

# **Private Hire Regulations review**

**Consultation Report  
September 2015**

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# 1 Summary

We are reviewing a number of the regulations governing the licensing of the private hire trades in response to developments in the private hire industry, including the emergence of new technology and changes to the ways that people engage and use private hire services.

We identified a number of proposals for changes to these regulations through internal review and engagement with stakeholders. A consultation was conducted to get a fuller picture of views about these proposals, and to invite other suggestions.

The consultation ran from 27 March to 19 June 2015. The consultation intended to seek the views of private hire customers, trade members and stakeholders in the trade, including members of the taxi trade and organisations that have an interest in private hire activities.

Almost 4,000 responses were received in total to the consultation, including 28 from stakeholders and over 1,400 sent by licensed private hire drivers as part of a campaign by their operator. We commissioned an independent consultancy to analyse the bulk of the responses.

Most respondents suggested adjustments to specific regulations and improvements in enforcement to raise compliance, rather than any broad challenge to the level and nature of the current regulations. Major private hire operators felt that regulations should protect public safety and prevent exploitation of customers, but should not interfere in the operations of the private hire market nor hamper innovations that improve service to passengers. One elected representative felt that the levels of intervention should be reduced to encourage innovation and competition.

There was a high level of agreement among respondents that answered the consultation questions. A significant part of this agreement is the large number of responses submitted as a result of a taxi trade campaign. Although the campaign emails from private hire drivers did not address the consultation questions, these responses called for high standards for private hire drivers and expressed concern about possible changes that might affect their operator.

We will publish a further consultation in autumn 2015. This will consider detailed proposals on some of the issues that are being taken forward and invite comments from other concerned parties on suggestions made in the responses discussed in this report.

## 2 Background

We are a statutory body established by the Greater London Authority Act 1999 and are the licensing authority and regulatory body for London's taxi and private hire industries. We are the largest licensing authority in the country, being responsible for licensing approximately one third of all taxis and private hire vehicles (PHVs) in England. In respect of the private hire industry, we now license and regulate about 3,000 private hire operators and over 68,000 private hire vehicles and 86,000 private hire drivers (August 2015 figures<sup>1</sup>).

The Private Hire Vehicles (London) Act 1998 (1998 Act), the primary legislation governing private hire services in London, introduced licensing of private hire operators, drivers and vehicles in London. The licensing regime for operators came into effect in 2001, followed by drivers from 2003 and vehicles from 2004.

We are reviewing a number of the regulations governing the licensing of the private hire trades in response to developments in the private hire industry, including the emergence of new technology and changes to the ways that people engage and use private hire services.

We identified a number of proposals for changes to these regulations through internal review and engagement with stakeholders. The consultation was conducted to get a fuller picture of views about these proposals, and to invite other suggestions.

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<sup>1</sup> TfL Licensing figures

### **3 The consultation**

We designed the consultation to enable us to understand the views of private hire customers, trade members and others in relation to issues connected with TfL's regulations governing private hire activity. This is part of a review that we are carrying out in response to developments in the private hire industry, including the emergence of new technology and changes to the ways that people engage and use private hire services.

The objectives of the consultation were:

- To give stakeholders and the public the background to the regulations in question;
- To help us understand the level of support or opposition for proposals for changes to regulations, and the reasons for that support or opposition;
- To give respondents opportunity to present evidence for or against changes to regulations; and
- To allow respondents to make suggestions for other areas where regulations might be changed.

The consultation ran from 27 March to 19 June 2015.

#### **Who we consulted**

The consultation intended to seek the views of private hire customers, trade members and stakeholders in the trade, including members of the taxi trade and organisations that have an interest in private hire activities.

The initial list of organisations is attached as Appendix C. Individuals and organisations were invited to pass the details on to other organisations.

#### **Consultation material, distribution and publicity**

We produced a consultation document which:

- set out the background to the regulations and the development of licensed private hire in London;
- discussed the issues about each of the regulations that were being reviewed;
- sought respondents' views on these issues, both with closed questions and invitations to make open comments;
- invited respondent to suggest other issues that should be addressed by changes to regulations.

This was published on our consultation web site ([consultations.tfl.gov.uk/tph/private-hire-regulations-review](https://consultations.tfl.gov.uk/tph/private-hire-regulations-review)) in the form of a structured questionnaire. It was also available as a downloadable file in PDF format (see Annex 1).

We sent an email to stakeholders informing them of the consultation, highlighting key issues being discussed, and including a link to the consultation web site. We also promoted this on our Taxi and Private Hire (TPH) Twitter feed (@TfLTPH) and email distribution list, and circulated it to trade press contacts. A reminder email was sent to stakeholders and the TPH email list two weeks before the close of the consultation (see Appendices B and C).

We invited people to respond by completing the online questionnaire on our consultation tool. People could also respond or ask questions by emailing the TPH enquiries address which was provided on the email, or the TfL Consultations email account shown on the consultation page and in the downloadable document. A significant number of responses were received by email.

We asked 30 questions in total. Five of these were generic questions relating to the respondent's name, email address, organisation (if any), any role in the private hire trade, and how they heard about the consultation. The remaining 25 questions were a mix of open and closed questions about specific aspects of private hire regulations. The generic questions were not included in the downloadable document.

There was no marketing activity or meetings to promote the consultation. TfL staff had two meetings with private hire trade bodies to discuss the details of the consultation proposals. Staff also attended a meeting of the Licensed Private Hire Car Association, the principal private hire trade body, where the consultation was considered.

Almost 4,000 responses were received in total to the consultation, including 28 from stakeholders and over 1,400 sent by licensed private hire drivers as part of a campaign by their operator. The emails in this campaign made general comments but did not directly address the questions or issues raised in the consultation.

We commissioned Steer Davis Gleave (SDG) to analyse and report on the responses (apart from the stakeholders' responses). The SDG report is available as an Annex to this report (see Annex 2).

## 4 Overview of consultation responses

We received almost 4,000 responses to the consultation, made up as follows:

Respondent	Email/document	Online	Total
<b>Stakeholder</b>	13	15	<b>28</b>
<b>Other</b>	71	2435	<b>2506</b>
<b>Email campaign</b>	1428		<b>1428</b>
<b>Total</b>	<b>1512</b>	<b>2450</b>	<b>3962</b>

We commissioned Steer Davies Gleave (SDG, an independent consultancy firm) to analyse the responses, apart from those submitted by stakeholders. SDG's report is available as an Annex to this report.

The SDG analysis included a profile of the respondents.

Respondent	Number	Percentage
<b>Private Hire trade</b>		
Operator	23	0.6%
Driver	1564	39.8%
<i>(email campaign)</i>	<i>(1428)</i>	<i>(36.2%)</i>
<i>(other PHV driver responses)</i>	<i>(136)</i>	<i>(3.5%)</i>
Vehicle owner	16	0.4%
<b>Taxi trade</b>	1140	29.0%
<b>Campaign linked to taxi trade</b>	518	13.2%
<b>Member of public</b>	207	5.3%
<b>Not coded</b>	466	11.8%
<b>Total</b>	<b>3934</b>	<b>100.0%</b>

Many of the respondents who identified themselves as associated with the taxi trade submitted very similar responses as part of a campaign organised by taxi trade associations. These responses were also submitted by some respondents who could not otherwise be identified, shown as campaign responses in the above table; and by over 100 of the respondents who declared themselves as 'members of the public'.

Uber, the largest private hire operator in London, sent an email template to its drivers, encouraging the drivers to forward this message to us as a response. Over 1,400 responses were received as a result of this. These emails did not address the specific questions or issues raised in the consultation document, but discussed the benefits of Uber services to customers and drivers. The emails called for high standards for private hire drivers and expressed concern at the prospect of changes without proper consideration of the impacts. A copy of the email text is available as an appendix to the SDG report.

The next section presents the Executive Summary of the SDG analysis of the responses.

Section 6 summarises the stakeholder responses, and section 7 presents conclusions based on all the responses to the consultation. Our responses to the issues raised are summarised in Appendix A.

## 5 General responses

### Executive Summary of analysis report

#### *Overall consultation findings*

The analysis highlights a broad sentiment amongst respondents for an effectively regulated private hire industry with clear legislation, firmer enforcement of the regulations and stricter reprimands for those breaking the law. In the context of recent technological advances, disruptive innovation and the rise of the sharing economy, particular concern was expressed for the future of the taxi industry.

A summary of responses to the consultation's 13 closed questions, detailing the proportion of respondents agreeing or disagreeing with each question, is shown in Table 5.1<sup>2</sup>.

Amongst those who answered the closed questions, respondents showed a high degree of unanimity in their responses to the closed questions with the majority share never dropping below 72%. Sentiment was strongest in relation to the proposal to introduce a requirement for private hire driver applicants to be able to speak English to a certain standard (99% agree) and the suggestion that we should seek to revoke vehicle licences in instances where we have had cause to revoke an individual's driver's licence (99% agree).

**Table 5.1: Summary of responses to closed questions<sup>3</sup>**

Question	Proportion of respondents answering the question
Do you consider it necessary to make any changes to the current regulation (Regulation 11 regarding booking details)?	17% agree <b>82% disagree</b> 1% don't know
Do you consider it necessary to make it mandatory for an operator to record the main destination for every booking made before the commencement of each journey?	<b>96% agree</b> 3% disagree 1% don't know
Should the retention period of booking, complaints, lost property and driver, and vehicle records be harmonised?	<b>92% agree</b> 5% disagree 3% don't know

<sup>2</sup> The figures in Table 5.1 exclude the private hire trade campaign responses, as these did not answer the closed questions.

<sup>3</sup> The results of Q23 are excluded due to the ambiguity generated by the question (two questions were asked with only one opportunity for response). Please see the Annex (full report) for the analysis of the open responses to this question.

Question	Proportion of respondents answering the question
Should TfL prescribe requirements relating to operating centres?	<b>96% agree</b> 2% disagree 2% don't know
Do you agree that licensed private hire operators should provide passengers with details of the Vehicle Registration Mark and Driver photo ID?	<b>95% agree</b> 3% disagree 2% don't know
Should operators be required to engage with TfL before changing their operating model?	<b>96% agree</b> 2% disagree 2% don't know
Do you consider that TfL should introduce a requirement for private hire driver applicants to be able to speak English to a certain standard?	<b>99% agree</b> 1% disagree
Do you consider it appropriate for TfL to introduce new training for private hire drivers?	<b>93% agree</b> 6% disagree 1% don't know
Should it be mandatory for operators to supply and electronically upload details of their drivers and vehicles to TfL?	<b>97% agree</b> 2% disagree 1% don't know
Should we explore revoking vehicle licences in instances where the owner of a licensed vehicle is a licensed driver and we have had cause to revoke the driver's licence?	<b>99% agree</b> 1% disagree
Do you feel that TfL should stop accepting payment by postal order and cheque?	<b>84% agree</b> 8% disagree 8% don't know
Do you feel that there are any other regulations not covered in this paper that it would be appropriate to review?	<b>87% agree</b> 5% disagree 8% don't know

Respondents were also invited to leave comments to 20 open questions. The most frequently discussed themes were:

### *Regulations*

Comments included in this theme often discuss the scope, validity and/or appropriateness of the regulation(s) or regulatory framework specific to the question. Responses garnering particular support include those suggesting that all operating centres should have local authority planning permission (Q14), there should be a minimum UK residency requirement before a driver can be granted a private hire licence (Q23) and that the number of private hire licences should be limited (Q25).

### *Enforcement*

The difficulty of policing temporary events and stricter enforcement of existing rules and regulations are the most popular comments under the enforcement theme. Other comments incorporated within this theme include specific enforcement suggestions, for example the revocation of a licence following a misdemeanour and greater investment in enforcement officers.

### *Operations*

This is a broad theme and captures comments across several questions relating to the way that the private hire and taxi industries operate on a daily basis. It includes comments and suggestions on the time delay between booking and commencement of journeys, the ability to pre-book in advance, vehicle livery/identification, the linking of insurance details to Automatic Number-plate Recognition systems, the requirement (or otherwise) for a fixed landline at operating centres and complaints handling procedures, amongst others.

### *Passenger and driver safety*

The safety of the travelling public was a principal concern, particularly in relation to ride-sharing (Q9) and our proposal to establish controls around employee suitability (Q12). Respondents considered it the responsibility of both TfL and the operators to ensure that drivers are properly vetted and suitably qualified to be driving. Respondents were keen that any changes to regulation would not put passengers at risk. A smaller proportion of respondents noted that driver safety should also be considered.

### *Abuse of the system*

Comments included under this theme relate to concerns that regulations can be circumvented by drivers and operators who abuse the systems that are in place to maintain them. The most popular comments concerned the systems associated with licensing, insurance and driver/passenger identification.

The full report is provided as an Annex to this consultation report.

## 6 Responses from statutory bodies and other stakeholders

Twenty eight stakeholders responded, as follows:

Organisation type	Email/document	Online	Total
Statutory body	2	1	3
London local authority	1	4	5
Elected representative		5	5
User group/campaign group	1	1	2
Private hire trade body	3		3
Major PH business	2		2
Taxi trade body	3		3
Taxi business		2	2
Other	1	2	3
<b>Total</b>	<b>13</b>	<b>15</b>	<b>28</b>

The following discussion summarises the nature of these stakeholders and key points not brought out in response to specific consultation questions. The stakeholder responses are then considered question by question.

### Statutory bodies

#### *Greater London Assembly Transport Committee*

The Committee based its response on the investigations they carried out for *Future Proof*, the report into the London Taxi and Private Hire Trades that the Committee published in December 2014.

The Committee emphasised that the regulations must be applicable to all operators, regardless of size or technological capability. It expressed concern that some proposals might either weaken existing regulations or allow a third tier of services between taxis and conventional private hire operations.

#### *London TravelWatch*

London TravelWatch (LTW) is the body established by the GLA Act to represent the interests of transport users in London.

#### *Information Commissioner's Office*

The Information Commissioner's Office (ICO) has statutory responsibility for promoting and enforcing the Data Protection Act 1998 (DPA), the Freedom of Information Act 2000, the Environmental Information Regulations and the Privacy and Electronic Communications Regulations 2003 (PECR).

As well as discussing the retention of records, the response considers the general approach to the growth in use of smartphone technology and implications for personal data. The Commissioner suggested that organisations should consider privacy and data protection as key factors in the early stages of assessing new ways of operating, and recommended the use of Privacy Impact Assessments (PIA) in these circumstances. He also recommended that authorities employ PIAs as part of development of legislation, policy or strategies.

### **London boroughs**

Five London boroughs responded, either as a response from the authority as a whole (London Borough of Havering) or from an officer with a relevant role in the authority (LBs of Croydon, Hillingdon and Lambeth, and Westminster City Council). There were no responses from authorities outside London.

### **Elected representatives in London local authorities**

Councillors in the London Boroughs of Bromley, Camden and Waltham Forest (two councillors) responded, along with a Common Council member in the City of London.

The last of these consistently argued for fewer bureaucratic rules and less regulation of the private hire trade, saying that the changes proposed would restrict entry into the sector and raise costs for customers.

### **User or campaign groups**

#### *Transport for All*

Transport for All (TfA) is a pan-London organisation of disabled and older people that campaigns on accessible travel. The response emphasised the importance of private hire for disabled people

#### *Solace Women's Aid*

Solace Women's Aid is a charity providing support of various forms to women affected by domestic abuse across London.

### **Private hire trade bodies**

#### *Licensed Private Hire Car Association*

The Association (LPHCA) is one of the major bodies representing private hire operators in London and elsewhere. The basis of the Association's response was to restore a 'level playing field that has been skewed by the arrival of regulatory disrupters' which have 'exploited' interpretations of existing laws and 'weak regulatory controls and lax enforcement'. The Association is keen to maintain the distinction between taxis and PHVs and feel that these developments threaten this two-tier system.

The Association proposed a regime requiring PHV drivers to be registered with a single operator, and said this was the most pressing priority because the current regime, where a driver can work for many operators, gave no control over working hours so increased the risk of fatigue-related collisions.

The Association suggested that further discussions or in-depth formal reviews, involving representatives of the private hire trade, are needed on many issues.

#### *Private Hire Board*

The Board (PHB) also represents Private Hire operators. Like the PHCA, The Board expressed concern at the blurring of the boundary between taxis and PHVs.

#### *GMB Professional Driver's branch*

The branch is a part of the general trade union, representing those who drive professionally and related occupations. The branch includes private hire drivers and taxi drivers, as well as other driving and support professions.

### **Major private hire businesses**

#### *Uber*

Uber is a relatively recent private hire operator and has grown rapidly since starting in London in 2012.

The business model relies heavily on mobile technology for both driver and customer. The customer makes a booking with a smartphone app, and is automatically put in touch with the mobile phone of an available driver. Automated systems use GPS tracking to inform the customer of the car's progress before pick-up and to calculate the fare, with premium pricing at times of exceptionally heavy demand. The customer pays through the app using a pre-registered bank card.

The introduction of this system has driven a significant growth in private hire activity, and Uber says it has more than 15,000 drivers providing over a million journeys a month in London.

Uber argued that regulations should protect people's safety and 'their pockets' but should not hamper new services that make lives easier.

In addition to a company response, Uber sent its drivers an email template to encourage them to respond to the consultation and over 1,400 responses were received as a result of this.

### *Addison Lee*

Addison Lee is a long-established private hire operator, with over 4,500 cars and drivers. The firm has significant government and corporate contracts as well as providing minicab services, offering a smartphone app that supports immediate or advance booking.

Addison Lee's response argued for proportionate regulation and effective enforcement, saying that the primary purpose of regulation is to protect public safety. The response said that regulations should not be used to interfere in the operations of the private hire market or to 'micro-manage' service provision, and should not be concerned with the commercial operation of individual companies. The response supported the two-tier system of taxis and private hire vehicles, and alleged that TfL has recently revised interpretations of the legislation and regulations for particular operators on an ad hoc basis. The firm argued that this has put public safety at risk.

### **Taxi trade bodies**

#### *Joint Taxi Trade*

This was a joint response by the main bodies involved in the taxi trade:

- the Licensed Taxi Drivers' Association, London Cab Drivers' Club, Unite the Union, United Cabbies Group (UCG), the Rail, Maritime and Transport Union (organisations representing taxi drivers);
- the London Motor Cab Proprietors' Association (representing taxi fleet owners);
- Computer Cab, Dial-a-Cab, Radio Taxis London (the three main traditional 'radio circuits' offering taxi bookings);
- Gett, Hailo, Cab App (app providers offering taxi services)
- the London Taxi Company (the manufacturer of the majority of London taxis).

The group represents 'the majority of London's taxi drivers, vehicle proprietors, fleet owners, radio circuits, taxi app companies and vehicle manufacturers'. (Note that some of these organisations submitted separate responses).

The response expressed concern at the apparent blurring of the distinction between taxis and private hire, caused by developments in technology and a 'reactive rather than proactive policy' by TfL.

#### *Unite the Union*

Unite is the largest trade union in the UK, with a substantial taxi trade membership.

#### *United Cabbies Group*

The United Cabbies Group is an organisation of taxi drivers.

## **Taxi businesses**

### *Dial-a-Cab*

This member-owned organisation is one of the traditional radio circuits offering taxi booking services and business accounts as well as a smartphone app.

### *Hailo*

Hailo is one of a number of firms offering taxi hailing and booking via a smartphone app. Hailo is also licensed as a private hire operator and offers executive cars.

## **Other**

### *Heathrow Airport Ltd*

Heathrow Airport Ltd (HAL) is the operator of Heathrow Airport which is a significant origin and destination for private hire trips.

### *London Pedicab Operators' Association*

Pedicabs or cycle-rickshaws operate in London outside of taxi or private hire licensing. This organisation represents pedicab operators and argued that these vehicles should be brought into the licensing regime.

### *SideCarCity*

This organisation offers tours of London using a scooter and sidecar combination. The response suggested that some models of two-wheeled scooters should be brought into the licensing regime.

## **Stakeholder responses to consultation questions**

*Question 1: Do you consider it necessary to make any changes to this current regulation [regarding booking records]?*

*Question 2: In particular do you consider it necessary to make it mandatory for an operator to record the main destination for every booking made before the commencement of each journey? Please explain why and how this could be enforced effectively.*

Many stakeholders felt that the obligation to record the destinations should remain in place for bookings, with some arguing for limited exceptions to this rule. Some argued that without a destination, drivers cannot plan the route before the journey so depend on navigation devices, and said this would be inefficient and unsafe.

Uber and some local councillors felt that the capability to trace and record GPS information meant that the obligation to give a destination was no longer necessary, and Uber argued that this flexibility was valued by passengers. Uber pointed out that its drivers are not informed of the destination until the passenger is in the car, to improve the reliability of the service by preventing drivers preferring particular hirings. (The Uber app does not require a destination in order to request a car, although one can be entered and a fare estimate can be obtained).

Private hire and taxi trade bodies felt that the use of new technology had allowed a 'third tier' to develop between taxis (allowed to 'ply for hire' – to pick up customers on street and at ranks, without any booking) and conventional pre-booked private hire. They suggested that regulations should be clarified to address this. The LPHCA felt that there could be a separation between the information to be recorded at the time of booking and that recorded when the job is despatched with the destination remaining among the details that must be recorded at booking.

The LPHCA and PHB suggested that fare quotations provided at booking should be binding and the provision for estimated fares should be removed; the GMB felt that customers should be advised on booking that additional stops or changes in the destination might incur extra costs.

*Question 3: What are your views on the use of business names and do you consider that current arrangements should be changed?*

*Question 4: Should operators continue to be allowed to specify an unlimited number of business names on their licence?*

Most stakeholders responded that there should be some limit and tighter restrictions on the names allowed, with several saying only one business name should be permitted on each operator's licence. In support of these views, respondents argued that multiple names cause confusion and uncertainty about the body responsible for the booking. Particular issues were raised regarding geographical names, especially if these are remote from the actual physical location of the operator; and about names apparently designed to be confused with those of other operators.

Addison Lee sought to introduce an opportunity for other operators to be consulted and object to new names; others felt that we should review and restrict names that could cause confusion.

TfA pointed out that wheelchair users may need to call several operators to find any with accessible vehicles, and often find themselves calling the same firm repeatedly when one organisation trades with a number of different names.

*Question 5: What is your experience of making complaints about private hire services and have you any suggestions for how current arrangements could be improved?*

Most stakeholders felt that complaints should continue to be made to the operator in the first instance, but many supported increased promotion of our role as a second line of complaint. Other themes were:

- complaints made to operators are often not dealt with in a satisfactory way
- it can be hard for customers and others to find contact details to complain about private hire issues: operators should be obliged to publicise channels for complaints including a telephone landline;
- all complaints, and actions taken in response, should be reported to TfL by the operators;
- TfL should monitor complaints (and subsequent action by operators) to identify issues with particular drivers and operators;
- there are particular issues with private hire drivers parking or loitering in residential areas around Heathrow Airport in order to be available for lucrative hirings, with problems of litter and conflict with residents;
- visually impaired customers face special difficulties if they want to complain as they cannot see vehicle details such as the VRM;
- wheelchair users are often charged extra, and would like effective channels to complain about this;
- TfA suggested comparison with the way all complaints about bus services are received by TfL, who pass the complaint on to the relevant operator.

*Question 6: Should the retention period of booking, complaints, lost property and driver, and vehicle records be harmonised?*

*Question 7: If so, what should the retention period be?*

Most stakeholders support harmonisation with a retention period of twelve months. Some stakeholders recommended longer periods, quoting the seven year requirement for tax records, the six year limitation for civil action or the three year norm for health and safety records. The UCG suggested a five year retention period for most records with a six month period for lost property details, but later suggested that electronic booking records should be retained for seven years and paper records for three.

The Information Commissioner drew attention to the obligations in the Data Protection Act to retain personal data for no longer than necessary for the purpose for which it was obtained, and said that revised retention periods should relate to business needs. Uber also said that retention periods should relate to Data Protection obligations.

*Question 8: What are your views on current arrangements for regulation of in-venue operators and how they may be improved?*

Stakeholders expressed concern about the current arrangements. The London Assembly Transport Committee and London TravelWatch highlighted the risks of abuse and the need for well-resourced and effective enforcement to ensure these arrangements are legal and safe. Responses from boroughs highlighted the importance of providing safe licensed services for people leaving venues, particularly at night. Private hire and taxi trade bodies supported more restrictions on licensing of these operations or an outright prohibition. Taxi trade bodies argued that 'satellite offices' were always contrary to the intentions of the private hire legislation, arguing that the presence of these operators contribute to problems with touting by staff and illegal plying for hire by drivers.

*Question 9: How are shared private hire services different to exclusive hires and how should this be reflected in the requirements that apply to them?*

Many stakeholders expressed concern about this proposal, with particular anxiety about sharing at night and ensuring that customers can make an informed choice on whether to share. There was some uncertainty whether the question referred to sharing arrangements operated for profit, within the taxi or private hire licensing regimes, and less formal cost-sharing or car-pooling arrangements. Stakeholders were concerned that the boundary between these should not be blurred and for-profit sharing should not be allowed using unlicensed vehicles or drivers. The GMB trade union argued that all sharing should be prohibited because of the risks to drivers and passengers; the taxi trade associations felt that sharing should not be allowed in private hire vehicles.

The response from Uber suggested that, in its view, the sharing service offered by this firm would be permitted under existing regulations. Uber argued against further licensing requirements that would 'limit the ability of the sector to innovate and offer new and better services to customers' and suggested that sharing in the way proposed would bring cost savings for customers and reduce congestion and emissions. Heathrow Airport also supported the principle of ride sharing to improve the efficiency of transport operations, and some local authorities and elected members acknowledged the potential benefits from sharing.

*Question 10: What are your views on licensing of private hire services at temporary events?*

*Question 11: What changes to the current licensing requirements could be made for TfL to better serve members of the public who attend such events?*

The private hire trade associations felt that temporary operating centre licences would be appropriate for these events, and would reduce opportunities for touting. The LPHCA suggested that taxi facilities should also be put in place for temporary events. The taxi trade associations said that any licensing would encourage minicab 'ranking', with illegal plying for hire, and felt that priority should be given to ensuring taxi facilities at events.

The GLA Transport Committee argued that adequate facilities must be in place for taxis and private hire vehicles before any temporary operator licence could be granted, and London TravelWatch opposed temporary licences saying that there were similar issues to in-venue licences. Local authorities argued that temporary arrangements can provide a useful service, and Westminster City Council suggested that different solutions would be needed for the great range of different types of events that take place. Heathrow Airport proposed discussions with us about formal contingency arrangements for the Airport.

*Question 12: What are your views on whether TfL should explore establishing controls in this area [Notification of convictions / cautions of individuals working for private hire operators]?*

Most stakeholders supported some level of checking for staff working for private hire operators, if these checks are appropriate to the role of the staff member concerned. Many referred to checks carried out through the Disclosure and Barring Service (DBS). The GMB and Unite trade unions said that these checks should be carried out on anyone who works in a private hire operating business, and the taxi trade associations said they should be applied to staff handling booking and despatching.

Addison Lee felt that issues that might arise would be breaches under other legislation (such as the Data Protection Act) and the additional checks proposed would be redundant. The firm felt that the issue would be adequately addressed by giving operators an obligation to ensure that only appropriate staff are employed and taking action against operators whose staff are found to be in breach (under the 'fit and proper' provisions in the legislation).

*Question 13: Should TfL prescribe requirements relating to operating centres?*

*Question 14: If so, what requirements for operating centres should be prescribed in the regulations?*

All the stakeholders that responded to this question thought that TfL should set requirements apart from the Common Council member and the London Pedicab Operators' Association. Others agreed that centres should be permanent structures, with a small number suggesting an exemption for centres at temporary events. Several mentioned a need for secure storage facilities for records and some said that there should be size and layout criteria based on the numbers of staff to be employed in the centre. London TravelWatch and one borough said that availability of car parking was important. The LPHCA said that operators had faced difficulties because of changes in our policy on whether planning permission was required for operating centres, and suggested TfL should develop and enforce clear criteria for what is necessary to perform the licensed function. The taxi trade associations said that planning permission should be a criterion. The LPHCA, PHB and Unite said that some shared premises were not suitable for operating centres and should not be licensed, and Unite said that all centres should be wheelchair accessible. Addison Lee said that centres should not be in residential premises. Private hire and taxi trade associations among others argued that there should be a landline telephone number made available to the public.

Uber suggested that the regulations should be 'future proof' and focus on outcomes for customers, drivers and the regulator rather than on specific technology (such as landline telephones). The firm pointed out that this approach could allow the regulator and passengers to benefit from the richer information available from electronic records, and also drew attention to the scrutiny applied by other regulators (such as Data Protection agencies) and the desirability of avoiding duplication or conflict in regulatory functions.

*Question 15: Do you agree that licensed private hire operators should provide passengers with details of the Vehicle Registration Mark and Driver photo ID and where contact details are provided by the customer (e.g. mobile phone number or email address) these details should be provided electronically (e.g. text message or email) before a booking is carried out?*

Most stakeholders agreed with this proposition. The GLA Transport Committee pointed out the importance of regulations that could apply to all operators, regardless of size or technological capability, but felt that limited information could generally be provided. One borough felt that operators should be encouraged, but not obliged, to provide this service; the Common Council member argued that the market already provided pressure for this and that a redundant regulatory requirement might stymie future developments.

Some felt that there should be a delay before introduction of this requirement, to allow operators to obtain the necessary capability; others suggested that, while the driver and vehicle information should be provided to the customer, the driver should not be given the customer's details.

*Question 16: Should operators be required to engage with TfL before changing their operating model and, if so, what is the best way to achieve this?*

Most stakeholders said that operators should have to obtain approval from TfL before changes. Some, including the GLA Transport Committee, suggested this could involve a variation of the operator's licence, with re-inspection and detailed scrutiny of the operating procedures. Addison Lee said that prospective licensees should satisfy TfL that their operating models fully comply with regulations and legislation, and called for particular scrutiny of novel business models. The firm called for robust scrutiny of business processes, although the introduction to the response said that regulations should not be concerned with the commercial operation of individual companies.

Some including Uber and Hailo said that operators should be free to choose and change their business models as long as they remain compliant with regulations and legislation. The ICO encouraged organisations to ensure that privacy and data protection are key considerations in the early stages of any new way of operating where personal data is being stored or used.

*Question 17: Do you consider that TfL should introduce a requirement for private hire driver applicants to be able to speak English to a certain standard? If so, what should this requirement be and what criteria should we set to determine how applicants meet this criteria?*

With the exception of the Common Council member, all the stakeholders who responded thought that we should set a standard for drivers' spoken English. Views were divided on the standards and assessments that should apply: some suggested that a spoken test could be required for the topographical knowledge assessment. Others suggested a range of qualification levels, including the levels required for British Citizenship, National Qualifications Framework level 3, Key Stage 4 or an appropriate NVQ standard.

Uber felt that a minimum standard of English should be required but that any additional barriers to entry into the trade should be carefully considered and should not form an administrative burden.

*Question 18: Do you consider it appropriate for TfL to introduce new training for private hire drivers and if so, what topics should be covered?*

*Question 19: Who should provide the training and have you any suggestions as to how it is delivered (e.g. face to face in a training centre, via an online training package etc.)?*

A Bromley councillor and the Common Council member felt that additional requirements would be an unnecessary barrier to entry and Addison Lee said that, beyond public safety, the market should determine the appropriate training. Other stakeholders felt that additional training would be appropriate to ensure high standards, with many endorsing all the topics listed in the consultation. TfA drew attention to poor service to disabled customers despite their heavy use of private hire services, and called for Disability Equality training based on the social model of disability. Uber called for measures to maintain high standards for private hire drivers, despite the organisation's concerns about barriers to entry into the trade,

A range of different approaches were put forward for training and assessment. There were concerns that the standards of topographical assessment centres were inconsistent, and some suggested that TfL should conduct the assessment to address this.

*Question 20: What are your views on [the proposal to check that hire and reward insurance is in place at vehicle licensing]?*

Stakeholders' opinions were divided on this issue. Many felt that this would be a worthwhile change, particularly if complemented by changes in the regulations so that only licensed private hire drivers could drive licensed vehicles (proposed under Question 25 below).

The LPHCA said that similar proposals have been rejected in the past because there are better ways of testing insurance when the vehicle is in use for private hire, and the PHB said the proposed test would cause problems for fleet owners as the hire and reward insurance is often arranged by the licensed driver. Uber felt that a more robust approach would be to require drivers to carry insurance documents at all times while working, and called for a concerted effort from TfL to improve the consistency and accessibility of information from insurance companies. The UCG and Heathrow Airport made similar suggestions calling for spot checks on working vehicles, targeted on the basis of insurance information.

*Question 21: Should it be mandatory for operators to supply and electronically upload details of their drivers and vehicles to TfL and, if so, how frequently?*

Most stakeholders supported this proposal, with suggestions for frequency ranging between 'as soon as there is any change' to three-monthly updates. Some pointed out that, with this information, we could notify relevant operators if a driver's licence is revoked. Taxi trade associations called for the suspension of licences of drivers that had not registered with an operator within a certain period.

Two elected representatives and Uber said that this measure was unnecessary.

*Question 22: Should we explore revoking vehicle licences in instances where the owner of a licensed vehicle is a licensed driver and we have had cause to revoke the driver's licence? Reasons for this course of action could involve cases where the driver has been convicted of a touting offence, a sexual offence, or has been revoked on medical grounds*

Most stakeholders supported this proposal, although the LPHCA and PHB questioned whether it would be appropriate if the driver's licence was revoked on medical grounds. The UCG suggested that there should be a 'fit and proper' criterion for PHV owners, similar to the one that applies to taxi proprietors.

Uber said that the vehicle should continue to be available to use as a PHV, allowing the driver to sell or lease it to another driver.

*Question 23: Do you consider that requirements for private hire licences are "fit for purpose" and what are your views on them generally? Do you consider that TfL should prescribe further requirements in the private hire regulations and, if so, what should these be?*

Most stakeholders felt that current requirements were not 'fit for purpose' and suggested changes to these, often relating to responses to the other questions.

The LPHCA suggested that drivers should be required to have UK bank accounts and be formally registered with a single operator, arguing that this would allow better control of working hours which are a significant safety risk, and support measures to make operators accountable for the behaviour of their drivers. Taxi trade bodies called for a minimum five years' UK residency before grant of a driver's licence, to ensure familiarity with British roads and a more complete DBS history. Others suggested we should not accept driving licences from some countries that are currently allowed because of the different standards that apply. LTW and others said that drivers' records of parking contraventions and other behaviour towards customers and local residents should be taken into account.

The taxi trade called for people named on operators' licences to have a minimum of three year's UK residency to allow effective DBS checks, and for operators and financial transactions to be based in the UK for tax purposes. The latter point was also suggested by the LPHCA.

Heathrow Airport Ltd suggested that regulations should encourage a transition to low- or zero-emission vehicles.

Some stakeholders felt that the current requirements were appropriate but that enforcement should be more stringent. Uber commented that the requirements have worked well in the past but revision is necessary to make sure that regulations allow innovation going forwards.

*Question 24: Do you feel that TfL should stop accepting payment by postal order and cheque?*

Stakeholders were divided on this proposal. The LPHCA expressed no view, the PHB felt it would be acceptable if alternatives to card payment were available, and the GMB said we should continue to allow cheque payment. The taxi trade bodies supported the proposal.

*Question 25: Do you feel that there are any other regulations not covered in this paper that it would be appropriate to review?*

Stakeholders made a broad range of suggestions in addition to those put forward in response to earlier questions. Proposals included:

- restrictions on the numbers of private hire licensees (note that Addison Lee felt that this measure, which had been suggested in statements by the Mayor, would not be appropriate until research has been into the reasons for the recent growth in numbers);
- measures to make operators accountable for the behaviour of their drivers, particular with regard to parking and other anti-social behaviour;
- there should be a delay between making a booking and the start of journey;
- operators should be obliged to offer advance bookings
- measures to address concerns about drivers not based in the UK, including that drivers should be required to have UK bank accounts or UK National Insurance number, to reject driving licences from countries with lower standards than in the UK, or that a substantial period of residence in a country with good availability of criminal records should be required;
- measures to address related concerns about data protection, taxation and accountability issues with companies using offshore agents or entities rather than the London-based licence holder, and proposals that data centres, company taxation and all relevant parts of any corporate structure should be based in the UK.
- a requirement that apps for private hire work should be authorised by us, with possible constraints such as a prohibition on apps showing vehicles available for hire and a requirement that driver apps require biometric security to prevent unlicensed drivers using sign-on details of licensed drivers;
- only licensed PHV drivers should be allowed to drive licensed PHVs (under current regulations, a licensed vehicle can be driven by anybody when it is not in use as a PHV);
- proposals for identification of licensed PHVs using an indicator on the VRM, with possible refinements to show when the vehicle is in use as a PHV;
- measures to encourage the transition to low- or zero-emission vehicles, and to ensure the availability of wheelchair accessible vehicles including those capable of carrying larger wheelchairs;

- licensing of a wider range of vehicles: SideCar City suggested that some motorcycles and scooters should be brought into the licensing regime and the London Pedicab Operators' Association said that pedicabs should also be licensed;
- restrictions on licensed vehicles: suggestions that PHVs should have four doors with minimum door sizes and safety standards; pedicabs should be prohibited, and autonomous (driverless) vehicles should not be licensed for private hire work;
- relating operators' licence fees more closely to the size of the operation;
- controls on cross-border hirings (ie operators based outside London providing journeys within London);
- controls on private hire fares, suggesting minimum fares for private hire trips and restrictions on 'predatory' pricing including additional charges for wheelchair users.

There were also calls for better enforcement of the regulations and for more active engagement with local authorities (including neighbouring authorities) and police about investigations into crime reporting and investigation; for publications of the outcomes of enforcement action; and greater transparency in the application of regulations and enforcement. Private hire trade bodies called for better engagement with the trade and regular meetings with the Mayor.

The ICO recommended the use of Privacy Impact Assessments where legislation, policy or strategies are being developed to ensure proposals are proportionate and justified. The LPHCA and PHB suggested that organisations arranging taxi bookings should have to meet similar requirements to private hire operators.

## 7 Conclusions

This section considers all responses, from stakeholders and others

### *General*

Most respondents suggested adjustments to specific regulations and improvements in enforcement to raise compliance, rather than any broad challenge to the level and nature of the current regulations. Major private hire operators felt that regulations should protect public safety and prevent exploitation of customers, but should not interfere in the operations of the private hire market nor hamper innovations that improve service to passengers. One elected representative felt that the levels of intervention should be reduced to encourage innovation and competition.

Private hire and taxi trade bodies expressed concern about the use of new technology allowing a 'third tier', licensed as private hire but accepting 'e-hails' and blurring the distinction between taxis (which are exclusively allowed to ply for hire) and private hire (which must be booked before the journey commences).

There was a high level of agreement among respondents that answered the consultation questions. A significant part of this agreement is the large number of responses submitted as a result of the taxi trade campaign. Although the Uber drivers' campaign did not directly address the consultation questions, these responses called for high standards for private hire drivers and expressed concern about possible changes that might affect Uber's operation.

### *Questions 1 and 2: booking details*

Most respondents felt that regulations should continue to require the destination to be recorded when a booking is made, and called for enforcement of this requirement. Some suggested that regulations should be modernised to clarify the distinction between plying for hire, which can only be performed by taxis, and private hire services which must be booked through an operator. Private hire trade bodies and some others felt that the provision for fare estimates at the time of booking should be removed, and binding fares should be quoted.

### *Questions 3 and 4: business names*

Most respondents felt there should be restrictions on the numbers of business names an operator can have, to reduce confusion among customers.

#### *Question 5: complaints*

Most respondents felt that the present system, where complaints about drivers are made initially to the operator, should remain, although many suggested that we should monitor these complaints. There were calls to make operators more accountable for the behaviour of their drivers. Respondents felt there were issues with some operators that do not publish information on ways to make complaints, particularly for people who are not their customers; and for disabled people who may have issues with extra charges for wheelchair users or may experience difficulty obtaining the information to make a complaint.

#### *Questions 6 and 7: record retention periods*

Most supported harmonisation of retention periods at twelve months.

#### *Question 8: in-venue operators*

Most respondents felt that current arrangements encouraged plying for hire and touting, although some stakeholders felt that these arrangements could assist in providing safe travel for people leaving late night venues. Better enforcement was widely supported.

#### *Question 9: shared private hire services*

Most respondents expressed concern about the safety implications of sharing. Many expressed particular opposition to the use of unlicensed vehicles and drivers for commercial sharing arrangements, and taxi trade associations felt that sharing should not be allowed at all in private hire vehicles. Uber implied that, in its view, existing regulations would permit the sharing arrangement the firm intended to offer and expressed concern about regulations that would restrict innovation.

#### *Questions 10 and 11: temporary events*

Many respondents felt that current arrangements encouraged plying for hire and touting, although the LPHC argued that temporary licences would help to reduce touting. There was widespread support for temporary taxi facilities at events.

#### *Question 12: operators' staff*

Most respondents supported DBS checks on all staff working for private hire operators, although Addison Lee felt that other measures already provide sanctions against any misuse of information by staff.

*Questions 13 and 14: requirements relating to operating centres*

Many respondents agreed that operating centres should be permanent structures with secure record storage facilities, and most said that a telephone landline number should be made available to the public. The taxi trade associations along with most respondents felt that local authority planning permission should be required; private hire bodies argued that criteria should concentrate on what is appropriate for licensing, and avoid duplication of other authorities' requirements. Some stakeholders said that some shared premises were not suitable for operating centres and should not be licensed. Uber argued that requirements should be 'future-proof' and focus on outputs for customers, drivers and regulators rather than referencing specific technology.

*Question 15: provision of driver and vehicle information to customers*

Almost all respondents supported this, although some had concerns about the timetable for implementation and the possible impact on some operators.

*Question 16: changes to operating model*

Most respondents said that operators should have to obtain approval from TfL before making changes, and called for clear procedures and terms of reference for this process. Some businesses argued that operators should be free to develop their business models as long as they remained compliant with the legislation and regulations.

*Question 17: spoken English standard for drivers*

Almost all respondents, including stakeholders, thought that we should set a minimum standard of spoken English, with diverse views on how this should be assessed.

*Questions 18 and 19: training for drivers*

Most respondents thought that additional training would be appropriate to address the key areas raised in the consultation document, particularly disability awareness. Stakeholders proposed various approaches for training and assessment. Other respondents predominantly said that training should be carried out face to face.

*Question 20: hire and reward insurance at vehicle licensing inspection*

Stakeholders were divided on this. Some stakeholders felt that there were more effective opportunities to check insurance, and the proposal to check at licensing would cause problems for vehicle leasing companies and insurance companies that will only insure licensed vehicles for hire and reward. Other respondents felt that private hire vehicles should be required to have valid hire and reward insurance at all times the vehicle is licensed and that this should be displayed in the vehicle.

*Question 21: provision of information to TfL*

Almost all respondents supported this proposal, although there was little agreement among stakeholders about how frequently updates should be required. Most respondents suggested weekly or fortnightly updates would be appropriate. Some respondents including taxi trade bodies supported the suspension of licences of drivers that had not registered with an operator. Other stakeholders said the provision of information was unnecessary.

*Question 22: vehicle licence after driver licence revocation*

Almost all respondents supported this proposal, although some stakeholders questioned whether it would be appropriate after revocation on medical grounds. Uber suggested that it would not be appropriate to revoke vehicle licences.

*Question 23: requirements for private hire licences*

Most respondents suggested changes to the licensing requirements. Many respondents and some stakeholders called for a minimum residence period in the UK before drivers could be licensed. Some respondents suggested that driver and operator applicants should provide National Insurance numbers. Uber felt that, although the regulations had been effective in the past, changes were needed to ensure that innovation in the industry would continue.

*Question 24: acceptance of postal orders and cheques*

Most respondents agreed that we should stop accepting postal orders and cheques for payments, although some stakeholders were concerned that alternatives should be available. The consultation material did not make clear whether this change would apply to taxi licence payments as well as private hire.

*Question 25: other changes to regulations*

Many changes were put forward, including some that have been discussed as responses to other questions. Those with greatest support were:

- Restrictions on the numbers of private hire licensees, particularly drivers;
- A minimum time period between a booking and the start of a journey;
- Operators should be obliged to offer advance booking;
- Measures to make operators more accountable for the conduct of their staff, including drivers;
- Approval of booking apps, including a requirement that these should not show vehicles available for immediate hire;
- A requirement to record an accurate pick-up point as well as destination at the time of booking;
- Requiring biometrics or equivalent security in drivers' apps or other processes to prevent unlicensed drivers signing in using licensed drivers' details
- Regulation of cross-border hiring

- Only licensed private hire drivers should be permitted to drive licensed PHVs;
- Private hire drivers should only be permitted to work for one operator at a time;
- Changes to the operators' licence fee structure so that fees are more closely proportional to the operator's size.

Our response to these and other proposals is considered in Appendix A.

### **Next Steps**

Some of these proposals will be implemented shortly.

We will publish a further consultation in autumn 2015, covering detailed proposals where appropriate and seeking wider views on some of the suggestions made in the responses discussed in this report.

## Appendix A – TfL responses to issues raised

We propose to take forward many of the proposals set out in this consultation. We plan to publish a further consultation in autumn 2015, setting out detailed proposals where possible and inviting views on some of the suggestions that respondents to this consultation have made.

The forthcoming consultation will address the following issues arising from the present report:

- Proposals relating to the process of booking private hire vehicles, the information recorded, and the operation of apps;
- Restrictions on business names;
- Harmonisation of record retention periods
- Making permanent the current suspension of licensing for in-venue operations and temporary events;
- Restrictions on ride sharing arrangements;
- Proposed requirements for DBS checks on staff in private hire operating businesses;
- Requirements for operating centres;
- Requirements for approval of operators' business models;
- An English language test for licensed drivers;
- Obligations regarding hire and reward insurance;
- Proposals for operators to regularly provide us with details of drivers and vehicles;
- A proposed end to our acceptance of cheque and postal order payments;
- Restrictions on drivers' working arrangements and the information they will have to provide;
- Restrictions on advertisements in private hire vehicles.

We will also announce the following measures:

- We will require regular reports from operators on complaints received, investigations and outcomes, and we will develop a more formal role in dealing with private hire complaints;
- We will invigilate the Topographical Skills Assessment;
- We will require additional training for private hire drivers, particularly including disability awareness;

Details of these measures will be provided.

We will give further consideration to additional driver training requirements and changes to the structure of operator licence fees, and these topics will be subject to further consultation if we decide to propose changes.

Separate discussions are taking place regarding the London Ultra Low Emission Zone which will reduce the emissions from PHVs.

Under current legislation, we cannot take action on proposals to regulate the following:

- the numbers of private hire licences;
- the levels of private hire fares;
- cross-border hirings;
- pedicab services; or
- autonomous (driverless) vehicles.

The Law Commission recently reviewed taxi and private hire legislation and regulation throughout England and Wales, and fresh legislation may be put forward to Parliament as a result.

## Appendix B – Consultation materials

The consultation was based around the online consultation tool, with a questionnaire that gave the background to each of the consultation questions in turn. The background information and the questions were also made available as a PDF document for download. This document is available as Annex 1.

An email was sent to stakeholders and to the TPH email lists at the start of the consultation period, enclosing a TPH Notice that outlined the consultation and directed recipients to the consultation page.

**Notice 01/15**

Transport for London  
London Taxi and Private Hire



**Private Hire Vehicles – have your say**

Help us to shape the future of the private hire industry in London by having your say in our comprehensive regulations review of private hire services.

In recent years there have been a number of developments within the private hire industry, including advances in technology and changes to how people engage and share private hire services. We want to ensure the regulations that provide for the licensing of private hire operators, drivers and vehicles keep pace with these changes.

We have today launched a public consultation, seeking your views on the regulations. This consultation covers a range of topics and questions including:

- Should we have an English language requirement for drivers?
- Is it beneficial to introduce new training requirements for applicants?
- Should we review the current arrangements for vehicle insurance?
- Do you have views on what information should be captured by an operator as part of a customer booking record?

The consultation opens today and runs until 19 June 2015.

You can find it on our website:  
<https://consultations.tfl.gov.uk/tph/private-hire-regulations-review>, where you will also find details of how to respond.

  
Helen Chapman  
General Manager,  
London Taxi and Private Hire

27 March 2015  
For previous Notices visit [tfl.gov.uk/tph](http://tfl.gov.uk/tph)

**MAYOR OF LONDON**

A reminder email was sent on 2 June, as follows:

## **Just over two weeks until Private Hire Regulations Review consultation closes**

- **TfL continues to seek views on potential changes to Private Hire regulations**
- **To contribute, visit <https://consultations.tfl.gov.uk/tph/private-hire-regulations-review>**

There are two weeks remaining in the consultation on proposed changes to regulations governing the Private Hire trade. Transport for London (TfL) regulates private hire drivers, vehicles and operators and is seeking views on whether those regulations should change and how they should be managed.

TfL launched the consultation as a direct result of discussions with the taxi and private hire trades. The consultation seeks views on a wide-ranging number of topics relating to the Private Hire industry, including:

- whether drivers should meet a standard English-language requirement before becoming licensed;
- whether TfL should take on an increased role in the complaints procedure;
- how regulations may be amended to allow ride-sharing; and
- how regulations governing in-venue operators may be improved.

The consultation also asks whether private hire operators' databases, of bookings and jobs undertaken, should be uploaded to TfL's servers. This would provide TfL with a greater understanding of the industry, assist in licensing and aid enforcement activity.

**Transport for London – London Taxi and Private Hire**

## Appendix C – List of stakeholders initially consulted

Consultees were invited to forward the consultation document to other interested parties and responses from these parties are also invited.

### Private hire trade associations

- Chauffeur and Executive Association
- GMB (Greater London Private Hire Drivers Branch)
- Institute of Professional Drivers and Chauffeurs
- Licensed Private Hire Car Association
- Private Hire Board

### Taxi driver associations

- Heathrow Airport Taxi Drivers United
- Licensed Taxi Drivers Association
- London Cab Drivers Club
- London Suburban Taxi Drivers Coalition
- RMT Cab Trade Section
- Unite the Union Cab Trade Section
- United Cabbies Group

### Other licensing authorities

- Neighbouring taxi & private hire licensing authorities
- National Association of Licensing and Enforcement Officers
- Senior Traffic Commissioner
- Institute of Licensing

### User groups and other stakeholders

- Action on Hearing Loss
- Age UK
- City of London Police
- Department for Transport
- Disabled Persons Transport Advisory Committee
- Equality and Human Rights Commission
- Guide Dogs

- Heart of London
- Heathrow Airport Ltd
- Inclusion London
- Joint Committee on Mobility for Disabled People
- Living Streets
- London Accessible Transport Alliance
- London Assembly Members
- London Chamber of Commerce and Industry
- London City Airport Ltd
- London Councils
- London Cycling Campaign
- London First
- London local authorities
- London MPs
- Home Counties MPs
- London NHS bodies
- London TravelWatch
- Metropolitan Police Service
- Network Rail
- New West End Company
- Passenger Focus
- People 1st
- RNIB
- Roads Task Force members
- Society of West End Theatres
- Suzy Lamplugh Trust
- Train Operating Companies serving London
- Transport for All
- TfL Youth Panel
- Visit London (London & Partners)

Messages advertising the consultation were sent to taxi and private hire trade members on the Taxi and Private Hire email circulation list and recipients of the TPH Twitter feed.

**Annex 1 – Consultation document and questionnaire**

**Annex 2 - Analysis of responses by Steer Davies Gleave**