

Integrated Impact Assessment (IIA) of Taxi and Private Hire Proposals

Final Report

Transport for London

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Quality information

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Glossary of abbreviations, acronyms and terms

Abbreviation/ acronym	Full name
DfT	Department for Transport
DBS	Disclosure Barring Service
EHRC	Equality and Human Rights Commission
EqIA	Equality Impact Assessment
GLA	Greater London Authority
IoD	Index of Deprivation
IIA	Integrated Impact Assessment
LB	London Borough
LGBT	Lesbian, Gay, Bisexual and Transgender
ONS	Office for National Statistics
PCG	Protected Characteristic Group
PHV	Private Hire Vehicle (also referred to as minicabs)
PSED	Public Sector Equality Duty
Taxis	Also referred to as black cabs
TfL	Transport for London

1. Introduction

Purpose

- 1.1 AECOM has been commissioned by Transport for London (TfL) to undertake an Integrated Impact Assessment (IIA) of:
 - Taxi and private hire vehicle (PHV) proposals for implementing recommendations in the Department for Transport's (DfT) Statutory Taxi and PHV Standards;
 - Additional proposals aimed at improving the safety of taxi passengers and improving taxi services; and
 - Additional proposals aimed at improving the safety of PHV passengers and improving PHV services.
- 1.2 This includes an assessment of:
 - Equality impacts (assessment of proposals on protected characteristic groups¹ as covered by the Equality Act 2010);
 - Business/economic impacts;
 - Environmental impacts;
 - Crime and disorder impacts; and
 - Health impacts.
- 1.3 As a public body TfL's Licensing and Regulation department is responsible for licensing and regulating taxi and private hire services, reviewing and setting taxi fares, appointing taxi ranks, improving travel information and making services safer and more accessible.
- 1.4 This IIA provides a consideration of potential direct and indirect impacts (both positive and negative) associated with the taxi and PHV proposals. The approach draws on evidence from secondary and primary data sources including feedback from stakeholder engagement.
- 1.5 This report supports TfL to fulfil its equality duties in relation to the Public Sector Equality Duty (PSED) and also provides a set of recommendations to assist TfL with discharging their ongoing PSED in the process of implementing the proposals.

Overview of taxi and PHV proposals

- 1.6 In February 2019 the DfT consulted on proposed statutory guidance to taxi and PHV licensing authorities on how to use their licensing power to protect children and vulnerable adults. In July 2020 the DfT published the final Statutory Taxi and Private Hire Vehicle Standards² outlining around 80

¹ Protected characteristic groups considered in the Equality Act 2010 include: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

² DfT (2020). Statutory taxi and private hire vehicle standards. Available at:
<https://www.gov.uk/government/publications/statutory-taxi-and-private-hire-vehicle-standards>

recommendations the DfT expect to be implemented unless there is a “compelling reason not to”. These recommendations cover:

- Referrals to the Disclosure and Barring Service and the Police;
- Licensee self-reporting;
- Overseas convictions;
- Criminal convictions and rehabilitation;
- Criminality checks for drivers, vehicle proprietors and PHV operators ;
- Complaints against licensees;
- Safeguarding awareness;
- Language proficiency;
- Record keeping; and
- Suspension and revocation of driver licences.

1.7 The Standards include recommendations that will impact on taxi & PHV driver licence applicants, currently licensed taxi & PHV drivers, taxi & PHV vehicle licensees, PHV operators and taxi and PHV passengers.

1.8 TfL is already compliant with the majority of the recommendations in the Statutory Standards but is consulting on proposals for implementing recommendations it is not compliant with and which may have significant impacts on taxi and PHV passengers or the taxi and PHV trade. In addition TfL is seeking to implement additional proposals to improve safety and services.

1.9 At the time the IIA was undertaken these proposals were split into two parts – Part A and Part B.

- Appendix A sets out the proposals for how TfL will implement the recommendations in the DfT’s Statutory Standards that it is not currently compliant with (Part A proposals); and
- Appendix B sets out additional proposals to improve safety and services (Part B proposals).

1.10 TfL’s consultation will be split into three parts:

- **Part 1:** Proposals for how TfL will implement the recommendations in the DfT’s Statutory Taxi and PHV Standards
- **Part 2:** TfL is seeking views on how they can further improve safety for taxi passengers, although not consulting on any specific proposals
- **Part 3:** Proposed changes to some of the current licence conditions and requirements for PHV operators, proposed new licensing conditions and requirements for all PHV operators, and areas where TfL is seeking views but not proposing changes at this stage

1.11 Table 1-1 lists the reference numbers used in the IIA and summarises the final proposals that will be included in TfL’s consultation. Stakeholders were asked for their views on some items that have not been taken forward as proposals for the consultation.

Table 1-1: Part 1, 2 and 3 proposals

IIA Reference	Consultation Reference	TfL Consultation Summary
1 (A)	Part 1: DfT 10: Changing licensing policies and requirements	Wherever possible, TfL propose to apply any new licensing policies immediately. That where appropriate, when there are changes in licensing requirements TfL will review the licences already issued. In order to re-assess licensees' fitness if there are changes in licensing requirements, TfL is proposing that for taxi drivers and PHV drivers TfL retain the DBS certificates where information is recorded so they are aware of any criminal history that it disclosed.
2 (A)	Part 1: DfT 1: Licensee self-reporting	TfL propose to: - Prescribe a licence condition that will require all taxi drivers to inform TfL of any arrest and release, charge or conviction of any offence within 48 hours. This prescribed condition will apply to all licensed taxi drivers with immediate effect - Attach a condition to every PHV driver licence issued on or after the implementation date that the licence holder informs TfL of any arrest and release, charge or conviction of any offence within 48 hours. The condition will be applied to all PHV drivers over the three-year renewal cycle - Amend the regulation that requires PHV operators to notify TfL of convictions within 14 days to state 48 hours and extend the requirement to include "arrest and release, charge, caution or conviction"
3 (A)		
4 (A)		
5 (A)	Part 1: DfT 2: Complaints against licensees	TfL propose to: - Require all taxis and PHVs to display signage that will include information on how to make a complaint to TfL alongside other statutory and important safety information - Prescribe a condition that will require every taxi driver to ensure that the taxi they are driving is displaying the signage. This prescribed condition will apply to all licensed taxi drivers with immediate effect - Attach a condition to every PHV driver licence issued on or after the implementation date that the PHV they are driving is displaying the signage
6 (A)		

IIA Reference	Consultation Reference	TfL Consultation Summary
7 (A)	Part 1: DfT 3: Overseas convictions	TfL propose to change their current Certificate of Good Conduct (CoGC) requirements and require from applicants for a taxi driver, PHV operator and PHV driver licence a CoGC to cover any periods outside the UK since the applicant was 18. When renewing, taxi drivers and PHV drivers will have to declare any further extended periods when they have lived overseas for three or more continuous months since they were 18, and then obtain a CoGC accordingly. An 'extended period' will be three or more continuous months.
8 (A)	Part 1: DfT 4: Driver DBS checks	TfL propose to amend their existing DBS requirements and: - To introduce an application requirement that requires all applicants for a taxi driver's or PHV driver's licence, both new and renewal, to provide evidence of registration with the DBS Update service - To introduce a licence condition that once licensed, all taxi drivers and PHV drivers maintain continuous registration with the DBS Update service - That once taxi drivers and PHV drivers have registered with the Update service, TfL will undertake six monthly checks with the DBS
9 (A)		
10 (A)	Part 1: DfT 5: Safeguarding training and English language skills	TfL has have already introduced a safety, equality and regulatory understanding assessment and an English language requirement for PHV drivers. TfL propose to introduce a mandatory safety, equality and regulatory understanding assessment for all new and renewing taxi drivers. TfL will continue to monitor the speaking and listening skills taxi drivers demonstrate when completing the Knowledge to ensure that London taxi drivers' English skills meet the objectives in the Standards. The safety, equality and regulatory understanding assessment will be used to determine new and renewing taxi drivers' reading and writing skills.
11 (A)	Part 1: DfT 6: Vehicle owner DBS checks	At this time TfL do not propose to introduce any additional requirements for either taxi or PHV owners.
12 (A)		
13 (A)		
14 (A)		
15 (A)		TfL propose:

IIA Reference	Consultation Reference	TfL Consultation Summary
16 (A)	Part 1: DfT 7: PHV operator DBS checks	- To introduce a new licence condition that will require all existing licensed PHV operators to provide a basic DBS check each year within 28 days of the anniversary of the licence issue date - To require all new applicants for a PHV operator's licence to provide a basic DBS certificate annually - That all basic DBS checks are obtained through TfL's service provider
17 (A)		
18 (A)		
19 (A)	Part 1: DfT 8: PHV Operator booking and dispatch staff	TfL propose: - To prescribe a new licence condition that all PHV operators must keep a register of booking and dispatch staff - That the information that must be included in the register will include name, date of birth, and reference number and date of DBS check - To require all new and renewing applicants for a PHV operator licence to provide their policy on employing ex-offenders with their application
20 (A)		
21 (A)		
22 (A)	Part 1: DfT 9: PHV operator booking records	TfL propose to amend the existing PHV operator booking record requirement to: - Include the name of any individual that responded to the booking request and the name of any individual that dispatched the vehicle - Specify that the booking records must record the driver's PHV licence number - Specify that the booking records must record the vehicle registration mark (VRM) of the vehicle
23 (A)		
27 (A)	Part 1: DfT 7: PHV operator DBS checks	TfL propose: - To introduce a new licence condition that will require all existing licensed PHV operators to provide a basic DBS check each year within 28 days of the anniversary of the licence issue date - To require all new applicants for a PHV operator's licence to provide a basic DBS certificate annually - That all basic DBS checks are obtained through TfL's service provider

IIA Reference	Consultation Reference	TfL Consultation Summary
28 (A)	Part 1: DfT 8: PHV Operator booking and dispatch staff	TfL propose: • To prescribe a new licence condition that all PHV operators must keep a register of booking and dispatch staff • That the information that must be included in the register will include name, date of birth, and reference number and date of DBS check • To require all new and renewing applicants for a PHV operator licence to provide their policy on employing ex-offenders with their application
29 (A)	Part 1: DfT 1: Licensee self- reporting	TfL propose to: • Prescribe a licence condition that will require all taxi drivers to inform TfL of any arrest and release, charge or conviction of any offence within 48 hours. This prescribed condition will apply to all licensed taxi drivers with immediate effect • Attach a condition to every PHV driver licence issued on or after the implementation date that the licence holder informs TfL of any arrest and release, charge or conviction of any offence within 48 hours. The condition will be applied to all PHV drivers over the three-year renewal cycle • Amend the regulation that requires PHV operators to notify TfL of convictions within 14 days to state 48 hours and extend the requirement to include “arrest and release, charge, caution or conviction”
24 (B)	Part 3: Op7: Data breaches	TfL propose that all PHV operators would be required to notify TfL within 72 hours of all data breaches, material data losses or infringements of data protection law affecting the data of UK drivers and/or customers, whether those incidents occur in the United Kingdom or elsewhere.
25 (B)	Part 3: Op9: Licence checks	TfL propose that all PHV operators should: • Regularly and frequently check the validity of PHV driver and PHV licences before making the driver and vehicle available to carry out private hire bookings • Use a TfL platform such as the licence checker (or similar) to carry out the checks
26 (B)	Part 3: Op8: Document checks	TfL propose that all PHV operators must have in place and make use of appropriate checks to: • Verify that all documents provided by PHV drivers are legitimate

IIA Reference	Consultation Reference	TfL Consultation Summary
		- Confirm documents relate to the PHV driver providing them - Verify that all documents (e.g. licence, insurance, etc.) provided by PHV owners are legitimate - Confirm PHV documents relate to the relevant vehicle The checks will need to be carried out when a PHV driver or PHV is first registered with a PHV operator and then ongoing checks will be required once the driver or vehicle are available to the PHV operator to fulfil bookings.
30 (B)	Part 3: Op2: Safety related complaints	TfL propose that within 48 hours of receiving a safety related complaint about a PHV driver, a PHV operator should: - Assess whether it is necessary to suspend or remove that driver account pending further inquiries - Notify TfL if they have suspended or removed a PHV driver
31 (B)		TfL propose that within 48 hours of receiving a safety related complaint about a PHV driver, a PHV operator should: - Assess whether it is necessary to suspend or remove that driver account pending further inquiries - Notify TfL if they have suspended or removed a PHV driver
32 (B)	Part 3: Op3: Lost property	TfL propose that PHV operators will be required to make reasonable attempts to contact the owners of the lost property, where the owner is known and can be contacted.
33 (B)	Part 3: Op4: Complaints information	TfL propose that booking confirmations from PHV operators will have to include information on how passengers can make a complaint to TfL and the operator.
34 (B)	Part 3: Op5: Operating model changes	TfL propose that PHV operators must notify TfL of any material changes to their operating model at least 28 days before the change is made.
35 (B)	Part 3: Op11: Ridesharing	TfL is asking if there should be additional licensing requirements or conditions for all PHV operators who offer ridesharing services.
	Part 3: Op12: Conditions for larger PHV operators	TfL is asking for views on whether there should be additional conditions for PHV operators in the larger tiers.
36 (B)	Part 3: Op10: Public liability insurance	TfL is asking if the current minimum of £5 million for public liability insurance is still appropriate.

IIA Reference	Consultation Reference	TfL Consultation Summary
37 (B)	Part 3: Op6: Complaints records	TfL propose that PHV operators will have to retain complaints records for three years instead of 12 months.
38 (B)	Part 1: DfT 5: Safeguarding training and English language skills	TfL has already introduced a safety, equality and regulatory understanding assessment and an English language requirement for PHV drivers. TfL propose to introduce a mandatory safety, equality and regulatory understanding assessment for all new and renewing taxi drivers.
39 (B)	Part 2: T3: Taxi licence checker	TfL is seeking views on how they can further improve safety for taxi passengers, however they are not consulting on any specific proposals.
40 (B)		
41 (B)	Part 2: T2: Taxi driver photo ID	

1.12 The purpose of this IIA is to assess the potential equality, business & economic, environmental, crime & disorder and health impacts of all of the proposals. In doing so it will consider the impacts on those within the taxi and PHV trade as well as affected passengers.

Report Structure

1.13 Following on from this introduction section, the remainder of the report is structured as follows:

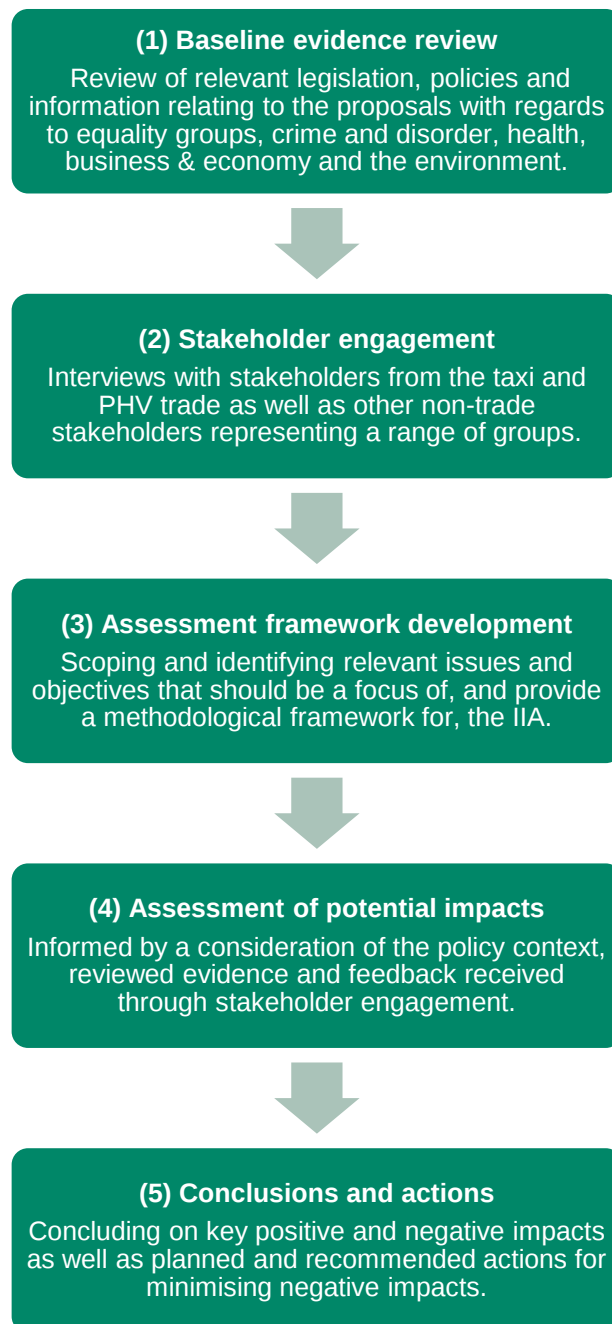
- **Chapter 2 – Approach to assessment:** setting out the approach to collection of evidence and assessment of impacts;
- **Chapter 3 – Stakeholder engagement:** an overview of the stakeholder engagement process undertaken for the IIA and a summary of feedback
- **Chapter 4 – Equality impacts:** an assessment of the equality impacts of the proposals
- **Chapter 5 – Business and economic impacts:** an assessment of the business and economic impacts of the proposals
- **Chapter 6 – Environmental impacts:** an assessment of the environmental impacts of the proposals
- **Chapter 7 – Crime and disorder impacts:** an assessment of the crime and disorder impacts of the proposals
- **Chapter 8 – Health impacts:** an assessment of the health impacts of the proposals
- **Chapter 9 – Summary of impacts**
- **Chapter 10 – Conclusions and recommendations:** conclusions and recommendations for enhancing positive impacts and minimising potential negative impacts of the proposals.

- **Appendix A** – Part A proposals
- **Appendix B** – Part B proposals
- **Appendix C Legislative and policy context** – providing context through review of relevant policy and legislation;
- **Appendix D Baseline evidence** – secondary data used to provide a baseline for the assessment of impacts;
- **Appendix E** – List of stakeholders invited to take part in IIA engagement

2. Approach

Introduction

- 2.1 This section sets out the approach to assessing the potential impacts of the taxi and PHV proposals. The assessment considers how the proposals could have both positive and negative impacts. In considering the impacts, this IIA takes a 'worst case scenario'.
- 2.2 The approach for undertaking this IIA and compiling this report follows a five-stage process:



Baseline evidence review

- 2.3 In addition to a review of relevant legislation, policies and guidance the baseline covers the following:
- Review of all relevant documentation and available information regarding the TfL proposals including the DfT's Statutory Taxi & Private Hire Vehicle Standards (2020)³;
 - Review of secondary data provided by TfL and other sources to develop an evidence base pertinent to the IIA; and
 - Evidence with regards to potential equality impacts as identified through TfL's 'Understanding our Diverse Communities' research report.⁴

Stakeholder engagement

- 2.4 TfL identified 54 stakeholders for AECOM to engage with to support the IIA (a full list of stakeholders is included as Appendix C). This included 'trade' related stakeholders i.e. those within the taxi and PHV industry as well relevant non-trade stakeholders representing a wide range of groups (for example. disabled people and women).
- 2.5 In total 20 stakeholders took part in the interviews which were carried out though face to face meeting or through video call between the 8th June – 5th July 2022.
- 2.6 Following this initial engagement activity, stakeholders were invited to provide further comments on two items:
- PHV operator booking information
 - The speaking and listening component of the taxi driver English language requirement
- 2.7 This resulted in further stakeholder engagement on these items between 14th October – 27th October 2022. AECOM contacted the 20 stakeholders who were previously interviewed and invited them to submit an online survey response or meet through video call to share their thoughts on these two items.
- 2.8 Details on the stakeholder engagement process and feedback is provided in **Chapter 3** of this report.

Assessment framework

- 2.9 An objective-led assessment framework has been developed using the Mayor's Transport Strategy IIA⁵ objectives to allow for consistency with other IIA work across TfL.
- 2.10 An initial scoping exercise was undertaken to identify relevant objectives relating to the Taxi and PHV proposals and these were used to form the basis of the individual assessments. Table 2-1 provides the full list of IIA

³ Ibid1

⁴ TfL (2019) Understanding our Diverse Communities 2019: A Summary of Existing Research <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

⁵ Jacobs (2017) IIA of the Mayors Transport Strategy 3 <https://content.tfl.gov.uk/integrated-impact-assessment-report.pdf>

topics and objectives and identifies which are relevant (scoped in) to this assessment, the type of assessment the objective is covered under and a brief justification for inclusion.

Table 2-1: IIA Objective scoping

MTS IIA Topic	MTS IIA Objective	Scoped In/Out of Taxi and PHV proposals IIA	Justification
Environmental Focus IIA objectives			
Air Quality	To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure	In (included as indirect impact in environmental impacts)	Changes in number of taxi and PH vehicles as a result of proposals could impact on air quality levels. Also, increasing licensing requirements and costs for drivers and vehicle owners could slow the transition from diesel and petrol vehicles to zero emission capable (ZEC) vehicles.
Materials and waste	To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	In (environmental impacts)	Proposals include increased production of printed materials (Photo IDs and DBS paperwork)
Climate change adaptation and mitigation	To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks	Out	No impacts identified
Energy use and supply	To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	Out	No impacts identified
Flood risks	To manage the risk of flooding from all sources and improve the resilience of people and property to all flooding..	Out	No impacts identified
Geology and soils	To conserve London's geodiversity and protect soils from development and over intensive use	Out	No impacts identified
Historic Environment	To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	Out	No impacts identified
Natural Capital and Natural Environment	To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity	Out	No impacts identified
Noise and vibration	To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure	Out	No impacts identified
Water resources and quality	To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system	Out	No impacts identified
Business and Economic Focused IIA objectives			
Economic competitiveness and employment	To ensure London has a safe, secure, accessible, world-class taxi and private hire service with opportunity for all providers to flourish.	In (included in business and economic impacts)	Proposals likely to have direct impacts on London based taxi and PHV businesses and

MTS IIA Topic	MTS IIA Objective	Scoped In/Out of Taxi and PHV proposals IIA	Justification
			employees, which could have broader indirect economic impacts on the sector.
Connectivity	To enhance and improve connectivity for all to and from and within and around London, including expanding travel horizons for those requiring safe, accessible travel options.	In (included in equality impact assessment and business and economic impacts with regard to reliance of disabled people on taxi as public transport option)	Proposals including measures to improve driver training with regards to disabled passengers are likely to have direct impacts on passengers, with potential indirect economic impacts.
Culture	To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.	In (included in business and economic impacts)	Proposals likely to have direct impacts on London based taxi and PHV services, which could have direct impacts on the London taxi brand, and indirect impacts on London's cultural sector.
Infrastructure	To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	Out	No impacts identified
Sustainable Land Use	Make the best and most efficient use of land so as to support sustainable patterns and forms of development	Out	No impacts identified
Housing Supply, Quality, Choice and Affordability	To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand	Out	No impacts identified
Social and Health Focused IIA Objectives			
Accessibility	To maximise accessibility for all in and around London	In (included in equality impacts)	Proposals aim to improve the standard of taxi and PHV service
Crime, safety and security	To contribute to safety and security and the perceptions of safety	In (included in crime impacts)	Proposals include measures for additional criminal record and character checks
Health and health Inequalities	To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities	In (included in health impacts)	Proposals aim to improve safety and health of children and young people and could impact on the health and wellbeing of those in the taxi and PHV trade
Equality and Inclusion	To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population	In (included in equality impacts)	Proposals aim to safeguard children and vulnerable groups and could contribute to fair and inclusive travel in London for all.
Social integration	To ensure London has socially integrated communities which are strong, resilient and free of prejudice	In (included in equality impacts)	Proposals aim to safeguard children and vulnerable groups and could contribute to fair and inclusive travel in London for all
Design	To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance	Out	No impacts identified

MTS IIA Topic	MTS IIA Objective	Scoped In/Out of Taxi and PHV proposals IIA	Justification
	existing sense of place and distinctiveness, reducing the need to travel by motorized transport		

Assessment of impacts

2.11 Impacts for each of the assessments have been determined against two assessment criteria: magnitude and sensitivity. These consist of:

Magnitude of impact: the extent to which those in the taxi and PHV trade, passengers and others would be impacted (positively or negatively) by the proposals considering the numbers or proportion that would experience the impact.

Sensitivity of impact: this considers how those impacted might respond; whether they are able to adapt to the proposals where negatively impacted. If the impacted group has no alternatives and, as such, will be greatly impacted by the proposal, then it is considered to be highly sensitive to the change. Where they are able to continue to function as normal, sensitivity would be low.

2.12 The identification of likely significant impacts has involved combining the sensitivity of those affected with the predicted magnitude of impact (change) using the assessment matrix provided in Table 2-2 below.

2.13 Where two significance categories are shown in the matrix, professional judgement has been used to select the appropriate category of significance. Evidence and rationale is provided for the selection of category.

Table 2-2 Impact rating matrix

		Magnitude of impact			
		No change	Low	Medium	High
Sensitivity of impact	High	Neutral	Minor or moderate	Moderate or major	Major
	Medium	Neutral	Minor	Moderate	Moderate or major
	Low	Neutral	Neutral or minor	Minor or moderate	Minor or moderate

2.14 A summary of positive and negative impacts and an overall rating is provided within a summary table alongside existing/planned and potential further mitigation measures to minimise negative impacts or enhance positive impacts.

Conclusions and actions

2.15 The final section of this report sets out conclusions on the impacts and sets out recommendations for enhancing benefits to those working in the taxi

and PHV trade and its passengers as well as appropriate mitigation against adverse impacts. It also sets out where issues raised through stakeholder engagement activity are being covered elsewhere in Taxi and Private Hire (TPH) or wider TfL functions.

3. Stakeholder engagement

Introduction

- 3.1 Stakeholder engagement was undertaken to explore the views of trade and non-trade stakeholders towards the taxi and PHV proposals.
- 3.2 Qualitative research was used for the engagement as it provided the opportunity to gain in-depth insight and explore respondents' perceptions towards the proposals and their impacts.
- 3.3 Interviews were conducted between 8th June – 5th July 2022 and involved a total of 20 stakeholders.
- 3.4 Following this, these 20 stakeholders were contacted and were invited to provide further comments on two items (PHV operator booking information and the speaking and listening component of the taxi driver English language requirement). Stakeholders were invited to complete an online survey or meet via video call to share their thoughts. A total of 15 stakeholders responded to this additional survey.

Stakeholders

- 3.5 TfL identified 30 trade stakeholders and 24 non-trade stakeholders for AECOM to approach for interview purposes. All stakeholders were contacted by AECOM to introduce the IIA work and invite them to take part in an interview (in person or through video call) or to submit a survey response. A summary of the proposals (as set out in Appendix A and B) was emailed in advance.
- 3.6 A full list of the stakeholders invited to take part in an interview and those who took part is included in Appendix C. A total of 20 interviews were completed including:
 - 15 trade stakeholders and 5 non-trade stakeholders;
- 3.7 Of the trade stakeholders:
 - 4 represented the taxi trade;
 - 8 represented the PH trade;
 - 1 represented both the taxi and PH trade; and
 - 3 represented the Knowledge of London delivery.
- 3.8 Some of the stakeholders contacted said they were unable to participate due to a lack of time or not having any resources available.

Interview approach

- 3.9 The basis of the discussion in each interview was a topic guide produced to cover different stakeholders (i.e taxi drivers and owners, PHV drivers and owners, PHV operators and non-trade stakeholders) with the proposals and

discussion points being arranged in an order that would be most applicable and relevant to each type of stakeholder.

3.10 A PowerPoint presentation was also produced which was used as show material during the interviews, displaying the proposals and further information about each which were used to stimulate discussion and remind stakeholders of the proposals. The content of the interviews included:

- General thoughts towards the proposal;
- Potential positive impacts of the proposal on passengers, drivers, vehicle owners and operators;
- Potential negative impacts of the proposal on passengers, drivers, vehicle owners and operators; and
- Other proposal-specific questions as appropriate.

3.11 Of the 20 stakeholder interviews conducted, 16 were carried out online using Microsoft Teams or Zoom, with the other four interviews being conducted face-to-face either at AECOM's Aldgate office or at another address arranged with the stakeholder. Each interview took between 45 mins and 2 hours to complete and was facilitated by a trained and experienced moderator. All interviews were audio-recorded and then transcribed, with the transcripts used for analysis and reporting.

3.12 For those who wanted to share their views on the proposals but could not attend an interview between 8th June – 5th July, an online SNAP survey was produced which they could complete. Two responses were received to this, with one of these responses being from a stakeholder who was also interviewed but wanted to share further thoughts.

General views towards taxis and PHVs

At the start of each interview, stakeholders were asked to share their general views of taxi and PHV services in London:

- Most stakeholders felt that both taxi and PHV services provide essential services and complement one another, recognising the benefit of being able to hail taxis and booking PHVs in advance of making a journey;
"I think the black cab industry and private hire offer different services and that they are complementary to each other... I think both groups do excellent work and provide excellent, but different, services to the travelling public."
- A few felt that the distinction between taxi and PHV services has been diminishing and converging in recent years from a passenger interface perspective, with regulations for both becoming more similar and consistent which they considered to be a positive change;
"With distinguishing the lines between the two kind of sectors (black cab and PHV), I think it is starting to diminish quite a bit... Street hailing is still one of the key things that differentiates taxi from private hire, but you increasingly see the concept of e-hail... I think the way the passengers and customers interface and interact with the two different types of vehicle is convergent to technology from my perspective."

- Most felt that the level of awareness among the public that TfL are responsible for licensing and regulating PHV services in London is low, but they felt that awareness was high that TfL are responsible for licensing and regulating taxi services;

“I would hazard to guess that people will be more aware [that TfL is responsible for licensing] black cabs, but they will probably not be aware of it for private hire vehicles. They certainly will not be able to differentiate or distinguish between the regulatory requirements of both.”

- A few believed there is more negativity and abuse towards PHV services from both the public and taxi trade, and they felt that this was unfair;

“Black cabs are always very useful for hailing on the street. They are an essential fabric of London, as indeed private hire vehicles are as well, but it’s always bothered me the abuse that private hire drivers get from black cabs.”

- Many felt that both taxi and PHV services have gaps in terms of safety and accessibility which can and should be improved, but a few felt that taxis were safer to use and that PHV services were not regulated enough, adding that they feel it is easier to become a PHV driver than a taxi driver; and

“I would say both services have gaps in terms of accessibility. In regard to the private hire car, you can book a driver, but not all drivers are aware of hidden disabilities or disability at all... I think black cab drivers have more of that awareness because they tend to be formally trained, but there are still gaps.”

“We see anything that improves safety as really important, and black cab drivers pride themselves on being one of the safest modes of transport.”

- One stakeholder felt that there should be more separation in PHV regulations based on the specific trades and industries that currently fall under this category, discussing how they felt many of the regulations for PHV operators and drivers are inappropriate for smaller operators.

“There should be different conditions applied to different trades... Many of the regulations are totally inappropriate for what we do, so regulations should vary according to the type of work which is undertaken, not [just] on the size of the operator.”

Information provision and complaints

PROPOSAL 5 & 6 (A): All taxis and PHVs must display signage showing information on how to make a complaint to TfL

Trade stakeholders

- Most taxi trade stakeholders felt that taxis already meet the proposal and display signage about complaints, so they felt that clarity was needed around this and whether further changes are needed for taxis or not. A few were concerned that additional signage would be overwhelming for passengers;
- Many were happy with these proposals as long as the additional signage does not obscure the view of or distract drivers or passengers, and some felt that it will increase safety and the feeling of trust between customers and drivers and operators;

- Some trade stakeholders felt executive and chauffeur services and their passengers would be unhappy with additional signage in vehicles, feeling that they are unnecessary and detract from the customer experience;
- Some trade stakeholders felt that it is easier to add signage inside taxis due to them having partitions and other places to display information, whereas it can be more difficult for PHVs. A few added that because many PHVs are also used as personal vehicles, stickers with information tend to need replacing more often;
- Some felt that it was unclear whether drivers are expected to purchase and install their own signage or if TfL would provide this. If drivers are expected to purchase and install this themselves, a few expressed concerns about the financial impact of this on drivers, but many felt that clarity and guidance is needed around this as to what needs to be provided in vehicles to comply with the new proposals, such as:
 - Are there TfL standard templates and signs that drivers need to have printed?
 - What contact information needs providing for people to contact TfL?
 - Is an email address sufficient for complaining, or do contact numbers also need providing?
- Although they supported the proposals to include information about how to make complaints through in-vehicle signage, a few PHV operators expressed concerns that TfL would receive more complaints than they felt operators should receive instead and address themselves;
- Some stakeholders were concerned about TfL's ability and capacity to deal with complaints and felt that the additional signage will encourage and result in more submitted complaints to TfL, and this may lead to an increase in false allegations. Some discussed how they expected many of these will not actually be complaints and will instead be general comments or minor reports, therefore feeling that the type of things that should be submitted as complaints needs defining;
- For smaller PHV operators, a few felt the need for complaints signage is lower, especially for those who have more interaction with customers, such as those providing touring or chauffeur services and could verbally explain how customers can complain should they wish to;
- Some stakeholders suggested other methods for providing complaints information or making complaints, such as barcodes that can be scanned and lead to further information, or providing a messaging service for those who want to report an issue immediately but do not feel comfortable calling a number and talking aloud.

Non-trade stakeholders

- All non-trade stakeholders supported the proposals for additional signage about how to make complaints, and they felt that this would improve safety and the comfort of customers with using such services. By also increasing the level of awareness that TfL are responsible for licensing and regulating both taxi and PHV services and the difference between the two, they also felt the likelihood of offences occurring would reduce due to greater accountability;

- One stakeholder felt that additional signage could be interpreted by some as “clutter” and be distracting; and
- Two stakeholders felt that signage needs to be accessible to all, including those who are visually impaired, suggesting that audio messages are used or other methods that would improve the accessibility for all such as bar codes that could be scanned.

PROPOSAL 33 (B): PHV operators are to include information about how to make a complaint to the operator and TfL in the booking confirmation sent to passengers.

Trade stakeholders

- Most trade stakeholders agreed with the proposal to include information about how to make a complaint to the operator and TfL in booking confirmations, with a few PHV stakeholders adding that they felt that this information was only needed in booking confirmations and not through in-vehicle signage; and
- Some trade stakeholders were concerned about the negative impact of including information about how to make complaints in booking confirmations, feeling that it may concern customers about using PHVs and could overload them with non-essential information (feeling the driver and vehicle are the main things for customers to know). Instead, they felt that this information should only be included through in-vehicle signage or providing the information with receipts at the end of trips.

Non-trade stakeholders

- Some non-trade stakeholders agreed with this proposal, but one felt that such information is only needed during or after the journey has been made;
- When making bookings, one stakeholder felt that customers should be able to provide details about any disabilities or special requirements so a driver knows in advance and can assist them. They suggested having apps for taxi services too where such information could be provided in advance of trips being arranged; and
- One stakeholder felt that some customers may be digitally excluded and therefore unaware of complaints information provided with bookings. They felt that it was important that information about how to make complaints was also provided in other ways, such as audio messages.

PROPOSAL 30 & 31 (B): Within 48 hours of receiving a safety related complaint about a PHV driver, a PHV operator must:

- Assess whether it is necessary to suspend or dismiss the PHV driver pending further inquiries
- Notify TfL of the outcome of the assessment and if the PHV driver has been suspended or dismissed

Trade stakeholders

- Some trade stakeholders agreed with these proposals and did not provide further comments, but most felt that further clarity is required around these proposals, such as:
 - What is considered to be a safety related complaint?
 - How are decisions to be made as to whether a complaint is safety related or not?
 - Do all safety related complaints need reporting to TfL or just specific types of complaints?
 - Is the 48-hour timeframe from the point the complaint is received or from the point it has been investigated and confirmed to be related to safety?
 - Are there different levels of safety related complaints and different requirements depending on the seriousness and severity of such complaints?
 - How are TfL to be notified of safety related complaints and outcomes of operator assessments?
- Some shared concerns about false complaints and allegations being made which could negatively impact drivers and require time to investigate fully before making a decision about action required regarding a driver;
- One stakeholder felt that TfL should be responsible for making an assessment of such complaints rather than PHV operators, as there is a risk that operators will not take the required action for a variety of reasons;
- Some shared concerns about potential loopholes where a driver may be suspended from one app but could continue to work for another app, with one stakeholder explaining that they are not aware of a driver's behaviour with other operators if they work for multiple PHV operators;
- Most trade stakeholders felt that 48 hours was too short a timeframe for investigating and making an assessment of a complaint and whether a driver needs dismissing or suspending, explaining that such complaints will often need further investigation and contact with all parties involved, and if the police are involved, this can also delay matters;
- Some felt that it is important to ensure drivers have the opportunity to defend themselves and provide their viewpoint on a complaint or reported issue, rather than automatically assuming the complaint is true and accurate. One stakeholder added that drivers should be informed of the results of assessments and kept in the loop with such processes; and
- Although some felt that serious complaints can and should be assessed with decisions made within 48 hours, most felt that initial interviews and investigations can begin within 48 hours but not reaching a decision on whether to suspend or dismiss, discussing how many depend on this work for their livelihood.

Non-trade stakeholders

- Most non-trade stakeholders supported these proposals and felt they would have a positive impact on safety, but a couple felt that 48 hours may not be a

long enough timeframe to make such assessments and decisions about complaints and drivers for all matters. They felt more serious complaints could be assessed and decided within 48 hours, but these would need determining from TfL in terms of what is considered to be a serious complaint; and

- Some said that it is important that the complainant is made aware of the result of the assessment, and one felt that a driver should be suspended while such complaints are being assessed.

PROPOSAL 37 (B): PHV operators are required to record details of complaints and retain these records for three years.

Trade stakeholders

- Most trade stakeholders were fine with the proposal to retain records of complaints for three years, with some of the larger PHV operators explaining that they already do this;
- Some PHV operators (both larger and smaller) felt that further clarity and justification is needed for this change, feeling that retaining records for 12 months is suitable and adding that TfL are already notified of any serious complaints and offences and will therefore have records of these for longer than 12 months if they are needed; and
- Some felt that more clarity around what records need to be kept was needed as they felt many reported complaints will not actually be complaints or may be incorrect, and they were concerned that if all reported complaints need to be kept for three years, more important issues may become buried.

Non-trade stakeholders

- None of the non-trade stakeholders commented on this proposal.

Taxi driver and vehicle information

PROPOSAL 41 (B): Introduce taxi driver photo ID that passengers can see before they get into a taxi in order to check that the driver matches the person shown on the photo ID.

Trade stakeholders

- Most PHV trade stakeholders agreed with this proposal and believed it would bring parity with PHV services, explaining that PHV drivers already carry photo ID and that photos of drivers are included with booking confirmations, whereas this is not the case for taxi drivers. A few added that they believed a current issue to be taxi drivers borrowing each other's badges to work or driving when unlicensed, and so they felt this proposal would help to address that issue;
- One PHV operator added that although taxi drivers carry metal badges, they felt that only informed passengers would be aware of this and the details included on the badge, whereas photo ID allows all passengers to check and confirm the identity of a driver before entering the vehicle, therefore improving safety and passenger confidence;

- In contrast to PHV trade stakeholders, most taxi trade stakeholders disagreed with the proposal and felt it is unnecessary, discussing how taxi drivers already carry a number of identifiers, including metal badges and licence documents which passengers can request to see should they wish to. A few explained how they felt taxis already provided safe and reliable services and felt they are the most regulated mode of transport in London;
- Some taxi trade stakeholders explained that they have never encountered a passenger who has asked to see their licence documents or photo ID, so they felt there is not a demand from passengers to implement this;
- Both types of trade stakeholders discussed how taxi drivers already have to carry a number of identifiers and were concerned about adding more to this, but one taxi stakeholder suggested including photo ID on existing identifiers that drivers carry rather than adding something else drivers need to remember;
- The taxi trade stakeholders who agreed with this proposal highlighted the sensitivity within the taxi trade around the tradition of metal badges and the need for photo ID, and another taxi trade stakeholder expressed their concerns about photo IDs being easy to forge, whereas metal badges cannot be easily forged;
- One taxi trade stakeholder assumed that TfL would fund any changes required in relation to photo ID for taxi drivers, but they were concerned about TfL's ability to do this due to funding being limited;
- A few stakeholders suggested including photo ID for drivers on the partitions inside taxis where it can be easily seen and will not be obtrusive to drivers or passengers. Another felt that including photo ID on the exterior of taxis would not make drivers easily identifiable until the passenger is closer to them; and
- Some expressed concerns about the safety and protection of drivers as a result of including photo ID for them, discussing how people may take photos or film drivers and/or their personal details in order to "name and shame" or expose their details for other purposes. Therefore, they felt a "balance" needs to be found between protecting drivers and protecting passengers.

Non-trade stakeholders

- All but one non-trade stakeholder supported this proposal and introduction of photo ID for taxi drivers, discussing how they felt implementing this would increase passenger safety and confidence when using taxis, enabling them to check a driver's photo and name before entering a vehicle. One added that they felt this should also be implemented to be consistent with PHV drivers who have photo ID;
- As well as carrying photo ID or wearing it around their neck, one stakeholder recommended including the photo of drivers on the passenger side window of taxis so drivers can be clearly identified by passengers before they enter the vehicle;
- A couple of stakeholders highlighted how photo ID for taxi drivers will be less helpful for passengers with sight issues, but they felt that other methods for identifying drivers could be implemented, such as including tactile signs or bar codes for those with scanner apps;

- The one non-trade stakeholder who disagreed with this proposal felt that the metal badges taxi drivers already carry are sufficient, and they expressed concerns about photo ID causing further issues and confusion where drivers may not closely resemble their photos despite being correct. This stakeholder also felt very few passengers would want to see photo ID before entering a vehicle unless they had previously had a bad experience.

TfL will not be consulting on proposal 41(B) at this stage but will be seeking views on how they can further improve safety for taxi passengers.

PROPOSAL 39 (B): Introduce an online licence checker that is publicly accessible and could be used by anyone to check if a:

- Person is licensed by TfL as a taxi driver
- Vehicle is licensed by TfL as a taxi

Trade stakeholders

- Most PHV and taxi trade stakeholders supported this proposal and felt it would allow passengers to check online before getting into a vehicle, as well as allowing taxi companies to use the checker should they wish to. Some also felt that it should be implemented for taxis due to it already being in place for PHVs, especially considering the majority of PHV drivers are from ethnic minority groups and this can be perceived as racial discrimination;
- A couple suggested that TfL implement a driver and vehicle licence checker portal where checks can be made for both taxis and PHVs, discussing how operators often cannot determine if a driver has provided their most recent licence and being unable to check if a licence has been revoked for being either a taxi or PHV driver;
- Some were unsure how useful the online checker would be and felt that very few passengers would want to use it; with a few explaining that taxis are considered to be a safer service than PHVs, and as taxis primarily provide a hailing service rather than advanced bookings, an online checker was considered to be more relevant for PHVs than taxis;
- A few felt that further clarification is needed to justify the proposal but also explain what data would be shown and how this would be shared, with some discussing how they had trust issues around the sharing of data with third parties and were concerned about how drivers' online information may be misused;
- A few emphasised that only information which is considered essential to check a vehicle and driver is licenced should be included on the online checker, feeling that the risk of such information being misused or compromising the safety of drivers needs to be considered and minimised;
- Opinion on whether photos of taxi drivers should be included on online checkers was mixed, with some discussing how they felt it was unnecessary and raises concerns regarding the safety and privacy of drivers, as well as potentially making it easier for licences and documents to be forged. Most of those who disagreed with photos being shown online agreed with proposal 41, explaining that they felt there was greater benefit of taxi driver photo IDs in the vehicles, but the risk of information being misused was greater online;

- Those who felt photos of taxi drivers should be shown online felt that it would enable passengers to confirm the driver and vehicle matches what is shown online to reassure themselves before entering the vehicle; and
- One explained that although they supported the proposal, they felt it would be important that the online checker is easy to use, well-organised, and continuously updated so that drivers do not lose out on work due to passengers being unable to find information about a taxi vehicle or driver due to an issue with the online checker. They suggested that a bar code could be added in taxis which passengers could scan to be directed to the online checker, and they also felt that a helpline contact number would be needed for passengers to call and receive assistance with checking for information if they are struggling to find it via the checker.

Non-trade stakeholders

- All but one non-trade stakeholder supported this proposal and felt that an online licence checker for taxis would improve safety and provide reassurance to passengers who wish to use the online checker before entering a vehicle. They also felt that photos of taxi drivers should be shown on the online checkers to allow passengers to check the driver matches the photo on the checker;
- One non-trade stakeholder felt that an online licence checker was not needed for taxis and felt that very few passengers would be interested in using this before entering a vehicle;
- A couple highlighted that those with sight issues would not benefit from the online checker unless they were able to hear audio of the information provided on the checker; and
- One stakeholder acknowledged that although they felt photos of drivers should be shown on the online checker, they felt that some would have concerns about whether their online photo or information would be misused, therefore creating safety and data protection concerns for taxi drivers.

TfL will not be consulting on proposal 39(B) at this stage but will be seeking views on how they can further improve safety for taxi passengers.

PHV information and taxi licence checkers

PROPOSAL 40 (B): Publicly accessible online licence checkers for private hire drivers, vehicles and operators are already available. Are any changes needed, or is there any additional information to be added to the checkers?

Trade stakeholders

- Across the stakeholder interviews, a few trade stakeholders felt the current online checker was useful and flexible, but some did provide suggestions for improvement to the online PHV licence checker:
 - People should be able to search for operators without knowing the local authority they are licensed in

'You have to know that it's in the borough of Tower Hamlets. How would anybody know that, how would anybody know and what are they supposed to do? Check fifty-two boroughs to find Uber?'

- Operator-specific information about lost property, how to make a complaint, and other information could be added;
 - Would be useful if the checker could be used for batches of vehicles rather than searching one at a time;
 - Makes and models of vehicles do not always match the log book for a vehicle which can cause confusion;
 - Sometimes unreliable to use as TfL do not inform operators when it is down for maintenance;
 - Providing the full private hire driver licence (PHDL) number (and to the daily download file provided by TfL) which includes the renewal and issue digits so that operators can check whether they have the most recent version of a driver's licence;
 - Previous licence periods should be shown in addition to future licences, rather than automatically overriding with new licence periods when renewed; and
 - Previous private hire vehicle licence (PHVL) numbers and licence periods should be shown as these will change when a new licence is issued.
- One of the larger PHV operators also provided the following two suggestions for improvement in relation to the sharing of data with TfL and checking of drivers' fitness to work:
 - An API or SFTP connection to the Operator Upload Portal should be provided to operators to enable an automated process for sharing weekly data and information with TfL rather than it being a manual process; and
 - Establishing an automated API connection between TfL and the Driver and Vehicle Standards Agency that would alert TfL in real-time to any changes to a driver's DVLA licence status that may impact their eligibility to hold a PHV or taxi driver's licence with TfL.
 - As with the online licence checker for taxis, there were mixed opinions about whether photos of drivers should be shown or not, with some feeling it enables an additional check for those who wish to use it. Whereas those who disagreed with adding a photo expressed concerns over the safety and privacy of drivers and how such photos could be misused. A few also felt that it could cause further issues in cases where passengers feel that the photo does not resemble the driver despite being correct, expecting this to occur more frequently with Black, Asian and minority ethnic drivers.

Non-trade stakeholders

- Other than one non-trade stakeholder feeling that photos of PHV drivers should be added, all other non-trade stakeholders felt that no further changes were needed to the online PHV licence checker; and
- A couple felt that very few passengers use the online checker themselves, with one believing this was due to a lack of awareness that the online checker exists, whereas the other felt most people rely on PHV operators carrying out the appropriate checks to ensure drivers and vehicles are licensed and fit for purpose.

TfL will not be consulting on proposal 40(B) at this stage but will be seeking views on how they can further improve safety for taxi passengers.

PROPOSAL 25 & 26 (B): PHV operators shall carry out regular checks to make sure drivers and vehicles are licensed before making them available to carry out private hire bookings, and they will verify that all documents provided by PHV drivers are legitimate and relate to the driver or vehicle.

Trade stakeholders

- In terms of trade stakeholders, this proposal was only discussed with PHV operators and other PHV trade stakeholders. Most agreed with these proposals, including all of the larger operators who explained how they already conduct multiple checks each day (e.g. every four hours or six times a day) using a daily download of information provided by TfL and other programs to carry out the checks. They also felt that regular checks should be carried out by all operators regardless of size, explaining that the risk of safety issues is still the same whether an operator is small or large, and such checks will reduce the likelihood of drivers driving once their licence has expired;
- An issue highlighted by a few operators which has been discussed in relation to other proposals is being unable to determine if a driver has provided their most recent licence or other documentation, highlighting this as a gap in what checks can be carried out unless changes are made to enable this to be checked;
- Many stakeholders queried how regular checks were expected to be in order to be compliant with the new proposals, and they felt that this frequency needs to be defined and clarified and whether this varies between operators;
- Smaller PHV operators discussed how they felt the regularity of checks for larger operators with larger numbers of drivers should be greater than those with fewer drivers, feeling the risk is lower for smaller operators where drivers are known rather than drivers often being “anonymous” to larger operators. A few explained how they feel the checks are time-consuming and more difficult for smaller operators, with one saying their checks are carried out on an ad hoc basis and consisting of manual checks against photocopies of documents or checking using the online PHV licence checker; and
- A couple of operators felt that TfL should inform operators when a driver is suspended or dismissed, discussing how operators currently have to find this out for themselves but explaining that there is still a 24-hour window where an operator may not know a driver has been suspended or dismissed until TfL provide the next daily download of information.

Non-trade stakeholders

- All non-trade stakeholders agreed with this proposal and felt that all PHV operators should carry out regular checks regardless of the size of the operator; although a couple did acknowledge that smaller operators may struggle with more regular checks;
- There were different opinions regarding how frequent checks should be carried out by operators, but this was mainly due to uncertainty about how often checks are currently conducted and what the expectation is from TfL

regarding this, with one non-trade stakeholder saying they felt checks should be carried out at least every six months. One felt that the frequency at which checks need to be conducted to be compliant with the new proposal needs to be defined to avoid uncertainty with compliancy; and

- One felt that a consistent process should be followed by PHV operators to check and ensure that vehicles and drivers are licenced and fit to operate, therefore reducing the risk of safety issues for passengers.

Assessments for taxi drivers

PROPOSAL 38 (A/B): All newly licensed and existing taxi drivers will have to pass an assessment of their safety, equality, and regulatory understanding (SERU).

Trade stakeholders

- There were mixed opinions on this proposal, with some sharing concerns about the negative impact on taxi drivers, but others agreeing with it and feeling it is fair to introduce as PHV drivers are required to undertake and pass this assessment. A few who supported this also believed the assessment to be relatively easy and straightforward to pass, so they did not expect it would have significant negative impacts on drivers;
- A couple of stakeholders were unsure what topics and aspects are covered by the SERU and felt that this needs clarifying, adding that the impact of the SERU assessment on driver and passenger safety will depend on the quality of the content and assessment. These stakeholders suggested the SERU should include topics on:
 - Disability and racial awareness;
 - Dealing with intoxicated passengers;
 - Keeping both drivers and the public safe; and
 - Safeguarding children.
- A couple were also unsure of the costs associated with the SERU and whether it would result in additional costs for drivers, with one believing this was a negative impact on drivers as they already have to pay for the Knowledge of London assessments;
- Some taxi and PHV stakeholders felt that the taxi driver SERU assessment should be added to the existing assessment process for the Knowledge of London without adding further costs for drivers, expressing concerns about drivers having to pay separately for this assessment in addition to the costs already attributed to the Knowledge of London;
- A few were also concerned about requiring existing taxi drivers to pass the SERU assessment and felt there would be resistance on this from taxi drivers, but they agreed with it applying for new taxi drivers. The concerns raised were that the assessments would be time-consuming, include additional costs to drivers, and could result in a loss of livelihood if they fail the assessment;
- A couple of taxi trade stakeholders suggested reintroducing enhanced driving tests for taxi drivers and integrating the SERU assessment questions into this rather than it being a separate assessment. They added that they do not feel

taxi drivers could pass this or the Knowledge of London assessments without a good level of English, so they felt this would also satisfy the requirements of proposal 10;

- A few suggested providing online resources and support for drivers in relation to the SERU to enable them to test their understanding, access interactive training and information from other organisations such as the NSPCC and Action for Children, and be able to access past assessments and training to help prepare themselves, suggesting that TfL promote this as continued professional development about best practice; and
- Only a few stakeholders commented on resits of the SERU assessment, but all felt that there should not be a limit on resits and not seeing an issue with this if drivers are to pay for their own assessments and resits. One PHV operator discussed how there is an existing condition for PHV drivers which results in licences being revoked if a driver fails the assessment twice, but they felt this was unfair and that more opportunities should be allowed.

Non-trade stakeholders

- All non-trade stakeholders supported this proposal, but a couple were unsure what aspects are already covered in the SERU that PHV drivers are assessed on. The following topics were suggested for inclusion into the SERU assessment if not already included, and they felt this should apply to both taxi and PHV drivers to improve the safety for both drivers and passengers:
 - Disability awareness (including invisible disabilities);
 - Professional conduct and standard of acceptable behaviour;
 - Safeguarding, recognising domestic violence, and protecting children from abuse;
 - Driver safety with violent passengers; and
 - Discrimination in relation to race, ethnicity, sex, disability and other aspects.
- Only one stakeholder commented on the number of attempts a driver should be allowed for the SERU assessment, with them suggesting that three attempts should be allowed, adding that they would be concerned that drivers are not taking their professional duties seriously if they failed three times; and
- One stakeholder also felt that the SERU assessment should be required on a regular basis, suggesting it is carried out in a similar process to how health and safety assessments are completed.

PROPOSAL 10 (A): A new English language requirement will be introduced for taxi drivers (level B1 on the Common European Framework for Reference of Languages (CEFR) required). This requirement would include the following components:

- **Reading and writing:** This would be covered by the SERU assessment
- **Listening and speaking:** This would be covered by the Knowledge of London assessment/appearances that taxi driver licence applicants are already required to take and pass

Trade stakeholders

- A couple of taxi trade stakeholders supported the proposal and felt that it would not cause any issues and they believe it would be relatively easy and straightforward to pass the assessments and meet the minimum requirement for English language, supporting the listening and speaking component being covered by the existing Knowledge of London assessments and appearances;
- Some taxi trade stakeholders disagreed with applying the English language requirement retrospectively and requiring renewing drivers to meet this minimum requirement, sharing concerns about existing drivers being excluded as a result of this proposal, particularly older drivers. They felt that this could result in a shortage of taxi drivers, both through existing drivers being excluded and the proposal acting as a barrier to new applicants;
- A few expressed concerns around the reading and writing component of the proposal and whether this would be unfair or discriminatory against those who are good drivers but struggle with reading and/or writing because of dyslexia, dyspraxia, or other learning conditions. They requested further clarity about this and what will be required;
- A couple of taxi trade stakeholders and one PHV operator felt that this proposal is unnecessary for taxi drivers, believing that the existing assessments and appearances as part of the Knowledge of London are sufficient. One also felt the proposed standard of B1 on the CEFR for English language is too high, discussing how the key aspect is being able to communicate with passengers in an appropriate manner and about geographical knowledge;
- One taxi trade stakeholder who supported the proposal felt that the minimum English language requirement should also be required of PHV drivers, discussing how they are not assessed on language and take no equivalent to the Knowledge of London.

Non-trade stakeholders

- Opinion was mixed among non-trade stakeholders around this proposal, with a couple feeling that it is unnecessary to assess a driver's reading and writing, explaining that they felt a driver's geographical knowledge and verbal communication skills are the most important aspects. They added that they felt this could create an extra barrier to taxi driver applicants and potentially exclude existing drivers and lead to a shortage. They also expressed concerns about it being unfair to assess a driver's reading and writing, particularly for those where English is not their first language or those with poor spelling or learning difficulties that affect this, such as dyslexia;

- One also felt that the existing Knowledge of London assessments and appearances sufficiently covered this proposal without introducing a separate minimum requirement; and
- In contrast to the above, a couple of non-trade stakeholders strongly supported this proposal and felt that it would benefit passengers and improve their safety. Both discussed how they felt that a driver with good English language skills would be able to assist passengers in distress or those with disabilities, as well as passengers being more confident and comfortable with drivers.

Further engagement

The following three options for the listening and speaking component of proposal 10 were presented to stakeholders for them to comment on:

1. **Option 1:** Assess listening and speaking through the existing Knowledge of London assessment/appearance process if this meets level B1 on the common European Framework for Reference of Languages CEFR⁶
 2. **Option 2:** If it does not meet level B1 on the CEFR at present, amend the existing Knowledge of London assessment/appearance process so it does meet level B1 on the CEFR
 3. **Option 3:** If it does not meet level B1 on the CEFR at present introducing a separate listening and speaking assessment for all new and existing taxi drivers that meets level B1 on the CEFR
- Most trade stakeholders showed a preference for option 1, closely followed by option 3;
 - Those who supported option 1 felt that the existing KoL assessment is an extensive 2-3-year process that would meet, if not exceed, level B1 on the CEFR. They advocated that it requires frequent in-person appearances in which drivers can adequately demonstrate their listening skills and spoken language through conversing with the examiner;
 - Stakeholders with a preference for option 3 were all members of the PH trade and felt this option was best practice in imparting parity between the taxi and PH trade;
 - One taxi stakeholder strongly opposed option 3 because it would require existing drivers to sit a listening and speaking assessment despite their length of experience in the trade; and
 - One non-trade stakeholder was balanced in their opinion. While a separate assessment could be unnecessary for those whose first language is English, and instead should be prioritised for applicants whose first language is not English; it would be the fair option to ensure that all drivers, both new and existing, are assessed to work at the same standards.

In December 2022 it was confirmed that TfL will continue to monitor the speaking and listening skills taxi drivers demonstrate when completing the Knowledge to ensure that London taxi drivers' English skills meet the objectives in the Standards.

If there is sufficient evidence to suggest that the Knowledge of London does not demonstrate taxi drivers' English speaking and listening skills, TfL propose to

⁶ British Council (2022). B1 English level. Available at: <https://www.britishcouncil.es/en/english/levels/b1>

introduce a separate speaking and listening test similar to that undertaken by applicants for PHV driver licences.

TfL are interested in stakeholder's views on whether taxi drivers' speaking and listening skills meet the objectives in the DfT's Standards or whether further assessment is necessary.

GDPR and data breaches

PROPOSAL 24 (B): PHV operators must notify TfL within 72 hours of all data breaches, material data losses or infringements of data protection law affecting the data of UK drivers and/or customers, whether those incidents occur in the United Kingdom or elsewhere.

Trade stakeholders

- Some of the larger PHV operators explained that they already have a similar condition to this proposal which they have to comply with, and they agreed with it applying across the industry regardless of the size of an operator;
- A couple felt that it was unnecessary to notify TfL in addition to already notifying the Information Commissioner's Office (ICO) of any such breaches or infringements and did not see the benefit of notifying both;
- One operator queried whether they are required to notify TfL of anything they also notify the ICO of, adding that they would support this if so and that it would ensure a standard approach of what needs to be notified to who;
- One felt that greater clarity is needed about the 72-hour timeframe and whether it takes holiday periods into account, asking whether operators will have an extension on this timeframe during holiday periods such as Christmas; and
- One PHV trade stakeholder felt that greater transparency and accountability around data processing is needed across the industry, discussing how there have been recent complaints from passengers about drivers not picking them up or cancelling. They felt that TfL should have their own Artificial Intelligence Act for apps and that each company that uses an app for their services should have an explainability statement which includes a rationale of how bookings are processed, who is responsible for handling bookings, who is responsible for cancelling bookings, and who is responsible for data processing and how this is done.

Non-trade stakeholders

- Only two non-trade stakeholders commented on this proposal, but both agreed with the proposal. However, one felt that clarity was needed as to whether the 72 hours is from the point of discovery of a data breach. If so, they felt that 48 hours would be an appropriate period of time to notify TfL within.

Lost property

PROPOSAL 32 (B): PHV operators will have to make reasonable attempts to contact the owner of lost property.

Trade stakeholders

- Most trade stakeholders agreed with this proposal, with the larger PHV operators explaining that they already have processes in place for handling and returning lost property to passengers;
- A few felt that greater clarity is needed as to what “reasonable attempts” means to understand what the expectation is for this proposal, whereas a few others felt that the “vagueness” of the proposal was appropriate and that TfL should continue to review operators’ lost property policies and processes during inspections to assess whether they are suitable;
- A few discussed the challenges around reports of lost property and attempting to contact passengers about it, explaining that it is not possible at times due to passengers providing inaccurate contact details. They also discussed how some passengers wrongly report that items were lost while travelling in a PHV, whereas it is more likely that the item was lost before they entered the PHV;
- One PHV trade stakeholder agreed with the proposal but felt that the responsibility should be on operators to arrange for lost property to be returned rather than expecting PHV drivers to return the items. A taxi trade stakeholder added that they felt lost property should be returned free of charge; and
- One PHV operator felt that the process for handling and returning lost property should be the same for all operators regardless of the type of item, and they added that illegal property should be reported to the police.

Non-trade stakeholders

- All non-trade stakeholders supported this proposal, but a couple felt that “reasonable attempts” needs to be clarified to understand what the expectation is, with one suggesting that three attempts should be made via phone call by an operator within 48 hours of the journey, with this being a blanket policy regardless of the type of item. Another suggested that operators work closely with the police to organise how lost property is returned;
- One discussed how they were aware that PHV drivers sometimes attempt to charge passengers for returning lost property to them, but the stakeholder felt that this should be free of charge across all operators and drivers, as well as reminding passengers to check they have all of their belongings before leaving the vehicle; and
- One suggested that lost property is stored at a TfL site rather than held by each operator, explaining that items left on TfL buses are stored at an office on Baker Street.

Booking and dispatching of PHV services

PROPOSAL 19, 20 & 28 (A/B): PHV operators must keep a register of booking and dispatch staff, including name, date of birth, reference number and date of DBS

Trade stakeholders

- Many trade stakeholders who commented on these proposals agreed with them as booking and dispatch staff have access to passenger information, however a few were unsure of the rationale for these proposals and felt this needs clarifying, adding that they believe the main risk to safety is the interaction between drivers and passengers;
- A few of the larger PHV operators highlighted that these proposals will not be applicable to all operators, explaining that some who are tech companies and use apps do not have any booking and dispatching staff, so they felt that this needs clarifying and confirming; and
- One of the larger PHV operators felt that these proposals could disproportionately affect smaller operators who take bookings by phone only, feeling that it will require additional layers of administrative work which they may struggle with.

Non-trade stakeholders

- Three non-trade stakeholders commented on these proposals, and all three agreed with them, adding that booking and dispatch staff have access to the personal details of passengers so should therefore be “scrutinised” as much as drivers are; and
- One also suggested that employees of PHV operators have their history of offences recorded, and that any reports of inappropriate behaviour while working for an operator should be recorded and monitored.

PROPOSAL 21 (A): PHV operators must have a policy on employing ex-offenders.

Trade stakeholders

- Most trade stakeholders agreed with this proposal, with a few adding that they already have such a policy and felt it is required as part of their social responsibility as an operator and to improve the safety of their services;
- One taxi trade stakeholder felt that judgements for ex-offenders should be based on the existing rehabilitation act rather than separate policies and regulations; and
- One PHV operator discussed how they felt a balance was needed between creating opportunities for ex-offenders and reducing the risk of danger to the public and passengers. They queried whether TfL have a policy on ex-offenders that operators could follow themselves?

Non-trade stakeholders

- Of the three non-trade stakeholders who commented on this proposal, one agreed with the proposal as written; and

- Of the other two, one felt that sex offenders or those who have committed more serious offences should not be allowed to work for a PHV operator, whereas the other stakeholder felt that further consultation is required around sentencing and rehabilitation, suggesting that people cannot be employed for a period of time until rehabilitated.

PROPOSAL 22 & 23 (A): PHV operator booking records must include the name of any individual that responded to the booking request, name of any individual that dispatched the vehicle, and the vehicle registration mark (VRM) of vehicle.

Trade stakeholders

- Most trade stakeholders agreed with these proposals, with some adding that they already maintain these records; and
- As highlighted in relation to proposals 19, 20, and 28, one of the larger PHV operators felt that these proposals could disproportionately affect smaller operators by requiring additional layers of administrative work in order to be compliant with these proposals.

Non-trade stakeholders

- The three non-trade stakeholders who commented on these proposals agreed with them.

Further engagement

Stakeholders were also invited to comment on the name of the driver carrying out the booking and the PHV driver licence number of the driver carrying out the booking being recorded by PHV operators when they take bookings.

- The majority of stakeholders supported this, including the three non-trade stakeholders. While some trade stakeholders felt they already comply with this, others supported the increased accountability and safety it generates for PHV travel;
- Two PHV trade stakeholders were neutral to this;
- The two trade stakeholders who did not support this felt that it duplicated existing records of the driver's licence number and increased admin pressures for PHV operators;
- Several trade stakeholders recognised the need for implementation time as booking and dispatching systems require software updates.

DBS and character checks

PROPOSAL 8 & 9 (A): Licensed taxi and PHV drivers will have to register with the DBS update service and have DBS checks every six months.

Trade stakeholders

- Opinion on these proposals were mixed, with around half of trade stakeholders agreeing and some discussing how they themselves or their drivers were already registered with the DBS update service. However, others expressed concerns with the proposals but also requested further clarity about them;

- Those who supported these proposals felt that registering with the DBS update service is more economical and requires less time investment in the long-term, therefore benefiting drivers;
- Many of those who disagreed or requested further clarity were concerned about checks being required every six months and felt this would become onerous for drivers, suggesting annual checks instead. Some also requested information about the cost comparisons of doing an enhanced DBS check every three years against registering with the update service and having checks carried out every six months. Many of these expected the costs to be higher for registering with the update service;
- A couple of taxi trade stakeholders felt that the application process for licence holders needs to be made clearer and more accessible for licence holders who are digitally challenged, particularly older drivers;
- Some taxi trade stakeholders expressed concerns about the impact of DBS checks and updates on licences, with one querying what the repercussions would be if a driver missed their DBS renewal date. They suggested TfL alerts drivers that they will be carrying out checks to allow drivers time to check and pay their subscription to the DBS update service if they hadn't already done so; and
- Another taxi trade stakeholder was concerned about TfL's capacity to conduct the more regular checks and whether this could cause any delays to drivers working. This stakeholder suggested a transition period is implemented so TfL can meet their deadlines for renewing DBS checks and also allow drivers to continue operating.

Non-trade stakeholders

- All non-trade stakeholders supported the need for DBS checks for drivers, but most felt that greater clarity is needed about the DBS update service and the impacts of this, with a few being concerned that the check is not as comprehensive as an enhanced check despite it being more frequent;
- A couple also felt that clarity is needed as to whether the DBS update service checks are manual or automated, expressing that if they require separate manual checks and time from drivers, the more frequent checks could be considered to be excessive and deter people from applying or continuing as drivers. One added that teachers and those working in schools are only required to have DBS checks every three years, and so they felt the same standard should remain for drivers; and
- One queried whether the DBS service still has access to the EU convictions database or whether this is no longer the case due to the UK leaving the European Union.

PROPOSAL 11 & 13 (A): Taxi vehicle licence applicants must have a basic DBS check when applying and once licensed have a check done annually.

Trade stakeholders

- Some trade stakeholders agreed with this, but most felt that taxi vehicle licence applicants would not need DBS checks unless they were drivers

themselves or would come into direct contact with customers or passengers;
and

- These stakeholders requested that TfL provide the rationale for these proposals, but a few discussed how they felt it was a driver's responsibility to check the vehicle they are using and ensure it is safe and fit for purpose.

Non-trade stakeholders

- All non-trade stakeholders were unsure why vehicle owners and licensees would need DBS checks unless they were drivers themselves or expected to come into direct contact with passengers or would have access to their personal details. They suggested that TfL provide the rationale for this to clarify the potential benefits; and
- A couple suggested that if DBS checks were required, they suggested that they should be enhanced checks to ensure the highest level of check is carried out, with one adding that they believed this check should be carried out annually.

In December 2022 it was decided that TfL will not propose to introduce any additional requirements for either taxi or PHV owners.

The proposal to undertake DBS checks and overseas checks on vehicle owners were not included in the DfT's 2019 consultation on the draft Statutory Standards. Stakeholders have not therefore had the opportunity to comment on the recommendation in the final version of the Standards.

Given the unique nature of the London taxi and PHV market, TfL would like to understand stakeholder's views as to the effectiveness of requiring London taxi and PHV owners, both renewals and new applicants and those renewing licences, to provide:

- A basic DBS certificate and that a check is undertaken annually; and
- A Certificate of Good Conduct to cover any periods of three or more continuous months spent outside the UK since the applicant was 18.

PROPOSAL 7, 12 & 13 (A): When applying for a taxi driver, PHV driver, PHV operator, taxi vehicle or PHV vehicle licence applicants must provide a Certificate of Good Conduct to cover any periods (three or more continuous months) spent outside the UK since they were 18. Once licensed, a Certificate of Good Conduct will be required for any periods (three or more continuous months) spent outside the UK.

Trade stakeholders

- Some trade stakeholders agreed with this, but most felt that further clarity was required on the following:
 - What is a Certificate of Good Conduct?
 - What is recorded on it?
 - How credible is it, and does this vary between countries?
 - Are there costs associated with obtaining them?
 - How can it be obtained and from who?
 - Is it obtainable from all countries?

- Do only new drivers require this, or do existing drivers also need this upon renewal?
- Many discussed their concerns about drivers being unable to obtain Certificates of Good Conduct from all countries they had spent longer than three continuous months in since the age of 18, and a few suggested that certificates should only be required for the last 1-3 years;
- Some discussed their concerns about being able to obtain certificates from some countries and felt that it may be discriminatory to deny a driver a licence due to this difficulty, with some providing examples of countries where they felt accurate and reliable records and documentation is difficult to obtain;
- Stakeholders were unsure whether certificates can be obtained through the UK or if they would need to contact the different embassies of each country they required a certificate for;
- Some felt that these proposals could potentially have a significant impact on both existing drivers and those considering becoming a driver, feeling that many may either be “knocked out” of the industry or prevented from becoming a driver due to the difficulties of obtaining certificates. A few were also concerned about what would show on such certificates and how offences/recorded incidents would affect their applications; and
- One taxi trade stakeholder suggested that TfL conduct residency checks for applicants to prove they were in a country for the time they said. They believed this would prevent applicants from providing incorrect certificates rather than providing the certificate for the countries they actually visited. The same stakeholder also felt the risks are greater for those in the transient workforce of the PHV trade.

Non-trade stakeholders

- Only a couple of non-trade stakeholders commented on these proposals, but as with the trade stakeholders, both felt that greater clarity is needed about:
 - What the Certificate of Good Conduct is?
 - How credible is it?
 - How can it be obtained and from who?
 - Is it obtainable from all countries?
- One was concerned about practicality issues in relation to obtaining the Certificate of Good Conduct, expecting that it would be difficult to obtain and may be unobtainable in some cases and countries, and they also believed drivers and operators would be deterred by this or concerned about what is recorded on a Certificate of Good Conduct. They felt that this could pose a barrier to both new and existing drivers and operators and could result in a shortage if they decide not to continue operating.

As above, in December 2022 it was decided that these proposals will not apply to taxi or PHV vehicle licence applicants. However, TfL would still like to understand stakeholder's views as to the effectiveness of requiring London taxi and PHV owners to provide a basic DBS check and Certificate of Good Conduct.

PROPOSAL 15-18 & 27 (A): Applicants for a PHV operator licence must have a basic DBS check when applying and have a check done annually (within 28 days of the anniversary of the licence issues date). DBS checks would have to be done through TfL's service provider.

Trade stakeholders

- Many trade stakeholders agreed with these proposals, but some requested that clarity is provided about who is required to have DBS checks for an operator, asking whether this just includes office holders, those in senior management, or if it includes booking and dispatch staff. A couple added that they did not understand why operators required DBS checks, feeling that only drivers should be required to have DBS checks as they directly interact with passengers. One felt that such checks were more relevant for smaller operators but not larger operators, particularly if they operate via apps;
- Some PHV operators disagreed with DBS checks for operators needing to be carried out through TfL's service provider, expressing concerns that the costs associated to this would be higher than having checks done as usual via the government;
- Some PHV operators expressed concerns about having to have DBS checks conducted within 28 days of the anniversary of the licence issue date, explaining that this could be difficult to arrange and felt that it was too restrictive of a period. One felt that the consequences of not having the check carried out within the 28-day period should be clarified;
- One of the larger PHV operators suggested either making the DBS update service available for basic checks as well as enhanced checks or requiring an enhanced check by PHV operators so they can register for the update service. They felt the update service is easier to use and saves time compared to doing separate checks; and
- One PHV operator felt annual checks were unnecessary. They expressed that there is no concept of licence renewal anymore and operators always undertake the full application process when their licence expires. This process includes a full DBS check which they felt satisfactory in covering any changes to their criminal record.

Non-trade stakeholders

- All non-trade stakeholders agreed with these proposals for operators, and most suggested that the DBS check should be enhanced rather than basic to ensure the highest quality assurance.

PROPOSAL 14 (A): Should TfL seek the power to introduce character and criminal record checks for PH vehicle licensees, as no DBS checks are currently required?

Trade stakeholders

- There were mixed opinions about this, with some feeling that PHV owners and licensees do not need DBS checks unless they are directly interacting with customers and passengers themselves or have access to their personal

information. Some requested that TfL provide the rationale for this. One added that it is the driver's responsibility to ensure the vehicle they are using is fit for purpose, particularly if it is not their own vehicle;

- Others agreed that PHV owners and licensees should have DBS checks to improve safety and reduce fraudulent activity, with some discussing how people can pretend to be PHV drivers despite not having a licence; and
- One PHV operator requested that TfL clarify how DBS checks would be implemented for companies leasing vehicles for PHV drivers to use, feeling that it needs to be clearer as to who is required to have DBS checks and who is responsible for ensuring these have been undertaken. Another PHV operator explained that they had encountered vehicle rental companies that were using fraudulent insurance information, and they believed requiring DBS checks for those who lease vehicles will deter this activity.

Non-trade stakeholders

- All non-trade stakeholders were unsure why vehicle owners and licenses would need DBS checks unless they were drivers themselves or expected to come into direct contact with passengers or would have access to their personal details. They suggested that TfL provide the rationale for this to clarify the potential benefits; and
- A couple suggested that if DBS checks were required, they suggested that they should be enhanced checks to ensure the highest level of check is carried out, with one adding that they believed this check should be carried out annually.

In December 2022 it was decided that TfL will not propose to introduce any additional requirements for either taxi or PHV owners. However, TfL would still like to understand stakeholder's views as to the effectiveness of requiring London taxi and PHV owners to provide a basic DBS check and Certificate of Good Conduct.

Self-reporting offences

PROPOSAL 2-4 & 29 (A): Taxi drivers, PHV drivers, and PHV operators must inform TfL of any arrest and release, charge, or conviction of any offence within 48 hours.

Trade stakeholders

- Some trade stakeholders agreed with these proposals and explained that public safety is a high priority and that they felt this would improve this;
- However, most felt that greater clarity is required around these proposals as to what has to be reported to TfL or if only particular charges and offences are required to be reported to TfL to comply with these proposals. Some trade stakeholders explained that they agree that more serious offences should be reported within 48 hours, but they queried whether speeding tickets, parking fines, fixed penalty notices, cautions, and other incidents would need reporting to TfL. Most felt that these do not need reporting to TfL and felt it would be unfair to revoke a licence for these reasons;

- Some queried what the potential repercussions will be from not reporting charges and offences to TfL within the 48 hours, asking whether TfL would revoke a driver's or operator's licence;
- A couple expressed concerns with notifying TfL of arrests and releases and whether this would result in their licence being suspended or revoked, with both sharing experiences of themselves and others being wrongly arrested during an incident and later being released, with one adding that the process should be that a driver or operator is "innocent until proven guilty". Another explained that they were concerned that drivers and operators would not report such incidents due to concerns over losing their livelihoods, potentially making safety issues worse;
- Most taxi and PHV trade stakeholders felt that the 48-hour period was too short, with suggestions for what the period should be ranging from 72-168 hours (a few suggesting each period within this range). The reasons for why stakeholders felt 48 hours is too short of a period include:
 - If a licence holder was arrested or liaising with the police over an incident, they may not have the opportunity to notify TfL within 48 hours or consider it to be their highest priority at the time due to the circumstances;
 - If an incident occurred on a Friday night, the 48-hour period would not include any standard business days which a few felt would be an issue for some; and
 - If an incident occurred over the weekend/outside of standard business days, a driver or operator may not be able to contact their members association for advice or contact TfL unless there is a 24/7 reporting service available.
- One taxi trade stakeholder explained that they were unaware drivers and operators were currently required to notify TfL of such offences within 21 days, and they believed awareness of this across the trade will be low.
- Some shared their concerns about TfL's capacity to receive and respond to such reports, feeling that clarity is needed about TfL's process for this and how quickly they will respond to drivers and operators;
- In terms of PHV operators reporting charges and offences, a couple felt that clarity is needed as to who this includes and therefore who would need to be reported to TfL (e.g. is it just office holders or named directors?); and
- Some felt that clarity as to how such offences are to be reported to TfL, querying whether the requirement is to notify TfL by phone, voicemail, email, via an online portal, or if any of these methods are sufficient. One added that they were concerned with the 48 hour timeframe as they discussed issues they have previously experienced with trying to contact TfL to report issues via telephone.

Non-trade stakeholders

- All non-trade stakeholders agreed with these proposals and felt that 48 hours was a reasonable timeframe but also short enough to improve public and passenger safety, and one felt that PHV operators should work closely with the police to ensure reports are made;

- One felt that clarity is needed as to whether the 48-hour timeframe means 48 working hours or if there are any exclusions or extensions to this period, such as for holiday periods;
- A “triage system” was recommended by one stakeholder which could be used to assess the severity and risk of a driver or operator based on the offence, and they explained that they would want TfL to assess such reports within two days;
- One suggested that if it was found that somebody did not self-report an offence, this should compromise their ability to retain their licence.

Changes to licensing policy and requirements

PROPOSAL 1 (A): Wherever possible, TfL propose to apply new taxi or private hire licensing policies immediately.

Trade stakeholders

- Some trade stakeholders agreed with this proposal applying across the industry, with a few adding that policies should be applied immediately if in the interest of public safety rather than waiting until renewal;
- However, most felt that transition or grace periods are needed to allow time for those affected to make the required changes to comply with new policies, particularly if a new policy requires significant changes to existing practices and behaviour or requires changes to vehicles. Suggestions as to how long the transitionary period should be varied from 1-12 months, but many felt that it depends on the policy change and impact on those affected;
- A few disagreed with the proposal, particularly smaller PHV operators, discussing how they felt it was fairer and more practical to continue with current policies and only taking new policies into account upon renewal of licences. However, a couple did add they agreed with the proposal for policies which are deemed to be urgent or essential to avoid or improve safety issues, but not all policy changes; and
- Some discussed how any communication about policy changes needs to be clear and widely publicised to ensure all affected are aware of upcoming changes, and they felt that appropriate lead-in time is needed for those affected to understand the changes in advance. A few felt that communication from TfL about previous policy changes has been poor and were concerned about some drivers being digitally excluded, explaining that they felt it would be unfair for a driver to lose their licence due to being unaware of a policy change.

Non-trade stakeholders

- Most non-trade stakeholders agreed with this proposal and felt that it would benefit the safety of taxi and PHV passengers; and
- A couple highlighted the inclusion of “where possible” in the wording of the proposal and agreed with this, discussing how they felt some policies may require transitionary periods for those affected to implement changes to be compliant. One stakeholder felt that a transition period of 6-12 months may be required for some policy changes in order to be fair to those affected.

PHV operator conditions

PROPOSAL 34 (B): PHV operators will be required to give TfL at least 28 days advance notice of any changes that they intend to make to their operating model, systems or processes that may affect compliance with the 1998 ACT, 2000 Regulations, or other licence conditions.

Trade stakeholders

- Only PHV operators and PHV trade stakeholders commented on this proposal, and there were mixed opinions from them, with some agreeing with the proposal but others suggesting changes to this or requesting further clarity;
- A couple of stakeholders felt that it is unnecessary to report minor changes in processes and systems to TfL, discussing how they felt this would be an onerous process, particularly for operators that use apps. Although one felt that such minor changes do not need to be reported to TfL, the other suggested reducing the days' notice to 14 instead of 28; and
- A couple of stakeholders felt that further clarity is needed with this proposal as to what changes TfL need to be notified of in order to comply with the proposal, with both discussing how they feel the current standards are unclear and left to interpretation.

Non-trade stakeholders

- This was not commented on by any of the non-trade stakeholders.

PROPOSAL 36 (B): Is the minimum of £5m for public liability insurance still an appropriate amount for PHV operators with operating centres which are accessible to members of the public?

Trade stakeholders

- Most trade stakeholders felt that the minimum of £5m for public liability insurance is still an appropriate amount, with only one PHV trade stakeholder feeling that it may need to be increased due to increases to the cost of living; and
- One PHV operator felt that clarity was needed around this proposal as to whether it only covered incidents at operating centres or if it covered other things too. Another PHV trade stakeholder felt that the £5m public liability insurance should be for both the carriage of passengers as well as for incidents occurring at operating centres.

Non-trade stakeholders

- This was not commented on by any of the non-trade stakeholders

PROPOSAL 35 (B): TfL currently place conditions on individual operator licences, and where the need has arisen, a number of operators have had additional conditions attached to their licences. TfL are seeking views on whether there should be separate licence conditions that will only be applied to the largest PHV operators (those in the top tier (Tier 8) and who can have 10,000+ PHVs available to them). Views are to be sought on the following:

- Should there be separate conditions applied to all of the largest PHV operators?
- Are there views on PHV operators in different tiers/of different sizes being licensed subject to different conditions?
- Are there views on whether all PHV operators in the same tier or offering the same type of services should have the same conditions attached, or are bespoke conditions still appropriate in certain circumstances?
- Should there be a ridesharing condition that will apply to PHV operators that offer ridesharing services regardless of the tier they are in?

Trade stakeholders

- Most trade stakeholders felt that the same conditions should apply to all PHV operators regardless of their size, discussing how it is important to improve safety standards across the industry and feeling the risks are the same for both small and large operators. However, a few added that they felt some conditions may not be applicable to all operators, such as those who do not use their own technology and software;
- One of the larger PHV operators felt that all Tier 8 operators should have bespoke conditions due to their size, whereas those in lower tiers should have more standard conditions;
- One of the smaller PHV operators felt that there should be bespoke conditions for smaller operators rather than the same across the PHV trade, discussing how they felt there should be more separation in conditions and regulations based on the specific trades and industries, feeling that many of the regulations are inappropriate for smaller operators;
- Almost all trade stakeholders agreed that there should be a ridesharing condition that applies to all PHV operators that offer such services, with many discussing the risks and safety concerns associated with ridesharing and having multiple strangers in a PHV at one time;
- Only one taxi trade stakeholder disagreed with applying a rideshare condition as they felt that no PHV operator should offer ridesharing due to the safety concerns associated with it, explaining that they felt it is inappropriate to put drivers in a position where passengers are strangers to one another and an incident could occur that a driver is liable for; and
- A couple felt that operators who offer ridesharing need to ensure their drivers are trained around this and that risk assessments are conducted to understand and mitigate safety concerns.

Non-trade stakeholders

- Only one non-trade stakeholder commented on this in relation to ridesharing, explaining that they felt that PHV operators and services should make it clear where ridesharing is offered as an option to avoid incidents where passengers share journeys with others without knowing this or due to a mistake. They also

raised other safety concerns with ridesharing, discussing how others could then find out where somebody lives or other locations they travel to from sharing a journey with them.

Additional engagement

- 3.13 A meeting with TfL's Independent Disability Advisory Group (IDAG) was also held to discuss the proposals and potential impacts.
- 3.14 IDAG was supportive of the Standards and the additional proposals. However, they acknowledged the supply and demand challenge, with a demand for more taxis in London and new applicants potentially being deterred by onerous standards. This is a concern for disabled people especially because there have been issues with the availability of taxis for Taxicard members.
- 3.15 They supported that the Standards focus on safety, but felt that quality of service, which is especially important for disabled people, was missing. They mentioned that there is little mention of the Equality Act throughout the Standards.
- 3.16 They also felt that TfL's existing information for disabled passengers needs updating because it mainly focuses on assistance dogs and wheelchair users and does not cover other disabilities and groups.
- 3.17 IDAG members also expressed concern that DBS checks are not picking up offences committed outside of the UK.
- 3.18 The need for a good analysis of taxi and PHV complaints and categorisation of complaints was also raised.

Summary of findings

- 3.19 The majority of stakeholders were supportive of the proposals overall and felt they would benefit passenger safety as well as the general experience of using taxi and PHV services. Non-trade stakeholders felt most positive about the proposals and potential benefits for passengers.
- 3.20 The proposals that stakeholders were most concerned about in terms of the potential negative impacts on drivers were:
- Proposals 2, 3, 4, and 29 – taxi drivers, PHV drivers, and PHV operators must inform TfL of any arrest and release, charge, or conviction of any offence;
 - Proposals 7, 12, and 13 – taxi drivers, PHV drivers, and PHV operators will need to provide Certificates of Good Conduct;
 - Proposal 8 and 9 – taxi and PHV drivers registering with the DBS update service and having checks every six months;
 - Proposal 10 – introducing a new English language requirement for taxi drivers;
 - Proposals 30 and 31 – PHV operators assessing and notifying TfL of safety related complaints; and
 - Proposal 41 – introducing photo ID for taxi drivers.

3.21 A key theme of the feedback was that more clarity and further information was required to be set out for a number of proposals. In particular concerns were raised over the practicality of implementing some of new policies with regards to both TfL processes and for taxi and PHV licensees and operators. These included:

- Proposals 2, 3, 4, and 29 – taxi drivers, PHV drivers, and PHV operators must inform TfL of any arrest and release, charge, or conviction of any offence;
- Proposal 8 and 9 – taxi and PHV drivers registering with the DBS update service and having checks every six months;
- Proposals 7, 12, and 13 – taxi drivers, PHV drivers, and PHV operators will need to provide Certificates of Good Conduct⁷;
- Proposals 11 and 13 – taxi vehicle applicants requiring a basic DBS check⁸;
- Proposal 14 – potentially introducing character and criminal record checks for PHV licensees⁹;
- Proposals 15, 16, 17, 18, and 27 – PHV operators requiring a basic DBS check;
- Proposals 25 and 26 – regular checks by PHV operators to ensure drivers and vehicles are licensed; and
- Proposals 30 and 31 – PHV operators assessing and notifying TfL of safety related complaints.

⁷ In December 2022 it was decided that TfL will not propose to introduce a requirement for PH vehicle owners to provide a Certificate of Good Conduct at this time.

⁸ In December 2022 it was decided that TfL will not propose to introduce a requirement for taxi vehicle owners to provide a basic DBS check at this time.

⁹ In December 2022 it was decided that TfL will not seek the power to introduce criminal and character checks for PH vehicle owners at this time.

4. Equality impacts

Overview

4.1 This section considers how the proposals are likely to perform against the three objectives relevant to equalities:

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population;
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice; and
- To maximise accessibility for all in and around London;

4.2 The assessment of equality impacts takes a judgement on how the proposals would contribute to the realisation of effects for people with protected characteristics as defined in the Equality Act 2010. These protected characteristics are:

- **Age:** this refers to persons defined by either a particular age or a range of ages. This can include children (aged under 16), younger people (aged 16-24), older people or pensioners (i.e. those aged 65+), the elderly/very old (i.e. those aged 80+);
- **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. It can also include people who have progressive conditions such as HIV, cancer, or multiple sclerosis (MS) - even where someone is able to carry out day to day activities;
- **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
- **Marriage and civil partnership:** marriage or civil partnership can be between a man and a woman or between two people of the same sex;
- **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
- **Race:** the Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
- **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
- **Sex:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives;

- **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.
- 4.3 In assessing equality effects TfL also consider other groups who are already at a disadvantage for example those living in poverty, refugees and asylum seekers, and ex-offenders. As such these groups are also included within this EqIA.
- 4.4 As there are unlikely to be any impacts with regards to marriage and civil partnership, this protected characteristic has been scoped out of the assessment work.
- 4.5 The assessment considers both differential and disproportionate impacts on protected groups. A **differential** equality effect is one which affects a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised vulnerability or sensitivity associated with their protected characteristic. This would align with the sensitivity of an impact using the assessment approach.
- 4.6 A **disproportionate** equality effect arises when an impact has a proportionately greater effect on a protected characteristic than on the general population overall at a particular location (i.e the magnitude of the impact). In some cases, protected groups are subject to both differential *and* disproportionate equality effects. The EqIA considers impacts on groups of people and not those on specific individuals. The criteria used to determine differential or disproportionate impacts with respect to protected groups include where:
- A certain protected group may be over-represented amongst those working in the taxi and PHV industry and/or amongst taxi or PHV passengers;
 - People who share a protected characteristic form a disproportionately large number of those adversely affected;
 - Amongst those affected by the proposals, people who share protected characteristics are particularly vulnerable or sensitive to a possible impact in relation to their specific protected characteristic;
 - The proposals may either worsen or improve existing disadvantage affecting people who share a protected characteristic;
 - People with shared protected characteristics amongst the affected population may not have an equal share in the benefits arising from the proposals. This can be either due to direct or indirect discrimination or where the groups experience particular barriers to realising such benefits, unless suitable actions are proposed to overcome those barriers; and
 - The proposals may worsen existing community cohesion amongst those affected and TfL's customers and staff or exacerbate conflicts with community cohesion policy objectives.
- 4.7 The approach is based on AECOM's understanding of the Equality Act 2010, particularly section 149 regarding the PSED, and supporting technical guidance produced by the Equality and Human Rights

Commission (EHRC),¹⁰ TfL's guidance on Equality Impact Assessments¹¹ as well as AECOM's in-house approach to conducting Integrated Impact Assessments.

Assessment of impacts

Objective: To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population

Positive impact: Improved safety for vulnerable passengers (including those from protected characteristic groups) as a result of increased criminal checks

- 4.8 The proposals include more frequent enhanced DBS checks for taxi and PHV drivers (Proposals 8 & 9 (A)) and taxi vehicle licensees (Proposals 11 and 13 (A)) as well as new basic DBS check requirements for PHV operators (Proposals 15-18 and 27 (A)).
- 4.9 Enhanced DBS checks include a barred lists check, so more information about an individual can be available when considering if they are fit to be licensed. The increased frequency of checks minimises the likelihood of vulnerable passengers being exposed to potential danger when travelling in taxis or PHVs. This could have a positive impact on children, women and vulnerable adults, who are more likely to be victims of sexual assault and related offences.
- 4.10 The safety impacts to be realised from this proposal are potentially more significant for passengers using PHVs as a higher number of journey-related sexual offences have been reported against booked licensed PHV drivers (2014-2020) compared to taxis.¹² As such, the requirement for PHV drivers to have more regular enhanced DBS checks will further increase the safety of passengers.
- 4.11 In addition, the new requirement for PHV operators to have a basic DBS check will have increased safety implications because TfL will no longer be reliant on self-declaration of convictions, instead there is a more reliable source of new cautions or convictions from which TfL can review the operator's fitness to be licensed. Further, stakeholders supported this safety measure on the grounds that PHV operators have access to personal details of passengers, such as their home address. However, the main limitation of a basic DBS check is that it does not check against barred lists. This would not filter out licensees on the sex offender's register and therefore limits the safeguarding of the public.
- 4.12 For Proposal 14 (A)¹³ TfL questions whether it should seek the power to introduce character and criminal record checks for PHV licensees. By doing so, this could also generate positive impacts in terms of safeguarding the public and in particular more vulnerable groups. Introducing character and

¹⁰ EHRC (updated Feb 2021) Technical Guidance on the Public Sector Equality Duty: England <https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>

¹¹ TfL (Feb 2019) Guidance Note: G1060 A1 – Equality Impact Assessments

¹² TfL. TPH journey-related sexual offences. Available at: <https://tfl.gov.uk/corporate/safety-and-security/security-on-the-network/tph-related-sexual-offences#on-this-page-4>

¹³ While the impacts of proposal 14(A) were assessed for the purpose of this IIA, it was decided in December 2022 that TfL will not propose to introduce any additional criminal or character check requirements for either taxi or PHV owners at this time.

criminal record checks for PHV licensees could deter them from committing an offence, as TfL will be made aware of cautions and convictions when a DBS check is done, or deter them from allowing their licensed PHVs to be knowingly used to conduct illegal activities.

- 4.13 Proposing a licensing condition to require all taxi drivers, PHV drivers and PHV operators to inform TfL of any arrest and release, charge or conviction of any offence within 48 hours (Proposals 2-4 & 29 (A)) could provide further positive impacts of safety for vulnerable passengers. Narrowing the window to report offences limits the potential for passengers to be placed in a position where their driver is under investigation or a convicted criminal. Additionally, tighter regulations could deter licence holders from committing offences due to the increased threat of being identified and having their licence revoked or from those likely to commit offences using the taxi and PHV trade for such purposes.

'[Increased DBS checks] are really encouraging to see, because...three years is a long time for someone to commit a serious crime and no-one know about it.'

Non-trade stakeholder

Positive impact: Improved security and perception of security for passengers (including those from protected characteristic groups) through use of online taxi driver and vehicle licence checker and taxi driver photo ID.

- 4.14 The TfL licence checker allow passengers to confirm the vehicle they are getting into is licensed and driven by a licence holder. Whilst currently available online for checking PH operator, driver and vehicle licences, Proposals 39 & 40 (B)¹⁴ would also make this service available for checking taxi driver and vehicle licences.
- 4.15 This could have a positive impact on passengers by improving perceptions of safety while travelling. This would have a particularly beneficial impact on those who are most vulnerable to safety and security issues including women, vulnerable adults and children.
- 4.16 However, feedback from some stakeholders emphasised that the limited public knowledge of the licence checker service creates a barrier to these positive impacts. The licence checker may also be difficult for some to use, needing details of a vehicle's registration plate to use the service. Including a link to the TfL licence checkers in booking confirmations could raise awareness amongst PH passengers, while making it more accessible for digitally challenged users.
- 4.17 Introducing a photo ID for taxi drivers (Proposal 41)¹⁵ is an accessible way for passengers to immediately corroborate the identity of the driver prior to entering a vehicle. Whilst taxi drivers currently wear a metal badge, only informed passengers may recognise this identifying feature. Feedback from stakeholders recognised that the photo needs to be displayed somewhere

¹⁴ While the impacts of proposals 30 & 40 (B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

¹⁵ While the impacts of proposal 41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

accessible for the passenger such as the partition screen or the driver's side passenger door.

- 4.18 However, although the current proposals were broadly seen as positive they do not fully meet the needs of visually impaired passengers. Firstly, the taxi licence checker relies on passengers being able to see the taxi driver's badge number, vehicle registration or taxi vehicle licence plate when they hail a taxi. Where a taxi is booked in advance through an app, details of the driver and vehicle can be sent prior to the journey via a booking confirmation and checked through the screen reader app. Feedback on Proposal 41 (B) with stakeholders proposed replacing the taxi driver photo ID with tactile signs containing the drivers name and ID for visually impaired passengers to confirm the driver's identity.

'It's [photo ID] another layer of safety for a passenger. You won't be with familiar with what he looks like, whereas the photo gives you an immediate confirmation.'

Trade stakeholder

'Like many other visually impaired people...especially when it comes to the photo...I probably would like to see alternative ways for the vision impaired...to identify and verify the driver.'

Non-trade stakeholder

Positive impact: Increased confidence for passengers (including those with protected characteristics) through improved complaints information

- 4.19 The proposals include a requirement for all taxis and PHVs to 'display signage showing information on how to make a complaint to TfL' (Proposals 5&6 (A)). Additionally, Proposal 33 (B) sets out that PHV operators are to include information about how to make a complaint to the operator and TfL in the booking confirmation sent to passengers.
- 4.20 Current awareness that TfL is responsible for regulating taxi and PHV services is low, with only around one third of taxi and minicab passengers aware that TfL is the licensing authority and therefore can be contacted regarding any complaints.
- 4.21 The proposal for increased information on how to make a complaint could help to raise awareness of incident reporting for customers. An effective complaint process could increase driver and operators' accountability and responsibility, whilst increasing passenger's confidence in using their service. This could be of particular benefit to more vulnerable passengers such as disabled people, older people and women.
- 4.22 However, engagement with stakeholders signalled a need for consistency in signage. Currently, some taxis have different signs containing complaints information within the taxi vehicle. Combining all of these signs into one clear sign could provide more clarity for passengers wanting to find relevant information such as incident reporting procedures. Furthermore, Proposals 5 & 6 do not currently include provision for those who are visually impaired and would benefit from information from audio announcements as they

enter the vehicle, or alternatively a barcode which is compatible with the screen reader app. Additionally, passengers with partial vision require bold, bright and non-contrasting colour for signage to be accessible.

- 4.23 While providing complaints information in the booking confirmation could generate an accessible complaints' procedure for PHV passengers, a follow-up text after the journey could be a more appropriate place for complaints information. The booking confirmation may become an overwhelming source of information which passengers fail to engage with.
- 4.24 Although incident reporting is useful to identify ongoing issues with drivers it does not tackle immediate issues of safety and security and therefore positive impacts in improving confidence, safety and security are only assessed as minor. A system whereby passengers could report live incidents (of a non-999 nature) could help passengers feel more secure and in control when alone in an unfamiliar environment and ultimately could prevent passengers who are feeling threatened from getting out of the vehicle into a potentially more dangerous environment, especially at night.
- 4.25 Proposals 30 & 31 could provide positive effects of safety for passengers through establishing a narrow window for addressing safety-related complaints. Proposal 37(B) also requires operators to record details of complaints and retain these records for three years, as opposed to 12 months which is currently required. Engagement with stakeholders representing vulnerable passengers discussed the importance of reporting and responding to low level safety complaints, because if these behaviours are repeated, it can flag issues with drivers who are repeatedly the subject of complaints before escalating into a high-level safety concern or issue.

Negative impact: Potential discrimination of older taxi drivers and those with learning difficulties due to new assessment requirements

- 4.26 A current requirement for PHV drivers is the Safety, Equality and Regulatory Understanding Assessment (SERU). Proposal 38 (B) is for this to be introduced for taxi drivers. This contains a written assessment which must be passed for licensing requirements.
- 4.27 Consequently, these assessments could prevent those who struggle with exam conditions due to age, disability, or inexperience, from obtaining a licence as they otherwise could under existing assessment criteria. In particular, the new SERU assessment requirement could discriminate against older drivers who form a large proportion of taxi drivers in London. Proposed suggestions for minimising negative impacts whilst ensuring the relevant level of safety, equality and regulatory understanding include:
- Incorporating the SERU assessment as part of an Advanced Driving Test
 - Creating more practical based methods of assessment rather than a 'desk' based assessment. This should also be continuous with video updates for drivers on key issues, training and guidance as part of continuous professional development.
- 4.28 Furthermore, other proposals, such as that to automate the DBS process could also have positive impacts on older drivers and those uncomfortable with using digital technology. This service automates DBS checks every 6-months which reduces the layers of admin work required for a full DBS

renewal. This may benefit older licence holders who may have limited access or knowledge of technology, and licence holders who may experience other issues with using technology.

'I've got members that could barely read and write, real problems with the literacy and we've got quite a lot of dyslexic members as well, so that would be a real kind of challenge'

Taxi trade stakeholder

'We've got guys who drive cabs that are in their sixties and seventies, but they struggle with the digital stuff if it becomes too complicated, it should be nice and simple.'

Taxi trade stakeholder

Negative impact: Potential disadvantage or discrimination of taxi drivers whose first language is not English and those with learning difficulties

- 4.29 The proposal to introduce a new formal English Language requirement for taxi drivers includes an assessment of speaking, listening, reading and writing abilities to a B1 level on the CEFR. The reading and writing skills of taxi drivers are a new criteria expected to be assessed through the SERU assessment, while three options were being considered to assess listening and speaking. In December 2022, it was confirmed that TfL will continue to monitor the speaking and listening skills taxi drivers demonstrate when completing the Knowledge of London.
- 4.30 Applying the English language requirement to established licensees could discriminate against drivers with learning difficulties, such as dyslexia or dyspraxia, and drivers whose first language is not English. After years of serving the industry, excluding licensees who may have difficulty passing the new English language requirement despite their existing competency as a driver, could generate a loss of livelihood. This is likely to have negative impacts on those from ethnic minority groups and those who may not have experience in reading and writing assessments such as older people and those with learning difficulties.
- 4.31 New applicants with learning difficulties or whose first language is not English could also experience barriers to entry.
- 4.32 Taxi drivers who have been working in the industry for a number of years and have passed the Knowledge of London should have a sufficient level of English to pass the English language requirements. However, consideration and support should be provided by TfL for those who may need support in undertaking reading and writing assessments. Therefore, the potential impact is likely to be minor negative overall.

'What I would say is as you're fully aware...with the Knowledge and how that process is undertaken, if you struggle with English language you would not pass the Knowledge... I don't think an English language requirement for taxi drivers is relevant.'

Taxi trade stakeholder

Negative impact: Potential discrimination for those with a clear criminal record but are unable to obtain a Certificate of Good Conduct

- 4.33 The proposal for a Certificate of Good Conduct to demonstrate no overseas convictions for taxi and PHV drivers (Proposals 7) could exclude licence holders who are unable to obtain documentation through no fault of their own. This would likely have a disproportionate impact on applicants from ethnic minority groups with a disproportionate impact on PHV drivers for who ethnic minority groups form the majority of drivers.
- 4.34 Stakeholders from the taxi and PHV trade raised concerns over potential inconsistency in the credibility of Certificates of Good Conduct that may arise depending on the country of origin. Some nations undertake a formal check at the Embassy, while others may take bribery in exchange for a certificate, meaning criminal convictions might go unreported or licensees allegedly pay for a clear record. While this stakeholder concern is appreciated, there is limited available evidence of corruption and bribery to support this potential impact. The existing knowledge of the application process for Certificates of Good Conduct, which varies from country to country, is outlined on the government website¹⁶.
- 4.35 Further discriminatory effects may occur in cases where the licence holder cannot access the country's Embassy due to civil conflict, availability of transport or financial constraints. These discrepancies could generate inequalities in TfL's ability to accredit the licensee's character and assess the licence holders' fitness to drive.
- 4.36 This could also present knock-on negative impacts on the supply of drivers for the taxi and PH trade. There could potentially be a shortage of drivers if licence holders are deterred from applying due to their inability, or concerns regarding their ability, to obtain a Certificate of Good Conduct. More clarity and process guidance will be required if these proposals are implemented to define mitigation in these cases.

¹⁶ Gov.uk (2013). Criminal record checks for overseas applicants. Available at: <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

'It was never clear to me if there's a criteria about what that certificate of good conduct should be.'

Non-trade stakeholder

'Where do you get them? You can go to the Embassy of the country you've been in. Is that hard to do? It depends what country you've been in. Is that going to be something that's a bit burdensome?'

Taxi trade stakeholder

'Depending on the country they've lived in how easy it is to quickly get a CG?'

Private hire trade stakeholder

Neutral impact: Potential equality impacts on passengers through increased fares

- 4.37 Taxi fares are regulated by TfL through taking into account any changes in taxi drivers' operating costs, including licence fees and assessment charges. While PHV operators set their own fares and can choose to increase the fares passengers pay or increase the commission PHV drivers pay to their operator.
- 4.38 Considering this, the additional costs incurred by taxi drivers through the new taxi assessments are not likely to have a significant impact on fares – as compared to other factors such as fuel, insurance, vehicle costs and average national earnings which will have greater impacts.
- 4.39 On the PHV side, any additional costs incurred by PHV operators were not suggested as significant by stakeholders. Consequently, it is not likely that PHV operators would consider increasing fares significantly as a result of these proposals.
- 4.40 Therefore, it is not likely that any fare increases resulting from the proposed changes would be significant, and the overall impact on passengers is likely to be neutral.

Objective: To ensure London has socially integrated communities which are strong, resilient and free of prejudice

Positive impact: Raised awareness of the needs of protected characteristic groups through taxi driver SERU assessment

- 4.41 The taxi driver SERU assessment is expected to cover drivers' obligations including under the Equality Act 2010, particular needs of passengers that arise because a passenger has (or may have) a protected characteristic under the Equality Act 2010, protecting children and adults at risk from harm and abuse, and passenger safety. This awareness could mitigate disability related discrimination and cases where taxi drivers refuse to accept disabled passengers.

- 4.42 As per the proposal, the SERU assessment would be used to assess awareness on equality issues and the requirements of the Equality Act 2010, raising awareness of the requirements of different groups with protected characteristics and helping to reduce discrimination. The SERU would also assist taxi drivers in identifying potential cases of child grooming, domestic abuse and county line drug runs and how to appropriately report these cases. Therefore, the SERU assessment should help to safeguard the most vulnerable groups of society – children, women, elderly and disabled people.
- 4.43 Engagement with groups representing disabled people highlighted concerns that the trade could treat the SERU assessment as a tick box exercise to retain their licence. Instead of a written assessment, they propose the most effective method of understanding equality issues would be continued professional development through an E-training course containing 'best practice' modules. An online portal collaborating with the NSPCC, Action for Children and smaller non-trade organisations could also provide interactive and influential training. This would ensure that licensees are taking their professional duties seriously and continuing to update their awareness and generating the aforementioned positive equality impacts.
- 4.44 Similarly, discussion with trade stakeholders proposed an alternative to the SERU assessment which could provide enhanced equality effects. They suggested reintroducing the taxi driving test. This previously involved a driving test in a taxi, demonstrating that a person could safely load, secure and unload a wheelchair user, and answering a series of relevant driving questions. Stakeholders proposed incorporating questions and scenarios from the SERU assessment handbook into the practical test to engage drivers and demonstrate that they can transfer theory into actions. This hands-on testing could provide a catered experience for disabled passengers which increases feelings of comfort and independence.

Negative impact: Risk of harassment for taxi drivers through introduction of photo ID and online licence checker

- 4.45 The introduction of photo ID for taxi drivers (Proposal 41(B))¹⁷ could potentially result in equality impacts with regards to harassment of drivers. Feedback from a PHV trade stakeholder reported that many of their drivers had been abused online and considered that the use of photo ID could provide an additional opportunity for unfair harassment of drivers should there be a dispute and this in turn could lead to a safety risk for drivers. Drivers from certain ethnic groups or religious groups, or female taxi drivers may be more at risk due to them being more at risk of hate crimes and abuse.
- 4.46 Engagement with trade groups revealed concerns for the driver's safety if their personal details are displayed. This could generate negative effects of harassment and online abuse from unsatisfied passengers. Therefore, there is a need to balance the driver's safety and data protection with the passenger's safety. There could be potentially negative effects of harassment and online abuse if the driver's photo is displayed.

¹⁷ While the impacts of proposal 41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

'From the point of view of a driver, [they are] sort of being the eyes and ears of the community.'

Non-trade stakeholder

'Certainly we support greater assessment of drivers in regard to their understanding about safety... what are the safety standards they should be adhering to with regards to appropriate behaviours...I think there's an opportunity there to train drivers in safety standards.'

Non-trade stakeholder

'There's that safeguarding element of, you know, being aware of children being used to transport drugs and county lines and domestic abuse scenarios and...where a driver could sort of intercept with some of those behaviours and what they should do about it.'

Non-trade stakeholder

Objective: To maximise accessibility for all in and around London

Positive impact: Improved standard of service of taxi and PH services for disabled passengers.

- 4.47 Proposals regarding the SERU assessment, information and signage and complaints could increase the standard of taxi and PHV services for disabled passengers.
- 4.48 However, further consideration for the needs of disabled passengers such as visually and hearing-impaired passengers, is required to increase the potential for improved standard of taxi and PHV services.
- 4.49 An additional point was raised with regard to how passengers using wheelchairs are perceived by the taxi and PH industry. It was recommended that to encourage equal treatment of wheelchair users and other passengers, the active wheelchair signage¹⁸ should be used in vehicles.
- 4.50 The DfT has recently consulted on revised best practice taxi and PHV guidance¹⁹. The focus of the best practice guidance is on how licensing authorities can best use their existing powers to ensure that the taxi and PHV drivers, vehicles and PHV operators that they license provide a safe, inclusive, accessible and attractive service for the passengers they carry. The draft best practice guidance includes a number of proposals aimed at improving services for disabled passengers. The DfT is currently reviewing the responses to the best practice guidance consultation. Once the

¹⁸ Accessibleicon.org (2022). The Accessible Icon Project. Available at: <https://accessibleicon.org/#read>

¹⁹ DfT (2022). Taxi and private hire vehicle best practice guidance. Available at: <https://www.gov.uk/government/consultations/taxi-and-private-hire-vehicle-best-practice-guidance>

outcome of the consultation is published, TfL will review and consider whether any changes or actions are needed.

Negative impact: Reduced availability of taxi and PH services.

- 4.51 The cumulative impacts of introducing new, and changing existing, regulations for taxi and PH services could deter people from applying to become a licensed taxi or PHV driver and consequently reduce the supply of taxis and PHVs. Passengers may then experience reduced availability and increased wait times for taxis and PHVs, and they may be unable to travel when they want to.
- 4.52 The availability of services was an existing issue named by stakeholders, especially post-Covid where the reduced supply of drivers and recovering demand for service has shifted the power to the drivers. Therefore, the proposals could exacerbate this issue and generate minor negative impacts.
- 4.53 Non-trade stakeholders representing disabled passengers felt that this could be particularly relevant for disabled passengers who rely on taxis and PHVs for daily travel, especially for hospital appointments, and already experience limited availability of vehicles.
- 4.54 Further, the lived experience of Taxicard members revealed that they often experience discrimination due to their eligibility for reduced fares. Taxi drivers may turn down less attractive jobs because there is more profitable demand elsewhere. It may be considered that a further reduction in the supply of drivers through these proposals could potentially exacerbate discrimination against Taxicard members and isolation from transport services.

Table 4-1: Summary of Equality impacts

Topic	Objective	Potential impacts	Impact rating
Equality and Inclusion	To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population	Improved safety for vulnerable passengers (including those from protected characteristic groups) as a result of enhanced criminal checks (Proposals 2-4, 8-9, 11, 13-18, 27 & 29).	Moderate positive
		Improved security and perception of security for passengers (including those from protected characteristic groups) through use of online taxi driver and vehicle licence checker and taxi driver photo ID (Proposals 39-41). ²⁰	Minor positive
		Increased confidence for passengers (including those with protected characteristics) through	Minor positive

²⁰ While the impacts of proposals 39-41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

Topic	Objective	Potential impacts	Impact rating
		improved complaints information (Proposals 5-6, 30-31, 33 & 37).	
		Potential disadvantage or discrimination for the older taxi drivers, including those with learning difficulties such as dyslexia and dyspraxia and exclude new applicants from less educated backgrounds (Proposal 38).	Moderate negative
		Potential disadvantage or discrimination of taxi drivers whose first language is not English and those with learning difficulties (Proposal 10).	Minor negative
		Potential equality impacts on passengers through increased fares. (All proposals).	Minor negative
Social Integration	To ensure London has socially integrated communities which are strong, resilient and free of prejudice	Raised awareness of the needs of protected characteristic groups through SERU assessment (Proposal 38).	Moderate positive
		Risk of harassment for taxi drivers through introduction of photo ID and online licence checker (Proposals 39-41). ²¹	Minor negative
Accessibility	To maximise accessibility for all in and around London	Increased standard of service of taxi and PH services for disabled passengers.	Minor positive
		Reduced availability of taxi and PH services (Proposals 5-6 and 38).	Minor negative

²¹ While the impacts of proposals 39-41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

5. Business and economic impacts

Introduction

- 5.1 The assessment of potential business and economic impacts arising from the proposals are assessed against the relevant scoped in IIA objectives set out in Table 2-1 above, namely:
- To ensure London has a safe, secure, accessible, world-class taxi and private hire service with opportunity for all providers to flourish;
 - To enhance and improve connectivity for all to and from and within and around London, including expanding travel horizons for those requiring safe, accessible travel options;
 - To safeguard and enhance the Capital's rich cultural offer to benefit all Londoners.
- 5.2 The assessment has been undertaken considering potential effects of the proposals on the following relevant receptors:
- Taxi and PHV drivers, taxi and PH vehicle licensees and PHV operators;
 - Taxi and PHV passengers; and
 - London's wider economy.
- 5.3 When considering potential impacts, both direct and indirect effects have been considered:
- Direct impacts could arise due to increased costs or changes to processes affecting drivers, operators or vehicle licensees. This could include the direct impacts on any operational cost increases, for example on profitability of the sector;
 - Direct impacts could arise due to increased fares for taxi or PHV passengers;
 - Indirect impacts could arise as a result of wider potential changes in passenger or driver behaviour as a result of the proposals including potential changes in perceptions which could in turn have economic impacts.
- 5.4 The assessment considers the impact of implementing: the Part A proposals only; and, the Part B proposals in addition to the Part A proposals, against the existing baseline with respect to taxi and PHV regulations and requirements.
- 5.5 The chapter concludes by setting out recommendations with respect to the proposals in order to minimise the potential direct and indirect business and economic costs of the proposals to drivers, licensees and operators, and the wider economy, and maximise potential beneficial impacts.

Assessment of effects

- 5.6 The assessment of potential business and economic effects follows the approach outlined in Chapter 2 above, and is assessed based on consideration of:

- The magnitude of the direct and indirect business and economic impacts expected to arise from the proposals; and
- The sensitivity to change, of taxi and PHV drivers; taxi and PH vehicle licensees; PHV operators; taxi and PHV passengers; and London's wider economy.

Magnitude of impacts

5.7 The assessment of the magnitude of impacts of the proposals considers the following potential direct and indirect effects:

- Potential direct business impacts on taxi and PHV drivers; taxi and PH vehicle licensees; and, PHV operators arising from additional costs and administrative requirements;
- Potential direct impact on taxi and PHV passengers arising from increased fares;
- Potential indirect business and economic effects on the taxi and PHV sector arising from perceived barriers to entry to the sector and/or individuals leaving the sector due to the additional costs and administrative requirements associated with the proposals;
- Potential indirect effects on London's economy arising from increased safety and accessibility of taxi and PHV services, as a result of the proposals - supporting passengers requiring safe, accessible travel in London, and in turn supporting spending in the London economy; and
- Potential indirect effects on London's economy arising from improved cultural branding as a result of a safer and more accessible taxi and private hire sector, which could drive additional tourist and leisure trips to the capital.

Direct impacts – potential additional costs and administrative requirements

5.8 A number of the Part A and Part B proposals would be expected to generate direct costs and administrative requirements for taxi and PHV drivers, taxi and PH vehicle licensees and PHV operators.

5.9 Table 5-1 below summarises the likely direct business and economic impacts (additional costs and administrative requirements) associated with each of the Part A proposals, on taxi drivers, taxi licensees, PHV drivers, PHV licensees and PHV operators

Table 5-1: Business and Economic Impacts of Part A proposals

Part A proposal description	Taxi Driver	Taxi Licensee	PHV Driver	PHV Licensee	PHV Operator
Criminal Record Checks					
PROPOSAL 8 & 9 (A): Licensed taxi and PHV drivers will have to register with the DBS update service and have DBS checks every six months, rather than just having an enhanced DBS	£13-£15 cost saving per year, based on moving from £52-£54 charge once every 3 years to £13 charge per year	N/a	£13-£15 cost saving per year, based on moving from £52-£54 charge once every 3 years to £13 charge per year	N/a	N/a

Part A proposal description	Taxi Driver	Taxi Licensee	PHV Driver	PHV Licensee	PHV Operator
check done every three years.					
PROPOSAL 11 & 13 (A)²²: Taxi vehicle licence applicants must have a basic DBS check when applying and once licensed have a check done annually, rather than just having a one-off standard DBS check if they are not a licensed taxi or PHV driver	N/a	Additional cost associated with additional annual DBS check. £18 charge for a Basic DBS check once a year, compared to a one-off £18 charge for a standard DBS check (according to the government's DBS fee reduction as of April 2022).	N/a	N/a	N/a
PROPOSAL 7, 12 & 13 (A)²³: When applying for a taxi driver, PHV driver, PHV operator or taxi vehicle or PHV licence applicants must provide a Certificate of Good Conduct to cover any periods (three or more continuous months) spent living outside the UK since they were 18. Once licensed, a Certificate of Good Conduct will be required for any periods (three or more continuous months) spent living outside the UK.	Likely to incur administrative costs for affected drivers.	Likely to incur administrative costs for affected licensees.	Likely to incur administrative costs for affected drivers.	Likely to incur administrative costs for affected licensees dependent on if TfL introduce character checks for PHV licensees.	Likely to incur administrative costs for affected operators.
PROPOSAL 15-18 & 27 (A): Applicants for PHV operator licence must have a basic DBS check when applying and have a check done annually, at present no DBS check is required. DBS checks would have to be done through TfL's service provider.	N/a	N/a	N/a	N/a	Additional cost of £30.85 for a Basic DBS check once a year through TfL's service provider. This cost will be incurred for every individual associated with the operator licence.
PROPOSAL 14 (A)²⁴: Should TfL seek the power to introduce character and criminal record	N/a	N/a	N/a	Additional cost of £18 for a Basic DBS check once a year.	N/a

²² While the impacts of proposals 11 & 13 (A) were assessed for the purpose of this IIA, it was decided in December 2022 that TfL will not propose to introduce any additional criminal or character check requirements for either taxi or PHV owners at this time.

²³ While the impacts of proposals 7, 12 & 13 (A) on taxi vehicle and PHV vehicle licence applicants were assessed for the purpose of this IIA, it was decided in December 2022 that TfL will not propose to introduce any additional criminal or character checks requirements for either taxi or PHV owners at this time.

²⁴ While the impacts of proposals 11 & 13 (A) were assessed for the purpose of this IIA, it was decided in December 2022 that TfL will not propose to introduce any additional criminal or character checks requirements for either taxi or PHV owners at this time.

Part A proposal description	Taxi Driver	Taxi Licensee	PHV Driver	PHV Licensee	PHV Operator
checks for PH vehicle licensees, as no DBS checks are currently required? If they did, these would most likely be the same as the character and criminal record checks for taxi vehicle licensees.					
PROPOSAL 2-4 & 29 (A): Taxi drivers, PHV drivers, and PHV operators must inform TfL of any arrest and release, charge, or conviction of any offence within 48 hours. Drivers and currently required to do this within 21 days, and PHV operators are required to within 14 days.	N/a	N/a	N/a	N/a	N/a
PHV Operator Conditions					
PROPOSAL 19, 20 & 28 (A): PHV operators must keep a register of booking and dispatch staff, including name, date of birth, reference number and date of DBS check.	N/a	N/a	N/a	N/a	Likely to incur set-up and on-going administrative costs.
PROPOSAL 22 & 23 (A): PHV operator booking records must include the name of any individual that responded to the booking request, name of any individual that dispatched the vehicle, name of the driver carrying out the booking, PHV driver licence number of the driver carrying out the booking, and the vehicle registration mark (VRM) of vehicle.	N/a	N/a	N/a	N/a	Likely to incur set-up and on-going administrative costs.
PROPOSAL 21 (A): PHV operators must have a policy on employing ex-offenders. No policy is currently required.	N/a	N/a	N/a	N/a	Likely to incur a one-off administrative cost associated with policy development.
Taxi Assessments					

Part A proposal description	Taxi Driver	Taxi Licensee	PHV Driver	PHV Licensee	PHV Operator
PROPOSAL 38 (A/B): All new applicants and existing taxi drivers will have to pass an assessment of their safety, equality and regulatory understanding (SERU). This is not currently required for taxi drivers.	£36 additional one-off cost and £16 resit costs; Potential loss of income costs if test failed and must resit.	N/a	N/a	N/a	N/a
PROPOSAL 10 (A)²⁵: A new English language requirement will be introduced for taxi drivers (level B1 on the CEFR required). At present there is no English language requirement for taxi drivers.	Cost covered by the KoL and SERU assessment (Options 1 and 2). Potential one-off cost and resit costs associated with Option 3 should an additional test be introduced (cost tbc); As above, potential loss of income costs if test failed and must resit.	N/a	N/a	N/a	N/a
Signage, Complaints and Lost Property					
PROPOSAL 5 & 6 (A): All taxis and PHVs must display signage showing information on how to make a complaint to TfL.	N/a	Likely to incur nominal administrative costs.	N/a	Likely to incur nominal administrative costs.	N/a
Changes to Licensing Policy and Requirements					
PROPOSAL 1 (A): Wherever possible, TfL propose to apply new taxi or private hire licensing policies immediately, instead of waiting until a new licence is issued and then taking the new policy into consideration.	Cost saving associated with DBS check change, and additional costs associated with SERU and CEFR assessments and relevant administrative costs to be incurred dependent on the policy change.	Relevant administrative costs to be incurred dependent on the policy change.	Cost saving associated with DBS check change, and relevant administrative costs to be incurred dependent on the policy change.	Relevant administrative costs to be incurred dependent on the policy change.	Additional DBS check costs and relevant administrative costs to be incurred dependent on the policy change.

5.10 Table 5-2 below summarises the likely direct business and economic impacts (additional costs and administrative requirements) associated with each of the Part B proposals, on taxi drivers, taxi licensees, PHV drivers, PHV licensees and PHV operators.

²⁵ While the impacts of proposal 10(A) were assessed for the purpose of this IIA, it was decided in December 2022 that TfL will continue to monitor the speaking and listening skills taxi drivers demonstrate when completing the Knowledge to ensure that London taxi drivers' English skills meet the objectives in the Standards.

Table 5-2: Business and Economic Impacts of Part B proposals

Part B proposal description	Taxi Driver	Taxi Licensee	PHV Driver	PHV Licensee	PHV Operator
Security Checks					
PROPOSAL 39 (B)²⁶: Introduce an online licence checker that is publicly accessible and could be used by anyone to check if a: Person is licensed by TfL as a taxi driver Vehicle is licensed by TfL as a taxi	Small set up cost funded through licence fees.	Small set up cost funded through licence fees.	N/a	N/a	N/a
PROPOSAL 40 (B)²⁷: Publicly accessible online licence checkers for private hire drivers, vehicles and operators are already available.	N/a	N/a	N/a	N/a	N/a
PROPOSAL 25 & 26 (B): PHV operators shall carry out regular checks to make sure drivers and vehicles are licensed before making them available to carry out private hire bookings, and they will verify that all documents provided by PHV drivers are legitimate and relate to the driver or vehicle.	N/a	N/a	N/a	N/a	Additional administrative cost.
PROPOSAL 41 (B)²⁸: Introduce taxi driver photo ID that passengers can see before they get into a taxi in order to check that the driver matches the person shown on the photo ID.	Likely to incur nominal administrative costs through increased licence fees.	N/a	N/a	N/a	N/a
PHV Operator Conditions					
PROPOSAL 24 (B): PHV operators must notify TfL within 72 hours of all data breaches, material data losses or infringements of data protection law affecting the data of UK drivers and/or customers, whether those incidents occur in the United Kingdom or elsewhere.	N/a	N/a	N/a	N/a	Additional administrative cost.
PROPOSAL 34 (B): PHV operators will be required to give TfL at least 28 days advance notice of any changes that they intend to make to their operating model, systems or processes that may affect compliance with the 1998 ACT, 2000 Regulations, or other licence conditions.	N/a	N/a	N/a	N/a	N/a
PROPOSAL 36 (B): Is the minimum of £5m for public liability insurance still an appropriate amount for PHV	N/a	N/a	N/a	N/a	Requirement to increase liability insurance could

²⁶ While the impacts of proposal 39(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

²⁷ While the impacts of proposal 40(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

²⁸ While the impacts of proposal 41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

Part B proposal description	Taxi Driver	Taxi Licensee	PHV Driver	PHV Licensee	PHV Operator
operators with operating centres which are accessible to members of the public?					incur additional cost.
PROPOSAL 35 (B): TfL currently place conditions on individual operator licences, and where the need has arisen, a number of operators have had additional conditions attached to their licences. TfL are seeking views on whether there should be separate licence conditions that will only be applied to the largest PHV operators (those in the top tier (Tier 8) and who can have 10,000+ PHVs available to them).	N/a	N/a	N/a	N/a	Impacts uncertain. Clarity required over nature of additional conditions.
Taxi Assessments - No additional Part B measures proposed.					
Signage, Complaints and Lost Property					
PROPOSAL 33 (B): PHV operators are to include information about how to make a complaint to the operator and TfL in the booking confirmation sent to passengers.	N/a	N/a	N/a	N/a	Additional one-off set-up administrative cost.
PROPOSAL 30 & 31 (B): Within 48 hours of receiving a safety related complaint about a PHV driver, a PHV operator must: Assess whether it is necessary to suspend or dismiss the PHV driver pending further inquiries Notify TfL of the outcome of the assessment and if the PHV driver has been suspended or dismissed	N/a	N/a	N/a	N/a	Additional administrative cost.
PROPOSAL 37 (B): PHV operators are required to record details of complaints and retain these records for three years, as opposed to 12 months which is currently required.	N/a	N/a	N/a	N/a	N/a
PROPOSAL 32 (B): PHV operators will have to make reasonable attempts to contact the owner of lost property.	N/a	N/a	N/a	N/a	Additional administrative cost.
Changes to Licensing Policy and Requirements - No additional Part B measures proposed.					

5.11 A summary of the direct cost and administrative impacts of the Part A and Part B proposals is set out in Table 5-3.

Table 5-3: Summary of Direct Business and Economic Impacts of Part A and Part B proposals

	Taxi Driver	Taxi Licensee	PHV Driver	PHV Licensee	PHV Operator
Part A proposals	- £13-£15 cost saving per year associated with DBS check change; - Administrative costs associated with providing a Certificate of Good Conduct, if relevant; - One-off additional costs associated with new SERU assessment (£36) and £16 resit cost; - Potential costs associated with lost income should SERU or other English language tests be failed.	- Minor administrative cost associated with new vehicle signage.	- £13-£15 cost saving per year associated with DBS check change; - Administrative costs associated with providing a Certificate of Good Conduct, if relevant;	- Minor administrative cost associated with new vehicle signage.	- Additional cost associated with additional annual DBS check; - Administrative cost associated with set-up and implementing registers of booking and dispatch staff, and bookings; - One-off administrative cost associated with setting up policy on employing ex-offenders.
Part B proposals ²⁹	- Minor administrative cost associated with new photo ID. - Small licence checker set up cost funded through licence fees.	- Small licence checker set up cost funded through licence fees.	- None.	- None.	- On-going administrative costs associated with: checking drivers and vehicles are licensed to operate; documents are valid; reporting any data breaches to TfL; dealing with safety related complaints; and managing lost property; - Additional cost associated with increased liability insurance; - Potential costs associated with introduction of additional conditions on large operators; - One-off administrative cost associated with adding complaints procedure to booking details.

5.12 The stakeholder feedback during consultation provides further detail on the potential magnitude of the expected administrative costs associated with the proposals. A summary of this feedback is set out in Table 5-4.

²⁹ While the impacts of proposal 39-41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

Table 5-4: Stakeholder Feedback – Potential Direct Costs and Administrative Requirements

Theme	Comments
Security Checks	- Any delays to DBS approval could negatively impact a taxi or PHV driver's livelihood through inability to work. (Part A) - DBS update service would save time and costs. (Part A) - Clarity required with respect to process and method of enforcement on requirement to report arrests within 48 hours. (Part A) - Annual operator DBS checks would increase the admin work and cost of running a licensed business. Additionally, resourcing challenges could occur if a DBS check must be undertaken by a senior position representing the operator. (Part A) - Increasing the regularity of PHV operator checks would increase the admin work and cost of running a licensed business. This resourcing pressure would particularly impact smaller operators. (Part B) - Taxi driver and vehicle licence checker could delay services due to the time taken for passengers to process the check. (Part B)
Operating Conditions	- Requirement for PHV driver and vehicle checking considered to be administratively laborious. (Part B)
Taxi Driver Assessments	- Additional test not acceptable given high existing cost of Knowledge of London process.
Signage, Complaints and Lost Property	- Concerns raised regarding costs associated with additional signage. - Clarity on signage requirements and formats required. - Clarity on administrative requirements with respect to safety complaints. - Additional signage could detract from customer experience in the case of executive and chauffeur services
Changes to Licensing Policy and Requirements	- A reasonable transition period should be allowed for to fulfil requirements.

5.13 Based on the evidence above, in the context of existing baseline licensing and operating costs, the likely magnitude of the likely direct costs and administrative impacts arising from the Part A proposals for taxi drivers and vehicle licensees and PH drivers and vehicle licensees is assessed to be low. The PHV operator administrative costs associated with setting up new booking registers is likely to incur an impact in terms of set-up costs in the short-term, however over the long-term the process is likely to become routinised, and overall the magnitude of this direct cost is also assessed to be low. Should changes be required to public liability insurance this could introduce a further increase or decrease in PHV operator costs. Having a policy on employing ex-offenders is not expected to incur any cost impacts.

5.14 The Part B proposals could present an additional nominal one-off cost for taxi drivers associated with providing photo ID, alongside a direct cost of the SERU assessment. The magnitude of this impact is assessed to be low. The additional costs and administrative requirements for PHV operators would require a range of additional administrative procedures to be set up and carried out on an on-going basis. However, PHV operators may pass these additional costs on to PHV drivers and/or PHV passengers. The short-term impact of setting up new practices could be of medium magnitude. Non-trade stakeholders did not comment on the impact of

additional costs or how significant this might be. Over the long-term as changes become routinised the impact would be expected to be low.

Indirect impacts – potential impact on taxi and PHV sector arising from perceived or actual barriers to entry to the sector

- 5.15 The proposals with both Part A and Part B would place additional requirements on taxi and PHV drivers, taxi and PHV licensees and PHV operators with respect to costs and administrative tasks which could for some create a barrier to entry to the sector, or lead some existing licensees, employers and/or employees to leave the sector. If this was to occur at a significant volume this could have an economic impact on the sector should it face shortages in drivers or other workers. In turn this could also affect passengers being able to access employment, services and leisure activities.
- 5.16 The following provides a summary of stakeholder feedback relevant to this potential effect:
- DBS check renewal time of 6-months is too frequent and could deter taxi and PHV driver licence applicants;
 - There could potentially be a shortage of taxi or PHV drivers if licence holders are unable to obtain a Certificate of Good Conduct. This may disproportionately impact less regulated nations with no formal Embassy proceedings. More clarity and process guidance is required for these proposals to define mitigation in these cases;
 - New assessments are potentially intimidating for taxi drivers, especially those who have never sat an exam before. They felt that asking existing taxi drivers, who may have serviced the industry for over 40 years, to undertake further assessment to retain their licence is a step too far. It could also deter new taxi driver applicants and generate supply challenges for the taxi trade. Adding additional assessments could exacerbate the financial implications of becoming a taxi driver through both the cost of taking and resitting the assessment and the earnings lost during periods of preparation.
- 5.17 While it is acknowledged that some taxi or PHV drivers may face barriers with respect to obtaining Certificates of Good Conduct, overall few concerns were raised on the potential barriers to entry to the sector. Based on the evidence above, and the scale of the changes proposed, it is considered likely that the magnitude of the indirect economic effects arising from changes in perceived or actual barriers to entry to the sector would be negligible, while acknowledging barriers could be higher for some groups (as assessed above).

Indirect impacts – potential economic impact arising from improvements to and perceptions of accessible travel by taxi

- 5.18 The proposals would require compulsory SERU assessments for taxi drivers, which would be expected to increase awareness among drivers of requirements of disabled passengers. Improved complaints information which increases feelings of safety for passengers could support increased use of taxi and PH services, especially as part of the night-time economy. This could particularly support establishments with later opening hours such as clubs and bars, which are more reliant on taxi and PH travel

outside of most public transport operating hours. The wider additional safety requirements for PHV operators could also increase perceptions of safety of travel for PHV passengers.

5.19 The responses from stakeholders provide some limited qualitative evidence that the proposals are likely to result in increased perceptions of accessibility of services for passengers. The following stakeholder feedback set out support for the potential positive accessibility impacts that could arise from the proposals:

- Support for a taxi driver English language requirement as it was felt that it would benefit passengers and improve their safety if drivers were able to assist a passenger in distress.

5.20 Improved perceptions could have a positive impact on the accessibility of travel for passengers with accessibility requirements, which could in turn have wider economic benefits should passengers more easily be able to access employment, services and leisure activities as a result of the proposals. It is difficult to quantify the potential magnitude of this impact, however in the context of the size of the wider London economy the likely magnitude of impact is likely to be negligible.

Indirect impacts – potential economic impact arising from improvements to and perceptions of London's iconic taxi brand

5.21 As set out above, the proposals would support accessibility and safety improvements to taxi and PHV services for passengers which could have a positive effect on perceptions of services, including London's iconic taxi brand. This could contribute to positive perceptions of London as a destination to visit, with associated economic benefits should this drive additional visits and spending in the capital.

5.22 There were no stakeholder comments of relevance to the potential impacts of the proposals on London's iconic taxi brand.

5.23 While safety improvements could support improved passenger perceptions of services, in the context of the size of London's wider economy and wider influences on drivers of visits to the capital, the magnitude of this effect is likely to be negligible.

Sensitivity of receptors

Taxi and PHV sector (including taxi and private hire licensees)

5.24 The baseline assessment (see Appendix D) provides evidence of the relative strength of London's taxi and PHV sector, with the taxi sector having experienced higher employment growth over the last 5 years and higher wages, compared to averages across England as a whole. To a large extent the relative size and higher wages experienced in the sector in London are reflective of broader economic trends and the strength of the capital's economy relative to England as a whole.

5.25 The baseline also sets out clear evidence of the impact the Covid-19 pandemic had on the sector, which translated into significantly lower average wages for workers than before the pandemic. Further evidence on the business challenges faced by drivers during the pandemic was provided in stakeholder interviews.

5.26 Wider macroeconomic changes associated with broader economic policy and trends are increasingly adding pressures across many business sectors, with many sectors facing higher operating costs, a more constricted labour market, and lower consumer demand.

5.27 Given wider economic changes, and the ongoing recovery following the Covid-19 pandemic, the taxi and PHV sector in common with many other sectors is assessed to be of medium sensitivity at the current time.

London economy

5.28 London is a large, globally competitive economy. Part of its strength is driven by its diversity, comprised of a broad range of sector strengths which protect it from adverse shocks arising from downward trends in any one sector.

5.29 In the broader context of the London economy's size and diversity, its sensitivity to changes in the taxi and PHV sector is assessed to be negligible.

Assessment of Likely Effects

5.30 Based on the assessment of the likely magnitude of impacts, and sensitivity of receptors outlined above Table 5-5 sets out a summary of the likely business and economic effects of the proposals.

Table 5-5: Summary of business and economic impacts

Topic	Objective	Potential impacts	Impact rating
Economic competitiveness and employment	To ensure London has a safe, secure, accessible, world-class taxi and private hire service with opportunity for all providers to flourish	Potential direct business impacts on taxi and PHV drivers; taxi and PH vehicle licensees; and PHV operators arising from additional costs and administrative requirements. (Proposals 1, 5-28, 30-33, 35, 36, 38, 39 and 41). ³⁰	Neutral – Taxi drivers, taxi vehicle licensees, PHV drivers, PHV licensees Minor negative – PHV operators.
Economic competitiveness and employment	To ensure London has a safe, secure, accessible, world-class taxi and private hire service with opportunity for all providers to flourish	Potential indirect business and economic effects on the taxi and PHV sector arising from perceived barriers to entry to the sector and/or individuals leaving the sector due to the additional costs and administrative requirements associated with the proposals. (Proposals 1, 5-28, 30-33, 35, 36, 38, 39 and 41). ³¹	Neutral
		Potential direct impact on taxi and PHV passengers if the availability of services decline in response to the	Neutral

³⁰ While the impacts of proposals 11-14 (A) were assessed for the purpose of this IIA, it was decided in December 2022 that TfL will not propose to introduce any additional criminal or character checks requirements for either taxi or PHV owners at this time. The impacts of proposals 39 & 41 (B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

³¹ As above, TfL will not propose to introduce any additional criminal or character checks requirements for taxi or PHV owners at this time. TfL will not be consulting on proposals 39 & 41(B) but will be seeking views on how they can further improve safety for taxi passengers

		new regulations deterring applicants and licence renewals. (Proposals 1, 5-28, 30-33, 35, 36, 38, 39 and 41). ³²	
Economic competitiveness and employment	To enhance and improve connectivity for all to and from and within and around London, including expanding travel horizons for those requiring safe, accessible travel options	Potential indirect effects on London's economy arising from increased safety and the standard of taxi and PHV services, as a result of the proposals - supporting passengers requiring safe, accessible travel in London, and in turn supporting spending in the London economy. (All proposals).	Negligible, in the context of the size of the wider London economy.
Economic competitiveness and employment	To safeguard and enhance the Capital's rich cultural offer to benefit all Londoners	Potential indirect effects on London's economy arising from improved cultural branding as a result of a safer and more accessible taxi and private hire sector, which could drive additional tourist and leisure trips to the capital. (All proposals).	Negligible, in the context of the size of the wider London economy.

Recommendations

5.31 The following clarifications over specific requirements and arrangements for the implementation of proposals would support taxi and PHV drivers, taxi and PHV licensees and PHV operators to prepare for changes and could reduce the administrative time required to implement them, with associated business benefits. It is recommended TfL should provide further clarity with respect to the following:

- **PROPOSAL 2-4 and 29 (A):** Clarity required on which offences should be reported within 48 hours, and process for enforcement. A contact method, clear reporting process and code of conduct should an offence go unreported should be established.
- **PROPOSAL 21 (A):** Advice should be issued by TfL on the policy requirements for PHV operators on employing ex-offenders. If available a policy template could be made available.
- **PROPOSAL 35 (B):** Clarity should be provided on the nature of additional licensing conditions that would be applicable to the largest PHV operators (those in the top tier (Tier 8) and who can have 10,000+ PHVs available to them).

³² As above, TfL will not propose to introduce any additional criminal or character checks requirements for taxi or PHV owners at this time. TfL will not be consulting on proposals 39 & 41(B) but will be seeking views on how they can further improve safety for taxi passengers

- **PROPOSAL 10 (A)**³³: Confirmation to be provided on whether an additional English language test is required (in addition to SERU assessment), and any associated cost, if relevant.
- **PROPOSALS 10 (A) and 38 (B)**: Clarity should be provided on arrangements should taxi drivers fail tests.
- **PROPOSALS 5 and 6 (A)**: Clear guidance should be provided on exactly what signage is required, and if there are specific templates to follow.
- **PROPOSALS 30 and 31 (B)**: Clarity should be provided on administrative requirements with respect to safety complaints.

³³ While the impacts of proposal 10(A) were assessed for the purpose of this IIA, it was decided in December 2022 that TfL will continue to monitor the speaking and listening skills taxi drivers demonstrate when completing the Knowledge to ensure that London taxi drivers' English skills meet the objectives in the Standards.

6. Environmental impacts

Introduction

- 6.1 This section considers how the proposals are likely to perform against the two objectives relevant to the environment:
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure;
 - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates

Assessment of impacts

Objective: Reduce emissions and harmful atmospheric pollutants

Neutral impact: Indirect impact on air quality due to potential changes in numbers of licence applicants as a result of proposals

- 6.2 Although reducing emissions is not a specific objective associated with the proposal, the impact assessment has identified that an overall impact of the proposals could be a reduction in the number of taxi and PH driver licence applicants, and in turn the number of taxis and PHVs in operation within London. However, it is recognised that the recent reduction in taxi driver licence applicants can be attributed to various factors and it is unlikely that the impact of these proposals would result in any significant change.
- 6.3 In addition, there are already licensing requirements to reduce emissions from taxis and PHVs. Therefore, the impact of the proposals on air quality is likely to be neutral.

Neutral impact: Delayed transition to zero emission capable (ZEC) vehicles

- 6.4 The additional costs incurred by all licensees through these proposals could generate a delay in replacing diesel or petrol vehicles with ZEC vehicles. This would limit a reduction in vehicle emissions.
- 6.5 However, overall the impact of this is likely to be neutral.

Objective: Significantly reduce waste generated and achieve high reuse and recycling rates

Negative impact: Increased use of printed materials for taxi driver photo IDs, assessment handbooks, training materials and security related paperwork

- 6.6 A number of proposals could require increased use of printed materials. This includes:

- Over 19,000 photo IDs for taxis drivers (Proposal 41 (B))³⁴
- Printing SERU handbooks and other training materials required for assessment purposes (Proposal 38 (B))
- DBS certificates (to potentially be produced on a more frequent basis)
- Notifying licence holders of the changes in regulations

6.7 Whilst some of the documents above can be produced digitally, others require paper copies. Also, given the nature of the industry and the demographic profile of drivers it is important that hard paper copies of training materials are available. This will produce a minor negative impact for this objective.

6.8 TfL recycled materials should be used where possible to reduce waste and products should be recyclable.

Table 6-1: Summary of environmental impacts

Topic	Objective	Potential impact	Impact rating
Air quality	Reduce emissions and harmful atmospheric pollutants	Indirect impact on air quality due to potential changes in numbers of taxi and PHV driver licence applicants as a result of proposals.	Neutral
		Delayed transition to zero emission capable (ZEC) vehicles.	Neutral
Materials and waste	Significantly reduce waste generated and achieve high reuse and recycling rates	Increased use of printed materials for taxi driver photo IDs, assessment handbooks, training materials and security related paperwork (Proposals 1, 8-9, 11, 15-18, 38 and 41) ³⁵ .	Minor negative

³⁴ While the impacts of proposal 41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

³⁵ While the impacts of proposal 41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

7. Crime and disorder impacts

Introduction

- 7.1 This section considers how the proposals are likely to perform against the objective relevant to crime and disorder:
- To contribute to safety and security and the perceptions of safety
- 7.2 The assessment covers the following themes of crime and disorder due to their relevance to proposals and the taxi and PHV industry:
- Licence offences;
 - Sexual offences; and
 - Hate crime, harassment and abuse.

Assessment of impacts

Objective: To contribute to safety and security and the perceptions of safety

Positive impact: Increased safety for children and vulnerable adults using taxi and PHV services

- 7.3 Several proposals reduce the risk of PHV operators and taxi and PHV drivers with a criminal conviction working with children and vulnerable adults. These include more frequent enhanced DBS checks for taxi and PHV drivers (Proposals 8 & 9 (A)), more frequent basic DBS checks for taxi vehicle licensees (Proposals 11 and 13 (A))³⁶ as well as new basic DBS check requirements for PHV operators (Proposals 15-18 and 27 (A)).
- 7.4 Enhanced DBS checks include a barred list check. The increased frequency of checks reduces the likelihood of passengers being in vehicles with criminal offenders when travelling by taxis or PHVs.
- 7.5 More frequent enhanced DBS checks will identify taxi and PHV driver licence holders committing offences and enable TfL to take action and potentially suspend or revoke a taxi or PHV driver's licence. This is a significant impact for the PH trade as there were a total of 140 recorded sexual offence charges from 2014-2020 (compared to two charges for taxis over this same time period).
- 7.6 There are a number of proposals that generate positive impacts for crime through enabling TfL to take action more quickly. These include:
- Proposals 2-4 (A): reducing the reporting time of arrest and release, charge, caution and convictions to 48 hours could enable TfL to take quicker action in assessing a driver's fitness to remain licensed;

³⁶ While the impacts of proposals 11 & 13 (A) were assessed for the purpose of this IIA, it was decided in December 2022 that TfL will not propose to introduce any additional criminal or character check requirements for either taxi or PHV owners at this time.

- Proposals 5 & 6 (A): improving the complaints information inside vehicles could increase passengers' awareness of TfL as the regulating body to which they should report incidents. Consequently, TfL could be made aware of concerns and take action more often; and
- Proposal 31 (B): introducing a new requirement for PHV operators to inform TfL of a safety related complaint within 48 hours provides tighter regulations around reporting which will increase TfL's awareness of potential danger to passengers. Stakeholders felt 48-hours was an appropriate time to deal with high-level and serious complaints, such as harm to another person.

7.7 These proposals could deter licence holders from committing offences due to the increased threat of being identified and having their licence revoked.

7.8 However, disparity in the credibility of Certificates of Good Conduct (Proposals 7, 12 & 13 (B)) could generate loopholes for licence holders who have committed offences overseas. These proposals rely on personal accountability and convicted licensees could not disclose that they have been abroad for a period of 3 months or longer. It was recommended by stakeholders that a residency check is undertaken to confirm the licensee's whereabouts and obtain a Certificate of Good Conduct where necessary.

7.9 In addition, proposal 10 (A) introduces an English language requirement for taxi drivers. This would ensure a clear communication channel exists between the driver and passengers in an emergency.

7.10 Further, the SERU assessment (proposal 38 (A)) requires safeguarding training for all taxi drivers. This includes identifying signs that children or vulnerable adults are being groomed, abused or exploited; for example, unaccompanied minors travelling to a hotel. Training would also include guidance on how to appropriately react in the best interests of the vulnerable individual.

7.11 This new taxi driver assessment would therefore generate positive impacts for the safety of children and vulnerable passengers.

'I agree with it being within twenty-four hours [rather than 48 hours]... I know it's a short amount of time, but you need to keep the public safe.'

Non-trade stakeholder

'You're dealing with the public...so public safety should be a top priority for everyone in the industry, including the drivers themselves.'

Trade stakeholder

Positive impact: Reduced risk of unlicensed drivers and vehicles operating in the taxi and PH industry

- 7.12 Public access to a taxi licence checker (Proposal 39 (B))³⁷ could assist in identifying unlicensed vehicles and drivers and prevent vulnerable passengers entering a vehicle which does not have a valid licence. Further, the licence checker could prevent unlicensed drivers renting a licensed taxi and carrying out journeys.
- 7.13 While the same impacts could be generated through Proposal 40 (B)³⁸, the PHV licence checker is already available online so no impacts were identified.
- 7.14 Furthermore, proposals 25 & 26(B), which will increase the regularity of operator checks, could reduce the likelihood of drivers driving beyond their licence because there is an increased chance of getting caught. Again, this could have a knock-on effect of improved safety for vulnerable passengers, especially children, vulnerable adults and women.
- 7.15 The above proposals could also have the knock-on positive effect of minimising the likelihood of passengers getting into unlicensed vehicles and becoming victims of crime.
- 7.16 However, PHV passengers may rely on operators to conduct thorough vehicle checks, so could feel less inclined to use the online checker prior to entering a PHV.
- 7.17 Proposal 41(B)³⁹ has conflicting positive and negative effects on crime. The photo ID could positively reduce the number of people attempting to drive under another person's licence. However, photo ID may be more easily forged compared to existing identifiers in taxis, such as the metal badge. Therefore, while photos could bring positive reductions in vehicle crime, it also opens opportunity to commit such offences.

Positive impact: Reduced risk of discrimination and hate crime towards passengers

- 7.18 As mentioned in Chapter 4, introducing the SERU assessment (Proposal 38 (A)) could generate positive equality impacts for protected characteristic groups. More specifically, assessing taxi drivers on the range of disabilities – both visible and invisible – and their legal obligations to carry these passengers could reduce the frequency of hate crime according to disability. In addition to disabled passengers, other groups vulnerable to hate crime may experience reduced vulnerability. This includes LGBT+ groups, young women and ethnic minority groups.
- 7.19 Engagement with stakeholders representing disabled people proposed that taxi and PHV booking apps could include an option to disclose special requirements within the app profile, such as wheelchair users needing ramp access, which is visible to the driver and removes the need to message the allocated driver of their requirements every time they travel. Through

37 While the impacts of proposal 39(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

38 While the impacts of proposal 40(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

39 While the impacts of proposal 41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

preparing the driver for the journey, this could prevent delays and frustration upon arrival.

Positive impact: Increased safety of PHV passengers through new PHV operator conditions

- 7.20 Proposals 19-23 (A) and 28 (B) would introduce new booking and dispatching requirements for PHV operators. Keeping a register of the name, date of birth, reference number and date of DBS check of the booking and dispatching staff would help to ensure the staff interacting with customers are legitimate employees with no criminal convictions.
- 7.21 Proposal 23 (A) also requires booking and dispatching staff to record the vehicle registration mark of the PH vehicle. This provides a record of the journey and vehicle to respond to complaints, especially safety related complaints, and could reduce PH industry employees committing an offence due to a more efficient recording procedure.
- 7.22 Further, the revision of proposals 22 & 23, to include the PHV driver licence number of the driver carrying out the booking, received stakeholder support for increasing the accountability and safety of PHV travel. Making these details available to the customer upon request could enhance this positive impact, alongside an additional check that the driver has passed their SERU assessment, especially if the customer is disabled or has identified needs.
- 7.23 Proposal 24 (A) requires PHV operators to notify TfL within 72 hours of all data breaches or infringements of data protection law. This would enable TfL to respond quickly to the potential exposure of passenger details, such as names, contact numbers and home addresses, and therefore minimise safety threats to PHV passengers.

Negative Impact: Increased risk of hate crime and harassment towards taxi drivers

- 7.24 Introducing taxi driver photo ID and an online licence checker for taxi drivers could expose taxi drivers to online hate crime and harassment from passengers, especially taxi drivers from ethnic minority groups and female taxi drivers.
- 7.25 A PHV online licence checker is already in place and app bookings often send a photo of the driver with the booking allocation. Consequently, engagement with PH trade stakeholders revealed anecdotal evidence of members being abused or stalked online through passengers uploading photos and licence details of the driver during disputes. This is a safety risk that could affect taxi drivers through the new proposals.⁴⁰

'There is another negative, which is people are filming each other on social media for the things that they think are particularly bad, so you're being named and shamed.'

⁴⁰ While the impacts of proposal 39-41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

Table 7-1: Summary of crime & disorder related impacts

Topic	Objective	Potential impacts	Impact rating
Crime, safety and security	To contribute to safety and security and the perceptions of safety	Increased safety for children and vulnerable adults using taxi and PH services (Proposals 2-13, 15-18, 27,31 and 38).	Moderate positive
		Reduced risk of vehicle crime (Proposals 25-26, 39 and 41). ⁴¹	Minor positive
		Reduced risk of discrimination and hate crime towards passengers (Proposal 38).	Moderate positive
		Increased safety of PHV passengers through new PHV operator conditions (Proposals 19-24 and 28).	Minor positive
		Increased risk of hate crime and harassment towards drivers (Proposals 39-41). ⁴²	Moderate negative

⁴¹ While the impacts of proposals 39 & 41 (B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

⁴² While the impacts of proposals 39-41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

8. Health impacts

Introduction

- 8.1 This section considers how the proposals are likely to perform against the objective relevant to health:
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the city and between communities.
- 8.2 Whilst assessing impacts against the objective, the health impact assessment considers impacts on:
- Taxi and PHV drivers;
 - Taxi and PHV passengers; and
 - The wider public.

Assessment of impacts

Objective: To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities

Positive impact: Increased safety for taxi and PHV passengers

- 8.3 Proposals to increase the frequency of DBS checks narrows the window of exposure for convicted drivers to carry passengers. The introduction of annual DBS checks for PHV operators may also prevent the PHV industry being used for criminal activities in London due to tightened monitoring. Furthermore, the shortened period between DBS checks could deter drivers from committing an offence because they will be identified more quickly.
- 8.4 This may result in a reduction in crimes against taxi and PHV passengers and therefore create positive health impacts through improved safety for passengers. The proposals will have a positive impact on physical health and mental health, particularly for those from vulnerable groups and passengers who are more likely to have safety concerns.

Positive Impact: Reduced levels of anxiety for taxi passengers through licence checks

- 8.5 Various proposals could also deliver positive mental health effects of reducing anxiety and stress when travelling for passengers, particularly those who are most vulnerable. Checking the validity of a taxi vehicle and driver (Proposal 39 (B))⁴³ before beginning a journey could provide reassurance and control for a passenger getting into an otherwise unknown vehicle. Similarly, more accessible information on complaints via signage and awareness of TfL as the licensing authority could ease anxieties about where to report safety concerns while travelling in a taxi or PHV. This could

⁴³ While the impacts of proposal 39(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

increase confidence when using taxis and PHVs. Consequently, this could generate feelings of independence and social inclusion which positively impact mental health and wellbeing.

'At the end of the day we're both [taxis and PHVs] carrying the most precious commodity you can have and that's people, children, and they need to know that the guy that's driving them from there to school or vice versa needs to be properly trained and is a professional driver'.

Taxi trade stakeholder

Negative Impact: Increased levels of stress and anxiety for taxi and PHV drivers

- 8.6 There could be negative mental health impacts of increased anxiety and stress through the new proposals for taxi and PHV drivers.
- 8.7 Proposals 7, 12 & 13 (A), regarding Certificates of Good Conduct and overseas convictions, could generate concern about the loss of livelihood through circumstances out of the licensee's control. Engagement with stakeholders sought clarity about the repercussions on the licence of individuals unable to obtain documentation to validate their time spent outside of the UK, whether this be due to corruption, inaccessibility or travel restrictions.
- 8.8 Furthermore, the new taxi assessments could induce anxiety and stress for taxi drivers who have never sat exams before or have learning difficulties. Stakeholders expressed specific concern for the older generation of drivers who could lose their licence after many years service to the industry. The knock-on effects of losing a licence, such as financial burdens and unemployment, are further health implications to consider.
- 8.9 A recommendation to minimise these negative impacts and prioritise assessment resources for those whose first language is not English, is to recognise assessments of listening and speaking skills that have already been undertaken. For example, certificates of GCSE's or City and Guilds of London courses.
- 8.10 Some stakeholders were concerned about TfL's ability and capacity to deal with complaints from passengers (Proposals 5 & 6 (A)). They felt that the additional signage will encourage and result in more complaints being submitted to TfL, and this may lead to an increase in false allegations which in turn could result in increased mental health and anxiety issues for taxi and PHV drivers. Some discussed how they expected many reports would actually be general comments or minor issues, therefore feeling that the type of things that should be submitted as complaints needs more definition.

Table 8-1: Summary of health impacts

Topic	Objective	Potential impacts	Impact rating
Health and health inequalities	To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities.	Increased safety for taxi and PHV passengers (Proposals 2-4, 8-9, 11, 13-18, 27 & 29).	Moderate positive
		Reduced levels of anxiety for taxi and PHV passengers (Proposal 39). ⁴⁴	Minor positive
		Increased levels of stress and anxiety for taxi and PHV drivers (Proposals 5-7 and 12-13).	Minor negative

⁴⁴ While the impacts of proposal 39(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

9. Summary of potential impacts

Overview

- 9.1 Table 11-1 provides a summary of the potential impacts of the proposals. The table also provides a brief overview of planned mitigation/actions to minimise negative impacts as well as activities in place to enhance opportunities resulting from beneficial impacts. High level recommendations are provided for further consideration.
- 9.2 It is envisaged that this table can be updated with more detailed actions once these are developed and be used to monitor equality effects as proposals progress.

Table 9-1: Summary of impacts

Theme	Potential impacts	Groups impacted	Impact rating	Existing/planned mitigation	Further recommendations
Equality impacts					
Equality and inclusion	Improved safety for vulnerable passengers (including those from protected characteristic groups) as a result of increased criminal checks	Passengers – including women, children and vulnerable adults	Moderate positive	N/A	N/A
	Improved security and perception of security for passengers (including those from protected characteristic groups) through use of online taxi driver and taxi vehicle licence checker and taxi driver photo ID ⁴⁵	Passengers - including women, children and vulnerable adults	Minor positive	N/A	TfL communications to inform passengers of the taxi licence checker tool.
	Increased confidence for passengers (including those with protected characteristics) through improved complaints information	Passengers - including women, and disabled people	Minor positive	N/A	Alternative signage formats for visually impaired passengers should be provided. For example, audio announcements or synchrony with the screen reader app.
	Potential discrimination of older taxi drivers and those with learning difficulties due to new assessment requirements	Taxi drivers – including older people, people with learning difficulties	Minor negative	When implementing the SERU assessment for the PH trade, TfL offer reasonable adjustments for those with a disability or conditions prior to booking the assessment and with documented evidence from the relevant professional.	Apply the same approach of reasonable adjustments for applicants with disabilities and consider only applying the additional taxi assessments to new applicants.
	Potential disadvantage or discrimination of taxi drivers whose first language is not English and those with learning difficulties	Taxi drivers – including people with learning difficulties and whose first language is not English	Minor negative	N/A	N/A

⁴⁵ While the impacts of proposals 39-41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

Theme	Potential impacts	Groups impacted	Impact rating	Existing/planned mitigation	Further recommendations
Social integration	Potential discrimination for those with a clear criminal record but are unable to obtain a Certificate of Good Conduct	Taxi and PHV driver, taxi and PH vehicle licensee ⁴⁶ and PHV operator	Minor negative	N/A	N/A
	Potential equality impacts on passengers through increased fares	Passengers – especially those on low incomes	Neutral	N/A	N/A
	Raised awareness of the needs of protected characteristic groups through SERU assessment	Passengers – including women, children and disabled people, vulnerable adults and potentially other groups (i.e transgender)	Moderate positive	N/A	N/A
	Risk of harassment for taxi drivers through introduction of photo ID and online licence checker ⁴⁷	Taxi drivers – including women and drivers from ethnic minority groups	Minor negative	N/A	N/A
Accessibility	Improved standard of service of taxi and PH services for disabled passengers	Passengers – including disabled people	Minor positive	There is currently no requirement for a taxi driver safety, equality and regulatory assessment, however some trade associations said they independently source disability awareness training for their members.	An interactive E-learning course and practical training could be a more effective method of continuous professional development.
	Reduced availability of taxi and PH services	Passengers – including disabled people	Minor negative	N/A	N/A
Business and Economic Impacts					
Economic competitiveness and employment	To ensure London has a safe, secure, accessible, world-class taxi and private hire service with opportunity for all providers to flourish	Taxi and PHV drivers; vehicle licensees; and PHV operators	Neutral – Taxi drivers, taxi licensees, PHV drivers, PHV licensees Minor – PHV operators.	N/A	- Clarity required on which offences should be reported within 48 hours. A contact method, clear

⁴⁶ While the impacts were assessed for the purpose of this IIA, it was decided in December 2022 that TfL will not propose to introduce any additional criminal or character check requirements for either taxi or PHV owners at this time.

⁴⁷ While the impacts of proposals 39 & 41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

Theme	Potential impacts	Groups impacted	Impact rating	Existing/planned mitigation	Further recommendations
	To ensure London has a safe, secure, accessible, world-class taxi and private hire service with opportunity for all providers to flourish	Indirect business and economic effects on the taxi and PHV sector	Neutral	N/A	reporting process and code of conduct should an offence go unreported should be established
	To enhance and improve connectivity for all to and from and within and around London, including expanding travel horizons for those requiring safe, accessible travel options	Indirect effects on London's economy and passengers	Negligible, in the context of the size of the wider London economy	N/A	- Advice should be issued by TfL on the policy requirements for PHV operators on employing ex-offenders - Clarity should be provided on the nature of additional licensing conditions that would be applicable to the largest PHV operators - Clarity should be provided on arrangements should drivers fail tests - Clear guidance should be provided on exactly what signage is required, and if there are specific templates to follow - Clarity should be provided on administrative requirements with respect to safety complaints
	To safeguard and enhance the capital's rich cultural offer to benefit all Londoners	Indirect effects on London's economy	Negligible, in the context of the size of the wider London economy	N/A	N/A

Environment impacts					
Air quality	Reduce emissions and harmful atmospheric pollutants	All groups	Neutral	N/A	N/A
Materials and waste	Increased use of printed materials for taxi driver photo IDs ⁴⁸ , assessment handbooks, training materials and security related paperwork	All groups	Minor negative	TfL published a sustainability report (2021) ⁴⁹ outlining their contributions to the Mayor's ambition for London to be a zero-waste city. This includes eliminating waste early in the planning stages and increasing recycling rates across transport.	TfL could source printed materials from companies using recycled materials as well as procuring services from social enterprises to increase the social value.
Crime and disorder					
Crime, safety and security	Increased safety for children and vulnerable adults using taxi and PH services	Passengers	Major positive	Enhanced DBS checks for taxi and PHV drivers when first applying and then every three years once licensed Certificate of Good Conduct required if taxi or PHV drivers have lived outside the UK for three or more continuous months in the last three years	Introducing residency checks to confirm the location of the licence holder in their time spent outside the UK could facilitate more reliable overseas conviction checks.
	Reduced risk of unlicensed drivers and vehicles operating in the taxi and PH industry ⁵⁰	Passengers and wider public	Minor positive	N/A	Defining the regularity of operator checks to ensure consistency and narrow the window of exposure would increase this positive impact rating.

⁴⁸ While the impacts of proposal 41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

⁴⁹ Transport for London (2021). Doing the right thing locally and globally: Sustainability Report 2021. Available at: <https://content.tfl.gov.uk/tfl-sustainability-report-29-september-2021-acc.pdf>

⁵⁰ While the impacts of proposals 39-41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

	Reduced risk of discrimination and hate crime towards passengers	Passengers	Moderate positive	TfL already require PHV drivers to undertake a SERU assessment based on the content in the PHV Driver Handbook Version 1.0 (tfl.gov.uk)	N/A
	Increased safety of PHV passengers through new PHV operator conditions	Passengers	Minor positive	N/A	N/A
	Increased risk of hate crime and harassment towards taxi drivers ⁵¹	Taxi drivers	Moderate negative	N/A	N/A
Health					
Health and health inequalities	Increased safety for taxi and PHV passengers	Passengers	Minor positive	TfL already conduct DBS checks for taxi and PHV drivers upon the renewal of their licence every 3 years.	N/A
	Reduced levels of anxiety for taxi and PHV passengers ⁵²	Passengers	Minor positive	An online private hire licence checker is already available here: Licence Checker (tfl.gov.uk)	N/A
	Increased levels of stress and anxiety for taxi and PHV drivers	Taxi and PHV drivers	Minor negative	N/A	N/A

⁵¹ While the impacts of proposal 39-41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

⁵² While the impacts of proposal 39(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

10. Conclusions and next steps

Conclusions

10.1 Overall, the taxi and PHV proposals would contribute to the safeguarding of children and other vulnerable passengers using taxi and PHV services in London. This IIA has identified the following positive impacts:

- Improved safety for vulnerable passengers (including those from protected characteristic groups) as a result of enhanced criminal checks, use of online taxi licence checker and taxi driver photo ID.⁵³
- Increased confidence for passengers (including those with protected characteristics) through improved complaints information.
- Raised awareness of the needs of protected characteristic groups through SERU assessment for taxi drivers;
- Reduced risk of PHV operators engaging with criminal activity as a result of introducing annual DBS checks;
- Reduced risk of taxi and PHV drivers with a criminal conviction coming into contact with children and vulnerable adults as a result of increasing the frequency of DBS checks;
- Reduced risk of the use of unlicensed vehicles and operation of unlicensed drivers through more licence checks by operators and publicly available taxi licence checker;⁵⁴
- Reduced risk of discrimination and hate crime towards disabled passengers and other groups due to awareness training as part of the taxi driver SERU assessment;
- Reduced levels of anxiety for taxi passengers through being able to check licences using the taxi licence checker.⁵⁵

10.2 However, it is considered that the proposals could have potential negative impacts with regards to the following:

- Potential direct business impacts on taxi and PHV drivers; taxi and PH vehicle licensees; and PHV operators arising from additional costs and administrative requirements;
- Potential direct impact on taxi and PHV passengers arising from increased fares;
- Potential disadvantage or discrimination of older taxi drivers, taxi drivers from ethnic minority groups and taxi drivers with learning difficulties as a result of the introduction of the SERU assessment;

⁵³ While the impacts of proposals 39 & 41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

⁵⁴ While the impacts of proposals 39 & 41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

⁵⁵ While the impacts of proposals 39 & 41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

- Potential for loss of employment for taxi or PHV drivers unable to obtain a Certificate of Good Conduct;
- Increased risk of hate crime and harassment towards taxi drivers due to use of photo ID or including photos on the online licence checker.⁵⁶ Women and drivers from ethnic minority groups may be more at risk;
- Environmental impacts associated with increased paperwork, photo IDs etc. However, it is assumed that this impact will be minor and that TfL's sustainable policy will be implemented to ensure sustainable practice the use of recycled materials;
- Increased levels of stress and anxiety for taxi and PHV drivers due to increased administration and assessment; and
- Potential reduction in the availability of taxi and PH services and increased wait times for passengers if the supply of taxi drivers, PHV drivers or PHV operators fall.

10.3 Those interviewed as part of the stakeholder engagement activity were strongly supportive of proposals to increase safety and security of passengers and felt that there would be benefits to passenger safety. Non-trade stakeholders felt most positive about the proposals and potential benefits and positive impacts on passengers, in particular women, children and young people and disabled people.

10.4 However, more clarity is needed around a number of the proposals, with various questions and concerns being raised over the practicality and impacts of implementing some of these as new policies, particularly:

- **Taxi drivers, PHV drivers, and PHV operators must inform TfL of any arrest and release, charge, or conviction of any offence (Proposals 2, 3, 4, and 29(A))** – the 48-hour period was deemed to be too short by those in the industry and more information on what the outcome would be if TfL were not informed in the time period provided. However non-trade stakeholders were in agreement with the proposal.
- **Taxi and PHV drivers registering with the DBS update service and having checks every six months - Proposals 8 and 9 (A)** – whilst most were in agreement with this, more clarity is needed on how this would work in practice.
- **Taxi drivers, PHV drivers, and PHV operators will need to provide Certificates of Good Conduct (Proposals 7, 12, and 13 (A))** – many thought that this did not provide enough security as different countries provided differing levels of assurance. It was also considered that this could prove difficult for those that were out of the country many years ago.
- **Regular checks by PHV operators to ensure drivers and vehicles are licensed (Proposals 25 and 26 (A))** – more information is required about how often this needs to be undertaken and how it would be enforced; and
- **PHV operators shall assess whether it is necessary to suspend or remove a driver within 48 hours of receiving a safety related complaint (Proposals 30 and 31(A))** – more clarity is required on what types of safety

⁵⁶ While the impacts of proposals 39 & 41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

related complaints would be included within this and the need to provide more guidance and direction for PHV operators. The 48-hour period was also deemed to be too short by those in the industry, especially for offences committed during out of office hours.

10.5 It was also considered that implementing these new policies immediately could create additional administration burden for some groups

10.6 The consensus amongst some groups was that more could be done to improve safety further, for example:

- Use of the advanced driving test for taxi drivers (this could include the SERU assessment);
- Equality and disability awareness training should be more practical based and teach methods 'on the job' rather than a desk based assessment. This should also be continuous with video updates for drivers on key issues, training and guidance as part of continuous professional development;
- Alternative to the Certificate of Good Conduct – many thought this could be 'bought' and would not effectively provide assurance of a security check;
- Use of apps and other software to support passengers undertaking a journey to report any incidents where they feel unsafe;
- Proposals on reporting of safety-related complaints are deemed to be subjective, left in the hands of PHV operators to make a judgement with no guidance; and
- Improvements to points of contact within TfL for drivers and passengers reporting complaints. Many felt that current set up was not effective and that the increase in potential complaints as a result of introducing new signage could increase resourcing pressures for TfL.

10.7 Feedback on other proposals such as taxi driver photo IDs and taxi licence checkers were deemed to have minimal safety impact for passengers by those in the taxi trade (whilst creating extra administration and safety risks for drivers). However, these proposals were welcomed by stakeholders representing passengers.

General recommendations

10.8 Specific recommendations have been made on various proposals within the impact assessment chapters. In addition, below are some general recommendations to support TfL in successfully implementing the proposal and enhancing positive impact:

- **Processes** – processes for implementing proposals should consider practical and reasonable timescales and parameters whilst maintaining the overall object to increase safety and security.
- **SERU** – the SERU provides an excellent opportunity to enhance awareness of groups with protected characteristics and therefore the content and delivery style of the assessment should be reviewed to ensure the best approach is undertaken to ensure that taxi drivers and taxi passengers are benefiting from the assessment provided;

- **Communication** – when communicating details of the implementation of the proposals TfL should consider the varying needs of those across the industry and provide consistent messaging. For example, there will be varying levels of ability and use of technology and social media etc. and therefore TfL should consider how best to communicate the details of the proposals and implementation;
- **Increasing safety for passengers through partnership working** – TfL should consider working with partnership organisations to further improve safety and perception of safety for taxi and PHV passengers. For example, consulting with groups representing those who are visually impaired to understand how best for visually impaired passengers to benefit from proposals including information and signage; and
- **Non TPH activities** – the effectiveness of the proposals on safeguarding children and vulnerable adults could be increased through supporting measures delivered by TfL outside of the remit of TPH and taxi and PHV regulations/standards. This includes projects, plans and programmes delivered through stakeholder teams, marketing and communications teams and the equality, diversity and inclusion teams to develop initiatives, campaigns and wider measures to promote safety and security.

Appendix A Part A Proposals

This section lists the Part A topics and proposals stakeholders were asked about in the engagement period for the purpose of this IIA. The proposals to be used in TfL's consultation are listed in Table 1-1.

	Topic	Proposal	Equality	Business	Environmental	Crime	Health		
1	Changing licensing policy and requirements	Wherever possible, we propose to apply any new licensing policies immediately.	~	~	-	~	~		
2	Licensee self-reporting	We propose to prescribe a licence condition that will require all taxi drivers to inform us of any arrest and release, charge or conviction of any offence within 48 hours. This prescribed condition will apply to all licensed drivers with immediate effect.	+	~	~	+	~		
3		As there is no power to prescribe licence conditions for PHV drivers, we propose to attach a condition to every licence issued on or after the implementation date that the licence holder informs us of any arrest and release, charge or conviction of any offence within 48 hours.	+	~	~	+	~		
4		We propose to amend the regulation that requires operators to notify us of convictions within 14 days to state 48 hours and extend the requirement to include “arrest and release, charge, caution or conviction”.	+	~	~	+	~		
5	Complaints	We propose to require all taxis and PHVs to display signage that will include information on how to make a complaint to TfL alongside other statutory and important safety information.	+	~	-	~	+	+	-
6		We propose to make it a condition of a driver’s licence that the taxi or PHV they are driving is displaying the prescribed signage.	+	~	-	~	+	+	-
7	Overseas convictions	We propose to require a Certificate of Good Conduct (CoGC) from applicants to cover any periods outside the UK since the applicant was 18.	-	-	~	+	-		

8	Driver licensing: DBS checks	We propose to introduce an application requirement that requires all applicants for a taxi or PHV driver's licence, both new and renewal, to provide evidence of registration with the DBS Update service. In addition, we propose to introduce a licence condition that once licensed, all taxi and PHV drivers maintain continuous registration with the DBS Update service.	+	~	~	+	+		
9		Once drivers have registered with the Update service, we will undertake six monthly checks with the DBS.	+	-	~	+	+		
10	Driver licensing: Safeguarding training and English language skills	We propose to introduce a formal English language requirement for taxi drivers. All new and renewing taxi driver applicants have to pass an assessment of their safety, equality and regulatory understanding.	-	+	-	~	+	-	
11	Vehicle licensing: DBS checks ⁵⁷	We propose to require all applicants for a taxi licence to provide a basic DBS certificate and that a check is undertaken annually.	+	~	-	+	+		
12		We propose to require a Certificate of Good Conduct (CoGC) from applicants for a taxi licence to cover any periods outside the UK since the applicant was 18.	-	~	~	+	+	-	
13		We propose that where an applicant for a taxi licence is already licensed by TfL as a taxi or PHV driver, they will not be required to provide a further DBS check or overseas check.	+	-	~	~	+	+	-
14		Should TfL seek the power to introduce criminality checks on owners of PHVs?	+	~	~	+	~		
15	PHV operator licensing: DBS checks	We propose to require all applicants for a PHV operator's licence to provide a basic DBS certificate.	+	~	-	+	+		
16		We propose to introduce a new licence condition that will require all operators to provide a basic DBS check within 28 days of the anniversary of the licence issue date.	+	~	-	+	+		
17		We propose that all basic DBS checks are obtained through our service provider.	+	~	-	+	+		

⁵⁷ While the impacts were assessed for the purpose of this IIA, it was decided in December 2022 that TfL will not propose to introduce any additional criminal or character check requirements for either taxi or PHV owners at this time.

18		We will be proposing that the requirement applies to: • Sole traders: the person who owns the company; • Companies: all the individuals who make up that company i.e. the company secretary and the board of directors; • Unregistered firms or partnerships: all the individuals who make up that firm or partnership, i.e. the partners; • The nominated representative of any operator who does not fall within one of the categories above.	+	~	~	+	+
19	Operator licensing: Booking and dispatch staff	We propose to prescribe a new licence condition that all operators must keep a register of booking and dispatch staff.	~	~	~	+	~
20		We propose that the information that must be included in the register will include name, date of birth, and reference number and date of DBS check.	~	~	~	+	~
21		We propose to require all new and renewing applicants for an operator licence to provide their policy on employing ex-offenders with their next application.	~	~	~	+	~
22	Operators: Booking records	We propose to amend the existing booking record requirement to include the name of any individual that responded to the booking request and the name of any individual that dispatched the vehicle.	~	~	~	+	~
23		We also propose to amend the existing booking record requirement to specify that the booking records must record the vehicle registration mark (VRM) of the vehicle.	~	~	~	+	~
27	Proposed new prescribed licensing conditions for all licensed operators	Operators shall provide a basic DBS check through a service provider authorised by TfL within 28 days of the anniversary of the licence issue date.	+	~	~	+	~
28		Operators shall keep a register of booking and dispatch staff. Information that must be included in the register will include name, date of birth, and certificate number and date of DBS check. All new and renewing applicants for an operator licence must provide their policy on employing ex-offenders with their application.	~	~	~	+	~
29	Proposed amended prescribed licensing conditions for all licensed operators	Amend existing prescribed condition 9(4)(a): Informing TfL of convictions. Proposal to shorten the period in which operators must notify us from 14 days to 48 hours and extend the requirement to include “arrest and release, charge, caution or conviction”.	+	~	~	+	+

Appendix A Part B Proposals

This section lists the Part B topics and proposals stakeholders were asked about in the engagement period for the purpose of this IIA. The proposals to be used in TfL's consultation are listed in Table 1-1.

	Topic	Proposal	Equality	Business	Environment	Crime	Health
24	Proposed new prescribed licensing conditions for all licensed operators	Operators shall notify TfL within 72 hours of all data breaches, material data losses or infringements of data protection law affecting the data of UK drivers and/or customers, whether those incidents occur in the United Kingdom or elsewhere.	~	~	~	+	~
25		Operators shall access a TfL platform such as the licence checker (or similar) that will enable regular checks to be conducted on the validity of both the PHV driver and vehicle licence before making the driver and vehicle available to carry out private hire bookings.	~	~	~	+	~
26		Operators shall ensure that they have in place and make use of, appropriate checks to verify that all documentation provided by a driver is legitimate and that it relates to that driver and/or licensed vehicle. Once a driver has been registered checks should be made on the validity of the documentation during the life of the licence.	~	~	~	+	~
30	Proposed amended prescribed licensing conditions for all licensed operators	Amend existing prescribed condition 9(4)(c): Informing TfL of details of suspended and dismissed drivers within 14 days. Proposal to change the timeframe from 14 days to 48 hours	+	~	~	+	~
31		Amend existing prescribed condition 9(7)(a) Complaints process: Proposal to amend this regulation so that an operator within 48 hours of receiving a safety related complaint concerning a driver shall assess whether it is necessary to suspend or remove that driver account pending further inquiries and notify TfL	+	~	~	+	~

32		Amend existing prescribed condition 9(7) (b) Lost property. Proposal to amend this regulation so that operators shall make reasonable attempts to contact the owner (where known) of the lost item	~	~	~	~	~		
33		Amend existing prescribed condition 9(10): Providing booking confirmation. Proposal to amend this regulation so that operators shall include in the booking confirmation information as to how the passenger can complain to the operator or TfL about the operator or driver.	+	~	~	+	~		
34		Amend existing prescribed condition 9(13): Changes to Operating Model. Proposal to amend this requirement so that operators shall give TfL at least 28 days advance notice of any changes that it intends to make to its operating model, systems or processes, that may affect compliance with the 1998 Act, 2000 Regulations or other licence conditions.	~	~	~	~	~		
35	Additional PHV operator related questions	We are seeking views as to whether we ought to prescribe in regulation conditions that will only be applied to those operators in Tier 8 i.e. those operators that have 10,000+ vehicles available to carry out PHV bookings. Applicants are asked to state the number of PHVs they will have available to them at any one time during the currency of their licence by selecting the appropriate tier as part of their application. There are currently 8 tiers designed to reflect the diversity of available fleet sizes for operators and to provide some leeway for operators to change the size of their fleet without requiring a new licence.	~	~	~	~	~		
36		Existing prescribed condition 9 (2) Public Liability Insurance. We are seeking views as to whether a minimum of £5m for public liability insurance is still an appropriate amount bearing in mind it has not changed since the introduction of private hire licensing in London in 2001.	~	~	~	~	~		
37	Change in Regulation (not conditions related)	Regulation 14 of the Operator Regulations requires operators to record details of complaints and to retain these records for 12 months. Proposal to extend this timeframe from 12 months to three years.	+	~	~	+	~		
38	Introduce of the Safety Equality and Regulatory Understanding (SERU) assessment	All new and renewing taxi driver applicants have to pass an assessment of their safety, equality and regulatory understanding. This will be similar to that recently introduced for PHV drivers and based on a taxi driver's handbook as well as testing understanding of the content of the new online safeguarding training.	+	-	+	-	-	+	~

39	Taxi licence checker (or other relevant platform) ⁵⁸	This would make data available through a TfL platform for public use by interested groups (e.g. passengers, proprietors, taxi booking companies, electric vehicle charge point operators, bus operators, etc.) and enable them to check if taxi driver or taxi vehicle licence is valid.	+	~	~	+	~		
40	Private hire licence checker ⁵⁹	Are any changes needed or is there any additional information to be added to the private hire operator, driver or vehicle licence checkers?	+	~	~	~	~		
41	Taxi driver photo ID ⁶⁰	The aim would be to make photo ID available so as passengers can see this before they enter the taxi and check the driver matches the person shown on the photo ID.	+	-	~	-	+	-	~

⁵⁸ While the impacts of proposal 39(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

⁵⁹ While the impacts of proposal 40(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

⁶⁰ While the impacts of proposal 41(B) were assessed for the purpose of this IIA, TfL will not be consulting on specific proposals at this stage but will be seeking views on how they can further improve safety for taxi passengers

Appendix B Legislative and policy context

This section identifies relevant statutory and policy requirements and associated guidance for the IIA.

Legislation

Taxi and PHV related legislation

Taxi drivers

The power to grant taxi driver licences is contained within section 8 of the London Hackney Carriages Act 1843⁶¹ and sections 8 and 8A of the Metropolitan Public Carriage Act 1869⁶² (as amended)

Article 25 of the London Cab Order 1934⁶³ (as amended) allows TfL to refuse a licence if the applicant:

- Fails to satisfy TfL that he is of good character and fit to act as a taxi driver;
- Is not entitled to work as a taxi driver in the UK; or

Having held a licence within the preceding three years has failed to work for a considerable part of that period (unless by reason of illness or other unavoidable cause).

Fitness to act as a taxi driver encompasses consideration of medical fitness and driving proficiency.

Article 27(1)(b) of the London Cab Order 1934 requires an applicant to satisfy TfL that they have an adequate knowledge of London before a licence can be issued.

Licences will not be granted to anyone under the age of 21 years (article 24 of the London Cab Order 1934). Applications will be accepted from prospective All London taxi drivers from the age of 18 years.

Licences may be granted on such conditions as may be prescribed and unless suspended or revoked, or granted to drivers whose leave to remain in the UK is time-limited, licences remain in force for three years.

⁶¹ Legislation.gov.uk (1843). London Hackney Carriages Act 1843. Available at: <https://www.legislation.gov.uk/ukpga/Vict/6-7/86/contents>

⁶² Legislation.gov.uk (1869). Metropolitan Public Carriage Act 1869. Available at: <https://www.legislation.gov.uk/ukpga/Vict/32-33/115/contents>

⁶³ Legislation.gov.uk (1934). London Cab Order. Available at: https://www.legislation.gov.uk/ukso/1934/1346/pdfs/ukso_19341346_en.pdf

PHV drivers

The power to grant PHV driver licences is contained in section 13 of the PHV Act 1998⁶⁴ (as amended). TfL shall grant a licence to an applicant if it is satisfied the applicant:

- Is at least 21 years of age;
- Has held a Great Britain, Northern Ireland, European Union or European Economic Area driving licence for a period of at least three years;
- Is a fit and proper person to hold a licence;
- Is entitled to work as a PHV driver in the UK;
- Has appropriate knowledge of London and general topographical skills; and
- Meets any additional requirements prescribed by TfL.

Additional requirements prescribed by the Private Hire Vehicles (London PHV Driver's Licences) Regulations 2003⁶⁵ (as amended) are that the applicant:

- Is physically fit;
- Can communicate in English to a specified standard; and
- Has an understanding of safety, equality and regulatory information.

Licences may be granted subject to such conditions as TfL may think fit, and are granted for three years or for such shorter period as TfL may consider appropriate in the circumstances of the case. Licences granted to drivers whose leave to remain in the UK is time-limited can only be valid for the period for which they are entitled to remain in the UK.

'Fit and Proper' test

TfL has a duty to ensure that any person they license as a taxi or PHV driver is a 'fit and proper person' to hold such a licence. In determining whether an applicant or licensee is fit and proper, TfL will first and foremost apply the policies in this document. In addition, TfL will ask itself the following question:

Without any prejudice, and based on the information before you, would you allow a person for whom you care, regardless of their condition, to travel alone in a vehicle driven by this person at any time of day or night?

If, on balance, the answer to the question is 'no', the individual will not be granted a licence.

Taxi vehicle licences

The power to grant taxi licences is contained within section 6 of the Metropolitan Public Carriage Act 1869 (as amended) and Paragraph 7 of the London Cab Order 1934 (as amended). A licence shall be granted if:

⁶⁴ Legislation.gov.uk (1998). Private Hire Vehicles (London) Act 1998. Available at: <https://www.legislation.gov.uk/ukpga/1998/34?view=plain#:~:text=Private%20Hire%20Vehicles%20%28London%29%20Act%201998%201998%20CHAPTER,the%20City%20of%20London%3B%20and%20for%20connected%20purposes.>

⁶⁵ Legislation.gov.uk (2003). The Private Hire Vehicles (London) (Transitional and Saving Provisions) Regulations 2003. Available at: <https://www.legislation.gov.uk/ukSI/2003/655/made?view=plain>

- The applicant is a fit and proper person;
- The vehicle conforms with the Conditions of Fitness; and
- The requirements of paragraph 8 of the London Cab Order 1934 as to liability to third parties are met.

Licences are granted subject to a number of conditions which are prescribed in paragraph 14 of the London Cab Order 1934.

Unless suspended or revoked, licences remain in force for one year.

Private hire vehicle licences

The power to grant PHV licences is contained in section 7(2) of the PHV Act. TfL shall grant a licence in respect of the vehicle if it is satisfied that the vehicle:

- Is suitable in type, size and design for use as a private hire vehicle;
- Is safe, comfortable and in a suitable mechanical condition for that use; and
- Is not of such design and appearance as would lead any person to believe that the vehicle is a London taxi.

The PHV Act is clear in describing the licensee as the owner. The Act identifies the owner as the registered keeper as defined by the Vehicle Excise and Registration Act 1994. Therefore, all licences are issued in the name of the registered keeper.

Licences are granted subject to a number of conditions which are prescribed, plus any other discretionary conditions placed on individual licences as TfL may think fit. The prescribed conditions are in the Private Hire Vehicles (London PHV Licences) Regulations 2004.

Licences are granted for one year or for such shorter period as TfL may consider appropriate in the circumstances of the case.

PHV operators

The power to grant a PHV operator's licence is contained in section 3 of the Private Hire Vehicles Act 1998 (as amended). TfL shall grant a licence to an applicant if it is satisfied that:

- The applicant is a fit and proper person to hold a London PHV operator's licence; and
- Has the right to work as a PHV operator in the UK.

Licences are granted subject to a number of conditions which are prescribed in regulation, plus any other discretionary conditions placed on individual licences as TfL considers appropriate. The prescribed conditions are set out in Regulation 9 of the Private Hire Vehicles (London) (Operators' Licences) Regulations 2000⁶⁶ (the 'Operator Regulations').

⁶⁶ Legislation.gov.uk (2000). The Private Hire Vehicles (London) (Operators' Licences) Regulations 2000. Available at: <https://www.legislation.gov.uk/uksi/2000/3146/made>

Licences are granted for five years or such shorter period as TfL may consider appropriate in the circumstances of the case.

Private Hire Operator's Handbook⁶⁷

The Private Hire Operator's Handbook provides advice and guidance for people working as licensed PHV operators in London, notably in relation to health and safety, reporting of misconduct, the Equality Act 2010, and delivering a safe PHV service.

When in receipt of information about a potential crime being committed, whether by a passenger, driver or member of the public, operators must pass the information immediately on to the police to ensure they can deal with the matter, and so that incidents can be investigated efficiently. All licensed operators are required to record complaints, investigate them and document the outcome of any investigation – records of complaints must be kept at all operating centres on the licence. Failing to keep a complaints record is one of the common reasons for failing a compliance inspection.

The Handbook also gives attention to the Equality Act 2010, outlining that it is unacceptable for operators, drivers or customers to use discriminatory language or behaviour towards any person. In relation to the Equality Act 2010, the Handbook includes a section on key considerations for delivering a safe PHV service for all PHV passengers, especially those who share protected characteristics. These considerations include:

- Make sure you record all of the passenger's details (in particular their home address and telephone number if known) clearly and correctly when they make a booking.
- Make sure that all of your drivers tell passengers who are travelling on their own to sit in the rear of the vehicle and not in the front.
- Be clear with the passenger about exactly where the driver is taking them and what the fare will be before the journey starts.

Although there is no reference in PHV legislation regarding the age at which a driver can carry a child unaccompanied, it is advised as good practice to ensure the driver knows the full name of the adult and the relationship between the child and the adult to whom they will be handed over to at the end of the journey. Furthermore, it is at the discretion of the operator to decide whether to accept bookings to carry children unaccompanied.

The Handbook also includes a section on safeguarding, defined as taking action to protect children, young people and vulnerable adults from significant harm, and to promote their wellbeing, including their health and welfare. It is advised that all PHV operators have established procedures to ensure their staff and drivers understand their safeguarding responsibilities and know what to do should they have concerns. The Handbook identifies key signs that a child, young person or vulnerable person is at risk.

⁶⁷ Transport for London (2020). Private Hire Operator's Handbook. Available at: <https://content.tfl.gov.uk/private-hire-operator-handbook.pdf>

Taxi and PH related policy

TfL Taxi and Private Hire Driver Policy (2021)⁶⁸

This policy sets out TfL's current approach on the consideration of taxi and private hire driver licence applications and associated matters in London. It is important that standards set by TfL ensure the safety of passengers and other road users.

General regulations for taxi and PHV drivers are set out alongside regulations for new applicants including:

- Offence guidelines
- Physical fitness
- Driving ability
- Right to live and work in the UK
- Topographical knowledge and skills test
- Appeals against a decision to refuse a licence
- Duration of licences
- Outstanding costs

Further regulations for licence holders include:

- Immigration permission
- Previous convictions, cautions etc
- New convictions, cautions etc
- Taxi driver offences
- PHV driver offences
- Misuse of taxi ranks and charging bays
- Equality Act offences
- Driver Conduct
- Complaints
- Renewals

TfL Taxi and Private Hire Vehicle Policy (2021)⁶⁹

This document sets out TfL's current approach to taxi and PHV licence applications and associated matters in London, taking into account relevant legislation (e.g. Human Rights Act 1998 and Equality Act 2010). It is important to recognise that taxi and PHV licences have separate legislation applying to them, as referred to throughout this policy.

⁶⁸ Transport for London (2021). Taxi and Private Hire Vehicle Policy. Available at: <https://content.tfl.gov.uk/tph-driver-policy.pdf>

⁶⁹ Transport for London (2021). Taxi and Private Hire Vehicle Policy. Available at: <https://content.tfl.gov.uk/taxi-and-private-hire-vehicle-policy-december-2021.pdf>

The powers to grant taxi and PHV licences are contained within the London Cab Order (1934) and PHV Act (1998). Any applicants found to have misled TfL will have their application refused and face prosecution under the relevant legislation.

TfL's current position on taxi and PHV regulations is shown in the table below:

Policy	Taxi	PHV	Current position
Vehicle Licences – applicants	✓	✓	Licences are issued in the name of the vehicle's owner (registered keeper)
	✓		Applicants for a taxi licence must provide a basic Disclosure and Barring Service (DBS) check to ensure the applicant is fit and proper. Applicants for a taxi licence who are already licensed as a London taxi or PHV driver will not be required to obtain a further criminal record check.
Vehicle Licences – holders	✓		Any taxi licensee who is convicted of a serious offence may have their fitness to hold a taxi licence reviewed
		✓	A PHV licence can be suspended or revoked 'for any reasonable cause', including, but not limited to, reasons connected to the fitness of the vehicle for use as a PHV.
National taxi and PHV database	✓	✓	At least on a weekly basis, TfL uploads details in respect of every currently licensed taxi and PHV, including the vehicle registration mark; the date the licence is valid from; the TfL plate (taxi) or licence (PHV) number.
Licences	✓		All taxis display a taxi vehicle licence plate on the rear of the vehicle showing the taxi vehicle licence 'plate number', when the licence expires and how many passengers the vehicle is licensed to carry
		✓	Displaying a licence disc on a PHV is required to indicate to the travelling public that prior to being licensed the vehicle has undergone checks to ensure their safety. Section 10(3) of the PHV Act allows TfL to grant exemptions where satisfied through written evidence supported by customer or operator references.

Greater London Authority Act 1999⁷⁰

The Greater London Authority Act 1999 ("the GLA Act") repealed the London Regional Transport Act 1984 and created Transport for London (TfL).

Prior to the creation of TfL, the power to issue taxi and taxi driver licences lay with the Assistant Commissioner and Commissioner of Police of the Metropolis. Section 253 of the GLA Act brought into effect Schedule 20 of that Act which transferred these powers to TfL. Similarly, under section 254 of the GLA Act the functions of the Secretary of State under the PHV Act 1998 were also transferred to TfL.

The GLA Act (section 141) gives the Mayor of London a general duty to develop and implement policies to promote and encourage safe, integrated, efficient and economic transport facilities and services for London. Using powers given to it by the GLA Act, TfL regulates how the public uses highways and is responsible for traffic signs, control systems, road safety and traffic reduction. TfL is also the licensing authority for taxis and private hire vehicles.

⁷⁰ Legislation.gov.uk (1999). Greater London Authority Act 1999. Available at: <https://www.legislation.gov.uk/ukpga/1999/29/contents>

Equality-related legislation

Equality Act 2010 and Public Sector Equality Duty⁷¹

The Equality Act 2010 legally protects people from discrimination both in the workplace and in wider society. It ensures that individuals with protected characteristics are not indirectly or directly discriminated against.

Section 149 of the Act sets out the Public Sector Equality Duty (PSED), to which TfL is subject in carrying out all its functions. Those subject to the PSED must, in the exercise of their functions, have due regard to the need to:

1. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and,
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The Equality Act 2010 explains that having due regard to the second aim (advancing equality of opportunity...) involves:

- Removing or minimising disadvantages affecting people due to their protected characteristics;
- Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; and
- Encouraging people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

The impact of the PSED is to require public bodies to take proactive measures to address inequality and help contribute to the government's commitment to tackle disadvantage and discrimination, advance equality of opportunity, and encourage good relations between all people.

Additionally, one aim of the PSED is to ensure that any negative or positive impacts of proposals or action taken by a public body are identified at an early stage and considered. Where a potential adverse effect has been found, proposed mitigation measures should be identified where reasonably possible.

The Policing and Crime Act 2017⁷²

Section 177 of the Act is focused on the 'licensing functions under taxi and PHV legislation: protection of children and vulnerable adults'. This states that the Secretary of State can issue guidance to public authorities as to how their licensing functions under taxi and PHV legislation may be exercised so as to protect children, and vulnerable individuals who are 18 or over, from harm.

Section 177(4) states that any public authority which has licensing functions under taxi and PHV legislation (including the PHV (London) Act 1998) must have regard to any guidance under this section.

⁷¹ Legislation.gov.uk (2010). Equality Act 2010. Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents>

⁷² Legislation.gov.uk (2017). Policing and Crime Act 2017. Available at: <https://www.legislation.gov.uk/ukpga/2017/3/contents/enacted>

Crime and Disorder Act 1998⁷³

Section 17 of the Crime and Disorder Act outlines the duty of each authority to which this section applies (including TfL) to do all it reasonably can to prevent:

- Crime and disorder in its area – including anti-social and other behaviour adversely affecting the local environment;
- The misuse of drugs, alcohol and other substances in its area;
- Re-offending in its area; and
- Serious violence in its area.

TfL recognises that ‘the legislation focuses on how our delivery of core services can make a significant difference to crime reduction in local communities’.⁷⁴

Transport policy

Department for Transport (DfT) Statutory Taxi & Private Hire Vehicle Standards (2020)⁷⁵

In support of evidence that taxis and PHVs are a high-risk environment with regards to the abuse and exploitation of children and vulnerable adults, these recommendations seek to establish common core minimum standards to better regulate the taxi and PHV sector. The standards in this document replace relevant sections of the Best Practice Guidance issued by the Department in 2010. The Department expects these recommendations to be implemented unless there is a compelling reason not to.

In accordance with section 117(4) of the Policing and Crime Act 2017, licensing authorities “must have regard” for the standards in practice. This includes considering safeguarding the public and potential failings in the development, implementation and reviewing of taxi and PHV licensing regimes.

The Mayor’s Transport Strategy (2018)⁷⁶

The Mayor’s Transport Strategy (MTS) outlines the Mayor’s policies and proposals to reshape the transport network in London over the next 20 years. Through applying the ‘Healthy Streets Approach’, this strategy will reduce health and economic inequalities throughout London by placing human health and experience at the centre of city planning.

The Strategy sets out the role London’s taxis provide in: delivering a reliable and trusted service to Londoners, tourists and business people; expanding travel horizons for those requiring safe accessible travel options; and, providing a safe onward journey option as the Night Tube expands.

Policy 20 of the Strategy says ‘*The Mayor, through TfL and the boroughs, and working with stakeholders, will seek to ensure London has a safe, secure, accessible, world-class taxi and private hire service with opportunity for all providers to flourish*’.

⁷³ Legislation.gov.uk (1998). Crime and Disorder Act 1998. Available at: <https://www.legislation.gov.uk/ukpga/1998/37/section/17>

⁷⁴ Transport for London (2022). Our safety priorities. Available at: <https://tfl.gov.uk/corporate/safety-and-security/security-on-the-network/our-safety-priorities>

⁷⁵ Ibid1

⁷⁶ London Assembly (2018). Mayor’s Transport Strategy 2018. Available at: <https://www.london.gov.uk/what-we-do/transport/our-vision-transport/mayors-transport-strategy-2018?intcmp=46686>

The Strategy states that it is essential that the iconic London taxi brand is maintained and enhanced as its environment continues to change. It states: 'This means continuing to monitor service standards, facilitating customer feedback, further improving the customer experience using technology (such as including taxi options in TfL's Journey Planner), and exploring new ways to reduce the barriers to becoming a black cab driver without compromising the quality of service offered.'

Raising standards for PHVs is also considered a priority. Improving compliance and safety of travelling by both taxi and private hire is a priority for both the Mayor and TfL.

An IIA has been undertaken for the MTS and the framework used has been adopted for this IIA.

The Mayor's Economic Development Strategy (2018)⁷⁷

This Strategy sets out the Mayor's approach to supporting a secure and prosperous London economy that works for all Londoners.

While the report does not refer to the taxi and PHV sectors specifically, London's transport system is identified as a key contributor to London's ecosystem for business, giving investors the support, confidence and services, they need to conduct business.

⁷⁷ Greater London Authority (2018). The Mayor's Economic Development Strategy for London. Available at: https://www.london.gov.uk/sites/default/files/economic-development-strategy-2018_1.pdf

Appendix D Baseline evidence

Introduction

This section provides an overview of the taxi and private hire industry in London, inclusive of taxi drivers, PHV drivers, PHV operators, taxi passengers and PHV passengers. This baseline draws on a range of relevant data made available by TfL, and wider AECOM desk research. It forms an evidence base pertinent to the IIA regarding taxi and PHV service issues identified as likely to affect licensees, passengers and protected characteristic groups, particularly children and vulnerable adults.

Taxis and PHVs are separate services with respective standards and legislation. For clarity:

- Taxis (also referred to as black cabs) can be hailed on the street, at designated taxi ranks or booked in advance.
- Private hire vehicles (PHVs) include minicabs and other services (e.g. limousines, chauffeur services, tour guides, some accessible transport services). PHVs must be booked with a licensed PHV operator prior to a journey starting.

Taxi and PHV Licences

There are five separate licence types within the taxi and PHV industry. These are listed below with the duration of each licence:

- Taxi driver: three years
- Taxi vehicle: one year
- PHV driver: three years
- PHV vehicle: one years
- PHV operator: five years (although shorter licences may be issued)

Taxi and Private Hire Vehicle Driver's licences

Table A-1 below shows the associated fees and assessments required to obtain a taxi driver licence. Table A-2 below sets out PHV driver's licence fees and assessment requirements.

Table A-1: Taxi drivers licence fees (July 2022)

Item	Fee	Notes
Licence application	£120.00	Non-refundable
Grant of licence	£180.00	A taxi driver's licence is valid for three years
Knowledge of London written exam	£200.00	All London applicants only
Knowledge of London appearance fee	£400.00	Payable by All London and Suburban applicants as a one-off payment
DBS fee	£52.00 (online) £54.00 (paper)	At present a DBS check is required: When an applicant first applies and then prior to their first taxi driver's licence being issued

		When a taxi driver renews their licence
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Table A-2: PHV drivers licence fees (July 2022)

Item	Fee	Notes
Licence application	£124.00	Non-refundable
Grant of licence	£186.00	A PHV driver's licence is valid for three years
DBS fee	£52.00 (online) £54.00 (paper)	At present a DBS check is required: When an applicant first applies When a PHV driver renews their licence
Speaking and listening assessment	£36.00	Re-sits cost £16.00
Topographical skills assessment	£36.00	Re-sits cost £16.00
Safety equality and regulatory understanding (SERU) assessment	£36.00	Re-sits cost £16.00. If a PHV driver licence applicant passes the SERU assessment they will be considered to have met the required standard for reading and writing

Assessments

Taxi drivers are required to undertake the Knowledge of London (KoL) assessment. The KoL includes a self-assessment, whereby applicants self-mark theory tests, followed by a written examination which tests applicants' knowledge of routes in the Blue Book - the Blue Book lists 320 routes (known as "runs") within the six-mile radius of Charing Cross. Applicants need to learn these routes, plus all the roads and landmarks within a quarter mile radius of the start and end points of each route. The final stages involve appearances, which are one-to-one oral examinations testing applicants' knowledge of locations across London. This component of a licence application costs £600, although applicants also need to cover other costs associated with doing the KoL (e.g. buying a moped, fuel, etc).

PHV driver licence applicants undergo three separate assessments which collectively assess their topographical skills, their understanding of safety, equality and regulatory information, and their speaking, listening, reading and writing skills. The speaking and listening assessment involves a short conversation via video or telephone with the TfL service provider. While the topographical assessment tests applicants' map reading skills, ability to plan a route and knowledge of compass points. Finally, the safety, equality and regulatory understanding (SERU) assessment for PHV drivers came into force in October 2021 to help ensure public safety and enhance levels of customer service. The assessment is based on information found in the PHV Driver's Handbook.⁷⁸ Once the SERU has been passed the applicant or driver is considered to have met the required standard for reading and writing. These compulsory assessments cost a total of £108.

Driving tests and wheelchair assessments

All taxis are required to be wheelchair accessible and there is a requirement for all taxi drivers to pass a driving test in a taxi and a wheelchair assessment. The Driver and Vehicle Standards Agency (DVSA) provided these tests until 31 December 2016 and charged between £92 and £112 for them.

There is currently no driving test or wheelchair assessment requirement for PHV drivers. Consultation on further improving safety for private hire passengers was carried out in 2018 but no decision has been made yet on whether to proceed with the proposals in this consultation. This consultation invited views on an advanced

⁷⁸ TfL (2021). Private Hire Vehicle Driver's Handbook. Available at: <https://content.tfl.gov.uk/phv-driver-handbook-v1.pdf>

driving test for PHV drivers, providing a clear complaints procedure for passengers and whether more detailed background checks should be introduced for drivers.

DBS checks

Both taxi and PHV driver licence applicants are required to provide an enhanced Disclosure and Barring Service (DBS) check as part of their application. This is a check on whether someone has a criminal record and, if they do, what information is on their criminal record.

An enhanced DBS check includes checks against the barred lists, which contain details of individuals who are not permitted to work with children or vulnerable adults due to a history of inappropriate behaviour or offences.

Once licensed, taxi and PHV drivers are required to have an enhanced DBS check every three years when they renew their taxi or PHV driver's licence. Taxi and PHV drivers are not currently required to sign up to the DBS Update service, which keeps their criminal record certificate up to date. This means drivers will not have to complete a new DBS check when applying for a renewal of their licence provided there has been no change to their criminal record. If they choose to register for the Update service, it currently costs £13 per year and can be renewed automatically.

Vehicle licences

Table A-3 below sets out taxi vehicle licence fees.

Table A-3: Taxi vehicle licence fees (July 2022)

Item	Fee	Notes
Licence fee	£66.00	Non-refundable
Grant of licence fee	£44.00	A taxi vehicle licence is valid for one year
MOT	£54.85	This is the current maximum set by VOSA for MOTs for cars with up to 8 passenger seats which must be renewed once a year

Table A-4 below sets out PH vehicle licence fees.

Table A-4: PH vehicle licence fees (July 2022)

Item	Fee	Notes
Application fee	£84.00	Non-refundable
Grant of licence fee	£56.00	A PHV vehicle licence is valid for one year
MOT	£54.85	This is the current maximum set by VOSA for MOTs for cars with up to 8 passenger seats which must be renewed once a year

PHV operator licences

Table A-5 shows figures for the type of licence held by PHV operators in London and the associated application and grant of licence fees. There are two licence fee structures which categorise PHV operators: the old structure uses two categories (0-2 vehicles and 3+ vehicles) while the new structure has 8 tiers.

The majority of operators fall into Tier 1 of the current licence fee structure (1200) with 0-10 vehicles, followed by Tier 2 (198) with 11-20 vehicles. There are three operators across London which have over 10,000 PHVs available.

Table A-5: PHV operator licence fees

Tier	Maximum number of PHVs allowed	% PHV operators – 6 th June 2022	5 year fee		Total fee	Structure
			Application	Grant of licence		
Small	0-2	0.66%	-	-	-	Old licence fee structure
Standard	3+	1.67%	-	-	-	
1	0-10	71.68%	£400	£1,600	£2,000	Current licence fee structure
2	11-20	11.83%	£1,200	£4,800	£6,000	
3	21-50	8.60%	£3,800	£15,200	£19,000	
4	51-100	4.48%	£6,000	£24,000	£30,000	
5	101-500	0.72%	£30,000	£120,000	£150,000	
6	501-1,000	0.06%	£70,000	£280,000	£350,000	
7	1,001-10,000	0.12%	£140,000	£560,000	£700,000	
8	10,001+	0.18%	£580,000	£2,320,000	£2,900,000	

Licence fees and costs

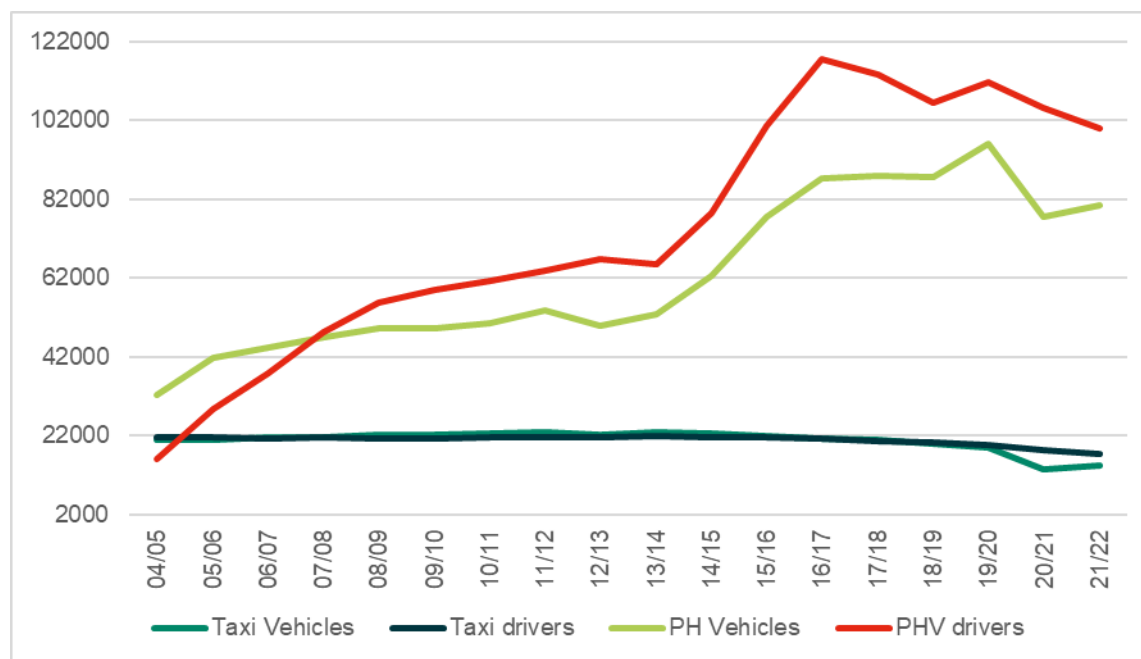
The expectation is for the cost of taxi and private hire licensing services to be fully recovered from the licence fees charged, with fees adjusted accordingly when there is an over or under recovery. In recent years there has been an under recovery of costs, where the income from licence fees has not covered the cost of licensing services. Therefore, if TfL plan to revert to full recovery this could increase licence fees for taxi and private hire applicants and licensees.

Number of licences issued

Figure A-1 shows that between 2005/06 and 2019/20 there was a significant increase in the number of licensed PHV drivers and PHVs in London, whilst the number of licensed taxi drivers and taxis remained relatively stable throughout the same time period. There was a noticeable decrease from 2019/20 to 2020/21 in licensed taxi and PHV drivers, from 22,400 to 20,800 and 111,500 to 105,300 respectively.

Across all years, there are significantly fewer licensed taxi vehicles than PHVs with the largest difference of 77,000 in 2019/20. The number of licensed taxis has experienced a gradual decrease since 2015/16, with a larger reduction in 2020/21 from 19,000 to 13,400. While licensed PHVs have experienced fluctuating increases until 2020/21 where a large decrease from 96,000 to 77,500 was recorded. In 2020/21, these figures extrapolate to 12.8 licensed vehicles per 1,000 people, 10.7 licensed PHVs and 2.1 licensed taxis, which is approximately double the national average.

Figure A-1: Taxis, PHVs and Driver Licences, London 2004-2022

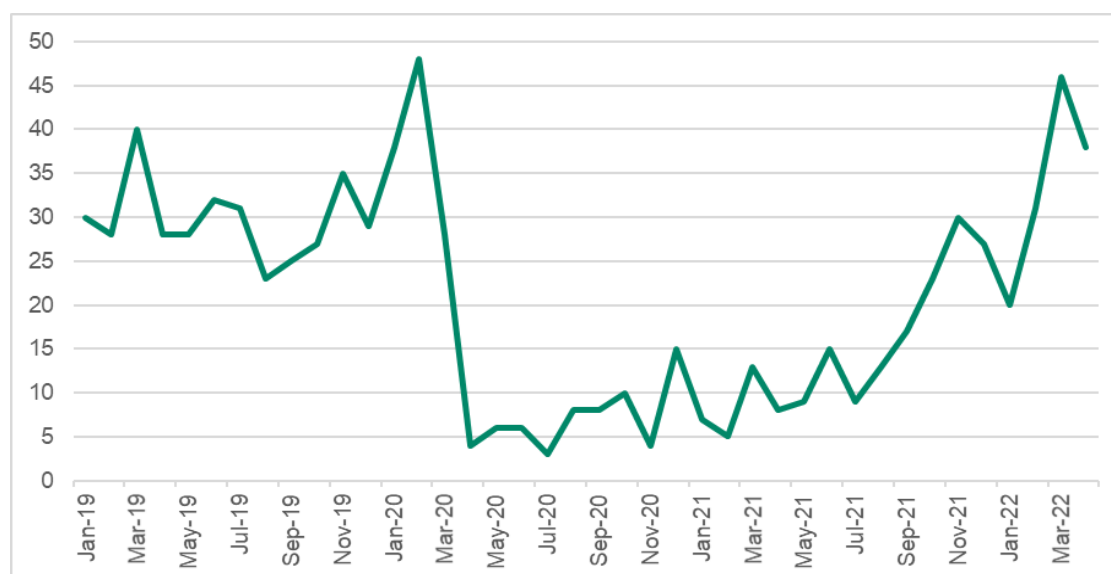


Source: TfL records and Department for Transport (2021)⁷⁹

The number of new applications received to do the KoL, people studying the KoL and newly licensed taxi drivers has been declining for several years.

The Knowledge of London Update (April 2022) reveals a significant drop in the number of new applicants from April 2020. Applications decreased from 28 in March 2020 to 4 in April 2020 and remained at 15 or below for the following 16 months, as shown in Figure A-2 below. Since September 2021, licence applications have recovered to early-2020 levels. There is an assumption that this could link to the impacts of Covid-19 discussed later in this chapter.

Figure A-2: Number of taxi drivers licence applications January 2019-April 2022



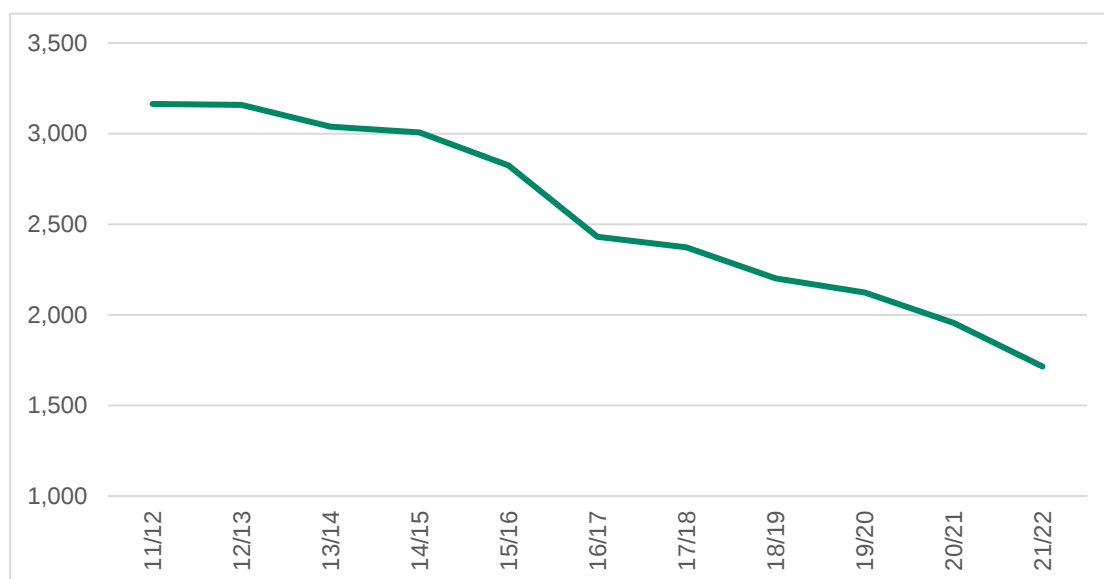
Source: KoL Update April 2022⁸⁰

⁷⁹ Department for Transport (2021). Taxi and private hire vehicle statistics. Available at: <https://www.gov.uk/government/collections/taxi-statistics>

⁸⁰ Information provided by TfL.

Figure A-3 reveals the number of PHV operators from 2011-2022. PHV operators have been gradually declining over time from a peak of 3,164 in 2011/12 to 1,715 in 2021/22.

Figure A-3: Number of PHV operators 2011-2022



Source: Information provided by TfL

Licensee satisfaction

The Taxi and PH Licensee Customer Satisfaction Survey (2021/22)⁸¹ revealed the following for taxi drivers, PHV drivers and PHV operators.

Table A-6: Taxi and PH Licensee Customer Service Satisfaction Survey (2021/22)

	Taxi drivers		PHV drivers		PHV Operators	
	2021/22	2020/21	2021/22	2020/21	2021/22	2020/21
Overall satisfaction with contact with TPH	43%	39%	55%	61%	47%	75%
Perceived fairness of treatment over time (total feeling fairly or very fairly treated by TPH)	69%	63%	74%	78%	80%	78%
Satisfaction with value for money for driver licensing fees	42%	36%	40%	42%	N/A	N/A
Satisfaction with value for money for vehicle licensing fees	51%	46%	36%	38%	N/A	N/A
Satisfaction with value for money for	N/A	N/A	N/A	N/A	39%	39%

⁸¹ Information provided by TfL.

operator licensing fees						
Feeling positive about the future of the trade	33%	10%	36%	25%	25%	17%
Income increased as a result of the pandemic	1%	N/A	1%	N/A	1%	N/A
Income decreased as a result of the pandemic	40%	N/A	38%	N/A	61%	N/A

Taxi and PHV driver information

The Taxi and Private Hire Driver Diary Survey (2016/17)⁸² provides the following overview of both taxi and PHV (minicab and chauffeur/executive car) drivers in London:

Taxi drivers:

- 50% (the majority) of London taxi drivers have been driving for over 20 years;
- Work an average of 8.87 hours per day;
- Work an average of 42.7 hours per week; and
- Work an average of 4.8 days per week.

PHV drivers:

- 44.6% (the majority) of PHV drivers have been driving for over 20 years;
- Worked an average of 8.35 hours per day;
- Worked an average of 41.4 hours per week; and
- Worked an average of 4.9 days per week.

Demographic profile of drivers

TfL taxi and private hire licensing data (2022) presents a demographic breakdown of drivers. This shows that:

- The majority of taxi drivers are male, aged 51-60, White British with no disability; and
- The majority of PHV drivers are male, aged 41-50, African with no disability.

Gender

There is a significant male dominance within the taxi and PH industry, with over 97% male drivers and only ~2% female drivers across both categories as shown in Table A-7.

⁸² TfL (2017). Taxi and Private Hire Driver Diary Survey 2016/17. Available at: <https://content.tfl.gov.uk/driver-diaries.pdf>

Table A-7: Gender profile of London taxi and PHV drivers (2022)

Gender	Taxi drivers	%	PHV drivers	%
Female	449	2.27%	2,215	2.19%
Male	19,356	97.71%	98,447	97.49%
Not known	5	0.03%	323	0.32%
Total	19,810	100.0%	100,985	100.0%

Age

The clear majority of taxi drivers are over 50 years of age (72.5%) whereas 69.7% of PHV drivers are aged 50 or under. Furthermore, there is a significantly higher proportion of young people aged under 30 licensed as a PHV driver (6%) compared with taxi drivers (1%). The opposite is found for the oldest age group with 5.3% of all taxi drivers aged 71 years and over compared with just 0.5% of PHV drivers (see Table A-8).

Table A-8: Age profile of taxi and PHV drivers 2022

Age	Taxi drivers	%	PHV drivers	%
30 and under	196	0.99%	6,035	5.98%
31-40	1,600	8.08%	27,755	27.48%
41-50	4,258	21.49%	36,562	36.21%
51-60	8,409	42.45%	23,540	23.31%
61-70	4,290	21.66%	6,615	6.55%
71+	1,057	5.34%	475	0.47%
Not known	0	0.00%	3	0.00%
Total	19,810	100.00%	100,985	100.00%

Ethnicity

Table A-9 shows that the majority of London taxi drivers are White British (62.91%) while there is greater variation in ethnicity across PHV drivers. The largest known ethnic group for PHV driver licensees is African (12.88%) closely followed by Pakistani (11.63%) and Other Asian or Asian British (11.15%). The largest ethnic minority group of taxi drivers is also African (4.71%).

Table A-9: Ethnic group of taxi and PHV drivers 2022

Ethnicity		Taxi drivers	%	PHV drivers	%
White	White British	12,463	62.91%	4,302	4.26%
	White Irish	199	1.00%	108	0.11%
	White other	634	3.20%	9,882	9.79%
Asian or Asian British	Bangladeshi	310	1.56%	9,808	9.72%
	Indian	126	0.64%	2845	2.82%
	Pakistani	220	1.11%	11,733	11.63%
	Other	296	1.49%	11,244	11.15%
Black or Black British	African	933	4.71%	12,995	12.88%
	Caribbean	384	1.94%	673	0.67%
	Other	146	0.74%	715	0.71%
Mixed ethnicity	White and Asian	53	0.27%	327	0.32%

Ethnicity		Taxi drivers	%	PHV drivers	%
	White and Black African	73	0.37%	372	0.37%
	White and Black Caribbean	93	0.47%	109	0.11%
	Other	99	0.50%	530	0.53%
Chinese or other ethnic group		243	1.23%	592	0.59%
Not known		3,538	17.86%	34,488	34.17%
Total		19,810	100.00%	100,723	100.00%

Disability

As shown in Table A-10 the majority of drivers have not disclosed their disability status. However, of those that did state this only 0.01% of taxi drivers and 0.3% of PHV drivers stated that they had a disability.

Table A-10: Disability of taxi and PHV drivers (2022)

Disability	Taxi drivers	%	PHV drivers	%
Yes	2	0.01%	271	0.27%
No	823	4.15%	38,920	38.54%
Unknown	18,985	95.84%	61,794	61.19%
Total	19,810	100.00%	100,985	100.00%

Language

While TfL does not hold any information regarding the spoken languages of taxi drivers, successful applicants must pass the Knowledge of London (KoL) as described in section 3.1.2. This process involves several one-to-one examinations where an applicant must describe the route between two destinations across London. All the one-to-one examinations are carried out in English.

PHV drivers must demonstrate English at Level B1 of the Common European Framework of Reference for Languages (CEFR). This requirement covers reading, writing, listening and speaking.

Taxi and PHV passengers

London demographic overview

Whilst limited demographic information for taxi and PHV passengers is available, the 2011 census recorded 8,173,941 people living in London. London's diverse and ever-changing population includes the following equality groups:

- 40% ethnic minority population;
- 51% women and 49% men;
- 32% under 25 and 11% aged 65+;
- 14% with a disability that affects their day-to-day activities 'a lot' or 'a little';

- 28% living in a household with an annual income of less than £20,000; and
- 2.5% considering themselves LGB (the highest proportion of all UK regions)

‘Understanding our diverse communities’ (2019)⁸³ is a collection of research commissioned by TfL to identify barriers faced by different London communities when accessing transport. This informs TfL’s key role in creating a fairer, greener, healthier and more prosperous city and is intended to be a source document for TfL staff to have due regard for all London’s communities when designing and delivering services. ‘Understanding our diverse communities’ assesses barriers to all modes of transport in London, not just taxis and PHVs.

TfL identified seven groups of Londoners which experience barriers when accessing transport. These are: Black, Asian and minority ethnic groups, women, the elderly (aged 65+), young people (aged 24 and under), disabled people, lower income groups and LGB Londoners.

TfL also identified interconnections between the Londoners who make up each equality group.

- Londoners living in a low-income household and over the age of 65 are more likely to be women;
- Black, Asian and minority ethnic Londoners are more likely to be younger;
- Women and those living in low-income households are more likely to be older;
- Men are more likely than women, and white Londoners are more likely than Black, Asian and minority ethnic Londoners to be working full-time.

The key barriers to public transport use cited by equality groups include cost of travel and slow journey times. Black, Asian and minority ethnic groups Londoners mention the cost of travel as a barrier most frequently (51%) followed by young people (50% between the ages 16 and 24). While cost of travel is only mentioned by 10% of elderly Londoners, reflecting the high use of older people’s Freedom Passes. Slow journey times is also cited as a main barrier for Black, Asian and minority ethnic groups, Londoners (31%) and young people (37%), while only 20% of Londoners aged 65+ mention this issue.

LGB Londoners report overcrowded services, cost of travel and disruptions as the three most common barriers to travel. They are significantly more likely than heterosexual passengers to experience unwanted sexual behaviour or hate crime, which generates fear of intimidation and abuse as a barrier to travel. While disabled Londoners mention many of the same issues as non-disabled passengers, they are more likely to report being impacted by them.

Concerns regarding safety and security while travelling is an issue felt across equality groups, by disabled Londoners (37%), young Londoners aged 16-24 (35%), women (34%) and Black, Asian and minority ethnic groups (33%). These groups

⁸³ TfL (2019). Understanding our diverse communities 2019. Available at: <https://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

were also more likely to have experienced a worrying incident within the three months prior to research.

Equality groups report varying levels of satisfaction with TfL transport systems. Black, Asian and minority ethnic groups give lower satisfaction ratings compared to white Londoners, particularly for PHVs, taxis, the Overground and Dial-a-Ride. While older groups are more satisfied with every mode of transport compared with all Londoners. Satisfaction levels between men and women, disabled and non-disabled passengers and low-income households and all customers are very similar. Passengers living in low-income households report very good overall satisfaction ratings for bus services and the Tube, which are on par with the mean satisfaction of all Londoners.

Taxi and PHV passengers

Focusing specifically on taxi and PHV services, the Taxi and Private Hire Driver Diary Survey (2016/17) provides the following taxi passenger profile:

- 52.1% of passengers are male;
- 4.6% of passengers are under the age of 16 and 11.7% are aged over 60; and
- 2.4% of trips include a wheelchair user and 0.4% include a passenger with an assistance dog.

While the following represent minicab passengers:

- 51.1% of passengers are male;
- 5.6% of passengers are under the age of 16 and 4.6% are aged over 60; and
- 0.6% of trips include a wheelchair user and 0.4% include a passenger with an assistance dog.

Customer satisfaction

The TfL Black Cabs and Minicab⁸⁴ Customer Satisfaction Survey (2021/22) revealed that overall taxi customer satisfaction has increased to the highest score in three years. Satisfaction with value for money, appearance of the driver and cleanliness of the vehicles experienced the biggest increases (albeit not significantly).

Overall minicab customer satisfaction has remained stable after four years of decreases, although 9% of customers felt the level of minicab services has declined in the last 12 months. The most notable increases in satisfaction came from the time to complete the journey, satisfaction with the driver taking the best route and the helpfulness and efficiency of office staff.

61% of taxi customers thought that taxi fares were too expensive, although the number who thought they were about right has increased (28% in 2020, 38% in 2021). Female and disabled taxi customers were more likely to feel taxi fares were

⁸⁴ Minicabs are taxis which may be booked in advance but are not licensed to pick up passengers who hail it in the street.

too expensive. While the proportion of minicab customers who felt minicab fares were too expensive has increased (36% in 2020, 39% in 2021).

While the proportion of taxi bookings via an app has increased (to 29%), minicab app bookings via an app have decreased (to 57%). Uber remains the dominant minicab app and Bolt continues to gain presence. There has been a significant decline in satisfaction with vehicle availability via app bookings for both taxis and minicabs. Further, satisfaction with wait times at taxi ranks has declined, with 41% of customers now waiting six minutes or more.

Roughly 10% of customers made a complaint about a taxi or minicab, the majority of which were satisfactorily resolved.

Safety

The 2017/18 TfL Safety and Security Survey⁸⁵ as shown in Table A-11 reveals that a lower proportion of taxi passengers (28%) experience concerns compared to PHV passengers (39%).

Table A-11: Percentage of population who have experienced concerns when travelling by taxi or PHV

Response	Ever had concerns when using taxis	Ever had concerns when using PHVs
Yes, all of the time	6%	7%
Yes, some of the time	22%	32%
No, never	65%	54%
Don't know	6%	7%

Table A-12 displays a breakdown of those experiencing concerns by protected characteristic group. This shows that women, people aged 16-34, heterosexual and minority ethnic groups are more likely to experience safety concerns, with figures higher for travel by PHV. Notably, there is a decreasing trend of safety concerns with age, with only 11% of those aged 65+ experiencing concerns. There are also larger percentages of each group having concerns when travelling by minicab compared to taxis.

Table A-12: Percentage protected characteristic with concerns about travelling by taxi or minicab

Protected characteristic group		Have concerns about travelling in a taxi	Have concerns about travelling in a minicab (PHV)
Sex	Men	23%	31%
	Women	24%	48%
Age	Aged 16-34	41%	47%
	Aged 35-64	24%	38%
	Aged 65+	11%	26%
Ethnicity	White	26%	38%
	BAME	35%	42%

⁸⁵ Information provided by TfL.

Sexuality	Heterosexual	29%	40%
	Lesbian/gay/bisexual	28%	36%

Source: TfL

Table A-13 displays the reasons people gave for having concerns.

Table A-13: Reasons for having concerns

Concerns with taxis	%	Concerns with minicabs	%
Taking a longer route to charge more	47%	Taking a longer route to charge more	44%
Driver being unfriendly/rude/having a bad attitude	32%	Unsafe driving	42%
Driver taking me the wrong way	31%	Driver taking me the wrong way/getting lost	38%
Unsafe driving	26%	Driver being unfriendly/rude/having a bad attitude	33%
Unwanted sexual behaviour from driver	25%	Concern that driver is unlicensed	32%
Concern about being in an unfamiliar vehicle	25%	Concern about being in an unfamiliar vehicle	28%
Concern about being a victim of crime	25%	Safety of the vehicle	27%
Driver being aggressive/feeling threatened	24%	Concern about being a victim of crime	26%
Dispute over cost of fare	22%	Unwanted sexual behaviour from driver	26%
Concern that driver is unlicensed	20%	Dispute over cost of fare	24%
Concern that driver is uninsured	20%	Concern that driver is uninsured	23%

Source: TfL

TfL figures for taxi and private hire related complaints reveal that more complaints are received by TfL about taxi drivers (56.5%) than PHV drivers (34.2%) followed by PHV operators (8.7%).⁸⁶ Table A-14 below reveals the 10 most frequent reasons for complaints. The most prevalent complaints are made in reference to inappropriate behaviour (19.8%), followed by dangerous driving (17.3%).

Other complaints include: licensing enquiry (3.2%), fare complaint (2.3%), offensive behaviour (1.8%), racial/homophobic abuse (1.3%), assault (1.0%), sexual harassment (0.5%), disability discrimination (0.5%) and assistance dog refusal (0.5%).

Table A-14: Top 10 reasons for taxi and PHV related complaints

Explanation	Complaints	% of total
Inappropriate Behaviour	653	19.8%
Dangerous driving	573	17.3%
Overcharge	235	7.1%
Operator complaint	210	6.4%
Compliance with TFL Procedures	185	5.6%
Intimidating/Threatening Behaviour	182	5.5%

⁸⁶ Information provided by TfL.

Fare Refusal	148	4.5%
Attitude/Rude Behaviour	134	4.1%
General enquiry/feedback	131	4.0%
Devious/Unplanned Route	117	3.5%

Source: TfL

Crime

Hate crime

The TfL Safety and Security Q4 2017/18 Report ⁸⁷ indicates that the proportion of Londoners experiencing hate crime while using public transport has reached a new peak of 23%. Of those, 17% witnessed hate crime directed towards another passenger, while 8% were targeted themselves. Incidents of hate crime continue to be perceived as racially/ethnically motivated in the form of verbal abuse.

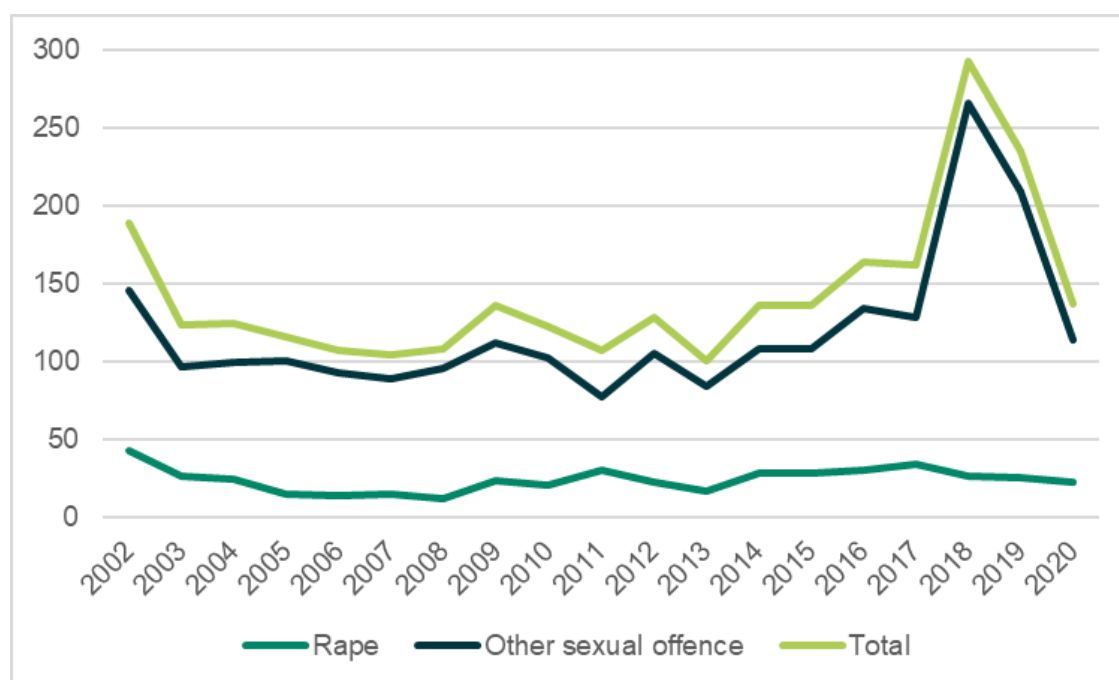
Sexual offences

The Safety and Security Report 2017/18 further reveals that 10% of Londoners experience unwanted sexual behaviour on the TfL public transport network. This behaviour appears to have a long-term impact, with people more likely to avoid travelling via public networks if they experience such incidents.

Figure A-4 below presents the recorded rape and other sexual offences figures for taxi and PH journeys from 2002-2020. Both rape and other sexual offences have fluctuated over time, the latter to a greater degree. Records of other sexual offences peaked in 2018 at 266, while 2002 represents the highest year recorded for rape (43). Both categories have experienced a decrease in the most recent records from 2019 to 2020.

This may not be a comprehensive list of offences committed. Passengers may be hesitant to submit a report due to personal circumstance or other concerns.

Figure A-4: Taxi and PH journey-related sexual offences 2002-2020



⁸⁷ Information provided by TfL.

Table A-15 shows the number of sexual offences where a driver has been charged (either convicted, found guilty or awaiting trial) from 2014-2020 by type of offence and type of vehicle.⁸⁸ The total number fluctuates over time, with 2015-2017 experiencing the highest volume of charges (34). The majority of these were experienced in licensed PHVs booked via an operator, reaching a peak of 26 charges in 2016. While taxis represent the lowest occurrence, recording only 3 charges over the 7-year time period.

Table A-15: Number of sexual offences charged from 2014-2020

Year	Total number of offences	Rape	Other sexual offences	Not booked		Booked via operator		Taxi	
				Unlicensed driver	Licensed PH driver	Licensed PH driver	Unlicensed driver	Licensed driver	Unlicensed driver
2014	26	8	18	6	5	14	-	1	-
2015	34	6	28	6	5	23	-	-	-
2016	34	5	29	3	5	26	-	-	-
2017	24	3	21	-	2	22	-	-	-
2018	18	2	16	1	1	14	1	-	1
2019	21	4	17	4	1	15	-	1	-
2020	8	2	6	1	1	6	-	-	-

Source: TfL taxi and PH journey-related sexual offences where a driver has been charged

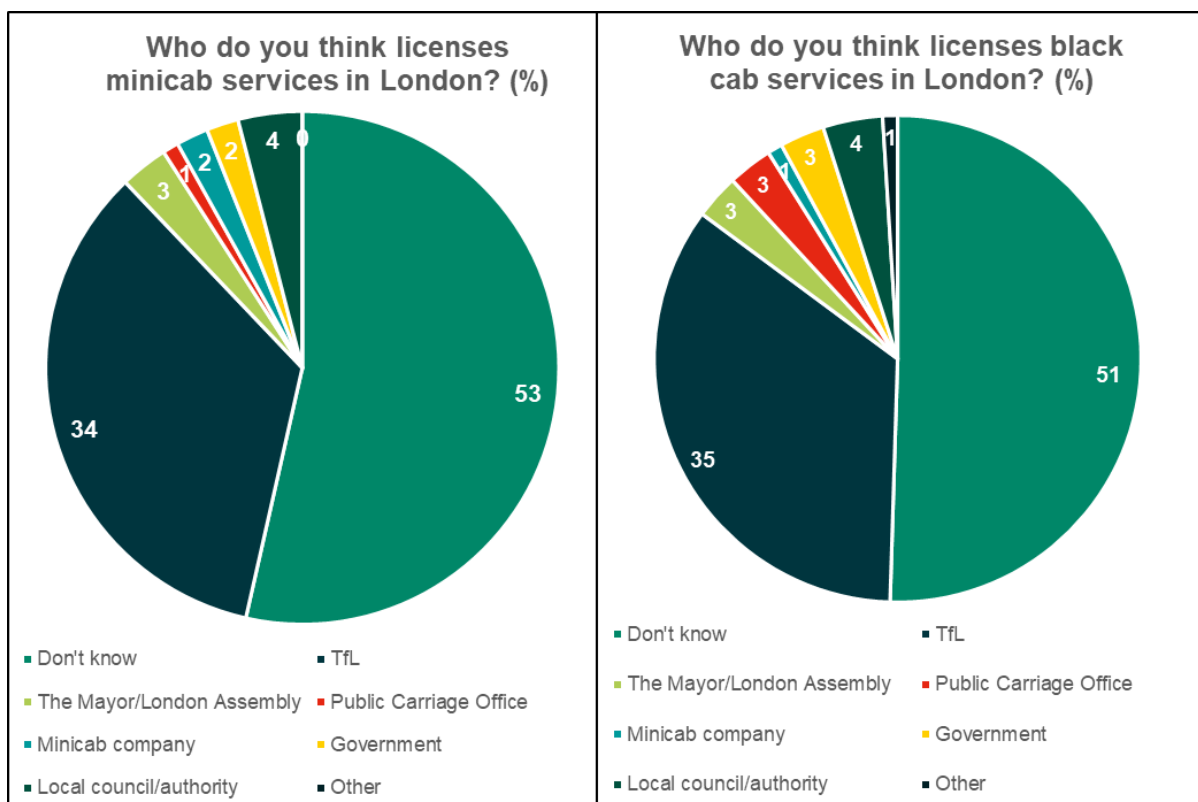
Awareness of licensing

The TfL Customer Satisfaction Survey 2021/2022⁸⁹ revealed that over half of customers were unaware of who licenses taxi and minicab services. Only around one third recognised that TfL is the licensing authority in London. This is significant for complaints and incident reporting, because passengers may be unaware that they can report misconduct or harassment to TfL.

⁸⁸ TfL. TPH journey-related sexual offences. Available at: <https://tfl.gov.uk/corporate/safety-and-security/security-on-the-network/tph-related-sexual-offences#on-this-page-4>

⁸⁹ Information provided by TfL

Figure A-5: Breakdown of who minicab and black cab passengers think license services



Source: TfL

The 2017/18 TfL Safety and Security survey⁹⁰ revealed that 49% of Londoners were aware that it was illegal for minicabs to pick up customers without a booking. However, there were varied levels of awareness across the protected characteristic groups. Londoners aged 16-24 were least likely to be aware (28%), while those aged 65+ were most likely to be aware (73%). Furthermore, men were more likely than women to have awareness of touting rules (52% compared to 46%), as were white Londoners compared with ethnic minority residents (55% compared to 37%).

Table A-16: Awareness that touting for business is illegal in 2017-18

Protected characteristic group		Number	Percentage
Sex	Men	3,613	52%
	Women	4,520	46%
Age	Aged 16-24	906	28%
	Ages 25-34	2,187	39%
	Aged 35-44	1,664	44%
	Aged 45-54	1,260	56%
	Aged 55-64	1,125	67%
	Aged 65+	1,013	73%
Ethnicity	White	5,566	55%
	BAME	2,474	37%

Source: TfL Safety and Security Survey 2017/2018

⁹⁰ Information provided by TfL.

Accessibility

Wheelchair accessible taxis and PHVs

There are significantly more wheelchair accessible taxis than PHVs despite the quantity of taxis decreasing by over 9,000 since 2015. TfL's 'Conditions for Fitness' taxi licensing policy requires all licensed taxis to be wheelchair accessible, although there is no requirement for taxi drivers to have disability awareness training. However, PHV drivers and operators have no requirement for disability training or wheelchair accessible vehicles, resulting in only 0.7% of licensed PHVs being designated⁹¹ wheelchair accessible vehicles.

Taxicard

Taxicard is a subsidised scheme for London residents with mobility impairments or partial sight. The majority of Taxicard journeys use taxis but PHVs are used for some journeys. As of 2022 there are 58,500 active members.⁹² Eligibility criteria for Taxicard includes:

- Receiving the higher rate mobility component of the Disability Living Allowance or the higher rate Attendance Allowance;
- Registered blind; and/or
- Receiving the War Pension Mobility Component

Table A-17 below shows the figures for Taxicard trips made across the last three years. The Covid-19 pandemic could be responsible for the sharp decrease in trips in 2020-2021. During the Covid-19 pandemic Taxicard holders could let someone else use their Taxicard on their behalf to collect necessities.

Table A-17: Taxicard completed trips (2019-2021)

Year	Completed trips
2019-2020	703,250
2020-2021	387,104
2021-2022	564,545

Source: TfL

The Taxicard Usage review survey⁹³ (2016) reveals that the majority of Taxicard holders utilise the service due to mobility problems (76.9%), followed by ease of use and flexibility (49.9%). The majority of respondents stated that the Taxicard scheme is important to them because: 'it picks me up from where I live' (81.2%) and 'it takes me straight to where I want to go' (77.1%). A range of purposes for Taxicard trips were reported in the survey, the most common being for hospital appointments (62%), followed by shopping (55.5%) and doctor appointments (43.2%).

The majority (54%) of Taxicard holders use both taxi and PHV services. However, 55% prefer taxis, with 62.8% reporting excellent standards of politeness and helpfulness from taxi drivers and 82.2% of respondents confirming that drivers assist them in and out of the taxi at all times.

Overall, 75.4% of respondents were either very satisfied or extremely satisfied with the Taxicard service. Improvements in reliability (19%) and more trips (22.1%) were

⁹¹ For the purposes of s165 of the Equality Act 2010

⁹² Information provided by TfL.

⁹³ Information provided by TfL.

the most common changes that would encourage people to make more Taxicard trips.

Environmental factors

Emissions standards

From January 2018 all newly licensed taxis must be zero emission capable (ZEC), and first-time taxi vehicle licences are no longer issued to diesel vehicles. ZEC taxis must emit no more than 50g/km of CO₂ and have a minimum 30-mile zero emission range. While petrol engines must meet the latest emission standards, which are currently Euro 6.

As of June 2022, 38% of the taxi fleet are ZEC. This includes two types of ZEC taxis: Dynamo taxis and LEVC TXe taxis accounting for 1.14% and 36.38% of the taxi fleet respectively.

Currently just over 9,000 licensed PHVs are fully electric. Between January 2020 and December 2022, all newly licensed PHVs under 18 months old must be ZEC and meet the Euro 6 emissions standard when licensed for the first time. While PHVs over 18 months old must have a Euro 6 (petrol or diesel) engine when licensed for the first time.

As of January 2023, all newly licensed PHVs must be ZEC and meet the Euro 6 emissions standards. ZEC PHVs must either emit no more than 50g/km of CO₂ and have a minimum 10-mile zero emission range, or emit not more than 75g/km of CO₂ and have a minimum 20-mile zero emission range.

Age limits

The age limit for Euro 3, 4 and 5 diesel taxis is 12 years.

Euro 6 diesel taxis, ZEC taxis and new conversions to liquid petroleum gas (LPG) have a slightly longer age limit of 15 years. Taxis which converted to LPG before November 2019 have an increased age limit of 20 years.

PHVs have a lower age limit compared to taxis, ranging from 10-15 years. All PHVs have a 10-year limit except for the small number with one of the exemptions below, which consequently have a 15-year age limit:

- Designated wheelchair accessible PHVs;
- PHVs converted to compressed natural gas (CNG), LPG or biomethane
- PHVs owned by a disabled PHV drivers, and which have had significant adaptations or modifications made so that the vehicle can be driven safely
- PHVs used for specialist needs transport services

On the whole, taxis have a younger age profile than PHVs with ~27% aged 2 years or under compared to 19% of PHVs. While the majority of PHVs (53%) sit between the ages of 3 and 6.

Business and Economic baseline

Businesses and Employment

This section summarises data on the number of jobs across London's taxi and private hire sector.

The most recent Office for National Statistics (ONS) Business Register and Employment Survey (BRES)⁹⁴ data indicates there were 14,000 jobs in the Taxi Operation sector⁹⁵ in London in 2020, representing 0.27% of all jobs across London. This compares to 38,500 jobs in the sector across England, which represents 0.14% of all jobs. This indicates the larger size of the sector in London compared to across England as a whole, which reflects the increased number of trips by taxi made in major cities.

UK Business Counts data⁹⁶, which uses the same standard industrial classification as above, shows the number of registered businesses in the Taxi Operation sector. The most recent data shows there were 2,275 registered Taxi Operation sector businesses in London in 2021 (0.38% of all businesses in London). This compares to 7,120 across England as a whole (0.27% of all businesses). Again this indicates the larger relative size of the sector in London compared to across England as a whole.

The number of Taxi Operation businesses in London grew by 21.7% over the five years 2016-2021, significantly higher than the growth in businesses across all industries (10.8%). Across England the number of Taxi Operation businesses grew more slowly, by 7.6%, over the same period, slightly above the average across all industries of 7.4%.

TfL's records show that the number of taxi and private hire licensees in London was much higher than that reported by the BRES and UK Business Counts data. This data indicates there were 119,600 licensed taxi drivers (19,500) and PHV drivers (100,100) in 2022. There were 95,100 licensed taxis (14,600) and PHVs (80,500) in London in 2022.

In comparison, there were 133,999 licensed taxi drivers (22,409) and PHV drivers (111,590) in 2019/20, and 114,916 licensed taxis (18,961) and PHVs (95,955) in London. While in 2020/21 there were 126,148 licensed taxi drivers (20,800) and PHV drivers (105,348), and 90,952 licensed taxis (13,423) and PHVs (77,529) in London.

Earnings

Annual Survey of Hours and Earnings (ASHE)⁹⁷ data shows mean gross annual pay of £32,441 for full-time taxi and PHV drivers in London in 2021, compared to £22,885 across England as a whole. This is lower than the mean wages across all industries of £45,886 in London, and £38,131 in England.

Business licensing and administrative costs

As outlined in section 4.3, there are a number of operational costs currently payable by taxi and PHV drivers, vehicle licensees and PHV operators.

In addition, PHV drivers may be required to pay the following charges:

⁹⁴ Office for National Statistics (ONS), (2020), Business Register and Employment Survey (BRES).

⁹⁵ 4 digit SIC code: 49.32.

⁹⁶ ONS, (2021), UK Business Counts.

⁹⁷ Annual Survey of Hours and Earnings (ASHE), (2021).

- **Congestion charge.** The charge is £15 daily when driving within the congestion zone between 7:00-18:00 Monday to Friday and between 12:00-18:00 Saturday to Sunday and bank holidays. Taxis are exempt from this charge. PHV drivers need to pay the full charge during charging hours, although designated wheelchair accessible PHVs fulfilling a private hire booking are exempt.
- **Ultra-Low Emission Zone (ULEZ).** TfL has consulted on proposals to expand the ULEZ so that the zone is London-wide from August 2023. Currently, the charge is £12.50 and the zone covers all areas within the North and South Circular Roads. Taxis are exempt from this charge. PHV drivers need to pay the full charge during charging hours, although designated wheelchair accessible PHVs fulfilling a private hire booking have been granted a grace period until October 2025 during which they are exempt from the daily charge. If the ULEZ is expanded to cover all of London it is proposed that taxis will remain exempt, and the grace period for designated wheelchair accessible PHVs will be extended to October 2027. Some PHV licensees may face additional costs through this new proposal. TfL has commissioned another integrated impact assessment for the London-wide Ultra-Low Emission Zone (ULEZ). The proposed scheme is expected to have a neutral impact on London's taxi and PHV providers due to taxis being exempt from the ULEZ charges and the PHV compliant rate being estimated at 97 per cent by 2023 and rising to 100 per cent by 2026.

A summary of key business licensing and administrative costs is set out in Table A-18.

Table A-18: Taxi and PHV Baseline Operational Costs

Cost description	Taxi Driver	Taxi Licensee	PHV Driver	PHV Licensee	PHV Operator
Licensing costs	£300 licensing cost (every 3 years)		£300 licensing cost (every 3 years)		
	£52-£54 DBS check (every 3 years)		£52-£54 DBS check (every 3 years)		
	£92-£112 driving and wheelchair test (one off cost)	£140 licensing fee (annually)	£108 speaking and listening, topographical skills and SERU tests (one off cost for passing first time)	£110 licensing fee (annually)	£2,000-£2,900,000 (upon licence renewal)
	£600 Knowledge of London test (one off cost for passing first time)	MOT costs (annually)	£80 medical costs (approximate cost which can vary between local GPs)	MOT costs (annually)	
	£80 medical costs (approximate cost which can vary between local GPs)				

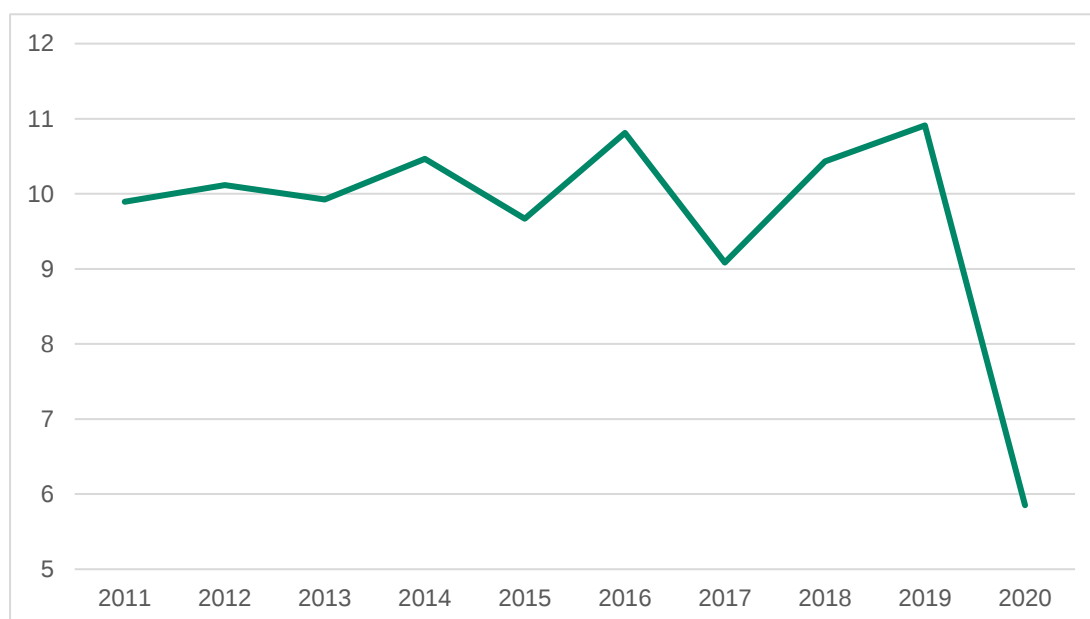
Congestion charge	N/a	N/a	£15 daily charge within zone (wheelchair accessible PHVs exempt)	N/a	N/a
ULEZ	N/a	N/a	£12.50 daily charge for vehicles that do not meet emissions standards (wheelchair accessible PHVs exempt until 2025)	N/a	N/a

Wider Economic Factors

COVID-19

The National Travel Survey can be used to analyse taxi and PHV passenger numbers across England.⁹⁸ Figure A-6 below shows the average number of taxi and PHV trips taken per person per year in England from 2011-2020. The average number of trips remained broadly the same between 2011 and 2019, ranging from 9-11. While the average in 2020 fell to 6 trips. This is largely attributed to travel restrictions during the Coronavirus pandemic.

Figure A-6: Average number of taxi and PHV trips taken per person per year by taxi or PHV, England (2011-2020)



Source: Dft (2022): National Travel Survey NTS0303¹

Furthermore, the percentage of passengers who reported using a taxi or PHV 'less than once a year or never' increased from 44% in 2019 to 54% in 2020. Findings from the National Travel Attitudes Survey suggest that 80% of taxi passengers were

⁹⁸ Department for Transport (2022). Taxi and private hire vehicle statistics, England: 2022. Available at: <https://www.gov.uk/government/statistics/taxi-and-private-hire-vehicle-statistics-england-2022/taxi-and-private-hire-vehicle-statistics-england-2022#taxi-and-phv-passengers---the-effect-of-the-coronavirus-covid-19-pandemic>

travelling by taxi less frequently in January and February 2021 compared to before the pandemic.⁹⁹

In terms of London, the population of Londoners relying on taxis (e.g. commuters, office workers and tourists) sat significantly below normal levels for a sustained period of time. Consequently, taxi drivers were more likely to stop working completely, to have sold their vehicles and to have their income decreasing as a result of the pandemic.¹⁰⁰ As of July 2022, roughly one in ten taxi drivers were not working. Provisional ASHE data shows mean gross pay of £14,000 for those employed in the taxi and PHV industry in London was less than half its value in the financial year ending April 2021, compared to £30,881 year ending April 2021, and £30,594 in year ending April 2019.

While some taxi and drivers were eligible for Government financial support schemes during the pandemic, others were not, and incomes fell significantly.

The number of taxi drivers and taxi vehicle licensees has fallen in recent years (a 14% reduction in taxi drivers between March 2020 and May 2022, while the number of taxi licences has decreased by 22%). Recent private hire licensing figures also reflect the impact of COVID-19 through a 20% reduction in PHV operators, 11.5% reduction on PHV drivers and 14% reduction in PHV licenses between March 2020 and May 2022. These could be short-term trends related to the pandemic, or the impact could be longer-term.

Brexit

Brexit has brought uncertainty to the taxi and PHV sector. Uncertainties over the future eligibility of EU driving licences, and the immigration status of European workers could impact the number of taxi and PHV drivers in London. Lower-skilled EU nationals may struggle to gain long-term entry to the UK job market due to changing immigration rules and a drive for talented and skilled workers. This could deter applications or licence renewals and generate knock-on effects reducing the supply of drivers.

Inflation

Operational costs for licensees are increasing, including diesel, petrol and electric charging costs. These represent direct additional costs to taxi and PHV drivers. Some PHV operators may choose to increase PHV fares to cover rising costs. TfL regulates taxi fares and changes in taxi drivers' operating costs are taken into account when reviewing taxi fares. However, increased fares could deter passengers from travelling by taxi or PHV in favour of cheaper alternatives such as buses and the London Underground.

Additionally, taxis and PHVs may face decreased demand if passengers have less money available or reduce how often they travel. These factors could have a large impact, especially in a post-pandemic economy, as a large proportion of usage and demand is based on leisure/social journeys.

There could also be an increase in the number of licence applications if there is a recession and people are made redundant. Previous recessions have generated an increase in the number of people applying to become a taxi driver, often as they are better placed to afford to do this through redundancy payment and have the time to invest in the Knowledge of London. An increase in the number of taxi and PHV

⁹⁹ Department for Transport (2021). National Travel Attitudes Study: Wave 5. Available at:

<https://www.gov.uk/government/statistics/national-travel-attitudes-study-wave-5/national-travel-attitudes-study-wave-5>

¹⁰⁰ Information provided by TfL.

drivers would mean increased competition for work, although it will take some time for new taxi driver licensees to complete the Knowledge of London and enter the industry.

The Taxi and Private Hire Licensee Customer Satisfaction Survey 2021/22 revealed that the number of drivers and operators who feel positive about the future of their trade has increased since 2020/21, however a larger proportion still express more negative than positive perceptions. Taxi and PHV drivers and PHV operators feeling positive about their future state the rising travel demand, a growing customer preference for taxi travel due to COVID-19 and the benefits of being in the self-employed PH trade as reasons. Those with a negative outlook cite rising costs, high levels of competition, and changing regulations or restrictions as concerns.

Appendix E List of stakeholders invited to take part in IIA engagement

The table below lists the stakeholders who were contacted and invited to take part in the IIA.

Type of stakeholder	Category	Stakeholder	Participated in IIA interview
Trade	Taxi trade	Licensed Taxi Drivers Association (LTDA)	✓
		London Cab Drivers Club (LCDC)	✓
		RMT	
		United Cabbies Group (UCG)	✓
		Unite the Union	
		London Motor Cab Proprietor Association (LMCPA)	✓
	PHV trade	Licensed Private Hire Car Association (LPHCA)	✓
		PHV Board	
		GMB	✓
		Chauffeur & Executive Committee	✓
		App Drivers and Couriers Union (ADCU)	✓
		United Private Hire Drivers (UPHD)	
		Independent Workers' union of Great Britain (IWGB)	
	PHV operator/taxi booking company	Bolt	✓
		Computer Cab	
		Ola	✓
		Uber	✓
		Via	
		Driver Guides Association (DGA)	✓
		The Keen Group	
		Green Tomato Cars Limited	
		Parker Cars Limited	
		FREE NOW	
		Gett	

Type of stakeholder	Category	Stakeholder	Participated in IIA interview
	Knowledge of London	Addison Lee	✓
		Access Mobility Transport Ltd	
		WizAnn	✓
		Knowledge Point	
		TfL KoL coordinator	✓
Non-trade	Equality	Suzy Lamplugh Trust	✓
		End Violence Against Women	
		Centre for Women's Justice	
		Fawcett Society	
		Young Women's Trust	
		London Forum of Civic and Amenity Societies	✓
		Runnymede Trust	
		Race Equality	
		Stonewall	
	Disability and accessibility	Transport for All	
		Age UK London	
		Guide Dogs	
		Royal National Institute for Blind People (RNIB)	✓
		Scope	
		Disability Rights UK	
		Inclusion London	
		Action Disability Kensington and Chelsea	✓
		Independent Age	
		National Pensioners Convention	
		Leonard Cheshire	
	Safeguarding	London Safeguarding Partnership	
	Passenger Group	London TravelWatch	
	Night time economy	Night Time Industries Association (NTIA)	✓

