove and the ability of BHCC effectively to regulate it has been the propensity for individual drivers to obtain a licence in London from TfL (where the regulatory standards are understood to be lower) and then to use that licence to accept fares using the Uber app predominantly in the Brighton & Hove area.
55. This practice has been widespread in Brighton & Hove since around 2015 and has been the subject of numerous complaints by the Undersigned both in written opposition to the granting and renewal of the Applicant's Operator's Licence and in other correspondence to BHCC.
56. On 14 February 2018, Uber announced a marked shift in its approach to the provision of services across licensing boundaries. The announcement said:



*“From Wednesday 14 March, drivers will still be free to choose where they want to drive, however, drivers will only be able to receive requests from the Uber app in the region in which their licensing authority is. The location of your driver’s licence will allow you to drive in one of 9 regions in England and Wales.”*

57. Brighton & Hove has been placed by this announcement into the South East region whilst Greater London (including surrounding areas) is given its own region. Assuming this announcement is backed up with effective action, and the technology works effectively to implement it, it would appear to follow that TfL and ULL registered Uber drivers will be prevented from picking up customers in the Brighton & Hove area going forwards. In the view of the Undersigned that represents a significant improvement, albeit it is regrettable how long it took for this announcement to be made.
58. It is apparent, however, that the announcement will do little to cure the wider problem of drivers operating in Brighton & Hove but licensed elsewhere in an attempt to circumvent BHCC’s high regulatory standards.
59. First, BHCC must bear in mind that this announcement, unilaterally declared by Uber, can be reversed at any time. It would be quite wrong for BHCC to give any substantial weight to it when determining this attempt by the Applicant to obtain a renewed Operator’s Licence.
60. Second, the Undersigned are deeply concerned to see that the South East Region as defined by Uber, seems to encompass a very wide area including both Brighton & Hove and Lewes. Lewes District Council is another licensing authority which has granted the Applicant an Operator’s Licence. It is well-known within the trade that Lewes District Council applies less stringent standards on the private hire drivers it regulates than BHCC.

61. A particular feature has been placed on Uber's own website<sup>3</sup> which highlights savings in terms of both time and money which drivers would experience if they chose to apply to Lewes District Council for a licence as opposed to BHCC. Since the announcement on 14 February 2018, the Undersigned have been informed that Lewes District Council has experienced a significant surge in applications for private hire licences. Given that there is no reason to suppose any corresponding surge in demand for vehicles in Lewes, the Undersigned suspect and fear that the applications are predominantly being made by drivers hoping to fill the gap left behind in Brighton & Hove by ULL drivers who previously operated there.
62. As a result of the sheer size of the geographical regions arbitrarily carved out by Uber, and the failure to make any reference to the jurisdiction of existing licensing authorities when devising them, the Undersigned consider that any benefits which might have been anticipated by Uber's announcement of 14 February 2018 are likely to be lost. Forum shopping by drivers seeking to obtain licences according to the lowest available standards and then working predominantly in areas of tighter regulation seem certain to remain a difficult issue in Brighton and Hove, notwithstanding the announcement.
63. Uber's announcement of 14 February 2018 is also revealing in that it might be assumed that the technology has always existed to restrict certain vehicles operating on the Uber App from certain geographical locations. It is to be remembered that, since 2015, the Applicant has undertaken that if it was given an Operator's Licence by BHCC, it would only use drivers and vehicles licensed by BHCC.
64. The Undersigned have consistently argued that undertaking was either devoid of practical meaning or was flagrantly breached by the Applicant by virtue both of the fact that the Applicant had obtained licences from numerous other authorities and by the fact that TfL-licensed drivers could be seen regularly accepting fares in the Brighton & Hove area.

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<sup>3</sup> <https://www.uber.com/en-GB/drive/resources/popular-jurisdictions-brighton/>

65. As it is now apparent that TfL licensed drivers could, all along, have been effectively excluded from Brighton & Hove by the geo-fencing technology, the Undersigned consider that the Applicant has deliberately misrepresented to BHCC that it would use only drivers licensed by BHCC whilst it has done nothing to prevent its drivers licensed by other authorities and ULL's drivers, licensed by TfL from operating in Brighton and Hove. It is respectfully submitted that this is not the conduct of a fit and proper person.

### **The impact on the effectiveness and relevance of the Blue Book**

66. For some years, residents of Brighton & Hove have enjoyed a superb standard of service when using private hire vehicles. The Undersigned are very happy to credit BHCC with this and the clear and high standards set in the Blue Book.
67. By way of illustration, BHCC has imposed upon the Undersigned a requirement that a proportion of our vehicles are wheelchair-accessible and has imposed a requirement of all Hackney and Private Hire Vehicles that CCTV must be installed in the vehicle. These requirements are beneficial to the public but are very costly for the operators in the city.
68. It is apparent both from the Applicant's submissions in October 2017 and from Mr Court's Briefing Document that the vehicles registered on the Applicant's fleet by BHCC have CCTV equipment in them. It appears also that there is now at least one wheelchair-accessible vehicle among its fleet.
69. Nevertheless, for the reasons discussed at great length already, the vehicles which are presently available to consumers using the Uber app in Brighton & Hove include very many which are not registered by BHCC. As things currently stand, many vehicles operating in Brighton & Hove are licensed by other authorities and, historically, many were licensed by TfL. It is apparent that, if those vehicles are included within the field of enquiry, the Applicant's compliance and Uber's compliance more generally with the requirements of the Blue Book are plainly inadequate.

70. Furthermore, the Undersigned are concerned that the Applicant seeks to use the Operator's Licence given to it to lobby BHCC to reduce the standards traditionally imposed within this area. The comments made by the Applicant at page 14 of its submissions in October 2017 are particularly troubling:

*"Our experience across over 80 jurisdictions in the UK indicates that one of the key deciding factors in where a driver chooses to get licensed is related to the time and cost of the licensing process. Councils with a modern streamlined process typically have the lowest incidence of cross-border driving. To assist Brighton & Hove to adopt a modern and streamlined process, Uber submitted a short discussion paper to the Taxi Forum."*

71. This discussion paper plainly and openly sought to relax significant and important standard imposed on applicants by BHCC at present. These included:

- a. The topographical test;
- b. The practical driving test; and
- c. The professional taxis and private hire driver tests.

72. The Undersigned are passionate about ensuring that those who use private hire vehicles in Brighton & Hove continue to benefit from the safety, security, comfort and convenience which comes with ensuring drivers of private hire vehicles are regulated to the highest possible standards. Despite the positive sentiments expressed by the Applicant in its submissions, the Undersigned consider that the discussion paper sent to the Taxi Forum better reflects the Applicant's true approach to the issue of regulatory standards in Brighton & Hove.

### **The proposed public meeting**

73. The Undersigned were very pleased to see that BHCC has acceded to the request which both they and others (including Cllr Wares) made that the determination of the

Applicant's request for a renewal of its Operator's Licence be made following a public meeting.

74. In their submissions made in October 2017, the Undersigned expressed the view that a well-advertised public meeting would enable BHCC to better understand the views of members of the public both about how the services are provided at present and the impact which Uber vehicle might have in the future.

75. In the Briefing Document, Mr Court said:

*"We may wish to take notice of the source of objections. In any event all of the objections come from the established trade within the city. We have identified no complaints from the residents of or visitors to the City. This would seem to suggest that the users of Uber have no concerns. It has been put to us that they may not know how to complain. I regard this as unlikely. People actively have to set up Uber and it is hard to believe that hundreds of thousands of users (millions?) are not able to work out how to complain. Indeed, this might be regarded as insulting to those who use Uber."*

76. Again, Mr Court seems to have somewhat misrepresented the point raised by the Undersigned in their submissions. What they said on that occasion, and which remains true today is that Uber is a global organisation which operates using sophisticated app-based technology. Operators such as the Undersigned would likely be recognised by customers as local businesses regulated locally. It may well not be obvious to customers unfamiliar with the complex regulatory structure of private hire vehicles that, when dissatisfied by their experiences with Uber, they can complain to BHCC.

77. The proposed framework of the public meeting is highly unlikely to address these concerns. It appears that, in order to be afforded an opportunity to speak at the public meeting, a person will be required to have made written representations by 23 March 2018. The notice of hearing for the public meeting is not planned to be

published until 5 April 2018. Accordingly, members of the public will be unaware of the existence of the public meeting until after the deadline for participating in it has expired.

78. A remarkably short period of time has been allocated for interested parties to make representations at the public meeting. You will note that the Undersigned constitute three distinct interest parties, who have chosen to collaborate in making these submissions. They respectfully request that 15 minutes is allocated to them at the public meeting in order to make oral representations.
79. This proposal will plainly fail to provide BHCC with anything like an accurate picture of the public perception of the private hire industry in Brighton & Hove.

#### **Conditions**

80. As has been stated already, it is understood that four conditions were imposed on the Applicant when its Operator's Licence was renewed in October/November 2017. Those conditions were proposed by the Applicant itself and, with respect, represent nothing more than the bare minimum which could reasonably be expected of a business in the Applicant's position.
81. In the event that BHCC does not accept the submissions made by the Undersigned and is of the view that the Applicant is a fit and proper person to be granted a new Operator's Licence, the Undersigned consider that any relaxation of the conditions already imposed should be avoided at all costs.
82. BHCC's decision letter of 2 November 2017 expressed concern about the scope of Condition 2 and sought to explore with the Applicant whether the period of 72 hours in which the Applicant was required to report criminal activity could be reduced. The Undersigned consider this period is unacceptably long and a period of 24 hours is more than enough time to report allegations of criminal conduct to BHCC.

83. The Undersigned consider that if, contrary to what is said here and at the public meeting, BHCC is minded to grant a renewed Operator's Licence to the Applicant, further conditions ought properly to be imposed.
84. Uber's announcement on 14 February 2018 suggests that it is possible within the app's technology, to geo-fence an area and to restrict the app's functionality outside that area. If that is correct, the Undersigned see no reason why BHCC should not impose a condition that only BHCC-registered drivers should be available to customers using the Uber app within the Brighton & Hove area.

## Conclusion

85. For the reasons set out above, the Undersigned respectfully submit that the Applicant is not a fit and proper person to hold an Operator's Licence. When the identity of the Applicant is properly identified, it is abundantly clear that it bears none of the characteristic features of a private hire operator and performs few, if any of the tasks anticipated by the Act.
86. Beyond that, the Applicant and the group of companies of which it is a part have ruthlessly and unashamedly exploited every possible flexibility and ambiguity in the interpretation of its working systems to its advantage. It has amended its Terms and Conditions and tailored its evidence to suit the specific outcomes which it has sought to achieve at different times. TfL has described this approach as "*materially false and misleading*". The Undersigned do not consider this to be conduct of a fit and proper person to hold an Operator's Licence.
87. If BHCC disagrees and is minded to renew the Applicant's Operator's Licence, it is requested that the renewal be for no more than six months to await the outcome of ULL's appeal to TfL in July 2018 and subject to a condition that only BHCC-registered drivers should be available to customers using the Uber app within the Brighton & Hove area.

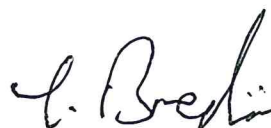


Yours faithfully


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.....  
Signed  
Andy Cheesman  
Director





22/03/2018

Unite the Union wishes to object to the renewal of Uber's Private Hire Operator's Licence currently issued by Brighton & Hove City Council on the following basis.

This objection differs from our previous objection lodged at the last consideration of renewal in terms of the augmentation of recent information.

Firstly we should like to establish what we believe about Uber's operation locally;

## **UBER**

Brighton & Hove City Council believe and "Uber" will contend, that the licensee in this case is Uber Britannia Ltd, a separate entity to all other incarnates of Uber. However, the "Uber Operation" locally in Brighton & Hove is patently not that simplistic and furthermore the "customer experience" or contract (from a customer's perspective) is we believe complicated, misleading and confusing.

Uber Britannia is not actually the same as the companies that deliver the Uber service and operation locally in Brighton & Hove. The word "companies" is key here.

Brighton & Hove Uber customers and users of the system that has been locally licensed by Brighton & Hove City Council don't realise that;

When they "request a ride" (in Uber's words) locally within the City of Brighton & Hove, then that "request" is handled by a "different" company based in the Netherlands called Uber BV. It is this "company" that forwards the "request" (not a booking I hasten to point out at this juncture). It is Uber BV that forwards the request for a driver to be dispatched to the user's location. It is also Uber BV who collects any payment required. At no point has the customer interacted or contracted with Uber Britannia Ltd (the company licensed by Brighton & Hove City Council)!

The supply of the vehicle is then handed by Uber BV to another company based in the UK, either Uber Britannia Ltd or indeed Uber London Ltd. However, there would seem to be a problem! As, the "request" or "booking" (as it is called in the UK) has already been accepted by a driver at this stage and before being handed by Uber BV to either Uber Britannia Ltd or indeed Uber London Ltd.

Therefore it runs that if we are to accept that each ("company") incarnate of Uber is separate, then Uber BV is operating without a "Private Hire Operator's Licence" or at the very least 'advertising for the acceptance of bookings', without a licence within the City of Brighton & Hove.

If conversely, we are to accept that all incarnates of Uber are in fact that, - Uber! Then we must accept that the customer contracts with Uber in its various guises and not specifically or individually with Uber Britannia Ltd. This does not however alter the fact that the initial "request for a ride" was/is accepted by a Private Hire driver who does not (in most cases) possess a Private Hire Operator's licence for the acceptance of Private Hire "bookings". The fact that the "booking" is documented to an Operator's Licence held by the various incarnates of "Uber" by virtue of 'back-filling' sometime later, does not we feel assist here.

The consequence of all this we believe, is that either;

All incarnates ("companies") are separate and Uber BV is acting unlawfully. If this is the case then this has clear ramifications upon the lawful nature of Uber Britannia's operation locally within Brighton & Hove.

or;

There is but one "Uber" albeit trading under different titles for their convenience. This belief is supported by the fact that the staff of all incarnates of Uber seem to be the same. i.e. Fred Jones as 'Head of Cities' is the "face" of Uber, Uber London Ltd and Uber Britannia. Therefore, we feel one could assume that Uber is Uber, is Uber.

Regardless, It can be argued that this setup (unlike other local licensed Operators, Radiocabs, Streamline, City Cabs) is so designed and deliberate. It is part of what has allowed Uber to blur the boundary between being a 'pre-booked' "Private Hire" service and 'plying-for-hire'.

The interesting fact here is that Uber Britannia is a locally licensed Brighton & Hove Private Hire Operator, yet it would seem that no passenger has ever called or contracted with them directly – they merely respond exclusively to requests forwarded by Uber BV, based in the Netherlands. Quite where Uber Global (based in San Francisco) fits into all of this legislatively speaking is quite frankly, anyone's guess.

In view of all of the foregoing, then clearly if we are to accept that Uber's operation in Brighton & Hove is lawful then there is but one Uber.

Consequently, any sanctions against, behaviour by any of its drivers (wherever they are licensed) or behaviour of Uber itself at large in any geographical area in the UK, must be considered when giving consideration as to whether to renew their Brighton & Hove Private Hire Operator's licence.

## **Transport for London (TfL)**

On Friday 22nd of September 2017, Transport for London announced that they had concluded that Uber was 'not fit and proper' to hold a Private Hire Operator's licence. They cited the following as their basis for the decision to refuse to renew Uber's licence:

- Their approach to reporting serious criminal offences.
- Their approach to how medical certificates are obtained.
- Their approach to how Enhanced Disclosure and Barring Service (DBS) checks are obtained.
- Their approach to explaining the use of 'Greyball' in London – software that could be used to block regulatory bodies from gaining full access to the app and prevent officials from undertaking regulatory or law enforcement duties. (We will return to 'Greyball' in detail later).

It is worth mentioning and noting separately here, the grave concerns of Police Inspector Neil Billany, who voiced them on behalf of the Metropolitan Police in a letter to the London regulator (TfL). We will also return to this in detail later.

It is also supremely worrying and what's more highly questionable that in Uber's appeal submission against the London Tribunal rulings on worker rights, they conceded that their drivers are indeed accepting journeys rather than Uber the "company". Uber have persistently claimed that they are, and have been operating within both the Local Government (Miscellaneous Provisions) Act 1976 and the Private Hire Vehicles (London) Act 1998. However, this admission of their practice would seem to breach both pieces of legislation.

It would also be remiss not to mention here, the subject of worker rights - if only in summary. The workers rights of drivers; frequently photographed sleeping in their vehicles on the streets of Brighton & Hove (photographic evidence available). Apart from the obvious danger(s) to Public Safety posed by this practice within the operation, it would tend to also cast doubt upon the financial viability (from a driver's perspective) of the Uber business model and suggest the requirement to work disproportionately long hours on their Private Hire Operation locally within Brighton & Hove in order to make a living. You perhaps do not need us to tell you that this constitutes a worrying practice. We know of no local drivers on local fleets who use their vehicle as a dormitory. This practice goes far beyond "taking a nap" with some vehicle having been fitted with "curtains" and blackout screens!

There is clearly a regulatory issue between TfL as the regulator and Uber as a Private Hire Operator and if there is an issue in London, then it follows that there is an issue of regulation or the infractions upon it, within Brighton & Hove as well. As the Uber Operation in Brighton & Hove utilises the same business model, the same software (App) and indeed in many cases the same drivers and vehicles, not to forget the same "Management Staff".

The primary purpose of the Taxi/Private Hire licensing is "Passenger Safety". The expected behaviour of a licensed Private Hire Operator should at the very least ensure that vehicles/drivers are adequately checked before they are allowed to subcontract to the company and if those checks have been found to be inadequate in London, then given that the same business model is in use by the same company in Brighton & Hove, then we believe it is safe to assume that the same inadequate checks may be in use locally by Uber. This should also be given serious consideration.

Any locally Licensed Private Hire Operator is also responsible for dealing with complaints from customers properly and passing these onto both the licensing regulator (in this case Brighton & Hove City Council) and the Police. We find the suggestion that there have been no customer complaints regarding Uber in Brighton (given the size and scope of their operation locally) surprising to say the very least and furthermore the Council's possible reliance on this to be dangerous in terms of complacency.

## **Metropolitan Police**

On 12th of April 2017, Inspector Neil Billany wrote on behalf of the Metropolitan Police to TfL voicing major concerns, claiming that Uber had not and were not reporting serious incidents to the Police. From the letter, examples were given;

- An incident involving 'road rage', where an Uber driver had appeared to brandish a firearm, which turned out to be pepper spray. Whilst Uber dismissed the driver, they failed to report the incident to the police. When the Police finally found out and mounted an investigation, as indicated in the letter, Uber refused to provide more information unless a formal request via the Data Protection Act was submitted - we deem this not to be the actions of a 'Fit & Proper' Operator.

Two more serious offences were cited, narrative taken from the letter itself;

- '...The facts are that on the 30 January 2016 a female was sexually assaulted by an Uber driver. From what we can ascertain Uber have spoken to the driver who denied the offence. Uber have continued to employ the driver and have done nothing more. While Uber did not say they would contact the police the victim believed that they would inform the police on her behalf...'
- '...On the 10 May 2016 the same driver has committed a second more serious sexual assault against a different passenger Again Uber haven't said to this victim they would contact the police, but she was, to use her words, 'strongly under the impression' that they would...'
- '...On the 13 May 2016 Uber have finally acted and dismissed the driver, notifying LTPH [London Taxi and Private Hire] Licensing who have passed the information to the MPS (Metropolitan Police Service)...'

'...The second offence was more serious in its nature. Had Uber notified police after the first offence it would be right to assume that the second would have been prevented. It is also worth noting that once Uber supplied police with the victim's details both have welcomed us contacting them and have fully assisted with the prosecutions. Both cases were charged as sexual assaults and are at court next week for hearing.

Uber hold a position not to report crime on the basis that it may breach the rights of the passenger. When asked what the position would be in the hypothetical case of a driver who commits a serious sexual assault against a passenger they confirmed that they would dismiss the driver and report to TfL, but not inform the police...'

The letter went on to explain that these weren't the only incidents the Metropolitan Police Service had become aware of. In total, Uber had failed to report six sexual assaults, two public order offences and one of assault. This had lead to delays of up to seven months before the Police could investigate. This is alarming, as in the case of the "Public Order" offences, in both cases the prosecution time limit had passed before the police became aware of them. Again, we deem this not to be the actions of a 'Fit & Proper' Operator.

Inspector Billany's letter concluded;

'...The significant concern I am raising is that Uber have been made aware of criminal activity and yet haven't informed the police. Uber are however proactive in reporting lower level document frauds to both the MPS and LTPH. My concern is twofold, firstly it seems they are deciding what to report (less serious matters / less damaging to reputation over serious offences) and secondly by not reporting to police promptly they are allowing situations to develop that clearly affect the safety and security of the public...'

Uber continually argues the overt safety of its operation both in London and elsewhere (including Brighton & Hove) and frequently uses public support as a weapon in any confrontations. These cases cited by Inspector Billany tend to display the reality of the effect of the Uber Operation on "Public Safety" behind all of Uber's 'marketing spin' and 'smoke and mirrors' both nationally and locally.

## **Data Breach**

In November 2017, Brighton & Hove City Council was alerted to the subject of Uber's breach of data and the clear and serious adverse effect(s) upon "Passenger/Public Safety" locally as it would appear that once again this "Operator" had concealed or "forgotten to report" a serious and relevant issue to regulators (such as Brighton & Hove City Council).

It was widely reported that some 57 million account holders (customers) and some 600,000 driver details were stolen in 2016 and that this was only admitted by Uber in November 2017 - some one year later!

Wes Streeting MP made a speech in Parliament voicing his concern(s) and describing Uber as having, '...played fast & loose with safety...'.

On the basis of the tardy admission of the breach by Uber, we suggested that the question for anyone involved in 'Taxi/Private Hire Licensing' within the City of Brighton & Hove was clear;

We asked whether, '...anyone could say with any conscience, conviction or furthermore with any regard for Local Public or Passenger Safety, that they were still of the belief that Uber remained or was in any way a "Fit & Proper" company to be licensed as an "Operator", operating Licensed vehicles within the City of Brighton & Hove?

We suggested that the security breach was alarming enough in itself, but the fact that it seemed it had been knowingly and recklessly concealed by Uber from licensing regulators (including Brighton & Hove City Council) was surely sufficient grounds for the immediate "Revocation" of their licence on the basis of dishonesty and withholding information!



We also noted that not only was this serious breach in 2016 **NOT** revealed to the General Public or Licensing Regulators (including Brighton & Hove City Council) until one year later, it was also revealed it appears that Uber had paid a financial "ransom" of some description to the hackers, in order to keep this matter "quiet" and away from the "eyes & ears" of the General Public and Licensing Regulators. We suggested that the further revelation that Japanese tech investor "SoftBank" seemingly being told about Uber's data hack before anyone affected by it was equally shocking, what's more concerning and seemed to point to a blatant disregard for the safety or security of the General Public.

We questioned whether these were the actions of a "Responsible Licensed Operator"???

Despite our assertions and alerts, Brighton & Hove City Council chose to take no action. However, York City Council did, at Uber's next Operator's licence renewal!

In December 2017, York City Council refused to renew the Uber's Operator's Licence based on the 'Data Breach' and its affect on local York based users of the Uber App.

York City Council concluded that Uber's failure to act in a responsible manner amounted to Uber not being 'Fit and Proper' to hold a York Operator's Licence.

Gerald Gouriet QC, a prominent Licensing lawyer described York City Council's process of the Uber Operator Licence Refusal thus;

' ...

**After deliberating in open session**, York's Regulatory and Licensing Committee refused (by majority) to renew UBL's York PHV operator's licence under section 62(1)(b) LGMPA 1976, namely "conduct on the part of the operator which appears to the district council to render him unfit to hold an operator's licence." The committee's reasons may be summarised –

The failure by Uber to inform the relevant authorities until November 2017 of a serious data breach that occurred in 2016 (and which affected York users of the Uber App) rendered UBL unfit to hold a PHV operator's licence.

...'

We note that York City Council reached their decision, '...**After deliberating in open session**...'. Something Brighton & Hove City Council (Councillor O'Quinn) has led us and local MPs to believe is unlawful through its 'sacrosanct' nature! Were York mislead here in terms of legal process and advice or has Brighton & Hove been misled, one wonders...???

Uber withdrew their appeal against the refusal by York City Council to renew their Operator's licence in March 2018. The question for any reasonably minded individual here is merely Why, if they considered the decision to be in some way flawed or wrong???

## **Greyball**

Another of TfL's concerns surrounds the use of 'Greyball'.

'Greyball' is a tagging system within the Uber app. Where a user who has been 'greyballed' opens up the app and rather than being shown a realistic view of the local area and Uber vehicles, the app shows them a custom Uber map instead. 'Greyball' also allows nearby drivers to be alerted to the presence of a 'greyballed' user, or for those users to be hidden from drivers as well. 'Greyball' was the subject of an investigation by the New York Times into Uber's activities in 2014. The paper claimed that Uber, knowing that they were breaking the regulations on taxi operation in the city, had accessed user data within the app and elsewhere to identify likely "Officials" and target them with false information. This ensured that those individuals were not picked up for 'rides' and hampering attempts by the authorities to police Uber's activities.

Initially, Uber denied the accusations. They confirmed that 'Greyball' existed, but insisted that it was only used for promotional purposes, testing and to protect drivers in countries where there was a risk of physical assault.

The seriousness of the allegations and the evidence presented by the New York Times prompted Portland's Board of Transport (PBOT) to launch an official investigation into Uber's activities (<https://www.portlandoregon.gov/saltzman/article/637492>). It was made public at the beginning of September. In it, Portland published evidence – and an admission from Uber itself – that during the period in which it had been illegal for Uber to operate in Portland, they had indeed used it to help drivers avoid taxi inspectors. In Portland's own words:

'...Based on this analysis, PBOT has found that when Uber illegally entered the Portland market in December 2014, the company tagged 17 individual rider accounts, 16 of which have been identified as government officials using its 'Greyball' software tool. Uber used 'Greyball' software to intentionally evade PBOT's officers from December 5 to December 19, 2014 and deny 29 separate ride requests by PBOT enforcement officers...'

The report did confirm that, after regulatory changes allowed Uber to enter the market legally, there seemed to be no evidence that 'Greyball' had been used for this purpose again.

However, as the report states;

'...[i]t is important to note that finding no evidence of the use of 'Greyball' or similar software tools after April 2015 does not prove definitively that such tools were not used. It is inherently difficult to prove a negative. In using 'Greyball', Uber has sullied its own reputation and cast a cloud over the TNC [transportation network company] industry generally. The use of 'Greyball' has only strengthened PBOT's resolve to operate a robust and effective system of protections for Portland's TNC customers...'

Portland also canvassed other transport authorities throughout the US asking whether, in light of the discovery of 'Greyball', they now felt they had evidence or suspicions that they had been targeted in a similar way.

Their conclusions were as follows:

PBOT asked these agencies if they have ever suspected TNCs of using 'Greyball' or any other software programs to block, delay or deter regulators from performing official functions. 7 of the 17 agencies surveyed suspected 'Greyball' use, while four agencies stated that they have evidence of such tactics. One agency reported that they only have anecdotal evidence, but felt that drivers took twice as long to show up for regulators during undercover inspections. The other agencies/cities believe that their enforcement teams and/or police officers have been blocked from or deceived by the application during enforcement efforts.

Uber are now under investigation by the US Department of Justice for their use of 'Greyball' in the US.

Of all the transport regulators in Europe, TfL are arguably the most technically literate. So it is not surprising to see it included within the list of issues.

One would expect that TfL have requested significant assurances and guarantees that 'Greyball' will not be used in this way in London. The fact that it is still included within the list of issues, tends we believe to suggest however, that this demand has currently not been met.

To return to Uber's Operation locally within the City of Brighton & Hove. Uber applied to Brighton & Hove City Council for a Licence to Operate Private Hire vehicles in the City. During the initial application and associated **public enquiry**, representatives from Uber committed to an agreement with the local (Licensing) authority (Brighton & Hove City Council) through a clear understanding from Uber at a previous Council Licensing Panel Meeting on October 19th 2015, where Uber stated that they would ONLY use Brighton and Hove licensed vehicles and drivers to service bookings in Brighton & Hove. In effect, a firm commitment from Uber to comply with the provisions of the Council's "Blue Book" bible of licensing conditions designed to protect the Cab using public locally.

Words of assurance that have proved to mean anything but what they say! As we now know, within hours of Uber's launch, Brighton & Hove was saturated with out of area Private Hire Vehicles, predominantly licensed by Transport for London (TfL) and this situation has persisted and increased in number. The City has been saturated and littered on a daily (and nightly) basis with a flood of TfL 'Minicabs' being 'operated' by Uber. This together with a "liquorice all-sorts" style mixture of other Uber vehicles from all over the Country. They also undertook to address the supply of Wheelchair Assessable vehicles under the Uber operation, to date this has still not been done.

The legal infractions reported to your authority together with (in almost every case) photographic evidence include:

- Uber Private Hire vehicles parking and 'Plying For Hire' on Brighton & Hove "Taxi Ranks" seemingly without let or hindrance from either the City Council or Uber, who have allegedly 'Geo-Fenced' these same ranks.
- Uber drivers sleeping in their vehicles on the streets of Brighton & Hove. This in itself represents a worrying erosion of local safety standards.
- Uber vehicles driving the wrong way up and down one way streets.
- The unlawful use of bus lanes by Uber TfL vehicles.

- The unlawful creation of Private Hire 'pick up points'/unlawful Private Hire ranks.

### **Questions For the Licensing Panel (Which Require A Written Response)**

We have set out below what we hope you will agree are some further pertinent questions for the City Council to answer fully, if need be in conjunction with Uber, before considering any application to renew its operator's licence:

1. If Uber has no involvement (as it has asserted previously) in the contract between the customer and the driver of the vehicle, who accepts the booking?
2. If Uber accepts the booking, how does it have no involvement in the contract between the customer and the driver?
3. If Uber considers that the driver accepts the booking (as it has asserted previously), does it accept that the driver must also hold a Private Hire Operator licence to accept bookings? If this is the case, what steps does Uber take to ensure that all bookings are only given to licensed operators? (Note - reference to "Uber" is to Uber BV (based in the Netherlands, being the company that customers and drivers enter into agreements with for use of its app platform).
4. Please kindly confirm whether you will be utilising external experts in the field of Taxi/Private hire despatch/booking technology and apps within your consideration of this licence renewal?
5. Has the Council engaged a forensic examination of the lawful nature of the operation of the Uber App and its compliance with the 1976 act?

6. Has the Council engaged specialist and **independent** legal advice on this renewal as we would suggest that the 'Uber Briefing Document for Officers and Members' supplied to the Licensing Panel for consideration and weighting at the last renewal and clearly authored by Simon Court (Solicitor - Brighton & Hove City Council) was a highly biased document, littered with factual inaccuracies, unsubstantiated subjective assertions and ill informed personal opinion. The trade were not given any opportunity to peruse, scrutinise, take issue with or disprove any inaccuracies of this document until after the decision (and then only by way of FOI) due to the "behind closed doors" nature of the deliberations! We consider that this fundamentally flawed the whole process of re-licensing and left it potentially "open to legal challenge" based on any possible weighting given by members to this document or its many assertions during the consideration, deliberation or decision making.

We respectfully ask that specialist and **fully independent** (of the Council) legal advice is sought and that if any such document is to be again considered then it should be offered to all for full open scrutiny and reasonable response prior to the Panel's consideration, deliberation or decision making!

We ask that all of the foregoing is considered as Unite the Union's formal objection to the renewal of Uber's Brighton & Hove Private Hire Operator's Licence. We therefore implore you as a responsible local licensing authority to refuse to renew Uber's Private Hire Operator's licence.

We are not 'anti-innovation' or anti competition, we merely ask that you consider 'Greyball', consider the Metropolitan Police's letter of concern and furthermore consider the actions required by or expected from a responsible licensed 'Private Hire Operator', specifically regarding the reporting of relevant events including 'Data Breaches'.

This is about holding Uber, as an Operator, to the same set of standards to which every other Private Hire Operator in Brighton & Hove already complies.

Sean Ridley  
Secretary Unite the Union – South-East Region (Cab Section).





**From:** Mohammed Shahjahan Ahmed  
**Sent:** 23 March 2018 11:36  
**To:** Jim Whitelegg  
**Subject:** Renewal of Uber's Private Hire Operator's License

**Dear Sirs**

I am writing to you on behalf of United Taxi Drivers Association, and in doing so I represent the sum of 89 members of licensed Private Hire and Taxi Drivers from Brighton and Hove City Council.

For the reasons set out in numerous emails circulated by the local licensed operators and unions, ever since the renewal of Uber's private hire operator's license last November, we oppose the renewal that is due on 4 May 2018.

I have been provided with copies of the written submission made by the local licensed operators, and I am aware of the union's submission and support and endorse the points raised by them in opposing the renewal of Uber's private hire operator's license.

I also fully support the representations made by the operators and local unions with regard to the process for the public hearing in that it lacks openness, fairness and transparency.

Please acknowledge safe receipt of this email and confirm that it will be placed before the licensing panel at the public hearing that will be held on 23 April 2018.

Yours Faithfully

**Mohammed Shahjahan Ahmed**

**Chairperson**

**United Taxi Driver's Association**



From: I S Consultancy Services  
Sent: 23 March 2018 19:24  
To: HCO  
Subject: Support Uber to stay in brighton

Name :ILYA GIRGAWI

Dear sir/madam,

I would like to support Uber to stay in Brighton.

I am a taxi driver currently hold a brighton licence badge.

I am starting the process to join Uber as I feel more confident to go back to be a taxi driver feeling more secured as I do not hold any cash. My cousin was slaughtered few years ago and my friend was stabbed with fork to rob them. I personally many customers run away after a long journey because they did not pay upfront I stopped working as I was fearful of my life and did not like the too much pain I had.

But since Uber came to brighton I visited their office few times and spoke to Charlie I started to feel more comfortable as there is no cash handling and my fare is secured. On top people who pay using their bank card clearly genuine respectable people and the system Uber has is very secured and reassuring for both customers and drivers.

HENCE I AM SUPPORTING UBER TO STAY IN BRIGHTON.

I WOULD LIKE TO SPEAK AND MY VOICE HEARD IF POSSIBLE.

THANK YOU IN ADVANCE FOR THIS OPPORTUNITY TO SUPPORT UBER.

ILYA



**From:** Claire Hawley  
**Sent:** 11 March 2018 23:15  
**To:** HCO  
**Subject:** In support of Uber in Brighton

Dear sir/madam,

I understand Uber's licence is up for review and you are open to written petitions of support.

I feel compelled to write to express my support of Uber and the men and women who drive for Uber to make ends meet.

Having recently moved from London I was happy to discover that Brighton offered the same level of options when it came to taxi travel.

For me, Uber is a more appealing option than a regular cab because my journey is trackable. Data tracks where i am, who has picked me up and what car i'm in. As a woman, often traveling alone, that makes a huge difference.

I also love knowing how long i will have to wait for a taxi to arrive. It's fantastic that regardless of where i am around Brighton i can hail a taxi via the app.

Until regular taxis can offer these benefits, I would like Uber to remain an option for Brighton and its visitors.

Yours faithfully,

Claire Alcock



From: elvis krasniqi  
Sent: 23 March 2018 11:26 AM  
To: HCO  
Subject: Pro uber .

I am in favour of uber getting the license extended in Brighton and hove .

Kind regards  
Elvis krasniqi





**From:** Emilia Pruszkowski  
**Sent:** 21 March 2018 19:08  
**To:** HCO  
**Subject:** Uber Licence Renewal - Hackney Carriage Office

When I first moved to England, the public transport wasn't that straight forward to grasp, I did however, have the Uber app installed on my phone which I'd use all the time in Canada.

When I first discovered Uber was operating in Brighton I was very happy. I live in Hove and from time to time used train into Brighton (when I didn't have my car), it'd cost less than 10pounds for a return and I'd usually then have to walk the remainder of my journey. An Uber into town however was much, **much** more convenient I could pay a very similar (if not 3-4pounds more) price to get a ride from my home to my exact location.

That high level of ease made Uber my go to when I need to pop into town, unlike the bus, train or other transport methods Uber was always ready when I was. After setting up the account once in Canada and updating my card details once when I moved to England I've never had to mess around with things like change, timetables or anything that over complicates a simple journey.

When I discovered Uber's future in the city was in question I jumped at the opportunity to defend the service that has been a consistent pleasure. I've never felt unsafe in an Uber due to most of the drivers being locals themselves, nor do I understand why a company such as Uber should have to defend itself when not only me but all my friends that use the service on a weekly basis with no qualms whatsoever!

I fully support Ubers license renewal and hope that my council makes the right decision too.

Emilia,



**From:** Anthony Prior  
**Sent:** 21 March 2018 13:42  
**To:** HCO  
**Subject:** UBER renewal

Hi, I was recently asked by a friend and colleague to share my views on Uber. In light of the upcoming licence renewal I thought I would share my comments. Please see my email quoted below.

Kind regards

Anthony Prior  
CEO Bagelman

"I think they have a terrible corporate culture.. based on what I've read.. but in also expect that is now being delt with following changes in the guard...

But, as a user.. I always choose them over the traditional cabs when traveling home to the sticks;  
More reliable for pick up (even b when I've pre booked a local cab)  
Better value (£22 Uber Vs 30£+ for local)  
Cleaner cars generally  
Less grumpy drivers.

Uber needs to be seen to be taking thier responsibility more seriously. But I do think that the old monopolies were overdue a shakeup.

I'm pro future, pro tech, pro driverless cars etc as long as it comes with due care... Then we get on to the subject of the future of employment, universal Basic Income and so on.. but that's another story ;)"

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**Anthony Prior**



From: Shane Malique  
Sent: 23 March 2018 16:29  
To: HCO  
Subject: Uber license renewal

Hi my name is Hussain and I just wanted to support Uber in their renewal.  
I have used them and they are a wonderful addition to our city as now as consumers we have a choice and co incidentally now all taxi companies are starting to up their game and provide a better service. The only concern is there is an influx of out of city cars which is causing congestion and pollution and this needs to be addressed when you renew their licence.  
Uber is a good, safe and convenient taxi service for our city and I hope they will get their license renewed.  
Thanks

Mr H Malique



**From:** Emma Deguara  
**Sent:** 09 March 2018 08:34  
**To:** HCO  
**Subject:** Please keep Uber in Brighton!

To whom it may concern,

I started at The University of Brighton in September last year. Being a student, I love having Uber in the city as it's convenient, often cheaper and more reliable than other taxi services. I find that it is far easier to have one Uber app when I travel, so I know my card details are safe, and it also saves me from having to use and remember to get cash. Often local taxi companies don't accept card and that sometimes leaves me without a way to get home at night. I know that other students my age also use Uber a lot in Brighton.

Many thanks,

Emma Deguara, Student at University of Brighton





**From:** Admisrtion Jamshid  
**Sent:** 23 March 2018 21:22  
**To:** HCO  
**Subject:** Fwd: SUPPORT UBER AND UBER LICENCE RENEWAL

date 23.03.2018

Jamshid Nariany Brighton and Hove licence driver 4597

Dear Martin Seymour

I am writing to support Uber renewal licence as I have worked 10 years in Brighton and Hove as a licensed taxi driver, now joined Uber on November 2017.

After these years and too many fuss about Uber, with all negative and concern; todays driving for Uber and I can strongly say Uber is convenient, fun and more safe to run.

I have spoken to many riders and they do believe it too.

Uber and our taxi knowledge works pretty nice around our city.

There are not any argument around fares, routes, timing, traffics, and navigating which was the biggest concern on a normal taxi drivers' every days life. Uber has done it all for you.

Everyone loves it and they are happy, I mean everyone, I spoke to, or gave them ride, except the ones and we know who.

I never had easy time when I was driving a taxi, now I am hassel free and to be honest, I love and enjoy it.

As well as this, most road user would give me more time to manoeuvre and there are more happier, friendly bus driver, no gentleman signal or any bad words, Or I have just not seen it yet.

I have lost some colleges, when I joined Uber, but most taxi driver I have been spoken to, would not mind if Uber works, like other taxi operators firm in our city, but they are not sure to join them.

I would love to engage, help and answer any question if that can help.

I strongly would recomend it to every one to use it, before they may loose it.

Today is Uber, Tomarrow could be Taxfy, Lyft or God knows what. Let us works with Uber for now.

I hope Uber stay and I can continue enjoying work, I do not think I would like to get back where I was before.

kind regards.  
Jamshid Nariany



**From:** Insaf Tadros

**Sent:** 23 March 2018 10:40

**To:** HCO

**Subject:**

Yes I supported Uber company my name is Insaf Tadros



**From:** Jamie Arnell  
**Sent:** 23 March 2018 18:57  
**To:** HCO  
**Subject:** Uber consultation

Dear sir/madam,

I write in connection with the Council's upcoming decision as to whether to renew Uber's license in the city.

I am the co-Chairman of A Better Brighton and Hove, and have been working closely with BHCC on the development of an ambitious plan to bring ubiquitous EV charging to the city.

Currently, taxis contribute 5-10% of Brighton's vehicle emissions. To date, despite repeated efforts, the local taxi trade has failed to engage proactively with BHCC or A Better Brighton & Hove around the opportunity which exists to secure OLEV funding for the installation of charging infrastructure to allow the taxi fleet to go electric. Instead, they have insisted that all discussions take place within a cumbersome BHCC/taxi trade forum, with long delays. This will likely result in BHCC missing the opportunity to bid for funding from OLEV to install charging for the taxi trade in the city (a competition due to be launched shortly, for which Brighton is completely unprepared).

Uber, on the other hand, is extremely engaged and has indicated that they would guarantee a level of off-take from any charging infrastructure which is installed.

I make no comment at all on the wider merits of Uber's license application except to urge Councillors to consider that:

- A. Uber's presence in the city might provide competitive pressure to switch to more sustainable vehicles, improving local air quality and reducing carbon emissions. The local taxi trade has not demonstrated any enthusiasm for innovation in this area.
- B. If Uber is not allowed in the city, Councillors should instead be securing commitment from the local taxi trade to be as innovative as Uber is prepared to be
- C. If the local taxi trade fails to engage around adoption of electric vehicles, the Council should consider mandating change if (and only if) the charging infrastructure is installed.

Regards  
Jamie Arnell



**From:** Amy Brewster-Brown  
**Sent:** 23 March 2018 16:22  
**To:** HCO  
**Subject:** Pro-Uber's license renewal

To whom it may concern,

Uber is a safe way for me to get home when I am out by myself or with friends who may not live by me. I live in Hangleton so getting home from town can take a while especially when on a night out as the buses come once an hour. Using Uber means I can get home fairly quickly, for a fairly reasonable price and is in my mind a safer taxi company than a taxi in the bays due to the driver rating system. Using Uber also means that once my taxi is booked I know where it is picking me up from and how long it will take meaning I am not waiting in the cold and alone for a taxi/bus.

In my experience the drivers have always driven safely and not too fast unlike some taxi drivers and the drivers have a good manner and always pleasant to talk to. I was coming home late from London and had missed the last bus home as it was a Sunday. It was freezing cold and within 10 minutes of me stepping off the train I had ordered my Uber, the driver had arrived, picked me up and had a lovely conversation with me about my day and his day. This extra engagement from the driver makes you feel more comfortable in the taxi and a more pleasant journey.

I am pro-Uber and support the license renewal as they offer me a safe and easy way to and from home!

Best Wishes,

Amy Brewster-Brown





From: David Q  
Sent: 16 March 2018 13:37  
To: HCO  
Subject: Uber

Hi

Just sending my support for Uber to be licensed in Brighton

I have used the app in Cape Town where it has made things safer

I also believe the costs and transparency of wait times to be excellent

Regards

David Quinton  
Brighton Resident



Dear Sir/Madam of the licensing committee,

I am a Lewes District licensed Hackney Driver. I have held my licence for over 10 years. I have worked for company's within my district but found the restrictions put on drivers hard to understand. I much preferred the Airport transfer side to the business rather than the repetitive local taxi work having to constantly return to a rank, a station or supermarket so after several years I set up my own company and introduced myself to other companies along the South coast who now call upon me when needed.

This much better suits my lifestyle as I can choose the jobs that I undertake.

The problem I had was that once I completed an Airport pick up and dropped passengers off in Brighton, I always had several wasted hours before my next job.

A friend told me of Uber coming into Brighton and were looking for Drivers to work in the City under the Uber App. I like the freedom in having control when I start and finish working with Uber on any given day, so I registered with them and have been working in Brighton for over a year now.

I would like to say that as a Brighton Uber Driver and having completed many hundreds of trips around the City, the service Uber provide to the community and visitors is a worthwhile and productive one.

The feedback I receive from the customers is highly complimentary

The way in which Uber works is very appealing to the customer and the Driver alike.

Uber sends the nearest Driver to the customer, this results in a quicker pickup time. I often get an additional trip request whilst I am on another, as the app knows where I am going to be and when I will be there and has calculated that I will be the quickest Driver to pick up the second passenger request. \*This in turn reduces traffic congestion, wasted fuel and pollution.

The passenger is given my name, my vehicle type and registration number.

\*They also are given a truthful and accurate time of arrival and can see my progress through traffic on their sat nav within the Uber app. They are generally waiting for me as I turn the corner to them \*This reduces waiting time and taxis waiting for passengers clogging the roads for all other road users.

The Driver is also furnished with the Passengers name so we can greet each other by name as they enter the vehicle.

Another great feature is that in the same way they see me driving towards them, \*they can then also monitor the route I take to their destination as well as sharing that information with a family member so they also know my name, car type and Reg number and in real time on their own device see my car taking their family member/partner/friend home.

Once delivered to their destination they quickly leave the vehicle (as no payment is taken directly )and I quickly rate the customer. I can then leave them within seconds and I am on my way \*this reduces the time I am pulled over reducing congestion on the road.

If they choose to do so, the customer can rate me using a 5 star system, they can also leave a compliment sign such as Excellent Service/Nice Car etc.

What I particularly appreciate is when they take the time to write a note about the service they receive. I find this very rewarding.

I have found that over the year I have been working for Uber, they are constantly seeking to improve their procedures by tweaking things as well as adding new improvements to help the experience for the Drivers and the passengers alike. I personally have recently been asked by Uber to join their new Engage Advisory Board, to act as a liaison between the Uber Drivers and passengers, talking to them and gathering their views, opinions and suggestions and relaying them to the Uber management with the regard to improving things in the future.

I like the way that Uber is forever trying to improve upon their business and I have agreed to join as an Engage Advisor.

From the feedback I receive daily from passengers, is that they enjoy using Uber and are grateful for the fact they now have a choice of Taxi company to use in Brighton.

May I conclude in saying that as a Lewes District Driver as well as an Uber Driver. All my colleagues have a great respect for the Brighton City Council Taxi Drivers. and sincerely hope we can all work in this fast growing City of ours together as gentlemen of the road, serving our community and visitors by giving a safe and secure value for money service.

**From:** Jake Hawley  
**Sent:** 07 March 2018 10:24  
**To:** HCO  
**Subject:** Uber in Brighton

Hello,

We recently moved to Brighton from London with our two children and live near Preston Park. We used Uber regularly in London and were thrilled to discover that it existed here too. We like it because it's extremely convenient and reliable.

We really hope it will be granted its license to continue to operate.

Thank you,  
Jake Hawley, Animator

**From:** Leyla Fakhr  
**Sent:** 06 March 2018 20:35  
**To:** HCO  
**Subject:** Uber

To whom it may concern,

As a brighton resident, now for over 15 years, I am often traveling within the city, either going to Brighton station, friends houses or for events in town. I always use Uber as i like the efficiency and ease it offers. I would like Uber to continue in Brighton because it's the only taxi company that makes me feel very safe no matter what time of the day I travel. Knowing the name, registration number and even route that my driver takes gives me a comfort I don't get with other taxi companies.

I hope their services will continue in our beautiful and forward thinking town.

Thank you for your time.

Kind regards  
Leyla Fakhr, Curator and Producer

**From:** Caroline  
**Sent:** 04 March 2018 14:35  
**To:** HCO  
**Subject:** UBER

I'd like to express my very strong support for Uber continuing to operate in Brighton.

I'm a resident of Kemptown where I've lived for 9 years. I use Uber all the time, in so many different situations. As an example, just in the last week I've used Uber to take my child to A&E at 7am, and to get my niece back to her house after a day down on the beach when we ran out of time and she had to get home quickly.

What Uber does for me is make me feel free and flexible, able to move around easily and spontaneously, and because it is such good value and with such a great interface it adds yet more freedom to my movement and my use of the service.

I have only ever had excellent experiences with Uber – both in Brighton and in London where I have also used the service. I hope it continues.

Feel free to contact me for further information.

Regards,

Caroline Jones

From: Darvish Fakhr  
Sent: 04 March 2018 10:02  
To: HCO  
Subject: über in Brighton!!

To whom it may concern,

I am a longtime resident of Brighton (over 25 years now), and have been using taxi services on and off for those 25 years. It has been a mixed relationship, to be honest. It is wonderful when I am in town and near taxi ranks, but that is not always the case. Once I remember, being out in the rain with my 3 year old boy and his 1 year old brother. We were in Moulscroomb and no busses or taxi ranks were in sight. If there had been Uber in Brighton, I would have been



saved, but as it turned out I was there for 25 minutes getting wet before a taxi arrived, and both boys ended up with colds from that day.

I am really hoping that Uber license will be renewed and integrated into the community. I am sure that it will be welcomed and add significantly to the area. please feel free to contact me if you have any questions.

Darvish Fakhr

**From:** Michael Rowe

**Sent:** 04 March 2018 01:05

**To:** HCO

**Subject:** Uber Support

To whom it may concern

I'd like to express my support of Uber continuing to operate in the city.

I've lived in Brighton from eight years and used Uber since it was available.

Quite simply Uber makes my life easier.

Our elderly neighbour uses Uber as it's more affordable than a taxi. She has a limited pension and it helps get her out and about.

I like the way that there's more competition for taxi and private hire companies – clearly good for the general public.

I'm a heavy worldwide Uber user and I've never had a bad Uber experience. Compared to my experiences with 'regular' taxi drivers Uber drivers have been overwhelmingly positive and happy.

The drivers have been polite and engaging and seem happy to have a chance to earn some money.

I hope you renew Uber's licence.

Mike Rowe

I am a freelance musician who travels a great deal. Please renew their licence.

Regards

Mike Rowe

From: Rachel Mathieson  
Sent: 03 March 2018 17:21  
To: HCO  
Subject: Uber In Brighton

Hi

I'm writing in support of Uber's license in Brighton and Hove .

I love the App , the whole convenience of it all. You can check the status of the driver, you don't need to have any cash on you , you can tip the driver and above all you know what you are going to pay .

We've set an account up on our older Childrens phone so if they are ever stuck anywhere they can also safely get home and we can see and monitor their whereabouts.

I've lived in Brighton for 24 years and am airline crew based at Gatwick.

Kind Regards

Rachel Mathieson

From: Georgia Edmonds  
Sent: 02 March 2018 17:27  
To: HCO  
Subject: UBER

Hello,

I wanted to write in support of Uber's license in Brighton and Hove. I've been using Uber for the past 13 months – would have been using it earlier but that was only when I became aware it was in Brighton. Luckily stumbled upon it while waiting at the bus stop around 2am trying to get home. I live up near Stanmer Park and take the 25 bus daily to and from work in town. It's usually reliable and regular, this night it didn't show up and I thought I'd be stuck in town as I had no cash on me and was up near St Peters church. Not near a taxi rank. It was fast and I made it home! Since then I've used it incredibly regularly, most weekends and sometimes during the week. I find it useful, easy, and always available within good times. I do sometimes also use Brighton taxis, however I never have cash and so few take card payments.

I think it's a benefit to Brighton and the people living and visiting here, I hope it stays.

Thank you,

Georgia

**From:** Mohammed Albayouk  
**Sent:** 23 March 2018 2:15 PM  
**To:** HCO  
**Subject:**

**My name is Mohammed I have Taxi license and private hire operator license. I believe that the Council should renew Uber's license for 5 years for the following reasons:**

**1. Uber helps provide better driver conditions for licensed Brighton and Hove drivers**

- It is important that drivers have good conditions in the city.
- Competition between operators should be encouraged to raise standards for drivers
- The arrival of Uber has improved conditions for drivers, as they have a better choice of operators to work with.
- Uber has provided a safer option for Brighton & Hove drivers; cashless payments mean that drivers do not have to carry cash late at night, drivers can be safe knowing that all trips are GPS tracked and Uber gives drivers using the App complete control and flexibility to take breaks when you want. This means you can be fully rested and safe when on the road.
- Uber also offers more flexibility and choice on what car to drive, which helps lower driver costs and make more money. Drivers are not forced to rent vehicles from Operators at very high rental rates

**2. Uber is improving safety and standards for passengers in Brighton & Hove**

- Our experience driving with many operators over the years is that Uber is raising standards of service in the city which is something that the Council should encourage
- The Uber App gives transparency and accountability to service with the 2-way rating systems so you are able to track and see who the good and bad drivers are.
- Also because all trip details are recorded it allows any disputes to be solved more easily, so drivers and riders are treated fairly.
- Because drivers and riders know everything is recorded by the App it creates a more safer and better environment for all
- Uber is the only operator to offer lower fares in the city, which is a great thing for customers
- The service is extremely popular with Brighton & Hove passengers who are always commenting how great the service is in the City and how they have come to rely on it

**3. Uber is providing valuable choice for drivers**

- For many years drivers have had very little choice in the city, with the few firms that are controlled by a small number of people - this has led to an environment of mistreatment, bullying, discrimination and unfairness for drivers
- Having more operators in the city empowers drivers and allows them the freedom to choose a different operator to work with if their current one does not treat them well

- In order to try and stop Uber growing, existing Operators and their drivers have regularly and routinely threatened and harassed Uber partner-drivers - even sending legal letters to drivers telling them that they will never be able to work for another operator in the city.
- If Uber does not have its license renewed then many drivers will be left with no work

### **Do not believe the campaign of misinformation about Uber**

- Since Uber launched in Brighton & Hove there has been a campaign of misinformation about Uber in an attempt to stop the firm growing or to remove its license.
- The Uber Drivers Association urges the Council not to take note of these unfounded claims and renew Uber's license
- The Council should be made aware that:
  - Many firms in Brighton & Hove use cars licensed in other areas to complete jobs in Brighton & Hove, for example using cars licensed in Lewes. They complain about Uber cars from other areas picking up in the city but this is not illegal and they do it as well.
  - Since Uber launched many Brighton & Hove licensed drivers have wanted to join the App but have been threatened and intimidated if they do. By being told that they will never work in the city again and that Uber will make sure that Uber loses its license. Uber must be granted a 5 year license to give licensed drivers reassurance in their future.
  - Whenever an Uber driver is working in the city they are the victim of constant abuse and harassment from local drivers. This harassment extends to making false claims that drivers are committing offences on the road.
  -

Finally I would like to say that me and other drivers been banned to work with our local companies for life. So if you refuse to renew Uber license this means That me and other drivers will be jobless.

Mohammad.

-----Original Message-----

From: Sean Fraser

Sent: 23 March 2018 21:49

To: HCO

Subject: Ramida Fraser

Ramida Fraser

Dear sir/madam,

I am a local resident. I am writing to you to ask you to renew Ubers license, to give our city a competitive taxi service.

This will generate healthy competition which can keep transport prices in check.

I have used Uber taxi services many times and have always been impressed by there punctuality, polite service, and competitive prices.

As an unaccompanied lady who works nights, I always feel safe when I'm in an Uber taxi.

As a bonus they also save me money, which is also an important point.

A cheaper and reliable service,

Best regards

Ramida Fraser





**From:** Raja Asif Javaid  
**Sent:** 23 March 2018 17:58  
**To:** EHL Safety  
**Subject:** Uber Licence Renewal

To The Honorable Members Of Licensig committee(Brighton&Hove City Council)

Dear Sirs/Madams

My name is Asif javaid and I have been Brighton resident since November 2005. I have been a taxi driver over 25years.I recently appointed member of UberENGAGE Advisory board.I would like to support uber application for the renewal of their operators licence.

I used Uber as a client first and being a taxi driver myself got so impressed by the level and quality of the service provided. To be honest I was under the influnece of the propaganda,how awful and kind of evil they were. But my personal experince was pleasantly surprise. So I decided to join them.

I have been partner driver with them for over a year now. It has been the best company i ever worked for over the last 25 years. I had taxi licences from very different places namely,Lewes,PCO(London),Wokingham,Reading and worked for one of the top taxi firms of relevent area.

Uber gives a choice to the public as welll as the drivers too. As a driver I was shocked to learn that you have to pay hundreds of pound(500\_100) as a joining fee(non refundable) to work with other companies in Brighton.and the driver still have to pay their sub while they are off for any reason including holidays,being sick and being off the road due to accident or anyother vehicle related issue.

Uber was the perfect choice for me,as there is no such fee and you can decide when to start and stop,and you don't penalise for this luxury. Uber provide the best possible safety for the public and drivers alike. App let the passenger and the driver to share their trip who ever they choose.

I have taken thousands of trip with Uber and hardly found a displeased client. Uber got a rating feature for the passengers and driver, which I think very pleasing and rewarding. Being a globally known taxi firm with a very welcoming feature of our city for the international and nationwide tourists visiting Brighton.

In my opinion,Uber should be granted their operating licence to carry on the great and amazing service they provide to the locals and the visiting travellers alike. And the drivers could have the choice to pay commission for the work provided,rather being on the list of a certain company.

Yours truely,

Asif Javaid



**From:** Nikki Gatenby  
**Sent:** 18 March 2018 06:04  
**To:** HCO  
**Subject:** Über licence renewal

Hello

I understand the licence for Uber is up for renewal in April and wanted to share my perspective – as a dweller, homeowner and marketing agency business owner in Brighton as well as an avid taxi user – for both myself and my clients.

I believe there will be some extreme views on the licence renewal, so wanted to share a balanced view too.

I think competition in the taxi industry is really good, providing:

It's good for the customer

It's good for the driver

I think Uber is amazing for customers. The speed of service, the fact you can track what's going on, the no need for cash and the reliability.

For the driver, all the negative press around below living wage earnings and lack of being treated well by the master brand is a problem for me. However, I also know that lots of Uber drivers rely on it to top up their income and value the flexibility.

I can image the Brighton cab companies can't bear the competition. And in all honesty i hugely value their service as I've never been let down by either Brighton cabs or Uber – so I think they both have a place.

Kind regards

Nikki Gatenby.



From: jack hoti]  
Sent: 23 March 2018 22:53  
To: EHL Safety  
Subject: Uber engage

Hi

My name is Xhevahir Hoti

I live at 1 hardwick road hove Bn38br

I hold brighton and hove taxi license. I have been working as a private hire for 4 years.i started working with Uber in the last 14 months and I like the way Uber operates .

Having worked with other private hire firms before and now with Uber , I find Uber much better and easier to work with. The Uber app is very useful , the drivers receive rating for their service , the costumer can track the car when on its way , its good and quicker that payments are made through the app, the good thing for me is that if I don't work I don't pay any charges where as before I had to pay the radio hire. Speaking to costumers while working with Uber , more than 95% of the customers prefer to use Uber instead of the other firms that operate in Brighton and hove . I have been selected as an Uber engage advisory and I would like to take part on the upcoming events .

Many thanks

Xhevahir Hoti



-----Original Message-----

From: Sean Fraser

Sent: 23 March 2018 10:49 PM

To: HCO

Subject: Sean Fraser

Sean Fraser

Frankies Grinder.

179 Edward street

Brighton

BN20JB

Dear sir/madam,

I am the Managing Director of Frankie's Grinder coffee bar. I am writing to you to ask you to renew Ubers license, to give our city a competitive taxi service.

This will generate healthy competition which can keep transport prices in check.

I have recommended there service to our customers who have all been impressed by there punctuality, polite service, and competitive prices, as have I.

We use Uber for all our deliveries, and are very satisfied with the service provided.

Furthermore, my business benefits from making Ubers office staff, coffee, on a daily basis.

I credit Uber for sustaining my business twofold.

A cheaper and reliable delivery service, and helping sustain my turnover.

Best regards

Sean Fraser

(Proprietor at Frankies Grinder since 2009)





-----Original Message-----

From: Paul Rowlands

Sent: 23 March 2018 16:21

To: HCO

Subject: Uber licence renewal

Dear Sir/Madam

I am writing to you regarding renewal of Uber's licence to operate in the city of Brighton and Hove.

I have held a Brighton private hire licence for the past thirteen years. Since the introduction of Uber to the city it has transformed the way in which I run my business. The flexibility that Uber has, allows me to work the times that I want and for the period of time that I want, whether that is ten minutes, or ten hours. That freedom is just not possible with any other Brighton based private hire company.

The way in which payments are received with Uber makes me feel much safer knowing that I don't have to carry a single penny in cash with me.

Because Uber have a ratings system for both passenger and driver, it ensures both parties are treated with respect and courtesy. Furthermore, this encourages me as the driver to give excellent service and for the rider to be courteous. This is demonstrated with my current rating of 4.95 out of 5, which is one of the highest ratings on the Uber platform for Brighton

The way in which the App allows rider to driver direct communication cuts out any ambiguity as to where the vehicle is enroute, so the rider feels more comfortable knowing when their vehicle will arrive.

Uber fits in with my personal clients, giving me greater flexibility and freedom. I can say hand on heart that every rider that I have picked up, loves Uber. They like the convenience and safety of Uber.

I personally like the share location feature where I can share my GPS position with a number of people if I feel uncertain about a particular rider, and riders are also able to use this feature to make them feel safer.

I am more than happy to be contacted should you wish to discuss further. But I think Uber has been a fantastic addition to the city of Brighton and Hove.

Yours faithfully,

Paul Rowlands



**From:** Sunetta Kiarie  
**Sent:** 22 March 2018 15:40  
**To:** HCO  
**Subject:** In Support of Uber in Brighton

To whom it may concern,

I wanted to share my views ahead of Uber's licence renewal. I moved to Brighton for many reasons, the sea, yes, but also the capacity for innovation that is ripe in the city's air. It is a city with an enormous amount of potential, a city whose future I am deeply invested in and fully look forward to being a part of. A future, I think, would be better created were we to continue to support the efforts of companies that are forward thinking and that can contribute not only to our economy but also, and most importantly, to our communities. It is always encouraging to see a company rooted in its community as is the case with [Uber's sponsorship to help Homewood College's students build a solar powered car.](#)

I've used Uber for a while now and will continue to do so. It provides me a safer, much quicker and reliable service compared to other companies I have used and I would be interested to see how the company could further contribute to Brighton and Hove's 2030 vision as I'm certain it would be a positive contribution.

I welcome the opportunity to discuss any of the above further.

Yours sincerely,

**Sunetta Kiarie | Writer, Optimist and Serendipity Engineer**



**From:** Nick Southgate  
**Sent:** 21 March 2018 13:28  
**To:** HCO  
**Subject:** In support of Uber

I am writing to express my support for renewing Uber's operator licence in 2018.

There can be a lot of negative noise around Uber, much of it drummed up by vested interest groups, and I think much of it is unfair.

As a resident of Rottingdean I often use taxis to go in and out of Brighton. There is no doubt that the convenience, cleanliness, price-point and professionalism of the Uber driver community has been an extremely welcome addition to our transport options.

Can we for once focus on the good things about Uber:

1. The flexible nature of the employment Uber offers is a lifeline to many people.
2. Uber is committed to a clean air policy. Much of its fleet is electric and will become more and more so – surely that is important to a Brighton constituency?
3. Uber is committed to reduce the number of private cars on the road. Again that is consistent with the policy of a city like Brighton.
4. Safety: Uber drivers are licensed to exactly the same degree as other Hackney carriage drivers in the city. I have used Uber all over the world and regularly in Brighton and never had any problem. Why? Because unlike other taxis, each Uber journey is tracked and the name of the driver and their details is recorded. I am happy for my daughter to use Uber.

There are always people who are resistant to change, especially from disruptive technologies. They are disruptive for a reason, because they are replacing something outmoded with something better. If Brighton wants to be seen as a modern, digital, switched-on, green city, it would be an absolute travesty if this application was rejected to appease the vested interests of the local Hackney carriages and the outdated politics of the GMB.

Yours

Nick Southgate



To the licensing panel  
Brighton Council for the Uber license hearing.

Dear Panel Members.

I am writing to support the continuation of the Uber operating licence in the city of Brighton and Hove.

The license should be extended as in my opinion Uber operate a safe and reliable service to the public.

My reasons for my support of the Uber licence includes the fact that the journey can be tracked, the drivers name, registration number, licensing authority and private hire licence details can be viewed prior to the customer accepting the ride.

The app make the booking of an Uber easier for the customer and with the transaction digitally taking place the driver is less likely to be attacked making it safer for the driver. Uber also limit the amount of hours a driver can work in any one day therefore reducing driver fatigue.

I also believe that competition is good for customers giving passengers more freedom of choice when ordering a private hire ride. There will always be a demand for normal Hackney Carriages.

Peter Woodcock





**From:** Luis A  
**Sent:** 23 March 2018 10:44  
**To:** HCO  
**Subject:** Uber Appeal Submission

To Whom it May Concern,

I am a regular Uber costumer and I have found the service they provide safe and reliable.

During the snow days, their availability was unparalleled, allowing me to get to work without any major disruption.

Regards,

Luis Ananguren



**From:** mohsen fatoorechi  
**Sent:** 23 March 2018 12:52 PM  
**To:** HCO  
**Subject:** Re: Uber Appeal Submission

Hi, I would like to mention my thought on why I like Uber to operate in Brighton and Hove area.

I have used Uber in Brighton and enjoyed their service. One specific time was when I got back very late from London (around 12am) and having missed the last connection train to London Road station I wanted to get a taxi home. The taxi rank out of Brighton Train station always has a long quite and waiting time late night because of the last train coming from London and now outbound train from Brighton. Getting an Uber I managed to save myself time and possibly avoided catching a cold in a very chilly night. The driver was very cheerful and got me home in no time. Left me wondering why did all those were queuing for possibly half an hour to get into a taxi.

Regards



**From:** Lauren Barry  
**Sent:** 14 March 2018 09:10  
**To:** HCO  
**Subject:** Uber

I'm writing in support of Uber's license in Brighton and Hove. I've lived in the city for 8 years with my husband and two children and have been using the Uber app here for the last few months. I like it because it provides an affordable, convenient and reliable form of transport for the whole family. It's enabled us to enjoy and budget a night out without needing to worry about adding a large taxi cost to the price of a babysitter, and helped us in the recent snow storms to take the children to school when we didn't have access to our car.

The app is simple to use, gives a clear price estimate and offers a huge convenience and price point bonus in comparison to other taxi companies.

I really feel it would be a loss for the city if their license was not renewed.

Thanks,  
Lauren Barry



# BRIGHTON & HOVE STREAMLINE Ltd

# 202020 747474

www.streamlinetaxis.org

*Brighton, Tuesday 3 October 2017*

Jim Whitelegg  
Licensing Manager  
Hackney Carriage Office  
Brighton & Hove City Council  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JE

**To be delivered by hand**

Dear Mr Whitelegg

## **Application to Renew Private Hire Operator's Licence by Uber Britannia Ltd**

As you are aware from past correspondence, we, the undersigned, represent a long-established group of Taxi and Private Hire operators based in the city of Brighton and Hove.

We write now urging Brighton and Hove City Council ("BHCC") not to grant Uber Britannia Limited ("UBL") a renewed licence ("an Operator's Licence") under section 55 of the Local Government (Miscellaneous Provisions) Act 1976 ("the Act"). We consider that, for the reasons set out in more detail below, it is now more apparent than ever that UBL is not a fit a proper person to be awarded such a licence.

We have taken time, and incurred expense, by obtaining the assistance of counsel in drafting this letter. The intention is to summarise arguments which have, until now, been contained in a large number of items of correspondence and perhaps to introduce some further arguments which BHCC has not previously considered. We have codified all those arguments into a single letter and we hope that this assists BHCC and identifies the issues which we feel ought to be raised with UBL.

During the preparation of these submissions, Transport for London ("TfL") has decided that Uber London Limited ("ULL"), another company operating under the Uber brand, is not a fit and proper person to be granted a renewed Operator's Licence. For reasons which are set out below, the observations made by TfL in relation to ULL seem to us to apply equally to UBL and we can see no sensible basis for drawing a distinction between the two. As a result, we would encourage BHCC to read and consider the reasons given by TfL in its decision of 22 September 2017.

## No Public Hearing

We wish to express our disappointment at the outset that BHCC has elected *not* to hold a Public Hearing for the determination of UBL's renewal application. The critical importance of this decision to UBL, to the wider Trade and to safety and welfare of the people of Brighton is plain and obvious, particularly in light of TfL's decision in respect of ULL. Due to the crystallisation of many issues both locally and nationwide, the need for arguments to be canvassed and, where appropriate, challenged in person, it is more vital even than when UBL first applied for an Operator's Licence in October 2015.

When the Public Hearing was held following UBL's first application for an Operator's Licence, the novel manner in which the service was being provided to customers and the lack of any real evidence about the mechanics of that service-provision resulted in a hearing which was characterised as much by uncertainty as it was by clarity. The understandable result was numerous undertakings were sought by BHCC and provided by UBL, and an Operator's Licence of only one year's duration was granted.

By the time UBL applied to renew its Operator's Licence in October 2016, it had only actually commenced effective operation a few weeks previously. Consequently, there was no real evidence to test the undertakings made publicly and no real customer or trade experience for BHCC to evaluate. In those circumstances, we can understand why the decision to renew UBL's Operator's Licence was then taken in private.

One year on, the position is very different indeed. Given what we have seen and reported to BHCC, coupled with TfL's recent determination, we consider that a decision by BHCC in October 2017 that UBL was a fit and proper person to hold an Operator's Licence would be an error of law and, very probably, irrational. There seems to us a very real risk that a decision to renew UBL's Operator's Licence might well be the subject of a judicial review, whether by us or by some other interested party. This would be a highly-regrettable position and one which neither the trade nor BHCC would welcome. The best way to avoid this outcome would be for all interested parties to be given an opportunity to set out their case in full in a public forum.

We understand that the decision not to grant a public meeting was based, in part, on the fact that no complaints have been received by members of the public (otherwise than those connected with the Trade). Respectfully, we consider this stance to be dangerously complacent. The very nature of Uber's business and service-delivery model means that customers may well be unaware that they have an opportunity to complain to BHCC about their experiences using the Uber App. Most customers recognise Uber to be a global brand and, unlike all established operators, one which has no obvious connection to the area in which the fare begins or ends. Indeed, in light of the matters set out here, there is a considerable possibility that a Brighton resident, using the Uber App to travel across the city, would do so in a vehicle licensed in London and driven by a driver similarly so licensed. That customer would, it seems to us, have no right to complain to BHCC, because the



operator in such a case would be ULL and the licensing authority would be TfL. Perversely, in such a circumstance, BHCC may well have no jurisdiction even to hear such a complaint.

Holding a well-advertised Public Meeting to consider UBL's application for a renewed Operator's Licence may well cause local residents to come forward with their personal experiences of using the Uber App, be those experiences good or bad. They could well inform BHCC's decision whether to renew UBL's Operator's Licence or not.

### **Why is Uber not a fit and proper person?**

We wish to respectfully remind BHCC of the legal test which it is required to apply here. Although the provision is well known to those who will come to make this decision, it is important that it is applied with precision and, respectfully, we fear that a certain amount of elision and/or paraphrasing has crept into its application when issues involving Uber arise.

Section 55(1)(a) of the Act states (emphasis added):

*(1) Subject to the provisions of this Part of this Act, a district council shall, on receipt of an application from any person for the grant to that person of a licence to operate private hire vehicles grant to that person an operator's licence:*

*Provided that a district council shall not grant a licence unless they are satisfied*

*(a) that the applicant is a fit and proper person **to hold an operator's licence.***

We emphasise these words because we consider that the approach BHCC took to the granting of UBL's operator's licence in 2015 failed adequately to take these words into account.

In our view, as a matter of language, a person or company might very well be a '*fit and proper person*' in the more general sense of the expression; whilst being a wholly unsuitable person to hold an Operator's Licence. By way of illustration, a person with a long-standing and exemplary record of service to the community, but who has no experience or expertise in the operation of Private Hire vehicle, might well fall into this category.

We would, therefore, urge BHCC properly to consider whether the applicant for this renewal, namely UBL, and not any other company or entity, meets this statutory test. In our view, when the statutory test is correctly applied to UBL, the following conclusions must be reached:

- (1) UBL performs none of the services associated with an operator of Private Hire vehicles. The services are performed either by the drivers themselves (unlawfully), by automated software or by a company or companies based overseas;

- (2) UBL can be shown to have breached undertakings given to BHCC when it first obtained its Operator's Licence in 2015;
- (3) UBL seeks an operator's licence from BHCC only to provide a fig-leaf to give credibility to a nationwide campaign of aggressive anti-competitive practices;
- (4) The proliferation of Uber-registered vehicles in Brighton and Hove is undermining the established regulatory framework put in place by BHCC to protect the safety and welfare of the public;
- (5) The business model by which UBL and the Uber brand operates makes them unwilling or unable to enforce any effective standards of discipline among their fleet of drivers.

We elaborate on the basis for each of those conclusions in the remainder of this letter.

### Is UBL actually an operator of Private Hire Vehicles?

Section 46(1)(d) of the Act states:

*Except as authorised by this Part of this Act*

*(d) no person shall in a controlled district operate any vehicle as a private hire vehicle without having a current licence under section 55 of this Act*

The term 'operate' in this context refers back to the definition in section 80:

*"operate" means in the course of business to make provision for the invitation or acceptance of bookings for a private hire vehicle.*

It follows, therefore, that if UBL is properly to be said to be a fit and proper person to hold an Operator's Licence, it ought to be able to demonstrate that it functions as an operator of Private Hire Vehicles. By this definition it must show that, in the course of its business, it makes provision for the invitation or acceptance of bookings for Private Hire vehicles.

We refer to the application form submitted by UBL in March 2015 for an Operator's Licence. This is the most recent application form available to us. The statutory declaration was signed by Ms Karen Walker and Mr Brent Callinicos. Both gave their addresses as being in California, USA. The head office of UBL was listed as an address in Manchester, albeit an address was provided in North Street as the location at which UBL would carry out its activities in Brighton. We do not know what infrastructure existed at the address on North Street or the office subsequently used by you by UBL at Grand Parade, however, we hope and expect that BHCC will investigate this as part of the assessment of UBL's renewal application.

UBL provided with its application a set of terms and conditions dated 8 December 2014 ("the 2014 T&Cs"). For the purposes of the 2014 T&Cs, 'Uber' is defined as being both UBL and another separate private company with a separate company number, namely ULL.

Part 1, Paragraph 2 of the 2014 T&Cs states (emphasis added):

*"Pursuant to the Local Government Miscellaneous Provisions Act 1976 and any related government regulations pertaining to the operation of Private Hire Vehicles (together the "Regulations"), a private hire booking made by you must be accepted by a person that holds a relevant PHV operator's licence. Uber is the holder of such a PHV operator licence in each of the jurisdictions in which it operates, and as set out in paragraph 3 below accepts at its registered address and/or operations centre private hire bookings made by you using the Uber App ("Bookings")."*

The paragraph 3 to which reference is there made states:

*"Uber accepts Bookings acting as disclosed agent for the Transportation Provider (as principal). Such acceptance by Uber as agent for the Transportation Provider gives rise to a contract for the provision to you of transportation services between you and the Transportation Provider...For the avoidance of doubt: Uber does not itself provide transportation services, and Uber is not a Transportation Provider. Uber acts as intermediary between you and the Transportation Provider...Uber accepts your booking as agent for the Transportation Provider, but is not a party to that contract."*

The Transportation Providers referred to in that paragraph are, it is to be remembered, the Uber-registered drivers. It seems highly unlikely that any drivers have Operator's Licences yet whatever steps UBL says it takes, it purports to do so as their agent. On UBL's own description of its working practices, it takes no active steps in its own capacity, but merely acts as an intermediary and agent of its drivers. In light of this, it is hard to fathom on what basis UBL asserted in 2015 and asserts today that it is an operator of Private Hire Vehicles.

The artificiality of the 2014 T&Cs is drawn into focus by considering the evidence filed by Ms Joanna Bertram<sup>1</sup>, the Regional General Manager of ULL in the Central London Employment Tribunal hearing of *Aslam v Uber Britannia Limited (and ors)*<sup>2</sup> at paragraph [60]:

*"ULL will receive a booking request from a Passenger. ULL will then make this request visible on the Driver's smartphone, together with the first name and rating of the passenger. It is then the Driver's decision whether or not to confirm their availability and willingness to take the trip. If they do choose to take the trip, they will touch to confirm to ULL that they are available and willing to take the trip. Having done so, ULL will accept and confirm the booking to the passenger on behalf of the Driver, and almost simultaneously and instantaneously allocate the trip to the Driver."*

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<sup>1</sup> <http://www.uphd.org/wp-content/uploads/2016/11/Jo-Bertram-witness-statement.pdf>

<sup>2</sup> [2017] I.R.L.R. 4

With respect, this evidence demonstrates the linguistic dexterity required to shoe-horn what happens in practice into the printed Terms and Conditions under which UBL and ULL operate. The only discretionary, indeed the only cerebral, decision taken in respect of the customer's request is taken by the driver of the vehicle swiping his smartphone screen. Once that decision is taken, the software *'accepts and confirms'* the booking both simultaneously and automatically. A process which involves no discretion or indeed any human input cannot, in our view, amount to acting as an operator of Private Hire Vehicles. If such a limited action could be so described, it is difficult to envisage how or why Parliament would have intended it to be a regulated activity.

It would also appear to be wholly contrary to BHCC's own views on the role of a Private Hire Vehicle Operator. In a report dated 19 October 2015, when UBL first applied for an Operator's Licence, the Director of Public Health, Jean Cranford said at paragraphs 3.2 - 3.5:

*"So, in simple terms, a private hire operator is the person who takes a booking for a private hire vehicle and then dispatches a PHV driven by a licenced [sic] private hire driver (PHD) to fulfil that booking...*

*However, the role goes far beyond simply taking bookings and despatching vehicles. In the course of making a booking and dispatching the vehicle and driver, the PHO will obtain significant amounts of personal information...*

*It is therefore vital that PHOs are as trustworthy and reliable as a driver, notwithstanding their slightly remote role."*

We entirely endorse these comments and say that they highlight how inappropriate it is, as a matter of language, to describe UBL as an operator of Private Hire Vehicles on the basis of UBL's own evidence and Terms and Conditions.

Furthermore, due to the manner in which the Uber brand operates, in particular, its interpretation of the decision in *Adur D.C. v Fry*<sup>3</sup>, we do not think it is credible for UBL to assert that it has any direct involvement at all in the acceptance and confirmation of bookings.

It is now apparent that, since UBL started operations in Brighton and Hove, when a customer opened the Uber App in the city and requested a fare, that request was sent to a number of nearby vehicles by the Uber App who could elect whether or not to take the fare. Some of those vehicles were registered in Brighton and Hove under UBL's Operator's Licence granted by BHCC. Others were registered in London under ULL's Operator's Licence granted by TfL. Whether the fare was accepted by a Brighton driver or a London driver was determined by factors such as the proximity of the drivers to the customer and the personal willingness of each driver to accept the fare.

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<sup>3</sup> [1997] R.T.R. 257

If both Ms Bertram and the published Terms and Conditions of ULL and UBL are to be believed, both ULL and UBL simultaneously sent the one customer's request out to its drivers and, depending upon which driver communicates its acceptance to its related 'operator' first, either UBL or ULL instantaneously accepts and confirms the booking.

With respect this is plainly an entirely artificial construct. In fact, it is clear that the software, in the form of the Uber App, sends the request out both to London registered drivers and Brighton registered drivers, one of whom accepts the request. The Uber App is, according to the Terms and Conditions (Part 2, Paragraph 1), operated by Uber B.V. a company established in the Netherlands. Neither UBL nor ULL has anything to do with the customer's request, at least until such time as the request is accepted by the driver.

Once the reality of the position is set out, it is apparent that the only credible candidates to be operators in relation to use of the Uber App are Uber B.V. and the individual drivers. Neither have applied to BHCC for an operator's licence, only UBL.

#### The breached undertakings

We wish to remind BHCC of the terms of the Decision Notice of 19 October 2015, pursuant to which UBL's first operator's licence was granted. This Decision Notice was produced following a public meeting at which various representations were made. These representations elicited certain undertakings from UBL and we consider that UBL has failed to meet those undertakings.

At paragraph 7.39 of the Decision Notice, the following comment is made:

*"Mr Byrne confirmed in response to questions by Councillor Marsh, the Chair, that Uber would have a dedicated office in Brighton & Hove and that all bookings made in the city would be processed there."*

Based on the business model described above, we have great difficulty understanding how this undertaking can have been met. As we have explained, an individual requesting a vehicle using his Uber App in Brighton may connect to a UBL vehicle registered in Brighton (or elsewhere) or a ULL vehicle registered in London. If, by chance, the driver who accepts the booking is registered in London, it would be a clear breach of the principle of the unity of licences if that booking was processed at UBL's office in Brighton. If UBL's position is that such a booking was 'made' in London, we suspect that Councillor Marsh would consider that she received a distinctly misleading answer to her question.

Furthermore, by a letter dated 11 November 2016, we note that Simon Court, Senior Lawyer for BHCC wrote to our then solicitors (referring to the renewal granted in 2016) saying:

*"The licence is subject to meeting the requirements set out in the Blue Book, and thus there is a requirement to use only drivers and vehicles licensed by Brighton & Hove City Council. Uber were reminded of their commitment to use Brighton & Hove City Council licensed drivers."*

This is consistent with paragraphs 7.34 and 7.64 of the Decision Notice from the previous year. Both Mr Court and the Decision Notice there draw upon an express undertaking given by the legal team who represented UBL at the public hearing in 2015 in the following terms:

*"Should Uber be granted a Private Hire Operator's Licence here in the City, they will only use drivers and vehicles licensed by Brighton and Hove City Council."*

Even if 'Uber' in this context is taken to mean UBL, it is difficult to see how the undertaking can be successfully complied with within the business model set out above. We are aware that UBL has obtained licences from a range of other licensing authorities, in addition to the licence ULL has obtained from TfL.

By way of illustration, it is apparent that UBL has been granted Operator's Licences by authorities as far afield as Oldham and York. We do not understand how one company can undertake to BHCC that it will use only Brighton & Hove registered drivers when applying for a BHCC licence and also (presumably) represent to York that it will only use York registered drivers when applying to York for a licence.

This is plainly a nonsense and inconsistent with its other undertaking that bookings made in the city would be processed there. Either the Uber model can distinguish which bookings are made in which locality or it cannot.

In our view, a company cannot sensibly be described as a fit and proper person if it gives undertakings to a licensing authority which it knows it is simply incapable of meeting.

#### Anti-competitive practices

When considering UBL's application to renew its Operator's Licence, it is important to remember the following matters:

1. UBL has Operator's Licences from a number of licensing authorities nationwide;
2. ULL is seeking to appeal TfL's decision not to renew its Operator's Licence in London; and
3. Both UBL and ULL maintain that the effect of the decision in *Adur D.C. v Fry*<sup>4</sup> is that an Uber-registered vehicle and driver (whether registered in London through ULL or elsewhere through UBL), can pick up and drop off a passenger anywhere in the country.

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<sup>4</sup> *ibid*



In light of these positions, one might wonder why UBL seeks to renew its BHCC Operator's Licence at all. As matters stand, Uber asserts that its vehicles can accept fares in Brighton and Hove, whether or not BHCC renews its Operator's Licence, albeit TfL's recent decision plainly impairs this.

Nevertheless, a large number of drivers and vehicles are currently licensed by BHCC for Private Hire. Most do not work for UBL but work for the companies of the undersigned. In our view, the primary, possibly the only, motivation behind UBL seeking an Operator's Licence from BHCC is to entice drivers to switch from our companies to Uber.

We believe this is happening nationwide as the global Uber brand and its UK-based companies seek to target the small local operators, to poach their staff and ultimately to drive them out of the market. This is plainly not in the interests of the residents of Brighton and Hove. If BHCC renews UBL's Operator's Licence, it would, in our view, risk being an unwitting facilitator of this aggressive monopolistic conduct.

It goes without saying, in our view, that a company which brazenly seeks to exert monopoly power to drive competitors out of the market is not a fit and proper person to hold an Operator's Licence.

#### The impact on the effectiveness and relevance of the Blue Book

For some years, residents of Brighton and Hove have enjoyed a superb standard of service when using Private Hire Vehicles. We are very happy to credit BHCC with this and the clear and high standards set in the Blue Book.

By way of illustration, BHCC has imposed upon the undersigned operators a requirement that a proportion of our vehicles are wheelchair-accessible and has imposed a requirement of all Hackney and Private Hire Vehicles that CCTV must be installed in the vehicle.

These requirements are beneficial to the public but are very costly for us. When UBL sought an Operator's Licence in 2015, however, these requirements were effectively dispensed with because Uber's business model made them impossible to be achieved. Not only are we aggrieved that this creates a playing-field which is far from level, we consider it to be a regression, as far as the standards of service provided to residents.

UBL seeks to offer Private Hire Vehicles to members of the public in Brighton and Hove which fail to meet the standards those customers have come to expect. Furthermore, having acquired its Operator's Licence back in 2015, UBL has taken it upon itself to make representations to the Brighton and Hove Hackney Carriage and Private Hire Forum that these established regulatory standards are unnecessary and ought to be reduced or removed. (Please refer to the Minutes of the Taxi Forum dated 2 May 2017.)

When applying the test under section 55 of the Act, BHCC must take a local view, with reference to the circumstances which exist in Brighton and Hove. When one considers the established Private Hire market in the city, it is apparent, in our view, that a company which cannot meet the local standards is not a fit and proper person to hold an Operator's Licence in this locality.

We also fail to understand how a company which, shortly after acquiring an Operator's Licence, lobbies for the diminution of safety standards within the industry can be said to be a fit and proper person to hold such a licence. UBL plainly does not prioritise the safety and welfare of its customers in the way BHCC is entitled to expect of its Private Hire Operators.

### The enforcement of standards

In light of the evidence which has come to light now Uber-registered vehicles have been operating in the UK for some time, it is abundantly clear that the observations made above about the business model under which UBL and ULL operate is having a significant impact upon public safety.

In an email dated 11 September 2017, Mr Court wrote to the undersigned as follows:

*"So the advice that I have given is that we assess our own local issues and not rely upon newspaper articles of unproven allegations and other assertions. The hard facts are that in relation to Uber as an operator we have had no local complaints other than from the trade or those related to the trade."*

In light of the matters set out above, and the clear overlap between the actions of UBL and ULL we consider this advice to be, with respect, quite extraordinary. We wish to make clear that we do not encourage BHCC to determine UBL's renewal application based on unproven newspaper rumours. What we strongly encourage BHCC to do, however, is to consider what TfL has itself determined is the impact of ULL's business model on passenger safety.

The published decision says as follows:

*TfL considers that Uber's approach and conduct demonstrate a lack of corporate responsibility in relation to a number of issues which have potential public safety and security implications. These include:*

- Its approach to reporting serious criminal offences.*
- Its approach to how medical certificates for drivers are obtained.*
- Its approach to how Enhanced Disclosure and Barring Service (DBS) checks are obtained.*
- Its approach to explaining the use of Greyball in London - software that could be used to block regulatory bodies from gaining full access to the app and prevent officials from undertaking regulatory or law enforcement duties.*



There is no proper basis for distinguishing the manner in which Uber services are provided by ULL in London from the manner in which they are provided by UBL in Brighton and elsewhere. If BHCC purported to confine its enquiry on this application to proven allegations made in Brighton about Brighton-licensed Uber drivers, it would not only be fettering its discretion unlawfully, it would be displaying an alarming complacency towards the safety and welfare of its residents.

TfL has not, to date, elaborated upon those categories of criticism. With respect, however, they seem to us to be a clear by-product of a business model in which a company is created in order to obtain a licence to perform a regulated activity, whilst that company simultaneously disclaims any liability for the way in which that activity is carried out. We refer in this vain to Part 2, Paragraph 8 of the 2014 T&Cs, those which were in force at the time UBL was first granted an Operator's Licence:

*"The quality of the transportation services requested through the use of the Uber App and/or the Services is entirely the responsibility of the Transportation Provider who provides such transportation services to you. Uber under no circumstance accepts liability in connection with and/or arising from the transportation services provided by the Transportation Provider or any acts, actions, behaviour, conduct and/or negligence on the part of the Transportation Provider or its employees. Any complaints about the transportation services provided by the Transportation Provider should be submitted to the Transportation Provider."*

The 2014 T&Cs made plain that UBL would, in effect, take no responsibility whatsoever for the actions of its drivers and any complaints were to be made to the driver himself. We fail to understand how this position was ever compatible with paragraph 76 of the Blue Book which states:

*76. The standard of service*

*The operator shall provide a prompt, efficient and reliable service to members of the public at all reasonable times, and for this purpose shall in particular;*

*76.1 ensure that when a private hire vehicle has been booked that the driver attends at the appointed time and place punctually, unless delayed or prevented by sufficient cause.*

*76.2 keep clean, adequately heated, ventilated and lit premises which the operator provides and to which the public have access, whether for the purpose of booking or waiting.*

*76.3 ensure that any waiting area provided has adequate seating facilities.*

*76.4 keep a summary of all complaints received regarding service provided or about drivers*

*76.5 Must provide an equal service for differently abled passengers*

*76.6 Any operator operating more than 100 vehicles must ensure that 20% of their fleet is Wheelchair Accessible.*

UBL's Terms and Conditions have been amended since the Operator's Licence was first granted and Part 2, Paragraph 8 no longer exists. Nevertheless, we consider that the new Part 2, Paragraph 5 is similarly at odds with the Blue Book. It states (in block capitals):

*"The services are provided "as is" and "as available." Uber disclaims all representations and warranties, express, implied or statutory, not expressly set out in these terms, including the implied warranties of merchantability, fitness for a particular purpose and non-infringement. In addition, Uber makes no representation, warranty, or guarantee regarding the reliability, timeliness, quality, suitability or availability of the services or any services or goods requested through the use of the services, or that the services will be uninterrupted or error-free. Uber does not guarantee the quality, suitability, safety or ability of third party providers. You agree that the entire risk arising out of your use of the services, and any service or good requested in connection therewith, remains solely with you, to the maximum extent permitted under applicable law."*

As a result, we say that one need not look to newspaper articles or rumour to discover that UBL's business model represents a threat to passenger safety. Such has already been determined by the largest licensing authority in the country and such is immediately apparent from a perusal of its past and present Terms and Conditions.

UBL is a company which invites BHCC to conclude that it is a fit and proper person to hold an Operator's Licence, yet seeks simultaneously to assert that it has no interest whatsoever in the way in which its Private Hire Vehicles are being operated. Those two things are plainly incompatible.

## **Conclusion**

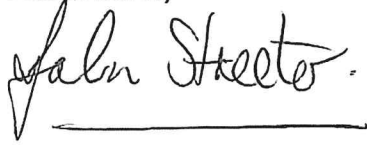
In our view, there is now an overwhelming body of evidence forming that UBL is not a fit and proper person to be granted an Operator's Licence by BHCC. We have endeavoured to summarise that evidence and the bases on which we make this assertion in the paragraphs above.

For these reasons, we consider that Brighton and Hove City Council now has no option but to deny UBL's application to renew its Operator's Licence.

In that event, we the undersigned licensed operators would offer any Brighton and Hove licensed driver displaced from UBL the opportunity to join one of our operated circuits as we would in no way wish to see any impediment upon the ability to work of any individual locally licensed driver.

Kindly acknowledge receipt. We await hearing from you in response.

Yours sincerely

A handwritten signature in black ink, reading "John Streeter". The signature is written in a cursive style with a horizontal line underneath the name.

**John Streeter, Brighton & Hove Streamline Vice-Chairman**

**Signed on behalf of:**

**Brighton and Hove Streamline Ltd  
Brighton and Hove Radio Cabs Ltd  
Southern Taxis [Brighton] Ltd**





22 September 2017

Mr Tom Elvidge  
General Manager  
Uber London Limited  
Aldgate Tower  
First Floor  
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Helen Chapman  
General Manager  
Taxi & Private Hire  
Transport for London

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Dear Mr Elvidge

## **Application for the renewal of a Private Hire Vehicle Operator's Licence**

We write further to Uber London Limited's (ULL) application for the renewal of a London Private Hire Vehicle (PHV) Operator's Licence, which we received on 18 August 2017.

We have carefully considered ULL's application, together with the results of the enquiries that have been undertaken over the past four months and other relevant material available to us.

For the reasons set out below, Transport for London (TfL) is not satisfied that ULL is a fit and proper person to hold a licence. As such, TfL has decided not to grant ULL a London PHV Operator's Licence to extend beyond 30 September 2017.

We are currently considering whether ULL's business model complies with the statutory framework, in certain key respects. TfL is currently minded to conclude that it does not. We have written to you separately about this matter.

In summary, the reasons for our decision are as follows. It is considered that each of these reasons, on their own, provide a sufficient basis to reach the view that ULL is not fit and proper:

- a) It is considered that ULL misled TfL in correspondence in 2014 as to the process by which bookings are accepted through the Uber app. In particular, ULL provided a false picture of the order in which various steps take place, when a booking is being accepted. TfL had asked ULL to explain its systems, and had been clear that we would rely on their answers when determining the lawfulness of their operating model. Whether or not the false information provided by ULL was determinative of the lawfulness of ULL's

model (a matter we address in separate correspondence), TfL considers that ULL's answers were materially false and misleading;

- b) ULL had available to it for use in London a piece of software known as 'Greyball'. Greyball can be deployed for a variety of legitimate purposes, though some companies within the Uber group have used it for the purposes of evading regulatory enforcement in other jurisdictions. TfL has corresponded extensively on this question with ULL. ULL has said that it has not been used for this purpose in London. However, we do not consider that ULL have been open and transparent with TfL about Greyball despite having been given ample opportunity by TfL to state its position clearly. In particular the extent to which those responsible for Uber's operations in London were aware or involved with decisions about its use in other jurisdictions. What information TfL now has about Greyball (and the involvement of ULL's senior staff in its possible use elsewhere) has only come to light following repeated questioning from TfL;
- c) ULL has demonstrated a lack of corporate responsibility in relation to a number of other issues which have potential public safety implications and which are detailed below.

Full reasons for our decision not to grant ULL a London PHV Operator's Licence are set out below:

**'Fit and proper person': s. 3 of the Private Hire Vehicles (London) Act 1998 ("the 1998 Act")**

1. Section 3(3) of the 1998 Act sets out the requirements that must be satisfied before TfL, as the licensing authority, can (and must) grant a licence. These include the requirement that the applicant is a "fit and proper person" and such further requirements as TfL may prescribe. The phrase "fit and proper" is used in a number of statutory contexts, but its meaning is context-specific: a person who may be "fit and proper" for the purposes of one licensing regime may not be for the purposes of another. The Courts have confirmed that licensing authorities may take into account "anything which a reasonable and fair-minded decision maker, acting in good faith and with proper regard to the interests both of the public and the applicant, could properly think it right to rely on."

**The 2014 Correspondence About the Acceptance of Bookings**

2. In 2014, in the course of correspondence with ULL, TfL asked ULL a series of specific and detailed questions about its booking process, as part of an investigation into the way in which ULL operated. In a letter dated 28 February 2014, TfL asked ULL specifically for data flows

associated with the booking process, starting with the process initiation by the passenger using the App. TfL also asked for details of the timing and extent of any information flow from consumer/app to back-end servers/booking engines to any intermediary servers and through to end driver/app. As TfL made clear in that letter, its previous questions to ULL and its follow-up letter of 8 April 2014, its concern was to clarify whether ULL, Uber BV (another entity within the Uber group of companies) or Uber's partner drivers were accepting bookings or making provision for the invitation and acceptance of bookings.

3. In response by letter dated 17 March 2014, ULL said that, in its view, it was accepting bookings. ULL described the process flow as follows:
  - a) Client (ULL referred to a passenger as a "client") requests a vehicle using the Uber app installed on a smartphone. The client's smartphone forwards the client's requested pick-up location, based on satellite GPS signals, to Uber London Limited's dispatch server.
  - b) Client request is accepted by the dispatch server.
  - c) The dispatch server selects an available licensed PHV driver and forwards details of client request to such licensed PHV driver.
  - d) Licensed PHV driver travels to requested pick up location, collects the client seeking transportation and completes journey.
  - e) At the conclusion of the trip, the driver terminates the trip. The driver's smartphone sends details of the route and drop off location, based on satellite GPS signals, back to the dispatch server, which triggers the calculation of the fare.
  - f) Both the driver smartphone and the client smartphone receive the details of the trip including the total amount charged and the route.
4. ULL also said that it retains full control of all dispatches, including the ability to contact the driver and the rider, the ability to cancel the request at any point before dispatch and to terminate a pick-up prior to the trip commencing. It said that it had full responsibility for the data stored on the dispatch servers. ULL concluded: "Uber London is not sub-contracting bookings, but is arranging for drivers (a few of whom hold an Operator's License of their own) to discharge a booking already accepted by Uber London Ltd. As you state in your letter, this is permissible."
5. ULL explained the process of accepting bookings once again, in a letter dated 17 June 2014:
  - a) GPS data is sent from the smartphones provided by ULL to its PHV drivers to our cloud servers, which in turn transmit such data to potential passengers, who access that data through the Uber App installed on their own smartphones... The data shows the potential passengers the location of vehicles in relation to



the potential passenger's own location, and gives an approximate time for the closest Uber vehicle to arrive at the potential passenger's pick-up location.

- b) If the passenger wishes to book a vehicle he does so through his GPS-enabled smartphone installed with the Uber App. The passenger can also use the Uber App to ask for a quote before making the booking. The customer's booking pick-up location is transmitted through the customer's GPS-enabled smartphone installed with the Uber App to ULL's licensed operating centre which is using hosted IT infrastructure, where it is accepted and logged on ULL's systems. It is instantaneously sent to the relevant driver. Also at the same time, ULL's systems will respond to the passenger by transmitting data held on its servers giving the driver's name, car type and registration.
- c) It is accepted that receipt and acceptance by ULL of the passenger's booking takes place at the same time as the relevant driver is notified of the booking. That is an inevitable consequence of the technology used. It does not alter the fact that ULL accepts the booking on behalf of the driver, evidences that acceptance by recording it and confirms such acceptance by arranging for details of the relevant driver to be communicated to the passenger. It is also relevant here that ULL can and occasionally does refuse bookings.

- 6. At that time, following careful consideration and based on the information provided by ULL, TfL concluded that ULL (not any other entity and not its drivers) was accepting bookings for the purposes of s. 2 of the 1998 Act.

**The 'taximeter litigation': *Transport for London v Uber London Limited, Licensed Taxi Drivers Association, Licensed Private Hire Car Association* – 2015**

- 7. Around the same time, a separate dispute arose concerning whether or not ULL's partner driver vehicles are "equipped" with a "taximeter" in breach of the prohibition in section 11 of the 1998 Act. In order to obtain a clear answer to that question, TfL issued Part 8 proceedings seeking declaratory relief, naming ULL, the Licensed Private Hire Car Association (LPHCA) and London Taxi Driver's Association (LTDA) as defendants. In his judgement of 16 October 2015, Ouseley J set out his understanding of the process by which ULL accepted bookings. Those facts were not in dispute; his description was largely taken from ULL's skeleton argument, supported by ULL's evidence. The relevant paragraph of the judgment describes the bookings process as follows:

"12. When booking, the customer can choose a particular type of vehicle. The nearest vehicle of that type available for hire will be shown on the Smartphone screen. The customer then indicates precisely where they want to be picked up, and clicks "request" to



make the booking. Uber accepts the booking and Uber's servers in the United States locate the nearest available vehicle of the type requested by the customer. The servers then send the accepted booking to the Smartphone of the nearest driver, who has 15 seconds to accept the booking. If he does not accept it, the server sends the booking to the Smartphone of the driver of the next nearest vehicle to the customer. When the driver takes on the booking, he is sent all the relevant details including the location. He can contact the customer via the Driver App but not via the customer's mobile number. The customer is sent also by the Customer App details of the driver, car and estimated time of arrival.” (emphasis added)

8. In its evidence to the Court, ULL had stated that it accepted booking requests before they were allocated to the nearest driver. The relevant paragraphs of the statement are:

“30. ... The customer then clicks “request” to make their booking. ULL accepts the booking and Uber's servers locate the nearest available vehicle of the type requested by the customer. The servers do this by reviewing all of the GPS coordinates of the relevant vehicle type using signals sent from the drivers' smartphones to the servers.

31. Uber's servers will then send the accepted booking on to the smartphone of the driver of the vehicle closest to the customer. That driver has 15 seconds to agree to take the booking. If a driver declines or does not respond within 15 seconds, the servers will send the booking to the smartphone of the next nearest vehicle to the customer. When a driver takes on a booking, he is sent all the relevant details...” (emphasis added)

9. The booking process described in these Court proceedings was consistent with the description provided by ULL to TfL in the course of the 2014 correspondence. In short, ULL clearly represented that it accepts the booking first, before then allocating it to the closest available driver.
10. Over the course of 2016, two separate public statements by companies within the Uber group, which cast some doubt on ULL's statements in the 2014 correspondence and the Taximeter litigation, came to TfL's attention.

## The Employment Tribunal dispute: *Aslam v Uber London Limited* – 2016

11. First, in 2016, Ms Bertram, the Regional General Manager for Northern Europe, gave evidence to the Employment Tribunal in a case concerning whether or not ULL's drivers were workers, for the purposes of European law. Her evidence described the booking process in terms that suggested the booking is not accepted by ULL until a driver has confirmed that they are available and willing to take the journey; confirmation to the customer and acceptance by ULL take place almost simultaneously and after that point. Her evidence was:

"45. ULL is responsible for accepting the booking made by a Passenger, as holder of the operating licence. However, at the point that a request is made by a Passenger, there is no obligation to provide a vehicle. As I explain below, the booking is accepted by ULL as the relevant private hire vehicle operator and allocated to the Driver. A booking is not accepted by ULL until a Driver has confirmed that they are available and willing to take it. Confirmation and acceptance then takes place by ULL almost simultaneously. A Driver is entirely free to make themselves available to provide the transportation services or not, which is described in further detail below. As such, the Operator Licence has no impact upon the freedom a Driver has when using the platform...

53. Once a request is made, and ULL has confirmed a Driver is available to accept the booking, ULL accepts the booking on behalf of that Driver...

60. ULL will receive a booking request from a Passenger. ULL will make this request visible on the Driver's smartphone, together with the first name and rating of the passenger. It is then the Driver's decision whether or not to confirm their availability and willingness to take the trip. If they do chose to take the trip, they will touch to confirm to ULL that they are available and willing to take the trip. Having done so, ULL accept and confirm the booking to the passenger on behalf of the Driver, and almost simultaneously and instantaneously allocate the trip to the Driver." (emphasis added)

12. This description is materially different from that given to TfL in the 2014 Correspondence. Whereas previously ULL had stated that it accepted the bookings first, before allocating them to a driver, in the Employment Tribunal it asserted that a booking is not accepted until a driver is available to take it. It may be noted that acceptance of a booking by ULL independently of and prior to any engagement by the driver would tend to support an argument that it is ULL, and not the driver, which accepts the booking. Conversely, acceptance by the driver in the first instance – and by ULL only thereafter – would tend to support an

argument that the drivers are independent contractors, rather than workers.

**The Canadian proceedings: *City of Ontario v Uber Canada Inc., Uber BV and Rasier Operations BV***

13. Secondly, in mid-2016 TfL became aware of a judgement of the Superior Court of Justice in Ontario in *City of Ontario v Uber Canada Inc., Uber BV and Rasier Operations BV*. In Ontario, the local regulatory requirements require a booking to be accepted by a driver, in direct contrast to the position in London. The Judge described Uber Canada as a “super-charged directory assistance service” and recorded Uber Canada’s evidence as being that “Uber adopts a passive, purely mechanical (if sophisticated) role in enabling the two protagonists (driver and passenger) ultimately to connect with each other and form an agreement and is not a party to the underlying agreement when formed.” Uber’s evidence was that:

“A trip is the result of a request made by a passenger using the Rider App and accepted by a driver using the Driver App. None of the respondents [the local Uber company] nor any of their employees or agents accepts calls or requests from passengers for the purposes of arranging transportation, nor does any of them dispatch drivers to passengers. ... the driver has sole and complete discretion over whether to receive, accept or reject requests.” (emphasis added)

14. A review of the judgment raised further questions for TfL. In particular: was the booking process in London different from that in Ontario? Or had Uber presented the same booking process differently in different jurisdictions, in order to satisfy the licensing authorities that they satisfied the different requirements of the local licensing regimes?
15. Prompted by the matters identified above, TfL entered into a further round of correspondence with ULL concerning its booking processes in 2016 and began its own investigation in 2017.

**The 2016-17 correspondence and TfL’s Investigation**

16. TfL sought an explanation from ULL about the apparent discrepancy between Uber’s evidence in Canada and ULL’s description of the mechanism whereby bookings are accepted in London. In particular, TfL enquired whether the booking process was the same in both locations.

17. ULL explained in a letter dated 7 October 2016 that the software underlying the app is the [REDACTED] but the [REDACTED]  
[REDACTED]

18. In November 2016, TfL staff attended a meeting at ULL's offices and ULL presented a slide deck setting out the process by which bookings are accepted. The slide deck explained the booking process as follows:

- a) Rider (ULL describe a passenger as a "rider") makes a booking request for pickup using the Uber app to describe the preferred location
- b) Uber identifies most appropriate driver for the booking request and system communicates the booking request via the app
- c) Driver confirms he/she is able to complete the booking by tapping the driver app
- d) Booking is accepted and recorded by ULL
- e) Details of the booking are sent to both the rider and driver
- f) Rider completes trip. The full booking record is stored by Uber London.

ULL provided a data download from the system with timestamps which showed [REDACTED] between driver confirming the request, and ULL accepting the booking.

19. TfL wrote to ULL on 16 May 2017, requesting permission for an IT systems architect to visit ULL and review the manner in which the technology and booking process works. TfL considered that the information provided by the systems architect would provide it with further clarity and enable it to understand the booking process better. In particular, it would assist in clarifying at which stage a booking is accepted and by which party to the transaction. TfL appointed Deloitte UK to carry out the IT systems architect review and Deloitte visited ULL between 25 July and 4 August 2017. Deloitte produced a report dated 7 August 2017 which details ULL's technology and booking process. .

20. The process flows showing the booking process are on page 19 of the report. In summary, a booking is made in the following way:

- a) A request is made by a rider using the Rider App. The system searches available drivers who are online, eligible and meet certain criteria such as estimated time of arrival (ETA). The system decides whether there are appropriate drivers to fulfil the request and notifies the rider of the ETA to pick up.
- b) The system checks whether surge pricing is valid at the pick-up point, calculates the trip fare estimate and the ETA and this is displayed on the Rider App.

- c) The Rider confirms the request and the system chooses the most appropriate driver based upon locally configured rules. The driver has 15 seconds to confirm the trip by tapping their device.
- d) When the driver 'accepts' the trip, ULL 'accepts' the trip automatically in the system and a booking record is stored in the ULL database. The system provides the rider with the relevant details of the driver name, photo, rating, ETA.

21. The IT architect review has provided TfL with a much clearer understanding of the booking process. Contrary to ULL's explanations of the booking process to TfL in the 2014 Correspondence and to the High Court in the Taximeter challenge, it is clear that ULL's system automatically 'accepts' the booking only after a driver has 'accepted' the trip. If the first driver to whom a booking is offered rejects the trip, it is then forwarded to the next available driver. ULL's prior assertions, that the dispatch servers arranged for drivers to discharge a booking already accepted by ULL, and that receipt and acceptance by ULL of the passenger's booking takes place at the same time as the relevant driver is notified of the booking, were false.

22. In a letter dated 30 June 2017, TfL sought clarification from ULL about whether it had changed its position on the booking process. ULL responded as follows in a letter dated 14 July 2017:

"In correspondence with TfL in 2014, our description provided to you of the booking process was much more generic. At the time, Uber was only operating in London in the UK and the correspondence was not focused upon the timing of acceptance in the way discussions have been in previous months. The emphasis of that exchange was confirming that ULL, and not anyone else, accepts bookings for the purposes of the 1998 Act and we did not go into the level of detail which we have done since corresponding on this from 2016 onwards. To the extent that our lack of precision has caused any confusion or difficulties, please accept our apology ... The detailed process is as has been described to you most recently and in the meeting we held in November 2016. This has been consistently described elsewhere, for example to various licensing authorities across England and Wales and in the witness statement I provided in the Aslam v ULL employment tribunal case."

23. We consider that this explanation is unconvincing. The correspondence in 2014 was extensive and detailed. TfL made specific requests for information about the booking process, pursuant to its concern to identify which party was accepting the booking (ULL, Uber BV or the drivers). Furthermore, ULL was clear and precise as to the 'chronology' of the acceptance process: its answers did not "lack

precision”; on the contrary, they were precise, but false. The same is true of the evidence it provided in the Taximeter case.

24. ULL asserts that its answers in 2014 were influenced by the fact that Uber was only operating in London at the time and not other areas of the UK. It is not clear how the fact that Uber is operating elsewhere in the UK changes or affects the way in which bookings are accepted. ULL gave a further explanation in its letter of 2 September 2017 and said that, when the system was only being used in London, it would only identify London licences at the stages described in paragraph 20(a) and (c) above. The letter states that ULL’s position on acceptance of bookings has not changed. It says that it has always strived to be clear that it is ULL which accepts the booking, and that this has always been and remains the case. ULL accepts in its letter of 2 September 2017 that the process described in 2014 “did not fully explain the process for checking which individual driver could complete the booking prior to acceptance, although it is obviously the case that such a step is necessary given that booking details are only provided to a single identified driver at the time of acceptance.” The letter also states:

“... ULL can only accept a booking once it has established that a particular driver is available – a driver could be logged on the app but not necessarily available for the booking. As the drivers available for any particular booking request may now be from more than one licensing jurisdiction, we have highlighted this step in the flow to you, ...

For the avoidance of doubt, we are not saying anything ‘different’ nor has the way bookings are accepted in London changed. Acceptance occurs once a driver has confirmed availability for the booking.”

25. We do not consider it is correct to say that nothing has changed in ULL’s explanation. Nor is it the case that the current explanation is ‘fuller’ and, for that reason, more accurate or complete. ULL’s presentation of its processes in 2014 was full, but false in a material respect. TfL considers that this is relevant to whether or not ULL is a ‘fit and proper person’ to hold a licence.

#### **Further matters relevant to TfL’s decision**

##### ***Greyball Technology***

26. In March 2017 it came to TfL’s attention through press reports that Uber had developed a piece of software known as “Greyball”. The press reported that this technology was developed to root out and target people that Uber considered were using the service inappropriately. It had been used to identify and circumvent the



enforcement activities of officials who were responsible for regulating Uber's businesses.

27. In essence, Greyball enables Uber to provide its customers with a modified view of its services. An Uber customer typically sees a 'standard' view of the app. However, Greyball can be used to display different or modified views, depending on the user. A 'Greyball' tag is applied to a particular customer account and, as a result, the standard view is hidden from them. The customer will not ordinarily be aware that they have been tagged, or that they are seeing a modified view of the app. The news coverage suggested that Uber had identified local law-enforcement officials via various means, and then excluded them from making effective use of its services via the use of Greyball.
28. ULL did not proactively contact TfL regarding Greyball technology, either before or after its possible use as a means of evading regulatory enforcement had been publicised. TfL initiated correspondence on 17 March 2017 and has written to ULL repeatedly seeking information on the use of Greyball in London, whether the technology formed part of the user system capable for use in London and the extent to which the program has been used in London and elsewhere around the world.
29. Ms Bertram, on behalf of ULL, initially replied on 24 March 2017 stating that Uber was undertaking a global investigation into the use of Greyball and expressed confidence that the investigation would not reveal any instances of Greyball being used for identifying and evading officials with responsibility for the regulation of Uber in London. The response did not directly answer TfL's questions in its letter of 17 March 2017.
30. On 16 May 2017, TfL wrote to ULL regarding its application for an operator's licence. The letter included five specific questions regarding the use of Greyball technology. ULL responded on 18 May 2017 with limited responses to the questions posed in relation to use of Greyball technology. On 26 May 2017, TfL sent ULL notice of its decision on ULL's application for an operator's licence (a grant of a short four month licence). This letter included six specific questions about Greyball.
31. On 30 June 2017, Jenner & Block ('JB') wrote to TfL advising that they were engaged by Uber to conduct an investigation into the use of Greyball technology in different markets worldwide. This was primarily to investigate whether Greyball was used to interfere with or impede regulatory enforcement. The letter stated that JB's investigation determined that the only use of Greyball technology in London involved its use for internal testing of new services purposes prior to launch. By way of example, a new service might be visible only to ULL employees, enabling them to test the service, before it was made available via the ordinary 'view'. The letter specified that five senior Uber officials were

interviewed as part of the investigation. No detail was provided of these interviews or of the interviewees.

32. TfL sent a further letter on 20 July 2017 requesting information on the extent of JB's investigation and the knowledge of those senior officials of the use of Greyball technology for the aforementioned purposes in other jurisdictions, in particular Ms Bertram and Rob van der Woude, who was a Director of ULL.
33. On 4 August, ULL responded and, on the same day, TfL also received a separate response from JB. ULL stated that "Jenner & Block's investigations into other jurisdictions have identified some evidence that certain of the five personnel you [TfL] identify in your letter, who are involved in the ULL business but have a wider, international role, have been exposed to communications regarding the use or potential use of Greyball technology outside the UK in a way that could have impeded or interfered with regulatory or law enforcement".
34. ULL stated that it would be amending its constitutional and corporate governance arrangements to include establishing a PHV Operator Committee chaired by an independent non-executive director which would be responsible for oversight of ULL's licensed activities.
35. After further correspondence, JB provided a key identifying the senior officials referenced in its letter of 4 August 2017. This revealed that Ms Bertram was aware of the use of Greyball technology being contemplated in a manner that could have had the effect of interfering with or impeding regulatory enforcement in markets outside the UK. The letter of 4 August 2017 stated that on a 'handful of occasions' in 2015, Ms Bertram was party to initial discussions to that effect.
36. JB's letter of 4 August 2017 stated that Mr van der Woude was not aware of the use of Greyball technology being used in other jurisdictions other than for legitimate business purposes prior to March 2017. However, he did have authority to authorise the use of Greyball technology in other jurisdictions by virtue of his position within the Uber group.
37. TfL sent a further letter on 22 August 2017 to ULL seeking information on which jurisdictions Ms Bertram has operational responsibility for and the directorships held by Mr van der Woude. TfL also sought information about any instances of misuse of Greyball technology for the purposes of interfering with or impeding regulatory enforcement which has taken place in those jurisdictions. Given ULL's vague statements regarding Ms Bertram's discussions on a 'handful of occasions', TfL also sought further information on this.
38. JB replied on 27 August 2017 and stated that Ms Bertram has additional operational responsibilities [REDACTED]



Mr van der Woude is a director of over Uber companies.

39. JB informed TfL that it had conducted investigations into certain of Uber's markets in the US and the UK. They had conducted "only limited investigations concerning markets for which Person C [Ms Bertram] has accountability for operational decisions and certain of the markets where the operating companies are those of which Person E [Mr van der Woude] is a director". No reliable conclusions had been formed as to the potential use of Greyball technology for the purposes of interfering with or impeding regulatory enforcement in those jurisdictions outside the UK and Ireland. However, it "is a possibility in [REDACTED] jurisdictions outside of the UK and Ireland".
40. No detail is provided about [REDACTED] jurisdictions' despite TfL requesting comprehensive answers. Such investigations outside the US and UK might conceivably cover jurisdictions for which Ms Bertram has operational responsibility for or where Mr van de Woude is a director. JB and ULL have declined to provide such information.
41. The letter further explained that Ms Bertram was party to email correspondence in 2015 which contemplated the possible use of Greyball technology as a means of addressing what "appeared to be potentially inappropriate action by local law enforcement". Details of these communications, the allegedly inappropriate action of local law enforcement, and the other parties to the correspondence have not been provided. JB also failed again to provide details of which jurisdictions these communications applied to, although it does not assert that the discussions related to a jurisdiction which is not under Ms Bertram's operational control.
42. We do not accept the assertions in ULL's and JB's letters that the aforementioned actions by senior officials have had, or will have no impact on ULL's performance of its licensed activity and are accordingly irrelevant to whether ULL is a fit and proper person to hold a licence in London.
43. Ms Bertram was the nominated representative on ULL's licence applications in 2012. On 18 August 2017, Ms Bertram was appointed as a Director of ULL and was the nominated representative of the licence on ULL's licence application made to TfL on the same date. However, on 31 August 2017 ULL wrote to advise that she was stepping down; that she had resigned as a Director of ULL on 30 August 2017; and that, although she will continue to have operational responsibility elsewhere within the Uber group of companies, she will no longer be engaged at ULL by 17 September 2017 (prior to the expiry of the existing licence).
44. We consider that Ms Bertram's conduct – in particular her correspondence with TfL – has been unsatisfactory and unhelpful. Ms

Bertram was the Regional General Manager for Northern Europe and was plainly of sufficient seniority to be regarded as a directing mind of ULL. She first wrote to TfL regarding Greyball on 24 March 2017. Some four months later, TfL has now been informed – after having to enquire repeatedly on this topic – that Ms Bertram was party to correspondence relating to the use of Greyball technology to evade enforcement in other jurisdictions for which she had personal responsibility. Within days of ULL identifying these facts, even though ULL had appointed Ms Bertram as a Director on 18 August 2017, in its letter of 31 August 2017, ULL informed TfL that Ms Bertram had moved on from her role, with an accelerated transition in the United Kingdom and had resigned on 30 August 2017.

45. It is clear from the correspondence received about Greyball that Uber employees in other jurisdictions escalated concerns direct to senior management (including Ms Bertram) regarding allegedly inappropriate action by local law enforcement. The use of Greyball technology was considered a means of addressing these incidents. These discussions took place in 2015, some two years before Uber globally committed to no longer use Greyball for the purposes of evading or impeding regulatory enforcement.
46. The responses of both ULL and JB have been limited and dilatory. Despite several requests for comprehensive information, JB's final letter simply alludes to the possibility of 'other jurisdictions' where Greyball technology might have been used for the aforementioned purposes. It can only be assumed that the 'relevant jurisdictions' which JB allude to might cover areas for which Ms Bertram had operational responsibility.
47. It is a matter which goes to ULL's fitness to be a licence holder that one of its directing minds knew about the potential and practice for Greyball technology to be used in other markets to impede regulatory enforcement, and in particular that she was party to correspondence about the use of Greyball for that purpose in areas under her operational responsibility. After TfL sought detailed information on this question ULL has failed to respond proactively and provide TfL with sufficient detail to comprehensively assess and understand the scope of this possible issue and its relevance to this jurisdiction.
48. In the absence of any other explanation, TfL infers that ULL's new corporate governance arrangements have been implemented at least in part as a result of the further enquiries made by TfL. We also surmise that the significant changes to the directorship of ULL were also at least in part the result of these enquiries concerning Greyball. ULL's correspondence has not been frank or open (as we would expect between an operator and the licensor/regulator). Furthermore, ULL appears to have recognised that its historic systems and conduct were not satisfactory.

49. Mr van der Woude was a director of ULL until 18 August 2017 when he resigned. ULL informed TfL of his resignation in its letter of 31 August 2017 and confirmed he has no operational responsibility for the London operation. He remains a director of over [REDACTED] other Uber companies. Despite requests for comprehensive information, JB have declined to provide specific information about investigations on use of Greyball technology in jurisdictions for which Mr van de Woude is a director. It can only be assumed that the [REDACTED] 'relevant jurisdictions' which JB allude to might cover areas for which he is a director. We note that press reports refer to the possible use of Greyball technology to impede regulatory enforcement in Australia and South Korea. Mr van de Woude is a director of Uber Australia Pty Ltd and Uber Korea Holdings LLC.
50. It is relevant to ULL's fitness to be a licence holder that its previous director holds directorships in other countries where there is a possibility that Greyball technology has been used for the purposes of interfering with or impeding regulatory enforcement. It has been admitted by ULL that Mr van de Woude had authority to authorise the use of Greyball technology in other jurisdictions by virtue of his position within the Uber group.
51. Although Ms Bertram and Mr van der Woude are no longer Directors of ULL, TfL remains concerned as to ULL's lack of candour in relation to the enquiries made concerning the use of Greyball technology, much of which was provided by JB and Helen Fletcher (Legal Director) on behalf of ULL. As explained in paragraphs 30, 39 and 40 above, there remain gaps and unanswered questions, which means that the full extent of the use of Greyball technology has not fully been addressed by ULL regardless of the identity of the senior management involved. We are also concerned that the changes to governance arrangements and senior management have only been made as a result of the pressure placed on ULL through our correspondence, and not through a desire to ensure that ULL is acting appropriately.
52. In conclusion, while we have been given assurances by ULL that it has not deployed the use of Greyball technology in London for the purposes of evading or interfering with regulation, the same cannot be said of other jurisdictions in which senior members of ULL had responsibility. It has taken extensive correspondence with ULL and JB and there remains a lack of transparency in certain areas. The changes made by ULL with regards to senior ULL officials and the implementation of a strict governance process appear to have been made to satisfy TfL as to their fitness and propriety at the point in time when we are considering their licence application. We consider that this is relevant to ULL's fitness and propriety in at least three respects:
- a) ULL's failure to correspond with TfL in an open, frank and transparent manner on important questions of legitimate interest to TfL as regulator;

- b) The historic conduct of senior staff within ULL who were aware that Greyball technology was being considered as a means of evading regulatory enforcement in jurisdictions for which they had direct responsibility;
- c) ULL's 'reactive' approach, which appears to be driven (at least in part) by TfL's persistence and enquiries.

## **Corporate responsibility**

53. TfL is concerned about a number of ULL's activities and conduct which have an impact on the safety and security of the public and demonstrate a lack of corporate responsibility, and cumulatively, demonstrate that ULL is not fit to hold a PHV operator's licence based on a lack of corporate responsibility. Examples are provided below.

### *Safety and criminal behaviour reporting*

54. On 12 April 2017, the Metropolitan Police wrote to TfL and set out its concerns that ULL had not reported allegations of serious criminal offences by its drivers, and that such behaviour was unacceptable. The Police referred to circumstances in which a driver had committed two sexual offences, neither of which were reported to the Police by ULL. References were also made to several other reports of criminal offences made by passengers to ULL but were not reported directly to the police. In relation to two public order offences, the letter said that the delay in reporting meant that no action could be taken as the period in which proceedings could be brought in the Magistrates' Court had expired. The letter noted that ULL was proactive in reporting lower level document frauds to the Police (as well as to TfL). The letter explained that there were two concerns, firstly that it seems ULL decides what to report; less serious matters / less damaging to reputation over serious offences; and secondly by not reporting to the police promptly ULL allows situations to develop that affect the security and safety of the public. TfL wrote to ULL on 28 July 2017 and sought its response to the Metropolitan Police's letter.

55. ULL stated in its reply of 8 August 2017 that proactive reporting to the police is a sensitive area and that it tries to balance its regulatory and privacy obligations. The letter states that ULL's general policy is that the choice of whether to make a police report is that of the victim, but where appropriate, it will encourage a Rider to report an incident to the police. It reports issues of fraud to the Police because it is the victim. It also states that it complies with its legal obligations to report incidents involving deactivation of a driver to TfL.

56. ULL also set out a number of other activities that it undertakes in relation to collaborative working with the police including a dedicated Law Enforcement Response Team which is responsible for working

directly with the police and other law enforcement agencies to support investigations about incidents involving a partner-driver, or rider on and off the Uber app, a dedicated Law Enforcement Portal, as well as giving examples of ULL's collaboration with the police during terrorist incidents.

57. With regard to the alleged sexual assaults referred to by the police, ULL provided details to TfL of its decision to dismiss the driver on 21 May 2016. Upon notification, TfL immediately suspended the driver on 23 May and notified the police on the same day. Further information was requested from ULL to assist TfL's investigation. However, despite the seriousness of this matter and the need to obtain information urgently, it was necessary to ask ULL to provide the information more than once. It is expected that a responsible operator would respond immediately in respect of matters of public safety to ensure that it can take necessary action against the driver. ULL's approach falls below this expectation.
58. The handling of the matters raised in the letter from the police gives concern to TfL about the importance which ULL attaches to the safety of its passengers. Without these issues being brought to our attention by third parties, such as the police, TfL would not be aware of ULL's approach to these matters. TfL has considered ULL's response and remains concerned about ULL's approach.

#### *Push Doctor*

59. ULL confirmed that between 22 August 2016 and 23 September 2016 it conducted a trial of Push Doctor, an online GP service that is designed to perform medical checks. ULL stated in its letter dated 14 July 2017 that the service was trialled in an attempt "to make use of an innovative solution to save applicants for a private hire driver's licence both time and money". As TfL did not accept medical reports received from driver applicants that had been issued by Push Doctor, ULL ceased directing their drivers to this service.
60. PHV drivers must be medically fit in order to be granted a licence. This means meeting the DVLA Group 2 medical standards which are the same standards applied to other professional drivers such as HGV drivers. Driver applicants are requested to undergo a medical examination with a qualified medical practitioner who has access to their full medical records. The doctor then completes a medical form, which is submitted to TfL. The DVLA is legally responsible for deciding if a person is medically unfit to drive. TfL, using our Occupational Health department, which employs medical experts, assess the contents of the medical form and determine whether the applicant meets DVLA Group 2 medical standards. As part of the medical examination, registered medical practitioners are required to provide information on the form such as the applicant's blood pressure and eyesight. A satisfactory and reliable examination of those kinds would

require an examination in person. Information on existing medical conditions is also required.

61. The medical fitness of PHV drivers is of paramount importance for the public safety of passengers and other road users. The DVLA standards emphasise that safe driving requires the involvement of vision, visuospatial perception, hearing, attention/concentration, memory, insight/understanding, judgement, adaptive strategies, good reaction time, planning/organisation, ability to self-monitor, sensation, muscle power/control and coordination. Injury or disease may affect any one or more of these abilities.
62. We consider that it is obvious that a comprehensive medical examination of the type required for a PHV licence applicant must be conducted in person. ULL's introduction and promotion of a service whereby prospective PHV drivers were medically examined via video link was unacceptable and inappropriate. Approximately 800 applications from new and existing applicants had undergone a medical assessment with Push Doctor via video link. Dealing with these applications caused additional pressure to the licensing system in order to ensure that proper medical assessments were carried out.
63. ULL's letter of 14 July 2017 states that ULL ceased promoting the service once TfL rejected those applications which included medical checks obtained through Push Doctor. While that is true, ULL only did so following an intervention from TfL. Encouraging drivers to undergo medical assessments which are clearly and obviously unsatisfactory demonstrates a lack of regard to public safety and security which gives TfL cause for concern.

*Enhanced criminal records certificates*

64. Applicants for a private hire vehicle driver's licence must obtain an enhanced criminal records certificate (ECRC) from the Disclosure and Barring Service (DBS) which discloses details of any spent convictions or cautions. There are important public protection reasons for this.
65. TfL is a registered body that has statutory powers to apply for ECRCs for applicants of PHV driver's licences. In 2011, TfL appointed another registered body, GBGroup, to obtain ECRCs for PHV applicants on its behalf. TfL's policy at the time was that it would consider ECRCs which have been obtained as part of the recruitment process for another job, provided the ECRC had been issued in the past three months with the same level of checks as required by TfL.
66. In its letter of 14 July 2017, ULL explained that "From March 2015 until recently, ULL suggested the service provider Onfido to those persons enquiring via Uber's 'Ignition' programme to obtain a DBS as part of their Private Hire licence application." TfL's initial position was that it would accept ECRCs which had been obtained by Onfido in



accordance with its policy that it would accept ECRCs for other roles which are no older than three months.

67. However, in late 2016, the DBS highlighted an issue with Onfido obtaining ECRCs, as they were not doing so on behalf of TfL. The DBS, therefore, questioned whether they had legal powers obtain them. Following correspondence with DBS, TfL has adopted a new policy on accepting ECRCs which have not been obtained by GBGroup.

68. During the course of correspondence between TfL and Onfido, Onfido confirmed that its identification checks of drivers were undertaken by ULL. This raised concerns for TfL as to the reliance that it could place on the ECRCs obtained. Checking the identification of the applicant for an ECRC is a crucial element of the ECRC process. ULL was not in a position to conduct those checks independently. TfL has concerns about any private hire operator conducting identification checks as part of the DBS process as we are keen to ensure impartiality. In a letter dated 2 September 2017, ULL stated that "Onfido has provided training to 16 Uber representatives in the DBS application process and requirements in order to enable them to check applicant documents prior to the application being submitted and has advised as to the types of documents which are accepted by the DBS for the purposes of their background check".

69. TfL considers that it is a vital part of the ECRC process that - in order to ensure the accuracy and integrity of the results - identification checks should be carried out independently. A prospective employer (or partner) cannot provide that independent checking service as it compromises the reliance upon which TfL as regulator can place on the results. ULL's approach in arranging for its staff to undertake such checks was unacceptable and demonstrates a lack of regard to the safety and security of passengers. TfL does not consider that ULL took into account the safety of the public using its services when it encouraged drivers and made arrangements for ECRCs to be obtained by Onfido.

## **Conclusions**

70. TfL has concluded that ULL is not a fit and proper person to hold a PHV operator's licence for each of the following reasons:

- a) ULL's provision of materially false information about its booking acceptance process in 2014 and 2015, as compared to the reality as explained in later correspondence and clarified by the IT Architect's Investigation. ULL has attempted to play down the changes. It says that it has not misled TfL and has been consistent in its explanation of the process. However, the evidence shows that this is incorrect. ULL's description of its processes in 2014 was misleading on a material point. (TfL is

currently minded to think the point is determinative, and that ULL's current operating model is accordingly unlawful, but the provision of materially false information is relevant to ULL's fitness and propriety irrespective of this point.) Either ULL knew that the information provided was misleading, or it did not understand its own systems sufficiently (despite assertions to the contrary). In either case, we consider that this is sufficient to undermine ULL's fitness to hold a London PHV Operator's Licence. It is essential, in the interests of protecting the public, that TfL can be satisfied that licensed operators provide accurate, full and frank information that TfL can rely on. The fact that TfL is unable to do so gives us serious concerns.

- b) ULL's responses in relation to Greyball. TfL has had to engage in extensive correspondence to obtain the (still incomplete) information that it has now. There remain questions about the extent to which, how often and where ULL Directors and Senior Managers were aware of the possible use of Greyball to evade regulatory enforcement in other jurisdictions. More importantly, ULL's responses to TfL's questions were partial and/or incomplete. TfL has had to repeatedly pursue and probe ULL on this issue in order to obtain the (still incomplete) picture that it now has. This undermines TfL's confidence in ULL, and in its approach towards its regulator. Consistent with its conduct in relation to other issues, ULL's response to TfL's enquiries has been entirely 'reactive' and the changes to its regulatory systems are not sufficient to give TfL confidence about its fitness and propriety.
- c) ULL's approach to the safety and security of the public, including its approach to reporting serious criminal incidents, and the use of Push Doctor and Onfido, gives TfL serious concerns about its apparent lack of regard to the safety of its customers, such that TfL concludes that it is not fit and proper to hold a licence.

## **Right of Appeal**

ULL may appeal our decision, information on how to do this is enclosed with this letter, please read the notice entitled 'Right of Appeal'.

Section 26(1) of the Act states:

"If any decision of the [licensing authority] 1 against which a right of appeal is conferred by this Act—

(a) involves the execution of any work or the taking of any action;



(b) makes it unlawful for any person to carry on a business which he was lawfully carrying on at the time of the decision,

the decision shall not take effect until the time for appealing has expired or (where an appeal is brought) until the appeal is disposed of or withdrawn.”

We consider that the purpose of section 26(1), read in context, is to allow an existing licensee such as ULL, whose application for renewal of its licence is refused, to continue to carry on business until such time as its appeal is disposed of or withdrawn. It follows that, where (as here) the decision in question is a decision not to renew a licence, the effect of s. 26 is to treat that decision – for the period until the appeal is disposed of or withdrawn – as if it had been a decision to renew.

### **Additional Information**

If you have any further queries regarding this decision, please contact us via the details contained at the top of this letter. It is important you quote your reference number in all communication with us.

Yours sincerely



Helen Chapman  
**General Manager**  
**Taxi and Private Hire**

