



Improving Safety in Private Hire Vehicles

Draft Integrated Impact Assessment

May 2018

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Executive summary

Introduction

Mott MacDonald was commissioned by Transport for London (TfL) to undertake an integrated impact assessment (IIA) on a number of regulatory proposals for the private hire vehicle (PHV) industry in London.

TfL is the authority responsible for the licensing, regulation and enforcement of all taxi and private hire services in London.¹ The 2016 Mayor's Taxi and Private Hire Action Plan² included commitments to introduce a number of new measures to ensure passenger safety. Recognising recent developments within the private hire industry, including advances in technology and changes to the way customers engage and use services, has led TfL to review existing regulations for private hire vehicles to understand where improvements can be made in the interest of public safety.

In undertaking a review of private hire regulations, TfL has developed eight proposals for new measures around an advanced driving test and vehicle signage. They are also requesting the views of respondents in a further four areas relating to checking of applicant driver's character through background checks and requirements around PHV insurance³.

To help define and test the content of these proposals, and the further areas for exploration, TfL is conducting a consultation from 26 March to 25 June 2018⁴. This consultation has been split into two parts:

Part one explores the eight detailed proposals around the introduction of new measures in relation to an advanced driving test for private hire drivers in London and vehicle signage requirements for private hire vehicles in London. The proposals are as follows:

1. Introduce an advanced driving assessment for all new PHV drivers.
2. Introduce an advanced driving assessment for all existing PHV drivers on the next renewal of their licence.
3. Introduce an enhanced wheelchair assessment for the drivers of all designated wheelchair accessible PHVs.
4. New mandatory signage displaying contact information introduced in PHVs.
5. Introduction of coloured licence discs.
6. Increase the visibility of PHVs.
7. Introduce assessment on a case by case basis for exemptions from displaying the proposed mandatory signage.
8. PHV driver's ID card to be displayed on the nearside of the PHV on the front windscreen in the top corner.

¹ It should be noted that there are key differences in the two parts of the taxi and private hire vehicle sector in terms of regulations and usage. Taxis are available for immediate hire, can be hailed from the street and accept pre-bookings. In contrast, PHV's cannot ply for hire or use taxi ranks. The scope of the review and the IIA is the PHV sector.

² Mayor of London Taxi and Private Hire Action Plan 2016. Available at: <http://content.tfl.gov.uk/taxi-and-private-hire-action-plan-2016.pdf>

³ See Appendix A for a summary of all proposals.

⁴ <https://consultations.tfl.gov.uk/taxis/improving-phv-safety/>

Part two seeks to gather views on what measures could be adopted relating to character checks of applicant drivers and new requirements for PHV insurance. This discussion will help TfL to feed into further development of possible final proposals.

The results of the consultation as well as the findings from the IIA will be fed into the TfL decision-making process.

About the IIA

Scope

TfL commissioned an IIA that explores the eight defined proposals currently listed in part one of TfL's consultation. This IIA considers the potential health, equality, environmental and economic and business impacts that may arise as a result of the proposed changes to private hire regulation put forward by TfL.

An overview of the focus for the assessment areas is provided below.

Assessment areas

Assessment	Focus
Health impact assessment	Identifies and assesses health, well-being and safety impacts in relation to the proposed changes.
Equality impact assessment	Identifies and assesses impacts on people with characteristics protected under the Equality Act 2010 which are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex; and sexual orientation. This equality impact assessment will help TfL to demonstrate its statutory obligations under the Equality Act
Environmental impact assessment⁵	Identifies and assesses the impacts across a range of environmental issues in relation to the proposed changes; for this assessment the principal focus has been emissions and air quality.
Economic impact assessment	Identifies and assesses impacts on businesses as a result of the proposed changes. Where relevant, this also considers, drawing on the data available, any potential wider economic impacts.

Impacts were considered for the following groups:

- drivers;
- operators;
- passengers; and
- pedestrians and other road users

Summary of proposal impacts

- **Potential positive impacts:** Looking across the proposals and the evidence reviewed to date it is anticipated that many of the proposals would likely result in improved safety and accessibility of PHVs for a range of passengers. There are some protected characteristic groups who are likely to disproportionately benefit from these improvements, in particular, those with heightened personal safety concerns and more vulnerable passengers. However, to ensure that the proposals are truly effective in increasing safety many will need to be accompanied by a programme of awareness raising work and careful implementation planning.

⁵ This assessment considers environmental issues in the context of an IIA and is not an Environmental Impact Assessment undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

As well as improved safety for passengers, proposals one to three can also expect to promote improvements to health and safety amongst drivers as a result of increased training and awareness. In encouraging safe practices amongst drivers, these proposals can also be expected to introduce costs saving for both drivers and operators through improved driver performance and reducing downtime as a result fewer accidents.

- **Potential negative impacts:** there are some areas where negative impacts are anticipated, although mitigation actions may minimise some of the effect of these. Evidence feeding into several of the proposals indicates that financial loss may be experienced by drivers as a result of additional requirements in becoming a PHV licensed driver. Certain protected characteristic groups, namely older drivers, BAME drivers and female drivers are likely to experience a disproportionate impact.

Cumulative impacts

TfL introduced new regulations in 2016 relating to private hire services in London and TfL intends to consult later in 2018 on further proposals in relation to ride sharing in private hire vehicles and other aspects to improve public safety. It is important for TfL to consider the cumulative impacts of any future changes.

Moving toward implementation

Following TfL's final decision-making process, it was stressed by stakeholders that TfL should carefully consider implementation of the proposals to ensure minimal impact on the Private Hire Industry. There are several elements to this and many views were shared during the stakeholder engagement interviews including:

- Greater clarity on the proposals would be greatly welcomed by the sector, particularly in relation to the cost and implementation of any advanced driving assessment.
- A number of operators and drivers were concerned that an advanced driving test would also encounter processing delays and the impact this may have on drivers and operators. In particular, stakeholders noted that TfL should consider the capacity of any provider to carry out the advanced driving tests in a timely manner and reduce any risk of a backlog.
- Phased introduction of proposals 1-3 would help to provide time for industry preparation or adjustments.
- Continued engagement with the sector throughout the implementation period would be valued, as this would help both TfL and operators to keep updated of any inadvertent consequences and work together to minimise negative impacts.
- TfL should consider the number of times they are engaging with the sector over a relatively short time frame, whilst continued engagement is necessary and good practice, TfL should review how they could join up engagement on a number of different proposals for example on improved safety and any changes to the Congestion Charge exemption.
- TfL should consider the cumulative impacts of improved safety in conjunction with the other regulatory changes taking place in the private hire industry.

1 Introduction

Mott MacDonald was commissioned by Transport for London (TfL) to undertake an integrated impact assessment (IIA) on a number of proposals for the regulation of the private hire vehicle (PHV) industry in London.

Private hire regulation was first introduced in London in the early 2000s following implementation of the Private Hire Vehicles (London) Act 1998. TfL is the authority responsible for the licensing, regulation and enforcement of taxi and private hire services in London. As the industry regulator, TfL has the statutory power to set new and amend existing regulations.

1.1 Background to PHV sector in London

The taxi and private hire industries provide a range of services as part of London's transport system and play an important role in servicing the night-time economy when other public transport services are limited. The licensing of private hire services covers drivers, vehicles and operators, and vehicles can be licensed to carry up to eight passengers. The PHV sector is diverse and covers a wide range of vehicles and services from the typical minicab through to chauffeur/executive, community transport and limousine services. They are an important mode of transport for servicing both the domestic and overseas visitor economy, particularly for airport-related trips. Research commissioned by TfL estimated on an average day there are approximately 265,500 minicab trips and 38,000 chauffeur/executive driver trips across Greater London.⁶

In recent years London has seen a significant growth in the number of licensed private hire drivers and vehicles which has contributed to wider challenges in London. At the end of 2009/10 there were around 59,000 licensed private hire drivers and 49,000 licensed PHVs. At the end of 2017/18 these figures had increased to around 113,600 and 88,000 respectively. At the same time the number of PHV operators fell from just over 3,000 to around 2,400.⁷

1.2 Improving safety in private hire

Customers now have a greater choice and convenience in choosing to travel in a private hire vehicle but the changes have also brought challenges in terms of growing traffic congestion, illegal parking, poor air quality and increased safety risks to passengers.

The Mayor's 2018 Transport Strategy has put improving personal safety and security across the Transport network as a key priority. The strategy sets out a vision zero approach to safety on London's street, whilst ensuring the transport system is safe and secure for all passengers. The Mayor intends for TfL to remain an example of global standards in the regulation of private hire services for passenger safety, security, accessibility and convenience. This includes engagement with colleagues outside of London to capture best practice in these areas.

TfL considers the PHV industry to be an asset to London. It wants to ensure that drivers who work in the industry work in a secure environment meeting the highest standards through appropriate training.

⁶ Taxi and Private Hire Driver Diary Survey 2016/17, Steer Davies Gleave

⁷ <https://tfl.gov.uk/info-for/taxis-and-private-hire/licensing/licensing-information>

TfL's primary consideration when reviewing private hire standards is that of public safety. This includes the safety of passengers travelling in private hire vehicles, licensed private hire driver safety and the safety of other road users. Examples of existing requirements include; a private hire vehicle inspection regime, private hire driver background checks and the assessment of drivers' medical history.

Over the past couple of years, TfL has consulted on and implemented a number of changes, for example introducing an English language requirement for all private hire driver's licence applicants and a requirement for operators to provide a booking confirmation to passengers before a journey

Following these changes, in 2016 TfL published the Mayor's Taxi and Private Hire Action Plan. There are specific actions in the Action Plan which link to this consultation on improving safety in private hire including:

- Requiring that private hire drivers pass an advanced driving test before they can be licensed or relicensed.
- Requiring details of TfL's customer complaints procedure to be clearly displayed in PHVs, as they currently are in taxis.

This is complimented by other activities undertaken by TfL including the annual Safer Travel at Night (STaN) communications campaign, which warns the public of the dangers of PHVs who have not pre-booked and various activities by compliance officers.

The consultation on improving safety in private hire launched on 26 March 2018 explores options to further enhance public safety of PHV services. As per the actions listed above, it is exploring a number of specific proposals around the introduction of an advanced driving test and new requirements for PHV signage. The consultation also asked for consultees' views on, changes to PHV insurance and additional character checks for PHV drivers to gather evidence on whether any subsequent specific proposals should be put forward by TfL.

1.3 Purpose and scope of the IIA

An IIA is a method for decision makers to assess the possible impacts, both positive and negative, that proposed changes may have on the population and area in which the proposal or intervention is planned. The aim of an IIA is to make recommendations to help identify potential positive and negative impacts and, where possible, minimise negative impacts of proposals and identify enhancement opportunities.

TfL will use the findings of the impact assessment along with the findings from the consultation process to help inform its decision-making to ensure that any changes are appropriate and fit for purpose. This impact assessment will be published before the consultation process has ended so that the public are fully informed of the anticipated impacts before responding.

TfL commissioned an IIA that considers the potential health, equality, environmental and economic and business impacts that may arise as a result of the proposed changes to private hire regulation put forward by TfL. These findings have been brought together in one single document. An overview of the focus for the four assessments is provided in table 1.1.

Table 1.1: assessment areas

Assessment	Focus
Health impact assessment	Identifies and assesses health, well-being and safety impacts in relation to the proposed changes.
Equality impact assessment	Identifies and assesses impacts on groups with characteristics protected under the Equality Act 2010, namely: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex; and sexual orientation. This equality impact assessment will help TfL to demonstrate its legislative requirements under the Equality Act.
Environmental impact assessment⁸	Identifies and assesses the impacts across a range of environmental issues in relation to the proposed changes; for this assessment the principal focus has been emissions and air quality.
Business and Economic impact assessment	Identifies and assesses impacts on businesses as a result of the proposed changes. This also considers any potential wider economic impacts where relevant and possible to assess with data available.

This report sets out the IIA findings. It incorporates an evidence review process (undertaken between 26 March and 30 April 2018) and engagement with the industry (undertaken between 2 April and 30 April 2018). See Chapter 2 for more details on the methodology. A list of persons and organisations invited to participate in the IIA is included in Appendix D.

1.4 Report structure

The remainder of this report is structured as follows:

- **Chapter 2** outlines the methodology and timescales for the IIA.
- **Chapter 3** outlines main issues associated with the proposed changes and specific impacts that may arise per proposal in relation to the four assessment areas.
- **Chapter 4** provides a summary for each of the four assessment areas and presents some overall conclusions and recommendations.

⁸ This assessment considers environmental issues in the context of an IIA and is not an Environmental Impact Assessment undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

2 Our approach

This section of the report outlines the methodology used for this IIA and each of the constituent topics. It also sets out the assumptions and limitations associated with the work.

2.1 IIA methodology

2.1.1 Scoping

The first task involved an initial scoping exercise to understand which of the eight proposals were relevant to each assessment topic (health; equalities; environment; business and economic). This was informed by a desktop review of the available literature and evidence to ensure a thorough understanding of the assessment areas under consideration. It used research from a range of secondary sources including academic journals, and data collected and research undertaken by TfL and the Department for Transport (DfT) amongst other organisations.

Based on the literature and evidence review, proposals were 'scoped in' or 'scoped out' using a scoping matrix. This set out the content and extent of matters that should be covered within the individual impact assessments, together with a justification for inclusion and exclusion. It was identified that proposal 7 is primarily an administrative change with limited resource requirements attached, therefore they are unlikely to have any disproportionate impacts in relation to the four assessment topics. The findings from this initial scoping exercise are set out in Appendix B. It should be noted that the decision to scope in or out proposals was revisited after engagement with stakeholders.

2.1.2 Establishing the assessment framework

As is IIA good practice, to guide the assessment of the proposals, a framework was developed to ensure consistency in the way the impacts were assessed.

This framework, shown below, was used to systematically assess each proposal as scoped in by the specialist areas. Impacts were considered for:

- drivers;
- operators;
- passengers; and
- pedestrians and other road users.

The three key criteria used to assess the impacts are:

- **Temporal / duration:** this considers whether an impact is expected to be long-term (e.g. where an impact brings about permanent change which will continue to affect receptors in some way for the foreseeable future), medium-term (e.g. will receptors be able to adapt to the change over time); or short-term (where an impact is experienced only at the point of implementation and is overcome by the receptor relatively quickly). It is not customary in IIAs to assign a number of years to each of these classifications unless there is defined data that sets this out, which has not been available for this assessment.
- **Distribution / scale:** this considers how many receptors might be affected by a proposal or impact. Where it is available quantified information is used; where this is not available a judgement has to be made based on the available evidence. This criterion also considers the

‘magnitude’ or ‘severity’ of the impact (i.e. to what extent will the receptor be affected relative to the current situation).

- **Sensitivity:** this considers how easily the receptor will be able to absorb or adapt to the impact. For example, if the impact is unavoidable, it leaves a receptor without alternatives or disrupts the ability to function (or trade) as normal, the receptor would be considered as highly sensitive to the change. Where there are alternatives or where the receptor continues to function as normal, sensitivity would be low.

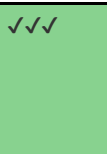
Table 2.1: Assessment framework

Proposal category	Proposal number	Scoped in or out	Private Hire Regulations Review Proposal	Identification of receptors (operators, drivers, users and others)	Description of the impact	Positive or negative impact	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures

Using the duration, scale and sensitivity criteria an impact classification was then assigned according to a seven-point scale as illustrated in Table 2.2 below. More detail is provided in Appendix C.

Table 2.2: Seven-point impact scale

Impact rating	Typical characteristics of impact	
XXX	Major adverse	Long term or permanent Experienced by whole population/all receptors Receptors affected are sensitive or vulnerable to change Would require considerable intervention to return to the baseline
XX	Moderate adverse	Medium term (experienced over a number of years) Affects many receptors across a wide geographical area Some receptors affected are sensitive or vulnerable to change May require some intervention to return to baseline conditions
X	Minor adverse	Short term impact/would be experience occasionally Affects a small number of receptors/impacts are spatially contained Few receptors affected are sensitive or vulnerable to change Return to baseline conditions requires natural or minimal intervention
0	Neutral	Unlikely to result in a detectable impact Baseline remains consistent
✓	Minor beneficial	Short term impact/would be experience occasionally Affects a small number of receptors/impacts are spatially contained Few receptors affected are sensitive or vulnerable to change Return to baseline conditions may occur naturally without future intervention
✓✓	Moderate beneficial	Medium term (experienced over a number of years) Affects many receptors across a wide geographical area Some receptors affected are sensitive or vulnerable to change May require continued intervention to return to baseline conditions

Impact rating	Typical characteristics of impact
	<p>Major beneficial</p> <ul style="list-style-type: none"> Long terms or permanent Experienced by whole population/all receptors Receptors affected are sensitive or vulnerable to change Would require considerable intervention for positive impacts to cease and baseline conditions to resume

In order to understand the range of impacts expected to be realised should all eight proposals be implemented, as well as impacts at an individual proposal level, the study team has taken a two-tier approach to assessing impacts:

- Firstly, based on the evidence available, the impacts on principal receptors (PHV operators, drivers, passengers, pedestrians and other road users) at an individual proposal level have been explored. This has been set out in Chapter 3.
- Secondly, the potential headline issues resulting from these impacts as a whole have been identified. These have been laid out in Chapter 4. Consideration has been given here to cumulative impacts.⁹

2.1.3 Engagement

Following the initial evidence review to inform the IIA, engagement with stakeholders was undertaken to ensure that stakeholder experience, judgement and expertise was integrated into the findings of the assessment. This IIA has drawn on three broad groups of stakeholders, namely:

- PHV operators, trade representations and driver representatives – these included interviews with large and small-scale operators, some of who had a wide coverage of London and others who were more localised. The trade union and driver representative stakeholders covered only those who specialise in the PHV industry.
- Equality, transport and passenger groups – these interviews included organisations specialising in the rights and experiences of specific protected characterises and those with a focus on road safety and passenger safety.
- Insurance representatives – a number of interviews were also conducted with insurance representatives (*please note the majority of this evidence will not be discussed in this IIA as they were providing some indicative views on the broader proposals in the consultation on insurance*).

The stakeholder list was developed with guidance and input from TfL. A total of 21 responses were received comprising of 19 interviews and 2 written submissions. A full list of organisations invited to participate in the IIA can be found in Appendix D.

2.1.4 Topic-specific methodologies

Each assessment area has taken an individual approach, informed by best practice, in order to complete the overall assessment framework (as described above) for each proposal. These methodologies are detailed below.

⁹ Cumulative impacts are when impacts of these proposals may be increased or reduced as a result of all proposals being implemented together and/or other policy interventions or developments that are going on in London at the same time.

2.1.4.1 Health impact assessment

The health impacts of the proposals have been considered by looking at five areas that are identified in TfL's 'Improving the health of Londoners: Transport action plan' (February 2014). These are:

- Physical activity
- Air quality
- Road traffic collisions
- Noise
- Access and severance

The application of the assessment framework identified the priority health issues – informed by scale, severity and duration and their rating. The assessment was qualitative, with the magnitude of the impact being informed by the strength of relationship to health identified through the research. Preliminary enablers or opportunities to support positive impact and mitigate negatives have also been considered.

A short-term engagement exercise was undertaken to discuss the impacts of these proposals with key stakeholders; stakeholders were targeted with regards to health impacts of these proposals, whilst wider stakeholders familiar with the PHV sector were also given the opportunity to comment on this category of impacts. The findings from this engagement were fed into the assessment of impacts.

2.1.4.2 Equality impact assessment

The Equality Act provides a single legislative framework to effectively tackle disadvantage and discrimination toward people with certain 'protected characteristics'. The protected characteristics and social groups who share them are set out in the table below.

Table 2.3: Protected characteristics under the Equality Act 2010

Protected characteristic	Equality and Human Rights Commission (EHRC) definition
Age	A person belonging to a particular age (for example 32-year olds) or range of ages (for example 18 to 30 year olds).
Disability	A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
Gender reassignment	The process of transitioning from one gender to another.
Marriage and civil partnership	Marriage is a union between a man and a woman or between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
Race	Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
Religion and belief	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (such as Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition
Sex	A man, woman or non-binary person
Sexual orientation	Whether a person's sexual attraction is towards their own sex or both sexes.

Source: EHRC 'Protected characteristics'

The equality impact assessment (EqIA), in accordance with the Equality Act has considered the needs and challenges of the above 'protected characteristics'.

In order to identify how different protected characteristics are likely to be affected by these scoped in PHV proposals, the following steps were taken:

- Rapid review of existing policy, strategy, research, and other published literature, with the aim of identifying:
 - The sensitivity of different equality groups to changes being proposed.
 - Possible disproportionate positive and negative impacts that could arise as a result of the proposals.
 - Enablers or opportunities that may support enhanced positive impact and reduced negative impacts on people from these groups.
 - Experience from elsewhere in maximising benefits and mitigating any negative impacts on these groups.
- Analysis of findings using the impact matrix. Each impact was assessed according to the assessment framework including consideration of the below factors:
 - the equality/community group and sub-group likely to experience the impact;
 - whether the impact is positive or negative;
 - the sensitivity of the group to the impact;
 - the duration and distribution of the impact;
 - mitigation measures for any negative impacts; and
 - any opportunities to further promote equality.
- Findings of the assessment clearly set out which of the protected characteristics are likely to experience disproportionate positive and negative impacts of each proposal and identify if and where further analysis and engagement is recommended.
- A short-term engagement exercise was undertaken to discuss the impacts of these proposals with key stakeholders; representative groups were targeted with regards to equality impacts of these proposals, whilst wider stakeholders familiar with the PHV sector were also given the opportunity to comment on this category of impacts. The findings from this engagement were fed into the assessment of impacts.

The discussion in chapter three is limited to the groups who have been identified as experiencing a disproportionate need. Appendix F provides further information about the protected characteristic groups and the rationale behind scoping certain groups in or out of the assessment in chapter three.

When referring to groups who may experience a disproportionate need we talk about sub groups of a protected characteristic. For example, we refer to impacts on Black, Asian and minority ethnic (BAME) drivers. An impact is not felt on 'race and ethnicity' because everyone has a race and an ethnicity. In these cases, we have specified the sub-groups to be clearer about what section of a protected characteristic group is experiencing an effect.

2.1.4.3 Environment

Air quality in the UK is regulated through standards for pollutants in ambient air (including nitrogen dioxide (NO₂) and particulate matter (PM₁₀) and through standards for pollutants at the source of emissions, including vehicles. There are no legally binding requirements relating

to CO₂ concentrations in ambient air, however there are emission standards applied to vehicle emissions.

Ambient air quality is affected by many sources such as regional pollution sources, power production, industry and transport and therefore this assessment has quantified impacts on air quality and CO₂ through potential effects on vehicle emissions only.

A short-term engagement exercise was undertaken to discuss the impacts of these proposals with key stakeholders; wider stakeholders familiar with the PHV sector were also given the opportunity to comment on this category of impacts. The findings from this engagement were fed into the assessment of impacts.

2.1.4.4 Economics and business

The economic and business aspect of the IIA provides an indication of the likely impacts on London's economy and where possible, with a focus on small businesses.

The data reviewed for this exercise came from a range of sources including market-wide statistics about the PHV sector, the 2001 PHV supply and demand study (in absence of the 2016 updated report), PHV sectors in other cities and research conducted/commissioned by TfL in the last 24 months in order to capture changes in the market following the launch of app-driven operators.

A rapid engagement exercise was undertaken with key stakeholders to better understand the impacts of each proposal; stakeholders most directly affected were targeted and were given the opportunity to outline the implications each proposal would have on their business. Additionally, wider stakeholders familiar with the PHV sector were also given the opportunity to comment. The findings from this engagement were fed into the assessment of impacts.

Based on the evidence gathered through the literature review and engagement exercise, the prospective impacts of each proposal were mapped and assessed in terms of duration, distribution, scale, and sensitivity (i.e. the strength of stakeholders' reaction to the actual or perceived negatives of each proposal) and assigned an impact rating based on the seven-point scale.

2.2 Assumptions and limitations

It is imperative that the following methodological assumptions and limitations are considered whilst reading this IIA.

- This report has been compiled as an IIA to highlight likely receptors impacted and likely duration, scale and sensitivity of the impacts resulting from TfL's eight proposals that were consulted on between 26 March and 25 June 2018.
- Engagement findings are not attributed to individual stakeholders by name in this report; comments received about impacts have been aggregated and used to inform the wider evidence on which the assessment has been based. Anonymity of responses is considered best practice as it enables participants to give honest answers and leads to a higher response rate.¹⁰ This approach to stakeholder engagement was also employed during the 2016 private hire regulations review IIA. It is important to note that any answers given by

¹⁰ See for example Halej, J/Equality Challenge Unit (2017) Ethics in primary research (focus groups, interviews and surveys), Oltmann, Shannon M. (2016). Qualitative Interviews: A Methodological Discussion of the Interviewer and Respondent Contexts Forum Qualitative Sozialforschung / Forum: Qualitative Social Research, 17(2), Art. 15. O'Haire C, McPheeters M, Nakamoto E, et al. Engaging Stakeholders To Identify and Prioritize Future Research Needs (2011) (Methods Future Research Needs Reports, No. 4.) [Table, Strengths and Limitations of Stakeholder Engagement Methods].

stakeholders during the interviews were cross referenced against public statements. There was no inconsistency between stakeholder engagement interviews and public statements.

- The purpose of the IIA is to understand and set out the impacts (positive and negative) of the proposals should they be implemented.
- The business and economic impact assessment has relied on engagement with operators to provide more detail and assurance for this assessment around the key impacts that could be experienced by different parts of the sector.
- It is understood that the impacts of some of these proposals, and whether they are implemented or not, could have wider impacts on other transport providers. Engagement has not been undertaken with representatives of these transport provider groups as part of this IIA.
- Engagement has been undertaken with representatives of some PHV drivers.
- The report refers to the Hackney Carriage Test (commonly known as the DVSA test). We have used data produced by the government on the proportion of drivers who have passed what is classed as the 'Taxi- Hackney carriage/Private hire' (coded Z in data sources).¹¹ As agreed with TfL, this dataset has been used as a proxy for likely pass rates of PHV drivers, as it provides the best available data on existing pass rates of similar assessments. Please note however, that the pass rates for the advanced driving test may vary from what has been reported in this document. For example, PHV drivers undertaking an advanced test may be slightly more experienced than others who currently take the test. It should also be noted that this data covers the whole of the UK and is not localised to London and as such does not take into account regional differences in pass rates.
- Until late 2016 the DVSA offered three types of driving assessment. The report assumes that following costs for the advanced drivers will be similar to these costs:
 - £92.94 for the advanced assessment which includes a wheelchair exercise (this is what TfL required for taxi drivers);
 - £26.56 for the upgrade assessment (for those who have done the standard assessment and now want to do the wheelchair exercise, or who passed the driving assessment but failed the wheelchair element)
- The Advanced Driving Assessment is not intended to assess the ability of an applicant's English language proficiency. The English language requirement of PH drivers is assessed through the English language test. The applicant must be able to communicate in English at or above level B1 on the Common European Framework of Reference for Languages (CEFR). The ability to communicate in English for the purposes of this requirement includes speaking, listening reading and writing.
- It is understood that the twelve-week consultation TfL is undertaking on views around the proposals will provide the opportunity for comment from the groups which haven't been engaged as part of the IIA. Groups which have already been engaged will also have a further opportunity to consider the contents of the IIA and provide comment as part TfL's consultation process.

¹¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/469300/dsa-practical-driving-test-pass-rates-by-age-gender-2009-2010.pdf

3 Assessment outcomes

This chapter sets out the assessment of each proposal, considering (where relevant) whether impacts will be experienced by operators, drivers, passengers and/or other road users. An assessment summary table is presented for each proposal. Where there are not considered to be any discernible differences of impacts compared to the baseline situation (as based on the assessment methodology) the boxes in the summary table are greyed out.

Detailed findings of this assessment are provided in a technical assessment framework outlined in Appendix E. This chapter provides a summary of that evidence.

3.1 Proposal 1: Introduce an advanced driving assessment for all new PHV drivers

New taxi drivers are required to take and pass an advanced driving assessment. The proposed standard of the private hire driver's advanced driving assessment will be the same as the taxi driver advanced driving assessment.

3.1.1 Summary

The table below summarises the impacts for each receptor across the assessment areas.

Table 3.1: Summary of Proposal 1

Topic	Operators	Drivers	Passengers	Other road users
Health		Moderate beneficial	Moderate beneficial	Moderate beneficial
Equality		Minor adverse	Moderate beneficial	
Environment		Minor beneficial	Minor beneficial	Minor beneficial
Economics and business	Minor beneficial	Minor adverse		

3.1.2 Health

3.1.2.1 Driver, passenger and other road user impacts

At the end of 2016 the Metropolitan Police Service (MPS) implemented the Case Overview and Preparation Application (COPA) system. This allows the reporting of personal injury collisions involving taxi and private hire vehicles to be shown as two separate categories from 2017 onwards. The following breakdown includes the number of private hire vehicle casualties in London from January to September 2017 and is for the Metropolitan Police area only. This is the latest data available and is still subject to change.

Table 3.2: Private hire vehicle casualties

Private hire users	
Killed	1
Killed and seriously injured	30
Slightly injured	473
All casualties	503

Source: TfL 'Road Safety' (2018): accessed online at <http://tfl.gov.uk/corporate/publications-and-reports/road-safetyTfL>

Requiring PHV drivers to undertake an additional test will likely improve the quality of driving amongst this group of drivers. Other classes of drivers (such as heavy goods vehicles and buses) are already required to undertake such tests and this requirement would therefore bring PHV in line with other frequent road users. In addition, a number of licensing authorities in other metropolitan areas of England and Wales require both taxi and PHV drivers to undergo a driving assessment before being licensed. The majority of authorities neighbouring London require an additional driving test (e.g. Slough Chiltern and South Bucks)¹².

Stakeholders have highlighted that figures around accident rates have indicated that professional drivers who have taken an advanced driving test have lower accident rates. Evidence suggests that a combination of acquired technical driving skills, frequent engagement in driving practice and desires to develop and engage in safe driving behaviours is more important in reducing road collisions than technical driving skills alone.¹³ Therefore, requiring PHV drivers to undertake an advanced driving test will likely reduce accident rates and likely bring about improvements in both safety for drivers, passengers and other road users as driving practices improve.

As well as improved safety the advanced driving test could also encourage smarter and more efficient driving styles for example less engine revving and less idling. This may reduce the proportion of harmful emissions produced by PHVs and, therefore, have a positive benefit in terms of improved human health. Those with respiratory diseases, the elderly and infants are likely to be more sensitive to any changes in air quality.

The proposal is assessed to have **moderate beneficial** impacts to health for drivers, passengers and other road users as a consequence of improved driving standards.

3.1.3 Equality

3.1.3.1 Driver impacts

Assuming a similar failure rate to the Taxi-Hackney carriage/private hire practical exams, where between 25% and 45% of drivers failed between 2009 and 2010¹⁴, the proposal is likely to impact on drivers' ability to operate as PHV drivers. This is because it can be expected that not all drivers will pass the advanced assessment at the first attempt. It is also likely that the assessment will be financially burdensome to drivers both in terms of potentially having to cover the cost of the test and through reduction and/or loss of income whilst they are training. However, it is noted that, in the majority of cases this is likely to be a one-off cost. The cost of training for the test is hard to quantify as this will depend on driver's ability and confidence in their car. BAME groups currently make up a high proportion of PHV drivers (around 91% of drivers, whose ethnicity is known, are non-white)¹⁵. As such, the additional cost impacts associated with the test are likely to be felt disproportionately by this group.

¹² See TfL (2018) 'Improving Safety in Private Hire Vehicles Consultation', appendix D. Available at: https://consultations.tfl.gov.uk/taxis/improving-phv-safety/supporting_documents/Improving%20Safety%20in%20Private%20Hire%20Vehicles.pdf

¹³ QUT (2017): 'Association between driver training, involvement in four-wheeled motor sports, and crashes on public roads.'

¹⁴ 'Driving licence Practical Pass rates: All Categories of Test by Age for 01/04/2009 to 31/03/2010'. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/469300/dsa-practical-driving-test-pass-rates-by-age-gender-2009-2010.pdf

¹⁵ TfL (2018): 'Taxi and PHV demographic stats'. Available at: <http://content.tfl.gov.uk/taxi-and-phv-demographic-stats.pdf>. Please note this has been calculated by removing those who refused to respond. Only white British drivers have been included as non-BAME. Of all PHV drivers, 32 % refused to respond, as such the estimates used in this report are based on the 68% who did respond to this question.

Further, the requirement for an advanced driving test is likely to have a disproportionate impact on several groups who may find it harder to pass this additional assessment. Those from outside of the UK that hold an EU/EEA licence will be unlikely to have experienced the test conditions and requirements involved in undertaking a test in the UK and may therefore struggle with the variation from previous test experiences. This proposal can, therefore, be expected to have a disproportionate impact on BAME drivers who learnt to drive outside of the UK.

It was identified by stakeholders that the requirement to undertake an advanced driving assessment could also negatively impact on female drivers. Stakeholders suggested that female drivers often drive part-time fitting this work around their caring duties (*it should be noted that not all part time drivers will be females nor is the report specifying that not all people with caring responsibilities will be female*). Though not specifically related to private hire industry, 42% of women in employment were working part-time in 2017 compared to 13% of men¹⁶ and are more likely to have a primary caring role when children are young.¹⁷ The additional requirements to become a PHV driver may be perceived as too great to justify part time work and therefore act as a greater barrier to women entering and remaining in the profession.

Older people who have had a licence for a number of years, may also struggle with being assessed again given the changes to assessments processes in the past few years. Data from pass rates of the Taxi-Hackney carriage/Private hire advanced test for black cabs in London showed that around 71% of over 60's passed compared with 76% of those aged 30-40.¹⁸

In spite of the proportion of drivers who fail the Taxi-Hackney carriage/Private hire practical exams (which this test is likely to be based on) and groups who may struggle to complete additional assessment requirements, the impact of this proposal is deemed **minor adverse**. Drivers are able to retake the test and the failure rate is expected to be lower than that of the Taxi-Hackney carriage/Private hire practical exam.

Specific equality mitigation measures or opportunities for enhancement for this proposal:

- If this proposal is implemented, sufficient guidance and support could be provided to drivers to help them adequately prepare for the test.

3.1.3.2 Passenger impacts

As noted above it can be assumed that the introduction of an advanced driving test would improve PHV driver's performance, reducing the number of road accidents. This has been asserted in stakeholder interviews.

There are several protected characteristic groups that have a higher propensity to use PHV services compared to the rest of the population, in particular, disabled groups and females.¹⁹ As such, any improvements to the quality and safety of the driving of PHVs will be of benefit to these groups.

On the other hand, stakeholders highlighted that this proposal may reduce the proportion of PHV drivers available to serve the public as the assessment may slow down the process of becoming a driver. This could mean that there are fewer drivers particularly at night leading to

¹⁶ House of Commons (2017): 'Briefing paper: Women and the Economy'

¹⁷ British Social Attitudes (2013): 'Gender roles'

¹⁸ See: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/469300/dsa-practical-driving-test-pass-rates-by-age-gender-2009-2010.pdf

¹⁹ For evidence see Appendix G

negative safety impacts. Given the higher propensity of people with a disability and women to use PHV services this may disproportionately affect their access to PHVs. However, it is likely this impact will be negligible given the significant number of private hire cars available for hire.

Proposal 1 is assessed to provide **moderate beneficial** equality impacts for all passengers, disabled or female passengers as higher users of private hire vehicles are likely to experience disproportionate beneficial impacts.

3.1.4 Environment

3.1.4.1 Driver passenger and other road user impacts

This proposal has the potential to introduce new PHV drivers to techniques that will improve their driving style, which will involve driving in a more fuel-efficient way. For example, the test may encourage less engine revving and idling. By reducing the amount of fuel used when driving, harmful emissions that have a detrimental impact on air quality will also be reduced, thus positively improving long-term local air quality in London.²⁰

Changes to air quality are likely to be localised with some cumulative benefits across London as such this proposal is assessed to provide **minor beneficial** environmental impacts.

3.1.5 Economics and business

3.1.5.1 Operator impacts

It is assumed that the introduction of the advanced driving test would improve some PHV drivers' performance. This would reduce the number of accidents and therefore the number of driver-days lost due to collisions²¹, benefiting the operators that would otherwise have lost income from such events.

Some stakeholders indicated that they would expect a possible long-term reduction of drivers as a result of some potential drivers being dissuaded from the profession because of the time and investment involved in becoming a PHV driver. It was felt that it would become harder for operators to attract drivers and that small and medium sized operators would be most negatively affected by this.

Overall, proposal 1 is assessed to provide **minor beneficial** business and economic impacts for operators due to reduction in accidents and result of savings.

Specific business and economic mitigation measures or opportunities for enhancement for this proposal:

- Adequate, well publicised and easily digestible TfL guidance should be provided to operators to help drivers prepare for each assessment.

3.1.5.2 Driver impacts

Stakeholders outlined that it currently takes 16-24 weeks to get a PHV driver licence and can cost approximately £724 for the application.²² It is expected that most drivers will have to cover the cost of the advanced driving test which introduces an additional financial burden on the

²⁰ Energy Saving Trust & DfT (2016): 'Advising fuel efficient driving techniques for your fleet'

²¹ Peck (2011): 'Do driver training programs reduce crashes and traffic violations? — A critical examination of the literature'. Available at: <https://www.sciencedirect.com/science/article/pii/S0386111211000021#s0040>

²² <https://tfl.gov.uk/info-for/taxis-and-private-hire/licensing/private-hire-driver-licence>

driver, as well as a time burden. In addition, assuming a similar cost²³ and failure rate to the Taxi-Hackney carriage/Private hire practical exams²⁴, the proposal will likely have an impact on the ability of drivers to work as PHV drivers. For some drivers the assessment may then add a barrier to employment as drivers will be at risk of reduction or loss of income whilst they are training.

Despite the possible future savings in car repairs and/or collisions from improved driving, drivers rather than operators will be expected to pay the additional cost and this is an extra financial burden. Some drivers may require driver training prior to taking the assessment and this training would be at their own expense. Moreover, there may also be an assessment re-test cost where required. However, given the past/fail rates of previous exams in most cases it is likely this cost will be a one off cost. For this reason, this proposal is assessed to have a **minor adverse** impact for drivers.

Specific business and economic mitigation measures or opportunities for enhancement for this proposal:

- Adequate, well publicised and easily digestible TfL guidance should be provided to drivers to help prepare for each assessment.
- TfL could allow sufficient flexibility in terms of testing times for drivers so that they can manage their work around the assessment.
- TfL could explore the possibility of recognising nationally accredited schemes; for example, the Road Passenger Vehicle NVQ. In reviewing this option, TfL would need to be confident that the NVQ covers all of the content within the advanced driving test.
- TfL could ensure that appropriate procedures are in place so that the advanced driving test procedure does not include a back-log which prevents drivers from participating in the labour market whilst they wait to pass the test.

3.2 Proposal 2: Introduce an advanced driving assessment for all existing PHV drivers on the next renewal of their licence

TfL has proposed that all existing PHV drivers will be required to take and pass the advanced driving assessment before the next renewal of their licence.

3.2.1 Summary

The table below summarises the impacts for each receptor across the assessment areas.

²³ TfL (2018): 'Taxi Drivers Licence Application Cost'. Available at: <https://tfl.gov.uk/info-for/taxis-and-private-hire/licensing/apply-for-a-taxi-driver-licence>

²⁴ Before submitting an application, the driver must have passed the Driver and Vehicle Standards Agency (DVSA) advanced driving test for taxi driver. It is essential that those who intend to carry passengers in their vehicles for their own monetary gain are proven to be of a high standard that reduces the risk of road accidents and danger to members of the public and the DVSA Taxi test is bespoke to those who wish to drive private hire and hackney carriage vehicles. It is of a higher standard than that of the normal practical driving test.

Table 3.3: Summary of Proposal 2

Topic	Operators	Drivers	Passengers	Other road users
Health		Moderate beneficial	Moderate beneficial	Moderate beneficial
Equality		Minor adverse	Moderate beneficial	
Environment		Minor beneficial	Minor beneficial	Minor beneficial
Economics and business	Minor beneficial	Minor adverse		

3.2.2 Health

3.2.2.1 Driver, passenger and other road user impacts

This proposal widens the scope of proposal one to all existing PHV drivers. Many of the impacts outlined for proposal one will, therefore, also apply here. For example, the proposal will likely improve the quality of driving amongst existing PHV drivers and as such could reduce the number of collisions and improve the safety of the drivers and passengers, as well as pedestrians and other road users. It also has the potential to improve human health through a reduction of harmful emissions through the introduction of fuel efficient driving styles.

Proposal 2 is assessed to have **moderate beneficial** impacts to health for drivers, passengers and other road users.

3.2.3 Equality

3.2.3.1 Driver impacts

As with proposal one the introduction of an advanced driving test for PHV drivers may create a barrier to employment as, based on pass data for the Taxi-Hackney carriage/Private hire practice exams, around 25-45% of drivers can be expected to fail this assessment. It is also likely that many drivers will be required to cover the cost of the assessment both in terms of the financial outlay to undertake the test and the time lost while preparing and undertaking the test. Given that BAME groups currently make up a high proportion of PHV drivers²⁵, this proposal can be expected to have a disproportionate impact on BAME drivers.

As with new drivers, certain existing PHV drivers can be expected to be disproportionately impacted by the advanced driving assessment including:

- Those from outside of the UK that hold an EU/EEA licence and who may struggle to undertake the assessment due to lack of experience in terms of UK driving test conditions
- Older drivers who have had a licence for a number of years and who may also struggle being assessed again given the changes to assessments processes in the past few years.
- Female drivers who work part-time and fit work around their caring duties; 42% of women in employment were working part-time in 2017 compared to 13% of men²⁶ and are more likely to have a primary caring role when children are young²⁷ (*it should be noted that not all part time drivers will be females*). The additional requirements that may involve more time and money may be perceived as too great to justify part-time work which could act as a barrier to entering the PHV industry.

²⁵ TfL (2018): 'Taxi and PHV demographic stats'. Available at: <http://content.tfl.gov.uk/taxi-and-phv-demographic-stats.pdf>

²⁶ House of Commons (2017): 'Briefing paper: Women and the Economy'

²⁷ British Social Attitudes (2013): 'Gender roles'

In spite of the proportion of drivers who fail the practical exams (which this test is likely to be based on) and groups who may struggle to complete additional assessment requirements, the impact of this proposal is deemed **minor adverse**. Drivers are able to retake the test and the failure rate is expected to be lower than that of the Taxi-Hackney carriage/Private hire practical exam due to their experience on London roads.

Specific equality mitigation measures or opportunities for enhancement for this proposal:

- If this proposal is implemented, sufficient guidance and support should be provided to drivers to help them adequately prepare for the test. Stakeholders suggested that consideration should also be given to the accessibility of the assessment.

3.2.3.2 Passenger impacts

The likely impact on passengers of this proposal is expected to be similar to those outlined for proposal one. As such, it is assumed that the introduction of an advanced driving test would improve some PHV driver's performance, reducing number of road accidents and therefore increasing passenger safety. Several protected characteristic groups have a higher propensity to use PHV services compared to the rest of the population, in particular, disabled groups and females.²⁸ As such, any improvements to the quality and safety of the driving of PHVs will be of benefit to these groups.

This proposal is assessed to provide **moderate beneficial** impacts for all passengers, particularly female passengers and passengers who are disabled.

3.2.4 Environment

3.2.4.1 Driver passenger and other users impacts

This proposal has the potential to introduce existing PHV drivers to techniques that will improve their driving style, which includes driving in a more fuel-efficient way. By reducing the amount of fuel used when driving, harmful emissions that have a detrimental impact on air quality will also be reduced, consequently positive improvements in long-term local air quality in London can be assumed. In addition, less collisions may result in better traffic flow, less delays and consequently less pollution.

This proposal is assessed to provide **minor beneficial** environmental impacts for drivers, passengers and other users.

3.2.5 Economics and business

3.2.5.1 Operator impacts

It is assumed that the introduction of the advanced driving test would improve some PHV drivers' performance. This would reduce the number of accidents and therefore the number of driver-days lost due to collisions²⁹, benefiting the operators that would otherwise have lost income from such events.

²⁸ For evidence see Appendix G

²⁹ Peck (2011): 'Do driver training programs reduce crashes and traffic violations? — A critical examination of the literature'. Available at: <https://www.sciencedirect.com/science/article/pii/S0386111211000021#s0040>

However, some stakeholders indicated that they would expect a possible long-term reduction of drivers as a result of some potential drivers being dissuaded from the profession because of the time and investment involved in becoming a PHV driver. It was felt that it would become harder for operators to attract drivers. It was felt that small and medium size operators would be most negatively affected by this.

Proposal 2 is assessed to provide **minor beneficial** business and economic impacts for operators.

Specific business and economic mitigation measures or opportunities for enhancement for this proposal:

- Stakeholders suggested that to mitigate the potential impact on operators in terms of loss of drivers, a staggered approach should be taken in requiring existing drivers to take the assessment. It was also suggested that there needs to be enough people to deliver the assessment and undertake the required administration so that the system can cope with the demand and that the length of time to qualify is kept to a minimum.
- Adequate, well publicised and easily digestible TfL guidance should be provided to drivers to help prepare for each assessment.
- TfL could allow sufficient flexibility in terms of testing times for drivers so that they can manage their work around the assessment.
- TfL could ensure that appropriate procedures are in place so that the advanced driving test procedure does not include a back-log which prevents drivers from participating in the labour market whilst they wait to pass the test.

3.2.5.2 Driver impacts

As mentioned in 3.1.4.1, it is expected most drivers will have to cover the cost of the advanced driving test which introduces an additional financial burden on the driver. Assuming a similar cost³⁰ and failure rate to the Taxi-Hackney carriage/Private hire practical exams, where between 25-45% of drivers failed³¹, the proposal will likely have an impact on the ability of drivers to operate as PHV drivers.

This proposal is likely to have a short-term impact as it will no longer be applicable once all of the existing drivers have renewed their licence. In addition, the test is likely to be available at convenient times and the test itself will only take 45-60 minutes. However, the loss of income whilst undertaking the test and while the licence is pending (for those who have fallen outside of the 4 month period in which to complete the test before license expires) is likely to be felt by drivers, with existing drivers more likely to struggle to complete the test and have less job mobility if they fail. As such, this proposal is assessed as having **minor adverse** business and economic impacts for existing drivers.

3.3 Proposal 3: Introduce an enhanced wheelchair assessment for the drivers of all wheelchair accessible PHVs

TfL proposes to require PHV drivers of wheelchair accessible private hire vehicles to take a wheelchair assessment to ensure consistency across the taxi and PHV industry and improve

³⁰ TfL (2018): 'Taxi Drivers Licence Application Cost'. Available at: <https://tfl.gov.uk/info-for/taxis-and-private-hire/licensing/apply-for-a-taxi-driver-licence>

³¹ Driving licence practical pass rates: All categories of test by age for 01/04/2009 to 31/03/2010. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/469300/dsa-practical-driving-test-pass-rates-by-age-gender-2009-2010.pdf

the service to wheelchair users. We have assumed a cost of this test of around £26.56 (see assumptions and limitation section). There is no estimate available for the time commitment required to train for the test.

3.3.1 Summary

The table below summarises the impacts for each receptor across the assessment areas.

Table 3.4: Summary of Proposal 3

Topic	Operators	Drivers	Passengers	Other road users
Health		Minor beneficial	Minor beneficial	
Equality			Moderate beneficial	
Environment				
Economics and business	Minor beneficial			

3.3.2 Health

3.3.2.1 Driver impacts

The introduction of this proposal is likely to improve the safety amongst drivers with designated wheelchair PHVs. The introduction of an enhanced wheelchair assessment should encourage best practice in assisting wheelchair users and help to avoid some of the health and safety issues that result from a lack of training and awareness. By ensuring that drivers have the appropriate skills and knowledge to assist wheelchair users, this proposal could reduce any injuries drivers may sustain from lifting and assisting passengers with wheelchairs.

This proposal will likely help ensure healthier practices amongst drivers, however, there a relatively few designated wheelchair accessible PHVs and as such this proposal is assessed to provide **minor beneficial** health impacts to drivers.

3.3.2.2 Passenger impacts

Evidence suggests that some wheelchair users have been exposed to unsafe assistance.³² The introduction of wheelchair assessments for drivers of PHVs should help ensure that drivers are provided with the additional skills and knowledge for assisting wheelchair users. This in turn should improve the safety of the wheelchair user and result in fewer injuries for them when getting into and out of PHVs and during their journey.

In addition, the proposal could ensure consistency of services for wheelchair users across the PHV network which could potentially result in greater confidence in using PHV services and improved safety standards.

As disabled users are more likely to use PHVs and the proposal would likely improve the safety of service to wheelchair users. As there are relatively few designated wheelchair accessible PHVs, it is assessed to provide **minor beneficial** health impacts for disabled passengers.

³² European Conference of Ministers of Transport (2007): 'Improving Access to Taxis'. Available at: https://www.iru.org/apps/cms-filesystem-action?file=en_publications/en_taxi_summary2007.pdf

3.3.3 Equality

3.3.3.1 Passenger impacts

The proposal would likely improve the standard of wheelchair services amongst PHV drivers who currently drive a wheelchair accessible PHV. This proposal may mitigate against negative passenger experience by providing better training and more knowledge to drivers, benefiting passengers by increasing the safety of the service provided. The stakeholders interviewed suggested that this proposal would promote confidence in using PHVs amongst wheelchair users as they would have evidence that safety concerns are being addressed and this would demonstrate to those who require a wheelchair accessible vehicle that an adequate service should be provided.

This proposal could provide **moderate beneficial** equality impacts to passengers, specifically affecting passengers who are wheelchair-users.

3.3.4 Economics and business

3.3.4.1 Operator impacts

It is assumed that having drivers who have undertaken the enhanced wheelchair assessment both operators and drivers will be better equipped to assist passengers who are wheelchair users. This should simultaneously expand their client base and improve the service for disabled clients.

On balance, given that only 0.6% of PHVs are wheelchair accessible³³, and that only a subset of these would require a standalone test, the cost is likely to be negligible and therefore this proposal is assessed to have **minor beneficial** business and economic impacts on operators.

Specific business and economic mitigation measures or opportunities for enhancement for this proposal:

- To mitigate the cost and time burden of undertaking the advance wheelchair assessment, it could be proposed that it is integrated within the advanced driving assessments as in proposal 1 or proposal 2.
- TfL could also consider whether the assessment could be incorporated as training for drivers rather than a tested exam.

3.4 Proposal 4: New mandatory signage displaying contact information introduced in PHVs

TfL has proposed to introduce new mandatory signage displaying contact information for display in licensed PHVs. The intention is to raise awareness amongst passengers that they can contact TfL if they want to comment on a PHV journey.

3.4.1 Summary

The table below summarises the impacts for each receptor across the assessment areas.

³³ 504 of 89,966 PHVs are wheelchair accessible as of 01/05/2018

Table 3.5: Summary of Proposal 4

Topic	Operators	Drivers	Passengers	Other road users
Health			Minor beneficial	
Equality			Minor beneficial	
Environment				
Economics and business	Neutral			

3.4.2 Health³⁴

3.4.2.1 Passenger impacts

This proposal could increase both safety and the perception of safety. Evidence suggests that there is a low awareness amongst passengers that TfL is responsible for licensing minicab services and can be used as source of complaint³⁵. By providing passengers with contact details of how to comment if they have an issue with their journey, the proposal gives passengers a clear avenue for recourse. Therefore, it could promote better reporting of unsafe drivers, ensuring appropriate review of drivers and leading to safer driving. Additionally, it may act as a deterrent to unacceptable or criminal behaviour.

The proposal also has the potential to increase passenger safety as the proposed signage on wearing seat belts would promote safe practices.

The sensitivity of the potential impact of this proposal is estimated to be low as passengers are unlikely to experience a significant change to the way in which they currently experience the service. Given this and the potential for safer journeys, this proposal has been assessed as providing **minor beneficial** health impacts to passengers.

3.4.3 Equality

3.4.3.1 Passenger impacts

This proposal could increase both safety and the perception of safety, in terms of PHVs. The proposal may promote better reporting of unsafe and dangerous drivers ensuring appropriate review of drivers and act as a disincentive to potential criminal behaviour.

Lesbian, gay and bisexual (LGB), BAME, and female passengers in London are more likely to be worried or anxious about the safety of public transport. TfL found that 14% of LGB passengers felt anxious or worried about public transport compared to 11% of all Londoners, 15% of BAME passengers felt the same compared to 8% of white passengers and 15% of women compared to 7% of men.³⁶ Although these figures demonstrate anxiety toward public transport they do provide some indication of disproportionate concerns experienced by some passengers. Providing these groups with additional contact information in PHVs to report journey issues may boost confidence when using PHVs, through promotion of safer driving and better enforcement.

³⁴ Stakeholders have suggested that this proposal poses a risk in terms of the potential for the signage to obstruct the drivers' vision which has the potential to cause negative health impacts for drivers. This has not been included in the main analysis due to TfL making it clear they will be reviewing the placing of the signage.

³⁵ TNS (2017) 'Taxi and Private Hire Licensee Customer Satisfaction Survey 2014/2015'.

³⁶ TfL (2015): 'Travel in London: Understanding our diverse communities'. Available at: <http://content.tfl.gov.uk/understanding-the-travel-needs-of-london-diverse-communities.pdf>

This proposal is expected to provide **minor beneficial** equality impacts to passengers, particularly those who are female, disabled, from a BAME background or identifies as LGB.

3.4.4 Economics and business

3.4.4.1 Operator impacts

The additional costs for provision of new signage will be covered by the private hire vehicle licence fees. However, as any increase in costs for a change in signage would be extremely small and is unlikely to have any impact on the licence fee, a **neutral** impact rating has been assigned to this proposal.

3.5 Proposal 5: Introduction of coloured licence discs

TfL is proposing to update the existing PHV licence disc displayed in the front and rear windscreens of PHVs, with licence discs which have a different colour each year. Given it is already a requirement for PHVs to have licence discs, it is not felt that this will cause any equality, business and economics or environmental impacts to operators, drivers, passengers or other road users.

3.5.1 Summary

The table below summarises the impacts for each receptor across the assessment areas.

Table 3.6: Summary of Proposal 5

Topic	Operators	Drivers	Passengers	Other road users
Health			Minor beneficial	
Equality				
Environment				
Economics and business				

3.5.2 Health

3.5.2.1 Passenger impacts

It is envisaged that it will be easier for CPOS and the police to identify expired licences, this could have the potential to improve safety for passengers. Members of the public may also be better able to identify an expired licence, though it is recognised this benefit would only be realised with increased public awareness and education.

However, stakeholders whilst noting the benefits did not think this would have significant health impacts given that there is already a requirement to have a licence disc. A **minor beneficial** impact rating has therefore been assigned.

3.6 Proposal 6: Increase the visibility of PHVs

TfL are proposing to introduce measures which will make PHVs more easily identifiable whilst also allowing the existing 'red route' signage to be removed.³⁷ This could be through new signage or it could be through introducing a distinctive licence plate.

³⁷ Red route signage is the signage placed in private hire vehicles to demonstrate they pick up and drop off passengers on most red routes

3.6.1 Summary

The table below summarises the impacts for each receptor across the assessment areas.

Table 3.7: Summary of Proposal 6

Topic	Operators	Drivers	Passengers	Other road users
Health			Minor adverse	
			Moderate beneficial	
Equality			Minor adverse	
			Moderate beneficial	
Environment				
Economics and business				

3.6.2 Health

3.6.2.1 Passenger impacts

Introducing more visible signage on PHVs could improve the safety of passengers, as it will make PHVs more identifiable, allowing compliance officers to more easily detect non-compliant vehicles that could potentially put the public at risk. In addition, the general public may be better able to identify their booked PHVs and in conjunction with clearer driver identification would allow passengers to more easily check the driver and vehicle details with their booking confirmation.

However, evidence has shown³⁸ that the general public tend to have little or no knowledge about what taxis and minicabs are legally allowed to do, with many not aware that PHVs must be pre-booked. Within the context of a lack of awareness of the rules governing PHVs, some stakeholders remarked that increased visibility of PHVs may make it easier, if the signage did not include clear information that PHVs need to be booked, for PHV drivers to attract jobs illegally and could cause confusion among passengers, particularly late at night. This concern has also been referenced by TfL in the consultation document.

On the basis of the evidence available, there are both **moderate beneficial** due to the improved safety impact of making PHVs more identifiable and **minor adverse** health impacts given the potential to for PHVs to attract jobs illegally.

Specific health mitigation measures or opportunities for enhancement for this proposal:

- Driver safety training could be provided detailing how to deal with potential confrontations.
- Signage should include clear information that PHVs need to be booked
- Continue to run awareness raising campaigns for the public to highlight the different regulations and requirements for bookings for PHVs and taxis.

3.6.3 Equality

3.6.3.1 Passenger impacts

As highlighted in 3.6.1, this proposal could improve the safety of all passengers, particularly of passengers from protected characteristic groups who have a higher propensity to use PHV

³⁸ See appendix E for further details on available evidence.

services compared to the rest of the population, in particular, disabled groups and females.³⁹ However, as also noted above, whilst this proposal can be expected to help passengers better identify PHVs, due to limited awareness around the regulations governing PHVs, it could also make it easier for PHV drivers to attract jobs illegally without a booking.

On the basis of the evidence available, there are both **moderate beneficial** and **minor adverse** equality impacts given to this proposal.

Specific equality mitigation measures or opportunities for enhancement for this proposal:

- Continue to run awareness raising campaigns for the public to highlight the different regulations and requirements for bookings for PHVs and taxis.

3.7 Proposal 7: Introduce assessment on a case by case basis for exemptions from displaying the proposed mandatory signage

3.8 Displaying the proposed mandatory signage

TfL proposes that exemptions from displaying the new signage should be considered on a case by case basis. It has put forward that vehicle owners should have to clearly demonstrate why the new signage should not be displayed inside their vehicle. This proposal would include a review of all existing exemptions upon renewal of licence.

This proposal is not suggesting adding more scrutiny to exemptions, nor suggesting that the possibility of exemptions is removed. Consequently, this assessed has found no significant health, equality, business and economic, or environmental impacts arising from the proposal. The number of cases this would impact is also very low so impacts on population would be negligible.

3.8.1 Summary

The table below summarises the impacts for each receptor across the assessment areas. Note grey shading denotes no impact across any topic area.

Table 3.8: Summary of Proposal 7

Topic	Operators	Drivers	Passengers	Other road users
Health				
Equality				
Environment				
Economics and business				

3.9 Proposal 8: PHV driver’s ID card to be displayed on the nearside of the PHV on the front windscreen in the top corner

TfL proposes that a version of the PHV driver’s ID card should be displayed on the nearside of the PHV on the front windscreen in the top corner.

³⁹ For evidence see Appendix E

3.9.1 Summary

The table below summarises the impacts for each receptor across the assessment areas.

Topic	Operators	Drivers	Passengers	Other road users
Health		Minor adverse	Minor beneficial	
Equality			Minor beneficial	
Environment				
Economics and business				

3.9.2 Health

3.9.2.1 Driver impacts

Stakeholders highlighted that PHVs are frequently used on both a commercial basis and a personal basis. Having personal details showing in the exterior of the windscreen would give easier access to both passengers and the general public, this may make them more vulnerable.. Stakeholders felt this proposal would make driver’s information more readily available when they were not in the car and is therefore an additional step to wearing driver ID card. It is felt, therefore, that this proposal could result in **minor adverse** health impacts for drivers.

Specific health mitigation measures or opportunities for enhancement for this proposal:

- Allow the driver data to be removable so that it is only displayed when the vehicle is being used as a PHV.

3.9.2.2 Passenger impacts

The additional display of contact details could help passengers to identify drivers and then subsequently report any incidents of unsafe driving to TfL. It also makes it easier for customers to check that the driver is licensed without approaching him or her and checking the ID card around their neck. It may also deter drivers from unsafe behaviour as they know their contact details are easily available.

However, some of the biggest operators already provide photo ID and TfL registration numbers to passengers when they book their ride. In addition, some stakeholders felt there would be little benefit displaying a PHV driver ID on the windscreen as they felt for passengers in the rear placing an ID badge on the windscreen would be too far away and too small for them to see. Passengers rarely look at this location when getting into a vehicle and the driver already wears a photo ID card; unlike taxis whom only have a numbered badge. However, TfL are continuing to run awareness raising campaigns for the public to highlight the different regulations and requirements for bookings for PHVs and taxis. As such this has been rated **minor beneficial**.

3.9.3 Equality

3.9.3.1 Passenger impacts

This proposal could reduce touting and improve the safety of all passengers, particularly of passengers from protected characteristic groups who have a higher propensity to use PHV

services compared to the rest of the population, in particular, disabled groups and females.⁴⁰ As such this has been rated **minor beneficial**.

⁴⁰ For evidence see Appendix E

4 Conclusions

The final chapter sets out a high-level summary of the impacts of the proposals and the potential cumulative impacts of implementing several of the proposals together. It also draws out some of the wider observations that have been gathered as part of this IIA which are relevant to the assessment scope and TfL's further decision-making and implementation process.

4.1 Summary of proposal impacts

From the initial desk-based assessment of the eight proposals currently being consulted upon by TfL, it is evident that both positive and adverse impacts could be realised:

- **Potential positive impacts:** Looking across the proposals and the evidence reviewed to date it is anticipated that many of the proposals would likely result in improved safety and accessibility of PHVs for a range of passengers. There are some protected characteristic groups who are likely to disproportionately benefit from these improvements, in particular, those with heightened personal safety concerns and more vulnerable passengers. However, to ensure that the proposals are truly effective in increasing safety many will need to be accompanied by a programme of awareness raising work and careful implementation planning.

As well as improved safety for passengers, proposals one to three can also expect to promote improvements to health and safety amongst drivers as a result of increased training and awareness. In encouraging safe practices amongst drivers, these proposals can also be expected to introduce costs saving for both drivers and operators through improved driver performance and reducing time away from work as a result fewer collisions.

- **Potential negative impacts:** there are some areas where negative impacts are anticipated, although mitigation actions may minimise some of the effect of these. Evidence feeding into several of the proposals indicates that financial loss may be experienced by drivers as a result of additional requirements in becoming a PHV licensed driver. Certain protected characteristic groups, namely older drivers, BAME drivers and female drivers are likely to experience a disproportionate impact from many of the proposals.

The following outlines headline issues by topic:

Health and equality impacts

Based on the assessment of the proposals, the headline findings in terms of health and equality are:

- Disproportionate health and equality benefits are likely where there are improvements to:
 - actual or perceived personal safety when using PHVs as a mode of travel; several of the protected characteristics are more susceptible to experiencing personal security concerns than the general population (notably, those from BAME backgrounds, disabled people, LGB people younger people and women);
 - driver's knowledge in terms of providing accessible services, which is likely to disproportionately impact disabled passengers and drivers of wheelchair accessible vehicles.

- driver performance in terms of driving in a fuel-efficient way. This should reduce the amount of fuel used when driving and so subsequently reduce harmful emissions damaging to health.
- Disproportionate negative effects in terms of health and equality are likely where there are changes which could:
 - In a small number of cases reduce the ability of passengers to distinguish between taxis and PHVs and encourage the inappropriate and unsafe use of PHVs such as drivers touting for fares or passengers using PHVs which have not been pre-booked.

In a small number of cases limit employment in the PHV industry for certain sections of the population (primarily older, BAME, women and disabled drivers). Clear guidance and support around the advanced assessment requirements should also be made available to drivers. It is advisable that some further specific engagement with groups is undertaken as part of any consultation around the proposals and during implementation.

It is advisable that work continues to be done to make the public aware that PHVs must be booked with a licensed PHV operator and that using unbooked PHVs is dangerous and illegal. This should help to reduce touting.

Environment

The assessment of specific impacts from each of the proposals has demonstrated that proposal one and two could have potential to slightly reduce the amount of fuel used when driving and so reduce emissions which have a detrimental impact on air quality. While these impacts are expected to have a long-term impact, the scale of their impact is expected to be low providing localised air quality benefits with some cumulative benefits across London.

Economics

Many of the proposals could be expected to reduce costs for both PHV drivers and operators through improving driver performance and consequently reducing driver down-time. However, it is likely there will be some minor adverse impacts:

- Undertaking the advanced driving assessments and enhanced wheelchair assessment will likely involve a financial cost for drivers to cover. Both will also suffer from the loss of employment while training and preparing for the tests.

There are some initial market-wide recommendations which could help to minimise several of the negative impacts identified through this IIA:

- Adequate, well publicised and easily digestible TfL guidance should be provided to support drivers to prepare for each assessment. This should be provided to both operators and drivers.
- TfL should ensure that processing times for the assessment is managed appropriately, and appropriate processes are put in place to ensure that there is not a backlog in assessing drivers.
- TfL should consider allowing flexibility with regards to testing times for drivers so that they can manage their work around the assessment.

4.2 Moving toward implementation

Following TfL's final decision-making process, it was stressed by stakeholders that TfL should carefully consider implementation of the proposals to ensure minimal impact on the Private Hire

Industry. There are several elements to this and many views were shared during the stakeholder engagement interviews including::

- Greater clarity on the proposals would be greatly welcomed by the sector, particularly in relation to the cost and implementation of any advanced driving assessment.
- A number of operators and drivers were concerned that an advanced driving test would also encounter processing delays and the impact this may have on drivers and operators. In particular, stakeholders noted that TfL should consider the capacity of any provider to carry out the advanced driving tests in a timely manner and reduce any risk of a backlog.
- Phased introduction of proposals 1-3 would help to provide time for industry preparation or adjustments.
- Continued engagement with the sector throughout the implementation period would be valued, as this would help both TfL and operators to keep updated of any inadvertent consequences and work together to minimise negative impacts.
- TfL should consider the number of times they are engaging with the sector over a relatively short time frame, whilst continued engagement is necessary and good practice, TfL should review how they could join up engagement on a number of different proposals for example on improved safety and any changes to the Congestion Charge exemption.
- TfL should consider the cumulative impacts of improved safety in conjunction with the other regulatory changes taking place in the private hire industry.

Appendices

A. List of proposals consulted on by TfL

A summary of the proposals listed in part one of the consultation document are outlined below:

1. Introduce an advanced driving assessment for all new PHV drivers

New PHV drivers are required to take and pass an advanced driving assessment.

2. Introduce an advanced driving assessment for all existing PHV drivers on the next renewal of their licence

All existing PHV drivers will be required to take and pass an advanced driving assessment before the next renewal of their licence. The only exemption to this requirement will be existing PHV drivers who are also licensed by TfL as London taxi drivers.

3. Introduce an enhanced wheelchair assessment for the drivers of all designated wheelchair accessible PHVs

It is proposed that PHV drivers of designated PHVs undertake a wheelchair assessment. The advanced driving test and enhanced wheelchair assessment will be provided by the same supplier on behalf of TfL.

4. New mandatory signage displaying contact information introduced in PHVs

It is proposed to introduce new mandatory signage displaying contact information for display in licensed PHVs. The intention is to raise awareness amongst passengers that they can contact TfL if they want to comment on a private hire journey and how they can do this.

5. Introduction of coloured licence discs

It is proposed to update the existing PHV licence discs displayed in the front and rear windcreens of PHVs, so that the colour of the licence disc changes each year.

6. Increase the visibility of PHVs

It is proposed to make PHVs more easily identifiable to improve public safety and to introduce signage to distinguish between taxis and PHVs. This may include:

- Introducing a licence plate fixed to the vehicle body or attached to a bracket using the number plate fastenings.
- Introducing a single separate licence plate at the rear of the vehicle containing all relevant information.
- Introducing a combination of rear licence plates and vehicle signage on both sides of the vehicle.

7. Introduce assessment on a case by case basis for exemptions from displaying the proposed mandatory signage

It is proposed that exemptions from displaying the new signage would be considered on a case by case basis and vehicle owners would have to clearly demonstrate why the new signage should not be displayed inside their vehicle. This would include a review of all existing exemptions upon renewal of their licence.

8. PHV driver's ID card to be displayed on the nearside of the PHV on the front windscreen in the top corner

It is proposed that a version of the PHV driver's ID card should be displayed on the nearside of the PHV on the front windscreen in the top corner to make it more visible and easier to read.

B. Summary scoping matrix

Proposal number	Proposal	Equality	Health	Business & Economy	Environment
1	Introduce an advanced driving assessment for all new PHV drivers	Scoped in	Scoped in	Scoped in	Scoped in
2	Introduce an advanced driving assessment for all existing PHV drivers on the next renewal of their licence	Scoped in	Scoped in	Scoped in	Scoped in
3	Introduce an enhanced wheelchair assessment for the drivers of all wheelchair accessible PHVs	Scoped in	Scoped in	Scoped in	Scoped out
4	New mandatory signage displaying contact information introduced in PHVs	Scoped in	Scoped in	Scoped in	Scoped out
5	Introduction of coloured PHV licence discs	Scoped out	Scoped out	Scoped out	Scoped out
6	Increasing visibility of PHVs	Scoped in	Scoped in	Scoped out	Scoped out
7	Introduction of case-by-case assessments on exemption form displaying the licence disc	Scoped out	Scoped out	Scoped out	Scoped out
8	Requirement to display private hire driver ID on the nearside of PHVs on the front windscreen in the top corner	Scoped out	Scoped in	Scoped out	Scoped out

C. Assigning an impact rating

C.1 Introduction

In order to ensure that the impact ratings are as robust as possible, a best practice approach of assigning impacts on a seven-point scale has been adopted for this project. The seven categories are set out as follows:

Seven point scale

Impact rating		Typical characteristics of impact
XXX	Major adverse	<ul style="list-style-type: none"> Long term or permanent Experienced by whole population/all receptors Receptors affected are sensitive or vulnerable to change Would require considerable intervention to return to the baseline
XX	Moderate adverse	<ul style="list-style-type: none"> Medium term (experienced over a number of years) Affects many receptors across a wide geographical area Some receptors affected are sensitive or vulnerable to change May require some intervention to return to baseline conditions
X	Minor adverse	<ul style="list-style-type: none"> Short term impact/would be experience occasionally Affects a small number of receptors/impacts are spatially contained Few receptors affected are sensitive or vulnerable to change Return to baseline conditions requires natural or minimal intervention
0	Neutral	<ul style="list-style-type: none"> Unlikely to result in a detectable impact Baseline remains consistent
✓	Minor beneficial	<ul style="list-style-type: none"> Short term impact/would be experience occasionally Affects a small number of receptors/impacts are spatially contained Few receptors affected are sensitive or vulnerable to change Return to baseline conditions may occur naturally without future intervention
✓✓	Moderate beneficial	<ul style="list-style-type: none"> Medium term (experienced over a number of years) Affects many receptors across a wide geographical area Some receptors affected are sensitive or vulnerable to change May require continued intervention to return to baseline conditions
✓✓✓	Major beneficial	<ul style="list-style-type: none"> Long terms or permanent Experienced by whole population/all receptors Receptors affected are sensitive or vulnerable to change Would require considerable intervention for positive impacts to cease and baseline conditions to resume

The duration, distribution/ scale and sensitivity criteria are used in the assessment framework to assess the impact classification for each scoped in proposal. The following criterion was applied to these three criteria in order to ensure that outcomes of the analysis were robust across the board:

Severity of impact criteria

Duration of impact criteria	Distribution/scale of impact criteria	Sensitivity of impact criteria	Severity impact rating
Long term	High	High	Major
Long term	High	Medium	Major
Long term	High	Low	Moderate
Long term	Medium	Medium	Moderate
Long term	Medium	Low	Moderate
Long term	Low	Low	Minor
Medium term	Medium	Medium	Moderate
Medium term	Medium	Low	Moderate
Medium term	Low	Low	Minor
Short term	Low	Low	Minor

D. Stakeholder engagement log

The following tables detail the stakeholders who were invited to participate in the IIA. Please refer to section 1.2 for further information on engagement. Stakeholders who participated in the IIA have been highlighted in green. A total of 21 responses were received comprising of 19 interviews and 2 written submissions.

Organisation	Outcome
Operators	
Addison Lee	Interview conducted
Carey International & Chauffeur & Executive Committee	Interview conducted
Carlton Cars & PH Board	Interview conducted
Crawfords	Interview conducted
Green tomato	Response not received
Parker Car Service	Response not received
Road Runners	Response not received
Smart Move cars	Response not received
The Keen Group	Response not received
Uber	Interview conducted
Smaller operators	
A2B Cars	Response not received
AA Chauffeurs Ltd	Response not received
Ace Transfer	Response not received
Airport Cars Direct	Response not received
Alex Conway	Response not received
British Tours Ltd	Response not received
Camden Cars	Response not received
Central Cars	Interview conducted
City Carriage Executive London Ltd	Response not received
Corporate Chauffeur Service	Response not received
Executive Chauffeur Drive	Response not received
Global Chauffeur	Interview conducted
Hayes End Radio Cars	Response not received
ISurrey Cars	Response not received
J V Chauffeur Services	Response not received
Jazz Wandsworth Cars	Response not received
Luxury Chauffeurs	Interview conducted
M1 Express Car Services Ltd	Response not received
Mare Street Cars Ltd	Response not received
Phoenix Cars	Response not received
R.I.M.A.C.D	Response not received
Roka Restaurant	Response not received
Wembleystadiumminicabs.com	Response not received
Woodbridge Car	Response not received
Equality and other stakeholder groups	
Access Mobility Transport	Response not received

Organisation	Outcome
Age UK London	Interview conducted
Association of British Insurers	Interview conducted
City of London Police	Response received via email
GMB	Interview conducted
Guide dogs	Interview conducted
London Travel Watch	Interview conducted
LPHCA & Private Hire Board	Interview conducted
Metropolitan Police – Cabs Unit	Interview conducted
Motor Insurer's Bureau	Interview conducted
National Autistic Society	Response not received
Plan Insurance	Interview conducted
Race Equality Foundation	Response not received
Runnymede Trust	Response not received
Scope	Interview conducted
Suzy Lampugh Trust	Interview conducted
The Royal Automobile Club	Response not received
The Royal Society for the Prevention of Accidents	Interview conducted
Tour guides rep (Driver Guides Association)	Interview conducted
Transport for All	Response received via email

E. Technical assessment framework

For a full summary of the proposals, please refer to Appendix A.

E.1 Health

Proposal number	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / opportunities of enhancement
1	In	Drivers, passengers, pedestrians and other road users	Proposal intends to improve the quality of driving amongst new PHV drivers by ensuring they demonstrate a higher standard of driving. This could improve the safety of the drivers and passengers, as well as pedestrians and other road users. The advanced driving test could also improve human health through a reduction of harmful emissions by the introduction of fuel efficient driving styles.	Positive: improved safety.	Long term: permanent change.	Medium: Could potentially affect a substantial number of passengers, pedestrians and other road users in London.	Moderate: passengers, pedestrians and other road users are likely to experience an improvement. Those with respiratory diseases, the elderly and infants are likely to be more sensitive to human health effects of air quality.	Moderate beneficial	

Proposal number	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / opportunities of enhancement
2	In	Drivers, passengers, pedestrians and other road users	Proposal intends to improve the quality of driving amongst existing PHV drivers by ensuring they demonstrate a higher standard of driving. This could improve the safety of the drivers and passengers, as well as pedestrians and other road users. The advanced driving test could also improve human health through a reduction of harmful emissions by the introduction of fuel efficient driving styles.	Positive: improved safety.	Long term: as each driver renews their licence and undertakes the test their driver behaviour will change.	Medium: Could potentially affect a substantial number of drivers, passengers, pedestrians and other road users in London.	Moderate: passengers, pedestrians and other road users are likely to experience an improvement. Those with respiratory diseases, the elderly and infants are likely to be more sensitive to human health effects of air quality.	Moderate beneficial	
3	In	Passengers	Could improve the safety amongst wheelchair users as drivers would have additional skills and knowledge for assisting wheelchair users in accessing their vehicles. Would also help to ensure consistency of services for wheelchair users across the PHV network, potentially resulting in greater confidence amongst wheelchair users and increased accessibility to social infrastructure. This could lead to increased quality of health and life for wheelchair users.	Positive: improved passenger safety and accessibility	Long term: permanent change	Low- only affect disabled passengers	Low: passengers are likely to experience some improvement in the services they receive.	Minor beneficial	

Proposal number	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / opportunities of enhancement
3	In	Drivers	Could improve the safety amongst drivers with designated wheelchair PHV as they would have additional skills and knowledge for assisting wheelchair users. These skills and knowledge could reduce any injuries drivers may sustain from lifting and assisting passengers with wheelchairs.	Positive: improved driver safety.	Long term: permanent change	Low - only affect all drivers with designated wheelchair access PHVs.	Low: drivers are likely to experience some improvement in the way they can deliver their services.	Minor beneficial	
4	In	Passengers	Raises awareness amongst passengers that they can get in touch and how to if they wish to make a complaint or comment regarding the service they have received. Signage could also improve safety by including seatbelt messages and to watch out for cyclists when opening doors.	Positive: improved passenger safety.	Long term: permanent change	Low: Passengers unlikely to experience significant change to the way in which they currently experience the service.	Low: passengers are unlikely to experience a significant change to the way in which they currently receive services.	Minor beneficial	
5	In	Passengers	It is envisaged that it will be easier for compliance officers and the police to identify expired licences and this could have the potential to improve safety for passengers.	Positive: improved passenger safety.	Long term: permanent change	Low: Passengers unlikely to experience significant change to the way in which they currently experience the service.	Low: Passengers unlikely to experience significant change to the way in which they currently experience the service.	Minor beneficial	

Proposal number	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / opportunities of enhancement
6	In	Passengers	Could improve the safety of passengers, in particular females, as they would be aware of legality of drivers before entering the vehicle. It could also help enforcement and police officers recognise unlicensed vehicles easily and therefore improve passenger safety.	Positive: improved passenger safety	Long term: permanent change	Medium: Could potentially affect all passengers and signage has potential to be fairly prominent.	Moderate: passengers are likely to experience an improvement..	Moderate beneficial	
6	In	Passengers	Could reduce the safety of passengers as there is evidence of passengers having low awareness of proper use of PHVs.	Negative : reduced passenger safety	Long term: permanent change	Number of passengers who are likely to use PHVs inappropriately is low .	Low: passengers are unlikely to experience a significant change in the services they receive.	Minor adverse	TfL to minimise this risk by increasing awareness of improper use of PHV. This could be through a marketing campaign or education
7	Out								
8	In	Drivers	Stakeholders highlighted that frequently PHVs are used on both a commercial basis and a personal basis. Having personal details showing in the exterior of the windscreen would make them more vulnerable both in terms of data protection and personal safety.	Negative: Reduced driver safety	Long term: permanent change	Low: the likelihood of attacks on drivers is low	Low: drivers will unlikely experience a change to their day-to-day working.	Minor adverse	Provide driver safety training on how to deal with potential confrontations.

Proposal number	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / opportunities of enhancement
8	In	Passenger	The additional display of passenger details could help passengers to identify drivers and then subsequently report any Incidents to TfL. It also makes it easier for customers to check that the driver is licensed without approaching him or her. However, operators already provide VRM driver's first name, photo ID (where this can be received) and TfL licence number to passengers when they book their ride.	Positive : Improved passenger safety	Long term : permanent change	Low : VRM, driver's first name, licence number and, where it can be received, are already provided by operators to passengers	Low : drivers will unlikely experience a change to their day-to-day working.	Minor beneficial	

E.2 Equality

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / opportunities of enhancement
1	In	Drivers	Assuming a similar cost and failure rate to the Taxi-Hackney carriage/Private hire practical exams (between 45% to 25% fail) – the proposal will likely have an impact on the ability of drivers to operate as PHV drivers, a number of which are BAME. The proposal may add a barrier to employment and drivers may be at risk of reduction or loss of income. Some drivers may have to cover the cost of the test.	Negative : increased costs for some BAME drivers	Long term : there will be costs associated with this going forward.	Low : This will impact all drivers however drivers can retake the test.	Low : This impact is contingent on the fact that in most cases this is likely to be a one-off cost, given evidence on pass/fail rates of comparable exams.	Minor adverse	

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
		Drivers	The advanced driving test may disproportionately impact those from outside the UK who hold an EU/EEA license who will not have experienced the type of test condition expected in the UK.	Negative: some BAME drivers may struggle with the format	Long term: permanent introduction of test requirement	Low: non-white British drivers make up c.91% of PHV drivers. it can be assumed that a high proportion hold EU/EEA licences and so would be impacted by undertaking an advanced driving test. However drivers can retake the test.	Low: all PHV drivers are required to have a UK or EU/EEA driving licence. The UK test is different to an EU/EEA test but there will be some synergies in testing.	Minor adverse	TfL should provide guidance support to help prepare for the test.
1	In	Drivers	Those drivers who have been driving for a number of years may be disproportionally impacted by the requirement for an advanced driving test. They may be unused to the conditions required for an advanced driving test..	Negative: some older drivers may struggle with the format of a new test	Long term: permanent introduction of testing requirement	Low: evidence suggests that over 60s make up less than five per cent of PHV drivers.	Likely to be low . Evidence from the pass rates for the advanced taxi driver test shows a around 71% of over 60s passing the advanced driving test.	Minor adverse	TfL should ensure that they provide sufficient guidance and support to help them prepare for the test,
1	In	Drivers	The stakeholder interviews suggested that the requirement to undertake an advanced driving assessment could also negatively impact on female drivers. Female drivers often drive part-time fitting this work around their caring duties. The additional requirements to become a PHV may act as a barrier to women looking to go into the profession	Negative: may struggle with additional requirements to enter profession	Long term: permanent introduction of a testing requirement	Low: women make up a small proportion of PHV drivers.	Likely to be medium . The test time tend to be in working hours, which may affect caring responsibilities.	Moderate adverse	TfL should ensure that they provide sufficient flexibility with test times.

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
1	In	Passengers	This proposal is likely to improve driver standards and safety. This is likely to disproportionately benefit some protected characteristic groups where there is increased usage among groups such as adults (16+), disabled people and women. Different reasons such as inaccessible public transport are likely to contribute to this increased usage. ⁴¹	Positive: better safety because of improved driver performance	Long term: permanent change	Medium: As no national data demonstrating divergence in road traffic collision rates between the professionally-trained and tested taxi drivers and PHV drivers, it is not possible to precisely quantify the impact attributable to an advanced driving test. As disabled people, women and people from deprived groups make up a high proportion of PHV passengers, any improvements to the safety of driving would likely have a high impact.	Low as other modes of transport are available to these groups.	Moderate beneficial	
2	In	Drivers	The proposal is placed on both new market entrants and existing drivers on licence renewal – assuming a similar cost and failure rate to the Taxi-Hackney carriage/Private hire practical exams (between 45% to 25% fail) – the proposal will likely have an impact for drivers to operate. It may act as a barrier to employment to some drivers from a BAME background. Drivers will be at significant risk of reduction or loss of income. Costs may be incurred by the individual driver.	Negative: increased cases for some drivers which could disproportionately impact on BAME groups	Long term: likely costs incurred going forward.	Low: This proposal relates to all new drivers entering the PHV sector – however they can retake the test.	The low driver sensitivity assumed for this impact is contingent on the fact that in most cases this is likely to be a one-off cost, given evidence on pass/fail rates of comparable exams.	Minor adverse	

⁴¹ See the 2015 Travel Survey and the Extra Costs Commission created by Scope for further information.

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
2	In	Drivers	The requirement for advanced driving test may disproportionately impact those of BAME background from outside the UK who hold an EU/EEA license – new drivers may not be accustomed to UK testing conditions	Negative - Certain BAME groups may struggle with the test format	Long term impact – permanent change	The sensitivity of this impact is rated low . All PHV drivers are required to hold a UK or EU/EEA driving licence. Whilst the UK driving test will be different to an EU/EEA test, the licence is considered equivalent and therefore will have a number of synergies in testing. As such, it can be expected that there will be a degree of cross over in the testing style.	The sensitivity of this impact is rated low . The different driving tests may be similar in some parts.	Minor adverse	TfL should ensure that consideration is given to disability in the design of the test and that appropriate support and adaptations are available for those who have a disability.
2	In	Drivers	It may be expected that those drivers who have been driving for a number of years and who have not been through the more recent changes to driving tests will be disproportionately impacted by the requirement for an advanced driving test. They may be unused to the conditions required for an advanced driving test and struggle to go through the process.	Negative	Long term impact as this a permanent introduction of a testing requirement	The scale of this impact is rated as low . Evidence suggests that over 60s make up less than five per cent of PHV drivers.	The sensitive of this impact is rated low . Evidence from the pass rates for the advanced taxi driver test shows around 71% of over 60s passing the advanced driving test.	Minor adverse	TfL should ensure that they provide sufficient guidance and support to drivers to help them adequately prepare for the test.

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
2	In	Passengers	This proposal is likely to improve driver performance and safety. This is likely to disproportionately benefit some protected characteristic groups where there is increased usage among groups such as adults (16+), disabled people and women. Different reasons such as inaccessible public transport are likely to contribute to this increased usage. ⁴²	Positive – better safety because of improved driver standards	Long term – permanent change	Medium: As no national data demonstrating divergence in road traffic collision rates between the professionally-trained and tested taxi drivers and PHV drivers, it is not possible to precisely quantify the impact attributable to an advanced driving test. As disabled people, women and people from deprived groups make up a high proportion of PHV passengers, any improvements to the safety of driving would likely have a high impact.	Medium impact - other modes of transport are available to these groups, but many protected characteristic groups do have a high reliance on PHV services.	Moderate beneficial	

⁴² See the 2015 Travel Survey and the Extra Costs Commission created by Scope for further information.

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
3	In	Passengers	This proposal would likely improve the provision of wheelchair services amongst PHV drivers who currently own a wheelchair accessible PHV. The proposed assessment would require drivers to ensure that they have the right adaptations to their car and are clear how to use them. Passengers often have a negative experience of travelling in a PHV. This can be down to attitude of drivers or an inaccessible design of the vehicle. ⁴³	Positive - better adherence to health and safety standards for PHV accessible vehicles	Long term impact - permanent change	In London, around 0.6% of PHVs were designated as wheelchair accessible vehicles in May 2018 the scale of this impact is rated as low .	The improved guidance to PHV drivers which would result from undertaking the wheelchair assessment would improve experience of using PHVs. The sensitivity of the impact has therefore been rated as high .	Moderate beneficial	TfL could publicise the number of vehicles which have passed the enhanced wheelchair assessment. TfL could publish the time slots these vehicles are available. Recommended to publish this in one location for easy reference.

⁴³ See research by the ECMT and DPTAC for more information

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
4	In	Passengers	This proposal could increase perception of safety as it provides passengers with contact details of who to complain to if they have an issue with their PHV journey. LGB Londoners (69 per cent), BAME Londoners (70 per cent) and women (70 per cent) are the least likely to be 'unworried' about the safety of public transport.	Positive - improved safety, improved perception of safety and improved reporting to enable TfL to identify, investigate and take action against non-compliant / illegal activity	Long term as this will change the way information for further assistance is provided	The scale/distribution of the impact is expected to be low , the signage will offer a recourse to complain and may act as deterrent. However, the effectiveness of signage will depend on its visibility..	Low as other modes of transport are available to these groups	Minor beneficial	

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
4	In	Passengers	<p>This proposal could increase perception of safety as it provides passengers with contact details of who to complain to if they have an issue with their PHV journey. As such, it gives passengers, particularly women passengers a clear avenue for recourse.</p> <p>In 2016, figures show that 31 individual drivers were charged with a Taxi and Private hire journey related sexual offence covering 34 offences. 31 of the offences were committed by licensed private hire drivers and 3 by an unlicensed driver.</p>	<p>Positive - improved safety, improved perception of safety and improved systems to record non-compliant activity reporting to enable TfL to identify, investigate and take action against non-compliant / illegal activity improved perception of safety and improved systems to record non-compliant activity</p>	<p>Long term as this will change the way information for further assistance is provided</p>	<p>The scale/distribution of the impact of this proposal on actual perception of safety at an individual level is expected to be low, the signage will offer a recourse to complain following an incident and may act as deterrent. However, the effectiveness of signage will depend on its visibility and placement.</p>	<p>Low as other modes of transport are available to these groups</p>	Minor beneficial	
5	Out								

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
6	In	Passengers	Improving the visibility of licenced minicabs may help encourage passengers, particularly women to travel more safely.	Positive - increased awareness of correctly licensed and unlicensed vehicles	Long term impact – permanent change	Medium – as discussed protected characteristic groups make up a high proportion of PHV passengers.	Low as other modes of transport are available to these groups	Moderate beneficial	
6	In	Passengers	This proposal would help passengers better identify PHVs. However, making PHVs easier to identify could make it easier for private hire drivers to attract jobs illegally, without a booking, and could cause confusion among passengers, particularly late at night, who may not be aware of the need for private hire journeys to be booked. As disabled people, older people, people from BAME groups, women and more deprived passengers are more likely to use PHVs, it can be expected that they are more likely to be impacted by this.	Negative - greater confusion around legal use of PHVs	Long term - impact as this is a permanent change to the visibility of PHVs	Low - Although protected characteristic groups make up a high proportion of PHV passengers, the numbers who use a PHV without pre- booking it are relatively low.	Low as other modes of transport are available to these groups	Minor adverse	
7	Out								
8	In	Passengers	The additional display of driver details could help passengers to identify drivers and then subsequently report any Incidents to TfL. It also makes it easier for customers to check that the driver is licensed without approaching him or her. However, operators already provide the VRM driver's first name, photo ID (where this can be received) and TfL license number to passengers when they book their ride. This will disproportionately impact higher users of PHVs such as women and disabled people.	Positive - improved safety	Long term impact – permanent change	Low - Although protected characteristic groups make up a high proportion of PHV passengers, a number of operators already send the passenger photo ID and TfL registration number to the passenger	Low as other modes of transport are available to these groups	Minor beneficial	

E.3 Environmental

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
1	In	Drivers and passengers	Intended to introduce new PHV drivers to techniques to help them drive better, including in a more fuel-efficient way. By reducing the amount of fuel used when driving, harmful emissions which have a detrimental impact on air quality can also be reduced. This proposal could also benefit human health.	Positive: improved local air quality.	Long-term: permanent change.	Low- likely to be localised air quality benefits, with cumulative benefits across London.	Likely to be low . However, those with respiratory diseases, the elderly and infants are likely to be more sensitive to changes in air quality.	Minor beneficial	
2	In	Drivers and passengers	Intended to introduce existing PHV drivers to techniques to help them drive better, including in a more fuel-efficient way. By reducing the amount of fuel used when driving, harmful emissions which have a detrimental impact on air quality can also be reduced. This proposal could also benefit human health.	Positive: improved local air quality.	Long-term: as each driver renews their licence and undertakes the test, their driving behaviour will change.	Low - likely to be localised air quality benefits, with cumulative benefits across London.	Likely to be low . However, those with respiratory diseases, the elderly and infants are likely to be more sensitive to changes in air quality.	Minor beneficial	
3	Out	Proposal is unlikely to increase or decrease the number of PHVs on the road, nor to effect driver styles or fuel types. Therefore unlikely to be environmental effects such as air quality.							
4	Out	Proposal is unlikely to increase or decrease the number of PHVs on the road, nor to effect driver styles or fuel types. Therefore, unlikely to be environmental effects such as air quality.							
5	Out	Broadly an administrative proposal. It is unlikely to increase or decrease the number of PHVs on the road, nor to effect driver styles or fuel types. Therefore, unlikely to be environmental effects such as air quality.							
6	Out	Proposal is unlikely to increase or decrease the number of PHVs on the road, nor to effect driver styles or fuel types. Therefore, unlikely to be environmental effects such as air quality.							
7	Out	Broadly an administrative proposal. It is unlikely to increase or decrease the number of PHVs on the road, nor to effect driver styles or fuel types. Therefore, unlikely to be environmental effects such as air quality.							
8	Out	Broadly an administrative proposal. It is unlikely to increase or decrease the number of PHVs on the road, nor to effect driver styles or fuel types. Therefore, unlikely to be environmental effects such as air quality.							

E.4 Economics and business

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
1	In	Operators	There is a potential positive impact of having a slightly reduced, but higher-skilled labour pool. Assuming the proposed advanced test could improve driver performance, this could result in a reduction in down-time as a result of fewer accidents, insurance claims, client disputes and so on.	Positive: reduced cost as a result of improved driving skills.	Long term: permanent change.	Low: As there is no national evidence that professionally-trained PHV drivers are involved in less road traffic collision rates, a quantified impact cannot be given. There has been an increase in the number of London taxi and PHV collisions ⁴⁴ which may be due to the increase in the number of PHVs. ⁴⁵ However, it is unclear whether the rise in incidents is due to more PHVs being on the road or the increasing pervasiveness of ride-hailing apps, with fewer driver-employment barriers.	Low: assumed operators and drivers will benefit from improved driver performance.	Minor beneficial	Adequate, well publicised and easily digestible TfL guidance provided to drivers to support drivers' preparation for assessment. TfL should allow flexibility for testing times so drivers can manage their work around the test.

⁴⁴ <http://tfl.gov.uk/corporate/publications-and-reports/road-safety>

⁴⁵ <http://tfl.gov.uk/corporate/publications-and-reports/road-safety>

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
		Drivers	Assuming a similar cost ⁴⁶ and failure rate to the Taxi-Hackney carriage/Private hire practical exams (between 25-45% fail ⁴⁷), the proposal will likely have an impact on the ability of drivers to operate as PHV drivers. This could add a barrier to employment or put drivers at risk of significant loss of income whilst they have a licence pending or seek alternative employment. It can be expected that most drivers will have to cover the cost of the test, introducing further financial burden; stakeholders outlined that it currently takes 16-24 weeks to get a PHV licence and costs £729 for the application.	Negative: cost increase for some drivers.	Long term: costs of proposal will be incurred going forward.	Low: relates to all new drivers entering the PHV sector, however drivers can retake the test.	Low: Impact is contingent on the fact that in most cases this is likely to be a one-off cost, given evidence on pass/fail rates of comparable exams.	Minor adverse	Adequate, well publicised and easily digestible TfL guidance provided to drivers to support drivers' preparation for assessment. TfL should allow flexibility for testing times so drivers can manage their work around the test.

⁴⁶ TfL (2018): 'Taxi Drivers Licence Application Cost'

⁴⁷ Driving licence practical pass rates: All categories of test by age for 01/04/2009 to 31/03/2010. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/469300/dsa-practical-driving-test-pass-rates-by-age-gender-2009-2010.pdf

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
2	In	Operators	There is a potential positive impact of having a reduced, but higher-skilled labour pool. Assuming the proposed advanced test could improve driver performance, this could result in a reduction in downtime as a result of fewer accidents, insurance claims, client disputes and so on.	Positive: reduced cost as a result of improved driving skills.	Long term: permanent change.	Low: As there is no national evidence that professionally-trained PHV drivers are involved in less road traffic collision rates, a quantified impact cannot be given. There has been an increase in the number of London taxi and PHV collisions ⁴⁸ which may be due to the increase in the number of PHVs. ⁴⁹ However, it is unclear whether the rise in incidents is due to more PHVs being on the road or the increasing pervasiveness of ride-hailing apps, with fewer driver-employment barriers.	Low: assumed operators and drivers will benefit from improved driver performance.	Minor beneficial	Adequate, well publicised and easily digestible TfL guidance provided to drivers to support drivers' preparation for assessment. TfL should allow flexibility for testing times so drivers can manage their work around the test.

⁴⁸ <http://tfl.gov.uk/corporate/publications-and-reports/road-safety>

⁴⁹ <http://tfl.gov.uk/corporate/publications-and-reports/road-safety>

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
2	In	Drivers	Assuming a similar cost ⁵⁰ and failure rate to the Taxi-Hackney carriage/Private hire practical exams (between 25-45% fail ⁵¹), the proposal will likely have an impact on the ability of drivers to operate as PHV drivers. This could add a barrier to employment or put drivers at risk of significant loss of income whilst they have a licence pending or seek alternative employment. It can be expected that most drivers will have to cover the cost of the test, introducing further financial burden; stakeholders outlined that it currently takes 16-24 weeks to get a PHV licence and costs £729 for the application.	Negative: cost increase for some drivers.	Long term: costs of proposal will be incurred going forward.	Low: relates to all new drivers entering the PHV sector, however drivers can retake the test if they fail.	Low: impact is contingent on the fact that in most cases this is likely to be a one-off cost, given evidence on pass/fail rates of comparable exams.	Minor adverse	Adequate, well publicised and easily digestible TfL guidance provided to drivers to support drivers' preparation for assessment. TfL should allow flexibility for testing times so drivers can manage their work around the test.
3	In	Operators	It is thought that the service will be improved for disabled people if operators and drivers are better equipped to service clients with physical disabilities, expanding their client base.	Positive: reduced cost as a result of improved driving skills.	Long term: permanent change.	Low: given the low proportion of PHVs that are currently wheelchair accessible.	Low: operators and drivers will be better equipped to serve clients with physical disabilities.	Minor beneficial	
4	In	Operators	Any increase in cost of signage would be minimal and is unlikely to impact on the licence fee.	Neutral				Neutral	
5	Out		Administrative proposal						

⁵⁰ TfL (2018): 'Taxi Drivers Licence Application Cost'

⁵¹ Driving licence practical pass rates: All categories of test by age for 01/04/2009 to 31/03/2010. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/469300/dsa-practical-driving-test-pass-rates-by-age-gender-2009-2010.pdf

Proposal	Scoped in or out	Identification of receptors	Description of the impact	Positive or negative	Temporal / duration	Distribution / scale of impact	Sensitivity of impact	Impact rating	Mitigation measures / enhancement opportunities
6	Out	Signage proposal will have no impact on operators or drivers' ability to participate in labour market. No costs passed to passenger. No commercial benefits are expected in terms of PHV market gain on taxis given their varying patterns of use.							
7	Out	Administrative proposal							
8	Out	Administrative proposal							

F. Equalities analysis

The tables below provides further information on the protected characteristics and the rationale for being scoped in or out. The fourth column provides evidence for the impact rating in the report and relates this to section 149 of the Equality Act. Namely that a public authority must, in the exercise of its functions, have due regard to the need to—

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

F.1 Proposal 1: Introduce an advanced driving assessment for all new PHV drivers

Protected characteristic group	Positive, negative or no impact	Receptor	Evidence justifying impact rating according to Section 149 of the Equality Act
Age	Negative	Drivers	a) Experienced drivers who have been driving for a number of years and have not been through the more recent changes to driving tests may be disproportionately impacted by this proposal. They may be unused to the conditions required for an advanced driving test and struggle to go through the process. Data on pass rates from the Taxi-Hackney carriage/Private hire advanced test showed that 71% of those aged over 60 passed whereas 76% of those aged 30-40 passed. ⁵²
			b) No evidence that relates to this requirement has been identified.
			c) No evidence that relates to this requirement has been identified.
Deprivation	No impact		a) No evidence that relates to this requirement has been identified.
	Positive	Passengers	b) The proposal is likely to improve driver performance and safety. A number of protected characteristic groups are more likely to use PHV services including those from deprived backgrounds; the average person in the lowest real income quintile made more trips per year by taxi or PHV than those in the highest real income quintile. ⁵³ Those from deprived backgrounds will therefore benefit from improved safety.
	No impact		c) No evidence that relates to this requirement has been identified.
Disability	No impact		a) No evidence that relates to this requirement has been identified.
	Positive	Passengers	b) The proposal is likely to improve driver performance and safety. A number of protected characteristic groups are more likely to use PHV services including disabled people; it was found that disabled people were 67% more reliant on taxis and PHVs than non-disabled people due to reasons such as public transport being inaccessible or in short supply. ⁵⁴ Disabled people will therefore benefit from improved safety.
	No impact		c) No evidence that relates to this requirement has been identified.
Gender	No impact		On the basis of the desk review and our stakeholder engagement, no

⁵² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/469300/dsa-practical-driving-test-pass-rates-by-age-gender-2009-2010.pdf

⁵³ DfT (2017): 'Taxi and Private Hire Vehicle Statistics: England 2017'

⁵⁴ Scope (2015): 'Driving down the costs of taxis and private hire vehicles for disabled people'

Protected characteristic group	Positive, negative or no impact	Receptor	Evidence justifying impact rating according to Section 149 of the Equality Act
reassignment			disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Marriage or civil partnership	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Pregnancy and maternity	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Race	Negative	Drivers	a) Assuming a similar cost and failure rate to the Taxi-Hackney carriage/Private hire practical exams (where between 25-45% failed), this proposal will likely have an impact on the ability of new drivers to operate as PHV drivers. This may add a barrier to employment or put drivers at significant risk of reduction or loss of income whilst they are training or have a licence pending or seeking alternative employment. Given that BAME groups make up a high proportion of PHV drivers ⁵⁵ , this proposal can be expected to have a disproportionate impact on BAME drivers. The proposal could disproportionately impact on those from outside of the UK who hold an EU/EEA licence who will not have experienced the type of test condition expected in the UK. It may therefore be harder for these individuals to undertake and pass the test.
	No impact		b) No evidence that relates to this requirement has been identified.
	No impact		c) No evidence that relates to this requirement has been identified.
Religion or belief	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Sex	Negative	Drivers	a) Stakeholders suggested that female drivers often drive part-time and fit PHV driving around their caring duties. The additional test requirements mean a higher amount of time and money required to invest which may not be justified by part-time work, acting as a barrier to women looking to go into PHV driving.
	Positive	Passengers	b) The proposal is likely to improve driver performance and safety. A number of protected characteristic groups are more likely to use PHV services including females; on average, females make more taxi or PHV trips than men (12 trips per person vs 9 trips per person) and this remains true for females of all ages above 16 years old. ⁵⁶ Females will therefore benefit from improved safety.
	No impact		c) No evidence that relates to this requirement has been identified.
Sexual orientation	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.

F.2 Proposal 2: Introduce an advanced driving assessment for all existing PHV drivers on the next renewal of their licence

Protected characteristic group	Positive, negative or no impact	Receptor	Evidence justifying impact rating according to Section 149 of the Equality Act
Age	Negative	Drivers	a) Experienced drivers who have been driving for a

⁵⁵ <http://content.tfl.gov.uk/taxi-and-phv-demographic-stats.pdf>

⁵⁶ DfT (2017): 'Taxi and Private Hire Vehicle Statistics: England 2017'

Protected characteristic group	Positive, negative or no impact	Receptor	Evidence justifying impact rating according to Section 149 of the Equality Act
			number of years and have not been through the more recent changes to driving tests will be disproportionately impacted by this proposal. They may be unused to the conditions required for an advanced driving test and struggle to go through the process. Data on pass rates from the Taxi-Hackney carriage/Private hire advanced test showed that 71% of those aged over 60 passed whereas 76% of those aged 30-40 passed. ⁵⁷
	No impact		b) No evidence that relates to this requirement has been identified.
	No impact		c) No evidence that relates to this requirement has been identified.
	No impact		a) No evidence that relates to this requirement has been identified.
Deprivation	Positive	Passengers	b) The proposal is likely to improve driver performance and safety. A number of protected characteristic groups are more likely to use PHV services including those from deprived backgrounds; the average person in the lowest real income quintile made more trips per year by taxi or PHV than those in the highest real income quintile. ⁵⁸ Those from deprived backgrounds will therefore benefit from improved safety.
	No impact		c) No evidence that relates to this requirement has been identified.
Disability	Positive	Passengers	a) The proposal is likely to improve driver performance and safety. A number of protected characteristic groups are more likely to use PHV services including disabled people; it was found that disabled people were 67% more reliant on taxis and PHVs than non-disabled people due to reasons such as public transport being inaccessible or in short supply. ⁵⁹ Disabled people will therefore benefit from improved safety.
	No impact		b) No evidence that relates to this requirement has been identified.
	No impact		c) No evidence that relates to this requirement has been identified.
Gender reassignment	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Marriage or civil partnership	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Pregnancy and maternity	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Race	Negative	Drivers	a) Assuming a similar cost and failure rate to the Taxi-Hackney carriage/Private hire practical exams (where between 25-45% failed), this proposal will likely have an impact on the ability of existing drivers to operate as PHV drivers. This may add a barrier to employment or put drivers at significant risk of reduction or loss of income whilst they are training or have a licence pending or seeking alternative employment. Given that

⁵⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/469300/dsa-practical-driving-test-pass-rates-by-age-gender-2009-2010.pdf

⁵⁸ DfT (2017): 'Taxi and Private Hire Vehicle Statistics: England 2017'

⁵⁹ Scope (2015): 'Driving down the costs of taxis and private hire vehicles for disabled people'

Protected characteristic group	Positive, negative or no impact	Receptor	Evidence justifying impact rating according to Section 149 of the Equality Act
			BAME groups make up a high proportion of PHV drivers ⁶⁰ , this proposal can be expected to have a disproportionate impact on BAME drivers. The proposal could disproportionately impact on those from outside of the UK who hold an EU/EEA licence who will not have experienced the type of test condition expected in the UK. It may therefore be harder for these individuals to undertake and pass the test.
	No impact		b) No evidence that relates to this requirement has been identified.
	No impact		c) No evidence that relates to this requirement has been identified.
Religion or belief	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Sex	Negative	Drivers	a) Stakeholders suggested that female drivers often drive part-time and fit PHV driving around their caring duties. The additional test requirements mean a higher amount of time and money required to invest which may not be justified by part-time work, acting as a barrier to women looking to go into PHV driving.
	Positive	Passengers	b) The proposal is likely to improve driver performance and safety. A number of protected characteristic groups are more likely to use PHV services including females; on average, females make more taxi or PHV trips than men (12 trips per person vs 9 trips per person) and this remains true for females of all ages above 16 years old. ⁶¹ Females will therefore benefit from improved safety.
	No impact		c) No evidence that relates to this requirement has been identified.
Sexual orientation	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.

F.3 Proposal 3: Introduce an enhanced wheelchair assessment for the drivers of all wheelchair accessible PHVs

Protected characteristic group	Positive, negative or no impact	Receptor	Evidence justifying impact rating according to Section 149 of the Equality Act
Age	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Deprivation	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
	Negative	Passengers	a) The proposal would put additional requirements and potential cost on PHV drivers who own an accessible vehicle. Evidence suggests the proportion of accessible PHV vehicles operating in

⁶⁰ <http://content.tfl.gov.uk/taxi-and-phv-demographic-stats.pdf>

⁶¹ DfT (2017): 'Taxi and Private Hire Vehicle Statistics: England 2017'

Protected characteristic group	Positive, negative or no impact	Receptor	Evidence justifying impact rating according to Section 149 of the Equality Act
			London is low, only accounting for 2.2% of all PHVs. ⁶² Any additional requirements for drivers may act as an inhibitor to the provision of accessible vehicles resulting in fewer options for disabled travellers. Additionally, evidence shows that two thirds of wheelchair users have been charged more by drivers because of their wheelchair. ⁶³ There is a risk, therefore, that PHV drivers may increase their charges as a result of the additional cost they incur by undertaking the assessment.
	Positive	Passengers	<p>b) The proposal would likely improve the provision of wheelchair services from PHV drivers who currently own a wheelchair-accessible PHV by ensuring drivers have the right adaptations to their vehicle and are clear on how to use them safely to reduce injury to themselves and their passenger. Evidence suggests disabled passengers often have a negative experience of travelling in PHVs either due to the attitude of the driver or because they are injured in the process of getting into and out of or travelling in the vehicle.⁶⁴</p>
	No impact		c) No evidence that relates to this requirement has been identified.
Gender reassignment	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Marriage or civil partnership	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Pregnancy and maternity	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Race	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Religion or belief	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Sex	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Sexual orientation	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.

⁶² DfT (2017): 'Taxi and Private Hire Vehicle Statistics: England 2017'

⁶³ Scope (2015): 'Driving down the costs of taxis and private hire vehicles for disabled people'

⁶⁴ European Conference of Ministers of Transport (2007): 'Improving Access to Taxis'

F.4 Proposal 4: New mandatory signage displaying contact information introduced in PHVs

Protected characteristic group	Positive, negative or no impact	Receptor	Evidence justifying impact rating according to Section 149 of the Equality Act
Age	No impact	Passengers	a) No evidence that relates to this requirement has been identified.
	Positive		The proposal could increase perceptions of safety as it provides passengers with contact details of who to complain to if they have an issue with their PHV journey. 65% of younger Londoners reported their frequency of travel is affected 'a lot' or 'a little' because of concerns over crime or antisocial behaviour and will take more precautions when travelling. ⁶⁵ Providing these individuals with additional contact information to report issues with their journey may boost confidence when using PHVs and act as a deterrent to criminal behaviour.
	No impact		b) No evidence that relates to this requirement has been identified.
Deprivation	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Disability	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Gender reassignment	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Marriage or civil partnership	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Pregnancy and maternity	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Race	No impact	Passengers	a) No evidence that relates to this requirement has been identified.
	Positive		b) The proposal could increase perceptions of safety as it provides passengers with contact details of who to complain to if they have an issue with their PHV journey. BAME Londoners were more likely to report they were worried about the safety of public transport, and 62% said their frequency of travel is affected 'a lot' or 'a little' because of concerns over crime or antisocial behaviour and will take more precautions when travelling. ⁶⁶ Providing these individuals with additional contact information to report issues with their journey may boost confidence when using PHVs and act as a deterrent to criminal behaviour.

⁶⁵ TfL (2015): 'Travel in London: Understanding our diverse communities'

⁶⁶ TfL (2015): 'Travel in London: Understanding our diverse communities'

Protected characteristic group	Positive, negative or no impact	Receptor	Evidence justifying impact rating according to Section 149 of the Equality Act
	No impact		c) No evidence that relates to this requirement has been identified.
Religion or belief	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Sex	No impact		a) No evidence that relates to this requirement has been identified.
	Positive	Passengers	b) The proposal could increase perceptions of safety as it provides passengers with contact details of who to complain to if they have an issue with their PHV journey. As such, it gives passengers, particularly female passengers, a clear avenue for recourse and could promote better reporting of unsafe and dangerous drivers. Additionally, evidence shows that women are amongst groups that are the least likely to be unworried about the safety of public transport; 61% of women said that their frequency of travel is affected 'a lot' or 'a little' because of concerns over crime or antisocial behaviour and will take more precautions when travelling. ⁶⁷ Providing these individuals with additional contact information to report issues with their journey may boost confidence when using PHVs and act as a deterrent to criminal behaviour.
	No impact		c) No evidence that relates to this requirement has been identified.
Sexual orientation	No impact		a) No evidence that relates to this requirement has been identified.
	Positive	Passengers	b) The proposal could increase perceptions of safety as it provides passengers with contact details of who to complain to if they have an issue with their PHV journey. LGB Londoners were amongst the groups most likely to be 'worried' about the safety of public transport (31%). ⁶⁸ Providing these individuals with additional contact information to report issues with their journey may boost confidence when using PHVs and act as a deterrent to criminal behaviour.
	No impact		c) No evidence that relates to this requirement has been identified.

F.5 Proposal 5: Introduction of coloured licence discs

As the proposal is suggesting to amend the colour of an existing sign to show the PHV is licenced and it is already a requirement for PHVs to have a licence disc, it is not felt this will

⁶⁷ TfL (2015): 'Travel in London: Understanding our diverse communities'

⁶⁸ TfL (2015): 'Travel in London: Understanding our diverse communities'

cause any equality issues for operators, drivers or passengers that are part of a protected characteristic group under the Equality Act.

F.6 Proposal 6: Increasing visibility of PHVs

Protected characteristic group	Positive, negative or no impact	Receptor	Evidence justifying impact rating according to Section 149 of the Equality Act
Age	Negative	Passengers	a) Increasing the visibility of PHVs could make it easier for PVH drivers to attract jobs illegally without a booking and could cause confusion amongst passengers, particularly late at night, who may not be aware of the need for private hire journeys to be booked. Evidence suggests that awareness about the difference between PHVs and taxis is low; a survey found that 80% of respondents had little to no knowledge about what taxis and minicabs are legally allowed to do. One in five respondents thought that minicabs could be hailed on the street and a quarter thought minicab can take passengers who approached them while parked. It was also found that 7% of respondents in London had used a taxi or minicab that they knew was illegal. ⁶⁹ As younger people aged 17-29 are more likely to use PHVs ⁷⁰ , it can be expected they are more likely to be impacted by this.
	No impact		b) No evidence that relates to this requirement has been identified.
	No impact		c) No evidence that relates to this requirement has been identified.
Deprivation	Negative	Passengers	a) Increasing the visibility of PHVs could make it easier for PVH drivers to attract jobs illegally without a booking and could cause confusion amongst passengers, particularly late at night, who may not be aware of the need for private hire journeys to be booked. Evidence suggests that awareness about the difference between PHVs and taxis is low; a survey found that 80% of respondents had little to no knowledge about what taxis and minicabs are legally allowed to do. One in five respondents thought that minicabs could be hailed on the street and a quarter thought minicab can take passengers who approached them while parked. It was also found that 7% of respondents in London had used a taxi or minicab that they knew was illegal. ⁷¹ As the average person in the lowest real income quintile made more trips per year by taxi or PHV than those in the highest real income quintile ⁷² , it can be expected they are more likely to be impacted by this.
	No impact		b) No evidence that relates to this requirement has been identified.
	No impact		c) No evidence that relates to this requirement has been identified.
Disability	Negative	Passengers	a) Increasing the visibility of PHVs could make it easier for PVH drivers to attract jobs illegally without a booking and could cause confusion amongst passengers, particularly late at night, who may not be aware of the need for private hire journeys to be booked. Evidence suggests that awareness about the difference between

⁶⁹ Suzy Lamplugh (2017): 'Eight out of ten people have little knowledge of what taxis and minicabs are legally allowed to do'

⁷⁰ DfT (2017): 'Taxi and Private Hire Vehicle Statistics: England 2017'

⁷¹ Suzy Lamplugh (2017): 'Eight out of ten people have little knowledge of what taxis and minicabs are legally allowed to do'

⁷² DfT (2017): 'Taxi and Private Hire Vehicle Statistics: England 2017'

Protected characteristic group	Positive, negative or no impact	Receptor	Evidence justifying impact rating according to Section 149 of the Equality Act
			PHVs and taxis is low; a survey found that 80% of respondents had little to no knowledge about what taxis and minicabs are legally allowed to do. One in five respondents thought that minicabs could be hailed on the street and a quarter thought minicab can take passengers who approached them while parked. It was also found that 7% of respondents in London had used a taxi or minicab that they knew was illegal. ⁷³ As disabled people are more likely to use PHVs ⁷⁴ , it can be expected they are more likely to be impacted by this.
	No impact		b) No evidence that relates to this requirement has been identified.
	No impact		c) No evidence that relates to this requirement has been identified.
Gender reassignment	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Marriage or civil partnership	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Pregnancy and maternity	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Race	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Religion or belief	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.
Sex	Negative	Passengers	a) Increasing the visibility of PHVs could make it easier for PVH drivers to attract jobs illegally without a booking and could cause confusion amongst passengers, who may not be aware of the need for private hire journeys to be booked, particularly late at night. Evidence suggests that awareness about the difference between PHVs and taxis is low; a survey found that 80% of respondents had little to no knowledge about what taxis and minicabs are legally allowed to do. One in five respondents thought that minicabs could be hailed on the street and a quarter thought minicab can take passengers who approached them while parked. It was also found that 7% of respondents in London had used a taxi or minicab that they knew was illegal. ⁷⁵ As females are more likely to use PHVs ⁷⁶ , it can be expected they are more likely to be impacted by this.
	Positive	Passengers	b) Improving the visibility of licensed minicabs may help encourage passengers, particularly women, to travel more safely. Research by TfL suggests that women have picked up on campaigns on ensuring safety at night, so it is expected that this proposal could be expected to have traction with women. On average, two women a week report a cab-related assault. ⁷⁷
	No impact		c) No evidence that relates to this requirement has been identified.

⁷³ Suzy Lamplugh (2017): 'Eight out of ten people have little knowledge of what taxis and minicabs are legally allowed to do'

⁷⁴ DfT (2017): 'Taxi and Private Hire Vehicle Statistics: England 2017'

⁷⁵ Suzy Lamplugh (2017): 'Eight out of ten people have little knowledge of what taxis and minicabs are legally allowed to do'

⁷⁶ DfT (2017): 'Taxi and Private Hire Vehicle Statistics: England 2017'

⁷⁷ TfL (2015): 'Travel in London: Understanding our diverse communities'

Protected characteristic group	Positive, negative or no impact	Receptor	Evidence justifying impact rating according to Section 149 of the Equality Act
Sexual orientation	No impact		On the basis of the desk review and our stakeholder engagement, no disproportionate impact in relation to Section 149 of the Equality Act has been identified.

F.7 Proposal 7: Introduction of case-by-case assessments on exemption from displaying the licence disc

As the proposal is not suggesting adding more scrutiny to exemptions and is not suggesting that the possibility of exemptions is removed, it is considered that no equality impacts would arise from this proposal. The number of cases this would impact is also very low so impacts on population would be negligible.

F.8 Proposal 8: Requirement to display private hire driver ID on the nearside of PHVs on the front windscreen in the top corner

PHVs currently have to make their ID card visible to passengers and this proposal is requesting that it is displayed more prominently. As the ID card is already a requirement for PHVs it is not considered that this would result in equality impacts on operators, drivers or passengers.

