

Complaints Policy

Effective Date: 19/06/2026

1. Policy Statement

OWLANE LTD is committed to delivering safe, reliable, and professional private hire services. We understand that, occasionally, concerns or complaints may arise. We value all feedback, including complaints, as an opportunity to improve our service and maintain the trust of our customers, drivers, and regulatory partners, including Hertsmere Council.

2. Purpose of This Policy

This policy sets out how OWLANE LTD will handle, respond to, and record complaints to ensure:

- A clear, fair, and accessible complaints process.
 - Timely investigation and resolution.
 - Continuous improvement of our services.
 - Compliance with relevant licensing authority standards.
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3. What Is a Complaint?

A complaint is any expression of dissatisfaction about:

- The conduct of a driver.
 - A booking, journey, or vehicle used.
 - The actions or behaviour of any OWLANE LTD staff.
 - The company's service quality, policies, or procedures.
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4. Who Can Make a Complaint?

- Passengers and members of the public.
 - Drivers or staff members.
 - Local authorities or partner agencies.
 - Anyone affected by the actions of OWLANE LTD or its drivers.
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5. How to Make a Complaint

Complaints may be submitted via:

- **Email:** Info@owlane.co.uk
- **Telephone:** 07463332114 / 07918006541
- **Post:** OWLANE LTD, City Road, London, EC1V 2NX
- **In Person:** By appointment at our office.

To help us process a complaint quickly, we ask complainants to provide:

- Full name and contact details.
 - Details of the complaint (what happened, when, where).
 - Vehicle registration or driver details (if known).
 - Booking reference or journey information.
 - Any supporting evidence (screenshots, receipts, witness details).
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6. Complaint Handling Procedure

Stage 1: Acknowledgement

- All complaints will be acknowledged within **3 working days**.
- We will confirm receipt and provide a reference number for tracking.

Stage 2: Investigation

- Complaints will be assessed by a designated complaints officer or manager.
- Relevant parties (e.g. driver, passenger, booking agent) will be contacted for clarification.
- Where applicable, CCTV, GPS logs, or booking records may be reviewed.

Stage 3: Resolution

- A written response will be issued within **10 working days** of acknowledgement.
- If a delay occurs, the complainant will be informed with an updated timeline.
- Outcomes may include:
 - Apology or goodwill gesture.
 - Driver disciplinary action (warning, suspension, retraining).
 - System or policy review.
 - Referral to Hertsmere Council or other authorities if necessary.

Stage 4: Escalation

- If the complainant is dissatisfied with the outcome, they may request a review by a senior manager.

- A final response will be provided within **10 further working days**.

Stage 5: External Reporting

- If the complaint relates to a breach of licensing rules or public safety, OWLANE LTD will inform the Licensing Authority.
- Complainants may also report directly to:

Hertsmere Borough Council – Licensing Department

Website: <https://www.hertsmere.gov.uk/business/licensing/private-hire-hackney-carriage-licensing>

Email: customer.services@hertsmere.gov.uk

Phone: 020 8207 2277

7. Confidentiality and Data Protection

All complaints will be handled in accordance with the **UK GDPR** and OWLANE LTD's **Data Protection Policy**. Information will only be shared with those involved in the complaint or where legally required.

8. Monitoring and Record-Keeping

All complaints will be logged and monitored to:

- Identify recurring issues or trends.
- Ensure accountability.
- Inform staff training and service development.

Complaint records will be retained securely for **6 years**.

9. Complaints Log Template

Below is the standard template used internally to log and manage complaints:

OWLANE LTD – Complaints Log

Ref. No.	Date Received	Complainant Name & Contact	Details of Complaint	Driver/Staff Involved	Actions Taken	Outcome	Date Closed	Reported to Licensing (Y/N)
e.g. C001	01/06/2025	John Smith – 07800 123456	Driver late & rude	Driver #102	Investigation, driver retrained	Apology issued	06/06/2025	No

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10. Review and Approval

This policy will be reviewed **annually** or sooner if required by changes in legislation or guidance from Hertsmere Council.

Managing Director

A handwritten signature in black ink, appearing to be 'J. J.', is written over a light yellow rectangular background.

Revision Date: 19/06/2026

Data Protection Policy

Effective Date: 19/06/2026

1. Introduction

OWLANE LTD ("we", "our", "the Company") is committed to protecting and respecting the privacy of our clients, employees, and business partners. This Data Protection Policy outlines how we collect, process, store, and protect personal data in compliance with the **General Data Protection Regulation (GDPR)**, the **Data Protection Act 2018**, and any other relevant data protection laws.

This policy applies to all personal data processed by OWLANE LTD in the course of our private hire vehicle operations.

2. Data Protection Principles

OWLANE LTD adheres to the following data protection principles when processing personal data:

- **Lawfulness, Fairness, and Transparency** – Personal data is processed lawfully, fairly, and in a transparent manner.
- **Purpose Limitation** – Personal data is collected for specified, legitimate purposes and is not processed further in a manner incompatible with those purposes.
- **Data Minimization** – Personal data collected is adequate, relevant, and limited to what is necessary.
- **Accuracy** – Personal data is kept accurate and, where necessary, up to date.
- **Storage Limitation** – Personal data is stored in a form which permits identification of data subjects only for as long as necessary.
- **Integrity and Confidentiality** – Personal data is processed in a manner that ensures its security, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage.
- **Accountability** – OWLANE LTD takes responsibility for demonstrating compliance with the principles listed above.

3. Types of Personal Data We Process

We may process the following types of personal data:

- **Customer Data:** Full names, contact details (telephone number, email address), booking history, payment details, and preferences.
- **Driver Data:** Full names, contact details, driver's license details, vehicle details, and employment status.
- **Employee Data:** Full names, contact details, employment records, salary details, and health information (where applicable).
- **Business Partner Data:** Company details, contact information, contracts, and other business-related data.

4. Purpose of Processing Personal Data

We collect and process personal data for the following purposes:

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- To fulfil private hire vehicle bookings and transportation services.
- To manage driver and employee information for operational purposes.
- To comply with regulatory requirements, including those set by Hertsmere Council.
- To process payments for services rendered.
- To improve and personalize customer services.

5. Legal Basis for Processing Personal Data

We process personal data based on the following legal grounds:

- **Consent:** Where individuals have provided consent for us to process their data.
- **Contractual Necessity:** Processing is necessary for the performance of a contract (e.g., providing transport services).
- **Legal Obligation:** Compliance with legal obligations, such as providing data to regulatory bodies or authorities.
- **Legitimate Interests:** Where processing is necessary for the legitimate interests of the Company, provided this does not override the data subject's rights and freedoms.

6. Data Retention

Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected or to comply with legal or regulatory obligations. Once the data is no longer needed, it will be securely deleted or anonymized.

7. Data Sharing and Third Parties

OWLANE LTD does not share personal data with third parties, except in the following circumstances:

- **Service Providers:** We may share personal data with third-party service providers (e.g., payment processors, IT support, insurance providers) for the performance of our services. These third parties are contractually obligated to safeguard the data.
- **Regulatory Authorities:** We may be required to share personal data with local authorities, such as Hertsmere Council, or law enforcement agencies to comply with legal obligations.
- **Business Transfers:** In the event of a business merger, acquisition, or sale, personal data may be transferred as part of the transaction.

8. Data Security

OWLANE LTD implements appropriate technical and organizational measures to protect personal data from unauthorized access, disclosure, alteration, and destruction. These measures include:

- Encryption of sensitive data where applicable.
- Regular security assessments and audits.
- Employee training on data protection best practices.
- Limiting access to personal data to authorized personnel only.

9. Rights of Data Subjects

Individuals whose personal data we process have the following rights:

- **Right to Access:** The right to request copies of personal data we hold about them.
- **Right to Rectification:** The right to request correction of inaccurate or incomplete data.
- **Right to Erasure:** The right to request the deletion of personal data under certain circumstances.
- **Right to Restriction of Processing:** The right to request the restriction of processing under certain conditions.
- **Right to Data Portability:** The right to request the transfer of personal data to another service provider in a structured, commonly used format.
- **Right to Object:** The right to object to the processing of personal data for legitimate interests or direct marketing.

10. Complaints

If you believe that we have not adhered to this Data Protection Policy or that your data protection rights have been violated, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**.

11. Contact Information

For any questions or concerns regarding this policy or our data protection practices, please contact us at:

Email: Info@owlane.co.uk

Phone: 07463332114 / 07918006541

Managing Director

Revision date: 19/06/2026



Disclosure and Barring Service (DBS) Policy

Effective Date: 19/06/2026

1. Policy Statement

OWLANE LTD is committed to ensuring the safety and security of our passengers, staff, and the wider public. We recognise our duty to safeguard vulnerable individuals and maintain public trust by ensuring that all staff in relevant roles are appropriately vetted through the **Disclosure and Barring Service (DBS)**.

This policy sets out how OWLANE LTD manages DBS checks and compliance for employees and contractors in relevant roles.

2. Purpose

The purpose of this policy is to:

- Identify which roles require a DBS check.
 - Ensure the DBS process is carried out fairly, lawfully, and in line with current legislation.
 - Protect individuals by preventing unsuitable persons from working in positions of trust.
 - Comply with the licensing conditions and best practices outlined by **Hertsmere Council**.
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3. Scope

This policy applies to:

- All staff and contractors in **regulated or relevant roles**, including:
 - Private hire vehicle drivers.
 - Office staff involved in dispatch or customer support.
 - Managers or supervisors with access to sensitive passenger or driver data.
 - Any employee with direct access to vulnerable passengers.

It does **not** apply to staff in roles that do not involve access to sensitive data or contact with the public (e.g. administrative or finance roles with no public interface).

4. Types of DBS Checks

OWLANE LTD recognises the following levels of DBS checks:

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- **Basic Check:** Shows unspent convictions only. May be used for staff in lower-risk roles.
- **Enhanced Check:** Shows spent and unspent convictions, cautions, reprimands, and warnings, plus information from local police if relevant.
- **Enhanced Check with Barred Lists:** Also includes checks against the children's and/or adults' barred list(s). Required for regulated activity with vulnerable groups.

All **licensed drivers** must undergo an **Enhanced DBS Check with Barred Lists**, in line with local authority licensing requirements.

5. Recruitment and Vetting Process

- All staff applying for relevant roles must undergo a DBS check before employment or engagement.
- Offers of employment may be conditional on the outcome of a DBS check.
- Re-checks will be conducted **every 3 years** or more frequently if required by **Hertsmere Council** or company policy.
- OWLANE LTD may subscribe to the **DBS Update Service** for ongoing monitoring, where applicable.

6. Handling and Storage of DBS Information

- DBS certificate information will be handled in accordance with the **Data Protection Act 2018** and **GDPR**.
- Disclosure information will be:
 - Kept confidential and secure.
 - Accessed only by authorised personnel.
 - Retained for no longer than necessary (typically no more than 6 months after the recruitment decision).
- A record will be kept of:
 - The date of issue.
 - The reference number.
 - The type of check.
 - The outcome (clear or further review required).

7. Risk Assessment Process

Where a DBS check returns information (e.g. criminal history), OWLANE LTD will:

- Conduct an individual risk assessment considering:
 - The nature and relevance of the offence(s).
 - The time elapsed since the offence.

- The applicant's explanation.
 - The role being applied for.
 - Make a fair and objective decision about employment or continued engagement.
 - Where appropriate, consult legal or safeguarding experts and the licensing authority.
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8. Ongoing Disclosure Requirements

All staff in relevant roles must:

- Immediately report any new convictions, cautions, or investigations that may affect their role.
 - Understand that failure to disclose relevant information may result in disciplinary action, including dismissal.
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9. Equal Opportunities and Fair Treatment

OWLANE LTD is committed to fair treatment of all applicants and staff, regardless of any criminal background. A conviction does not automatically prevent employment, unless it poses a safeguarding or legal risk.

Our policy complies with the **Rehabilitation of Offenders Act 1974**, and decisions are made on a case-by-case basis.

10. Monitoring and Review

- This policy is reviewed annually or when there are significant legal or regulatory changes.
- All managers and recruiters receive training on DBS and safeguarding responsibilities.

Managing Director



Revision Date: 19/06/2026

Lost Property Policy & Procedure

Effective Date: 19/06/2026

1. Policy Statement

OWLANE LTD is committed to ensuring that any items left behind in our private hire vehicles are handled responsibly and returned to their rightful owners wherever possible. This Lost Property Policy outlines the steps our drivers and staff must take when lost items are found and how customers can report or claim their property.

2. Purpose

This policy is intended to:

- Provide clear guidance to drivers and staff on handling lost property.
- Ensure lost property is securely stored and logged.
- Facilitate the timely return of lost items to owners.
- Comply with local authority licensing conditions and general duty of care.

3. Scope

This policy applies to:

- All OWLANE LTD private hire drivers (employed or self-employed).
- All passengers and customers.
- Office staff responsible for handling enquiries and storing lost items.

4. Definitions

- **Lost Property:** Any item unintentionally left behind in a private hire vehicle or in OWLANE LTD's premises.
- **Valuable Item:** Includes mobile phones, laptops, wallets, purses, passports, ID documents, bank cards, and jewellery.

5. Procedure for Handling Lost Property

Step 1: Driver Responsibility

- At the end of each journey, drivers must check their vehicle for any left items.
- If an item is found, the driver must:
 - Secure the item in a safe place within the vehicle until it can be handed in.
 - Inform OWLANE LTD as soon as possible via the designated contact method (e.g. call, app, or email).
 - Record the time, date, and booking reference (if available).

Step 2: Handing in Lost Property

- All found items must be handed to OWLANE LTD's office within **24 hours**.
- Items must be logged into the **Lost Property Log** (see section 8 below).
- High-value or sensitive items (e.g. bank cards, passports, medication) must be stored in a locked cabinet accessible only to management.

Step 3: Contacting the Owner

- If the owner is identifiable (e.g. from booking records or ID), OWLANE LTD will attempt to contact them within **24 hours**.
- Arrangements for collection or return (e.g. scheduled pick-up or delivery via recorded mail at the owner's expense) will be agreed with the claimant.

Step 4: Retention Period

- Lost property will be kept for a period of **28 days**.
- After this period, unclaimed items may be:
 - Donated to charity (for non-valuable items).
 - Properly disposed of.
 - Sent to the local authority or police (for passports, ID, or sensitive items).

6. Lost Property Report by the Public

If a customer believes they have left an item behind:

- They should contact OWLANE LTD via:
 - **Phone:** 07463332114 / 07918006541
 - **Email:** info@owlane.co.uk

They must provide:

- Passenger information

- Date and time of journey.
- Pickup and drop-off locations.
- Description of the item.
- Driver or vehicle information if known.

7. Unclaimed or Dangerous Items

- Items suspected to be illegal, dangerous, or hazardous (e.g. weapons, drugs) will be reported to **Hertsmere Council** and/or **local police** immediately.
 - OWLANE LTD will not be responsible for items unclaimed beyond the 28-day period.
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8. Lost Property Log Template

Ref. No.	Date Found	Driver Name/ID	Item Description	Owner Identified (Y/N)	Action Taken	Date Returned/Disposed	Officer Initials
LP001	01/06/2025	Driver #101	Black wallet	Yes	Returned to owner	02/06/2025	AM
LP002	03/06/2025	Driver #104	Set of keys	No	Held 28 days then disposed	01/07/2025	TK

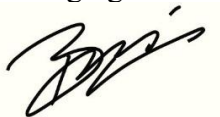
9. Staff & Driver Responsibilities

- **Drivers** must act responsibly and promptly when finding lost property.
 - **Office Staff** are responsible for logging, storing, and processing lost property.
 - **Managers** are responsible for monitoring the log, auditing records, and ensuring compliance with this policy.
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10. Review and Compliance

This policy will be reviewed annually or as required by updates in guidance from **Hertsmere Council** or changes in legislation.

Managing Director



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