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05 August 2025

Response to Hackney and Private Hire Policy 2025

Submitted by email to licensing@darlington.gov.uk

Dear Darlington Borough Council Licensing Team

CCTV

Uber is committed to working with local authorities to create a safer environment for everyone using and operating private hire vehicles. We believe that by adopting a forward-thinking, and technologically inclusive approach to CCTV policy, we can collectively achieve significant improvements in safety and accountability across the UK's private hire sector.

We understand this is a difficult regulatory area with a range of considerations to balance, including driver and passenger privacy. However, CCTV enables authorities as well as Operators to consider relevant footage and take more evidence-based decisions when investigating complaints. Drivers frequently tell us that they are in favour of CCTV and a 2024 survey by the National Private Hire and Taxi Association found that nearly 90% of drivers believe more should be done to safeguard them from aggressive or violent passengers.

As well as enabling more comprehensive and fairer investigation in response to complaints, CCTV serves as an effective deterrent, promoting good behaviour by all. It is used frequently in nearly all other transport settings including on buses, trains and the road network.

We encourage the Council to consider a strategy to reduce the cost of procuring and installing CCTV systems, which will maximise adoption among drivers. For example, Uber has technology within its App that allows drivers to record trips using the camera on their phone. We use this in many other countries that we operate in globally to good effect. As the driver uses our in-app technology, there is no cost involved to procure additional hardware. The fragmented approach to CCTV regulation in the Private Hire sector in the UK has made it challenging to enable this in our app in the UK.



Apart from video-based CCTV, we would also like to point out that it is worth considering audio recordings. In certain situations, audio recordings provide evidence which can lead to fairer outcomes of investigations than video footage alone. This is particularly true for complaints that relate to discrimination, sexual misconduct and inappropriate conversations.

Private Hire Livery

Uber has long held the view that licensing authorities should not impose any livery requirements on operators and private hire vehicles.

We support the recommendations made in section 8.12 of [DfT Best Practice Guidance](#) for the removal of livery on private hire vehicles.

Licensing authorities should not impose a livery requirement on private hire vehicles. The more distinctive a private hire vehicle is made to appear, the greater the chance that this might be confused with a taxi.... Licensing authorities' private hire vehicle signage requirements should be limited to the authority licence plate or disc and a "pre-booked only" door sign.

Modern technology, such as GPS tracking within smartphone apps, such as the Uber App, can often negate the need for livery as passengers can easily locate and identify their private hire vehicle using the information provided within the app (such as a driver's licence plate, vehicle make and licence number). We encourage riders to identify their driver by comparing the licence plate number on the vehicle with the number shown within the Uber app.

Some drivers have provided feedback to us that livery can be a burden for those who also use their vehicle for their own private usage. These drivers would prefer not to have to advertise their vehicle as a private hire vehicle, for example when dropping off or collecting their children from school or shopping at a local supermarket. Furthermore, highly visible signs on private hire vehicles, which identify them as such, may have the unintentional effect of increasing the incidence of plying-for-hire, in that passengers may assume that the trip is legal and legitimate due to the presence of signage.

Many drivers choose to multi-app to boost their earnings every week. Our experience across the UK demonstrates that ensuring drivers can access other work through multiple operators will be positive for drivers. GMB, Uber's recognised union, carries out regular driver engagement from which it is also clear that forcing drivers to work with one operator based on livery requirements limits drivers' earning potential.

Fire Extinguishers

Uber supports the removal of fire extinguishers in Hackney's and Private Hire Vehicles.

We would very much welcome the opportunity to discuss this further with Darlington Borough Council and can make ourselves available at your convenience.

Uber

Yours sincerely,

A handwritten signature in dark ink, appearing to be 'MF' with a long horizontal stroke extending to the right.

Matthew Freckelton Head
of Cities, UK

Uber