

Board

Date: 17 March 2016

Item: Private Hire Regulations Review

This paper will be considered in public

1 Summary

- 1.1 This paper summarises the outcome of TfL's review of the Private Hire Regulations ("the Regulations"), and considers what changes are necessary in the interests of public safety and to modernise the private hire industry. This is particularly necessary in light of technological advances that have changed the ways in which customers access private hire services, as well as the rapid growth in the industry in recent years.
- 1.2 The review consisted of three consultation exercises over the past 12 months, as well as extensive discussions and engagement with the private hire trade and other key stakeholders. TfL's overriding objective is to promote and enhance passenger safety and, as part of this process, TfL sought the views of customers through the consultation exercise through the use of focus groups, online and telephone surveys.
- 1.3 This consultation and engagement process generated a huge amount of interest in private hire services in London, including significant media commentary. The range of comment and opinion was very broad and, on some issues, highly polarised.
- 1.4 The second part of the consultation included 25 proposals that were formed through detailed consideration of the responses to the first part of the consultation. TfL has considered all representations made during this process very carefully which has resulted in amendments to four of the proposals that were consulted on; a proposal to undertake further work on two of the proposals; and a proposal not to progress with four of the proposals. It is therefore proposed to take forward a package of 19 proposals, which includes those with amendments, which it is believed will strengthen and modernise the regulatory framework for private hire services in London with the objective of improving public safety. This paper seeks the approval of the Board for this package of measures.

2 Recommendations

- 2.1 **The Board is asked to note the paper and:**
 - (a) **agree to the implementation of the 15 proposals, as originally proposed, under Appendix 1 Section A;**
 - (b) **agree to the implementation of the four proposals, as amended, under Appendix 1 Section B;**

(c) agree to TfL undertaking further work on the two proposals under Appendix 1 Section C;

(d) agree that TfL does not implement the four proposals under Appendix 1 Section D; and

(e) note the Commissioner will make the amending regulations necessary to implement the Board's decision.

3 Background

3.1 London has a large and vibrant private hire sector, which has existed since the 1960s to cater for a wide range of journeys. The private hire industry has been regulated by primary legislation since the early 2000s to ensure improved public safety. In recent years, new technology has emerged and app-based platforms now offer near instantaneous private hire bookings at the touch of a button. This has triggered a rapid growth in the sector, and in London, there are almost 100,000 private hire drivers, 76,000 private hire vehicles and almost 3,000 private hire operators.

3.2 Given this scale of change, and the fact that the Regulations have not been comprehensively updated since they were introduced in the early 2000's, TfL is now seeking to bring the Regulations up to date in the interests of public safety. TfL has undertaken an extensive consultation process to support this, attracting a huge response from customers, the taxi and private hire industry and other stakeholders.

3.3 Alongside the Regulations review, TfL is already progressing measures to improve service and safety standards by introducing an enhanced topographical test for new private hire drivers, a new complaints system so that customers can contact TfL if they have received poor service from a private hire driver or company and mandatory disability equality training and other improved training for drivers.

3.4 In addition to the Regulations review and those measures set out in paragraph 3.3 (above), the Mayor has secured a commitment from Government to progress separate legislation to enable TfL to regulate pedicabs, and has also asked TfL to investigate the impact and feasibility of removing the Congestion Charge exemption for private hire vehicles in central London to tackle pollution and reduce congestion. This is beyond the scope of this Private Hire Regulations Review and will be considered separately at a later date.

4 The Consultation Process

Part one (spring 2015): 27 March 2015 to 19 June 2015

4.1 The first part of the consultation was a wide ranging review of the Regulations governing private hire services in London. TfL received almost 4,000 responses to this part of the consultation which were analysed by Steer Davis Gleave (SDG), an independent consultancy, commissioned by TfL to do this work.

- 4.2 Following detailed analysis of the responses to this part of the consultation TfL developed a more detailed set of 25 proposals which formed the basis of part two of the consultation exercise.
- 4.3 The full consultation document can be found at Appendix 2, and the summary outcome reports included in Appendices 3 and 4.

Part two (autumn 2015) – Proposals: 30 September 2015 – 23 December 2015

- 4.4 The second part of the Private Hire Regulations Review consultation containing 25 detailed proposals ran from 30 September to 23 December 2015. It included 31 questions, most of which had a closed response element, and all of which had an open response element – principally to give respondents who did not support a proposal an opportunity to explain why.
- 4.5 TfL received the following responses to the consultation:
- (a) 15,816 formal responses by email and letter;
 - (b) 67 responses from stakeholders and statutory consultees;
 - (c) Further campaigns, surveys and petitions, comprising of:

Uber driver email	Opposition to some proposals	3,597
Other PH driver petition	Mixed opposition and support for particular proposals	52
Uber customer text	General opposition	65
Other letters	General support	7
Uber petition (approximate figure)	General opposition	200,000
Uber survey	Detailed individual views	1,885
Letters delivered by LTDA	Support for all proposals	1,162
AskPOB survey	Support for all proposals	2,979

- 4.6 We also carried out extensive engagement with users of private hire services including:
- (a) an online survey via the GLA Talk London website which received over 850 responses;
 - (b) an online survey via research by Future Thinking where over 2,500 responses were received, supported by a further 100 telephone interviews with customers aged 65+; and

(c) nine Customer Focus Groups conducted by an independent research company (2CV) to discuss the proposals in detail and understand customers' views and reactions to specific proposals. This was supported by a further eight one to one interviews with passengers or carers of someone with accessibility needs.

4.7 The results of this engagement are set out in Appendix 5.

4.8 The full consultation document can be found at Appendix 6, with the summary outcome reports included in Appendices 7 and 8.

Part three (winter 2016) – Integrated Impact Assessment (IIA): 28 January 2016 – 24 February 2016

4.9 The final part of the Private Hire Regulations Review consultation exercise was the consultation on the IIA, which TfL commissioned the consultancy firm Mott MacDonald to prepare for all 25 proposals. The IIA considers the potential health, equality, environmental and business and economic impacts that may arise as a result of the proposed changes to the regulations put forward by TfL.

4.10 The purpose of this work is to understand the views of the private hire industry, users of private hire services and other interested parties of the impacts of the proposals.

4.11 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. An IIA of the proposals is required in order to have a comprehensive understanding of the impacts on both the industry and passengers.

4.12 Mott MacDonald carried out engagement with a number of stakeholders to complete the IIA and presented the findings to TfL in January 2016, which were then published for consultation on 28 January 2016.

4.13 TfL received 68 responses to this consultation. Of these, 19 were from stakeholders, one of which comprised an AskPOB survey conveying the support of 596 individuals to a standardised response.

4.14 The Mott MacDonald IIA report can be found at Appendix 9, with the IIA consultation document at Appendix 10. The IIA consultation summary outcome report is attached at Appendix 11.

4.15 TfL took into account all representations made from all three parts of the consultation to decide whether or not to take forward each proposal, and on what terms. Appendix 1 contains a detailed summary of all the proposals and consultation responses.

5 Implementation of the Proposals

5.1 The proposed changes will be implemented through a mixture of new or amended Regulations. In some cases the changes will require changes to licensing conditions and/or adopting new policy or guidance.

- 5.2 TfL will work closely with key stakeholders including the Private Hire trade and customer groups to ensure that each proposal is implemented in a sensible and proportionate manner, without diluting the strong message of support which these proposals have attracted.

6 Equality Implications

- 6.1 In making decisions about whether or not the Regulations should be amended, and if so how, the Public Sector Equality Duty applies; namely an obligation to have regard to need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010, and to advance equality of opportunity between persons who share a relevant protected characteristic (race, disability, gender, age, sexual orientation, religion or belief, pregnancy and maternity and gender reassignment) and persons who do not share it and foster good relations between persons who share a relevant protected characteristic and persons who do not share it (section 149 of the Equality Act 2010).
- 6.2 In addition, advancing equality of opportunity involves, in particular, having regard to the need to remove or minimise any disadvantage suffered by those who share a relevant protected characteristic that is connected to that characteristic; to take steps to meet the needs of people who share a relevant protected characteristic which are different from the needs of those who do not share it; and encourage people who share a relevant protected characteristic to participate in public life, or in any other activity, where their participation is disproportionately low – this includes tackling prejudice and promoting understanding.
- 6.3 The public sector equality duty is non delegable and is a continuing obligation which applies not only to any decisions to amend the Regulations but also when TfL is considering issuing guidance or specifying requirements using powers in the Regulations.
- 6.4 In order to consider the equalities impacts of our proposals we have carried out an equality impact assessment as part of the full IIA which is attached as Appendix 9. The public and stakeholders were invited to consider the equalities and other impacts as part of the consultation process. Mitigation measures are set out in Appendix 1 and the IIA and the equalities implications will continue to be carefully considered as part of the implementation process.

7 Legal Implications

- 7.1 The proposals under consideration will have significant impacts on the delivery and use of private hire services in London. TfL's justification for making the changes (including ones it decides against) as well as the impacts themselves and the process followed are set out in this paper.
- 7.2 Decisions on the proposals are required to be justified, proportionate and strike a fair balance between competing interests.
- 7.3 Appropriate amendments will also be made to the relevant fees and charges regulations.

8 Financial Implications

- 8.1 The implementation of these proposals will have a financial impact on private hire services, in particular operators. The IIA seeks to capture these costs as well as setting out the corresponding beneficial impacts which justify the proposals.
- 8.2 The costs to TfL of implementing the proposals, such as any upgrades to existing IT resources to allow the uploading of driver and vehicle data, will be factored into the annual review of licence fees.

List of appendices to this report

- Appendix 1: Draft proposals for approval
Appendix 2: Private Hire Regulations Review consultation document March 2015
Appendix 3: Consultation part one report (TfL)
Appendix 4: Consultation part one report (SDG)
Appendix 5: Summary of engagement with customers
Appendix 6: Private Hire Proposals Consultation Document Sept 2015
Appendix 7: Consultation part two report (TfL)
Appendix 8: Consultation part two report (SDG)
Appendix 9: Mott MacDonald IIA January 2016
Appendix 10: IIA Consultation document January 2016
Appendix 11: Consultation part three report (SDG)

List of Background Papers:

None

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APPENDIX 1: Draft proposals for consideration and approval by the TfL Board

Whilst a summary of the consultation outcome and impact assessment is set out below, Members are referred to the full reports of the consultation outcome and impact assessment when considering each proposal.

A. TfL is seeking approval to implement the following 15 proposals as originally proposed

Proposal 1: Operators must provide a booking confirmation to passengers containing the photo ID e.g. the name or other relevant information of the driver, and details of the vehicle being used to discharge the booking where the customer is able to receive it.

(i) Original consultation proposal

We proposed that the information to be provided would be the vehicle registration mark (VRM) and the name and photograph of the driver (driver photo ID).

The rationale for this proposal is that having these details would reduce the risk of a passenger getting into the wrong vehicle, possibly with an unlicensed driver, and will help to deter illegal touting or plying for hire and therefore make a positive contribution to the alleviation of crime and disorder. It allows for very simple, but effective, safety messages to the public so they look out for this booking confirmation, and check the details, before entering the vehicle. We believe it will make a positive contribution to alleviating minicab related crime and disorder. Many operators have the facility to do this already; this change would make it compulsory for all operators.

(ii) Summary of consultation responses to the proposal

This proposal received widespread support across the industry and particularly strong support from customers and customer groups, who felt it would provide reassurance to passengers. Some Private Hire operators and business groups questioned whether this was proportionate. There was also some concern about how this could work for consumers without smartphones, and also the costs to smaller operators.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This proposal was assessed as a moderate beneficial impact to passengers for health and equality, improving passenger perceptions of safety and reducing the risk of using unlicensed vehicles, delivering benefits to a range of different equality groups. These benefits would increase over time as the use of technology expanded further. It is accepted that some protected groups, for example those with visual impairments, may not realise the benefits of this proposal – this could

be mitigated through providing the information through accessible formats. The scale of the business and economic impact to PHV operators will be felt differently across the market with a minor adverse impact to operators offering digital bookings and a moderate adverse impact to operators offering phone or office based bookings.

(iv) Summary of responses to the IIA consultation

Respondents broadly supported the beneficial health impacts for passengers and four stakeholder responses highlighted that this would have “at least” a moderate beneficial impact for passengers and therefore should be implemented to enhance public safety. One stakeholder suggested that biometric data could be used. There were no comments on the identified equality or environmental benefits. There was some concern raised by some stakeholders about a potential negative impact on drivers health (e.g. through inappropriate use of driver details being published by customers through social media or racial stereotyping if a photograph is included). In response to the identified business and economic impacts a concern was raised about the costs to smaller operators. There was a suggestion that the requirement be relaxed or adapted for specialist service providers, such as driver-guides and the chauffeur/executive sector.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with this proposal for operators to provide advance booking information about drivers and vehicles to customers who are able to receive it. It was strongly supported by consultees with over 80 per cent in favour of the proposal. It was especially supported by customers, who felt it would deliver safety benefits for passengers. As more customers make use of new technology the passenger safety benefits of this proposal will continue to increase.

The personal data of drivers which it is proposed that operators will share with passengers (name and photograph) is considered to be proportionate and justified as the minimum necessary in the interests of passenger safety and individual operators will continue to be required to process personal data in accordance with the protections in data protection legislation.

The amended regulations will provide TfL with the flexibility to change the required advance booking information over time where appropriate and justified, for example with further advances in technology. Provision will also be made in the specification to allow for customers who do not have the ability to receive the specified information, for example those without Smartphones or the ability to use one.

We have taken carefully into account the concerns raised by some respondents throughout the consultation process about the cost implications for smaller operators and also whether the cost of implementation could be passed on to passengers. However, we have

come to the view that, on balance, the clear public safety benefits are sufficient to justify the potential impact and cost to those operators who do not currently have the facility. As a minimum when the requirement is introduced, advance booking information in the form of a text message will be specified allowing the opportunity for operators to implement the necessary system changes to meet the photo ID requirement. A number of small to medium sized operators already have similar systems and technology in place.

The suggestion that specifying advance booking information would stifle competition has been taken into account but it is considered that the information specified would be the minimum necessary to achieve the desired outcome of enhanced passenger safety and that any effect on innovation is minimal and justified. Operators would be free to provide more specific information or information in different formats, if they felt appropriate. In combination with effective and appropriate enforcement and compliance, we believe this proposal is a strong complementary measure to minimise minicab-related offences.

We have also taken into account the concerns raised about driver identification being made available in the public domain, for example being published on social media, and the impact that may have on driver safety, or driver information being used by customers to make decisions about their journey based on a drivers appearance for example. We will give consideration to how this potential negative impact can be mitigated, perhaps through the issuing of guidance to operators.

Proposal 6: TfL will no longer issue licence variations to private hire operator licences to add in-venue (satellite offices) licences or temporary event operating centres.

(i) Original consultation proposal

We proposed to no longer issue operating licences to operate in respect of operating centres that are located within a venue which is primarily used for other purposes, for example a nightclub, newsagent or fast food outlet, and for temporary events such as sporting events and music festivals. There have been a number of enforcement problems at such venues with a high incidence of touting and illegal plying for hire.

(ii) Summary of consultation response to the proposals

This proposal received majority support overall with 58 per cent of respondents in agreement with the proposal and just 11 per cent opposing it. Of the private hire operators that responded to this question there was mixed support, with almost half, 49 per cent, agreeing with the proposal and a fifth, 20 per cent disagreeing. Westminster City Council, which is where a significant number of in-venue operations are located fully support the proposal due to the issues caused by the licensing of in-venue operators. Typically

stakeholders that opposed the proposal felt that existing arrangements were beneficial to consumers and removing in-venue licenses would increase the likelihood of touting and other illegal activity and inconvenience passengers. There was also concern that these arrangements are necessary as part of local licensing conditions in some areas outside Westminster and the City of London by those that opposed the proposal.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This proposal attracted different views from stakeholders on the perceived health impacts for passengers. Some stakeholders considered that an in-venue operating centre can, in itself, attract unbooked vehicles and give rise to illegal plying for hire or touting. However, other stakeholders suggested that stopping these places from being licensed could increase the vulnerability of passengers waiting outside. Given the differences in stakeholder views on personal safety impacts both the health and equality impacts for this proposal have been rated as neutral. Business and economic impacts were rated as moderate adverse due to the potential loss of income for operators in this part of the PHV sector.

(iv) Summary of responses to the IIA consultation

Respondents gave mixed views on the impacts of this proposal. Westminster City Council, where the majority of these operating centres exist, felt strongly that TfL should no longer grant licenses and indeed should rescind all existing licences as they are “the source of much illegal street touting and informal ranking, double parking and congestion of PHVs on street where engines are often idling”. They felt that the removal of these centres would have a beneficial impact to health and the environment. Some of the private hire trade responses argued that it was a retrograde step that would increase the instances of touting and reduce public safety and that smartphone apps could not replace an on-site presence to escort customers to the right vehicle. However, many consultees had the opposite view due to issues seen at the venues. One stakeholder felt that the proposal would allow other operators to provide alternative services thereby widening the choice for passengers.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with this proposal which received a majority support from consultees.

Technology and the marketplace have given consumers significant new options to book private hire journeys quickly and easily, greatly reducing the need for operators to have an operating centre within, or at, the venue. At the same time the concept of in-venue operating centres has led to a number of enforcement problems including illegal plying for hire and unauthorised PHV ‘ranks’ outside popular late night venues. As well as the strong views put forward by Westminster City

Council, this view was strongly supported by the London Assembly Transport Committee as part of its 'Future Proof' review into taxi and private hire services in London¹ which said that "‘Satellite offices’ are an example of how a well-intentioned policy has turned out to cause more problems than it solves".

We stopped issuing variations to licences where the application is for an in-venue operation over 12 months ago and no adverse issues have been identified or brought to our attention in that time.

We have considered the introduction of an inspection or enforcement procedure to identify and target only those centres with inadequate safeguards in place. However, our view is that it is justified and proportionate to prevent premises which are, for example, licensed for the sale of alcohol or gambling from being licensed as a PHV operator. In reaching this point, we take into account the representations made about the impact on operators whose business may depend wholly or mainly on operating out of in-venue operating centres. However, we consider that advances in technology which allow operators to arrange bookings without a physical presence in or at a venue mitigate this potential impact. The provision of booking facilities at a venue for example would not be prohibited; the acceptance of bookings at the venue would.

TfL may decline a licence application where the proposed operating centre is "in venue" but not subject to the proposed restriction, where the applicant is not considered a fit and proper person to hold a licence and decisions will be made based on the facts of individual cases.

We understand some of the concerns raised by some private hire operators through the consultation process and particularly where venues are located outside the City of London and West End, where other late night transport options are limited.

This point was made strongly by the LPHCA which represents the larger in-venue operators, during a recent daytime visit to two nightclubs with Board members to discuss concerns. We also recognise that there are contrasting views about the crime and disorder impacts of this proposal with some asserting that the potential for unlawful criminal activity increasing if there is no licensed venue. However our view on balance is that this change will make a positive contribution to alleviate crime and disorder, particularly as other measures such as targeted enforcement have not eliminated the problems at these licensed venues. We have carefully considered the equalities impacts of this proposal and the potential adverse impact on those groups who may have enhanced safety concerns such as disabled people, LGB, BAME groups, females and young people,

¹ https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Future%20Proof%20-%20Taxi%20%26%20PH%20Report.pdf

particular those who may not have access to Smartphones. In light of these potential impacts, we will work with stakeholders to explore alternative measures to assist customers in late night venues in these locations whilst minimising the potential of plying for hire or touting, for example by allowing passengers to remain inside venues whilst waiting for pre-booked vehicles or otherwise make facilities available for bookings to be made with licensed operators (for example through the use of a dedicated in-venue telephone), and by arranging for passengers to be collected safely. It is not the case that the proposal will stop passengers making use of private hire services to get to and from late night venues; it will stop those venues being licensed as operating centres in their own right which we consider to be a justified and proportionate proposal in the interests of public safety.

Proposal 9: Operators will be required to provide specified information e.g. details of all drivers and vehicles, to TfL when and how specified by TfL.

(i) Original consultation proposal

We proposed to require operators to provide TfL with information in such form, content and at such intervals as TfL specifies including details of drivers and vehicles.

There is currently no mechanism for TfL to obtain details of drivers and vehicles which are available to carry out bookings for an operator and currently this can only be done by requesting the particulars from an operator or by inspecting their records at their operating centre.

This creates difficulties for enforcement because, for example, it would be helpful to know which operator a driver worked for in order to confirm that he or she is insured.

(ii) Summary of consultation response to the proposals

Seventy four per cent of respondents supported this proposal with just 10 per cent not in favour of it. Customers and members of the public strongly supported it with almost 60 per cent of private hire operators and vehicle owners also in support. Private hire drivers were less enthusiastic with 48 per cent for and 22 per cent against the proposal. There was some concern about the costs to operators, which will partly depend on the technical requirements and frequency of submitting the material.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

The health impacts for passengers have been identified as moderate beneficial as this will help to improve passenger safety by making it easier for TfL to check appropriate insurance is in place and to identify and take action against unlicensed drivers. A minor adverse business and economic impact has been identified for PHV operators,

particularly those operators with limited electronic record keeping; however impacts are expected to be relatively short term.

(iv) Summary of responses to the IIA consultation

A majority of those responding supported the proposal and did not suggest any negative impacts. Stakeholders felt this would bring positive benefits to passenger safety and make a positive contribution in terms of the prevention of crime and disorder. One stakeholder expressed a concern that this would have a negative equality impact on drivers as they could be deemed “guilty until proven innocent” by TfL. Some respondents expressed concerns about how this proposal would be implemented i.e. whether the IIA had sufficiently captured the costs of this proposal including the resource required to complete the upload. The impact on specialist providers, such as the chauffeur and driver-guide sectors, was also raised.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with this proposal which had overwhelming support through the public consultation. We believe there is a strong passenger safety benefit of us having better information about which drivers and vehicles are attached to which operator. This will also enable swift resolution of customer complaints received via our complaints system which went live at the end of 2015.

We will explore the optimum frequency of electronically uploading this information, taking account the impact on businesses and the value of this information for enforcement and compliance purposes. Operators have given positive feedback about this proposal but have also raised some practical issues which we will address during implementation of the proposal and when specifying the frequency and level of the supply of information. In implementing this requirement we will be mindful of the data protection implications and the minimum disclosure necessary to meet the public safety objective.

Proposal 12: Harmonise retention periods for records to 12 months.

(i) Original consultation proposal

We proposed to harmonise the retention period for records under the Operator Regulations to be 12 months where it is currently six months. Having different retention periods for different records causes confusion to operators and doesn't allow a full compliance check on records older than six months. The proposal would mean that the period for retention of records is made 12 months for all records as opposed to six months for some records (e.g. complaints, lost property) and 12 months for others (e.g. driver and vehicle records).

(ii) Summary of consultation response to the proposals

This proposal received strong support in the consultation, including from customers, and a majority of the industry welcomed the clarification in the record keeping process. Some consultees did

question whether the change was necessary and whether the retention period should be six months.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This was identified as primarily an administrative change with limited resource requirement and therefore unlikely to have a disproportionate impact in relation to the four assessment topics.

(iv) Summary of responses to the IIA consultation

This proposal attracted little comment during the consultation. One respondent questioned whether a strong case had been made for regulatory change or that a proper assessment of the costs of retaining data had been made.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with this proposal which a majority of consultees, 71 per cent, consider a sensible measure to assist compliance activity. While a small number of respondents felt the retention period should be six months, it is felt that 12 months is more appropriate to assist compliance checks. We accept that there may be some additional cost to operators to implement this proposal but that the public safety benefits are considered to outweigh that. Operators will remain subject to data processing requirements in data protection legislation when otherwise processing the personal data of their drivers.

Proposal 13: TfL to impose a limit of the number of business names attached to each Operator's licence.

(i) Original consultation proposal

We proposed a limit of five on the number of business names attached to each Operator's licence.

(ii) Summary of consultation responses

There was majority support to this proposal with 63 per cent in favour of imposing a limit with strong support from customers, although some alternatives to the five business name limit were proposed with some consultees suggesting an alternative of one business name.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This proposal is likely to impact some operator groups more than others. It has the potential to have some short term negative consequences for some larger operators which have accrued multiple companies over a long period of time, whilst it may have long term advantages for operators which benefit from fewer competitors with a similar trading name. Engagement highlighted that operators with more than five operating names are not particularly common. The business and economic assessment is therefore rated as neutral.

(iv) Summary of responses to the IIA consultation

A majority of respondents supported the view that this proposal would have benefits to customers, although one consultee – representing Driver-Guides – considered that the nature of its business would mean an adverse business impact.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with this proposal.

Having multiple names, or names similar to other operators, can cause confusion as to who customers are making a booking with. There is evidence of operators applying for names containing geographic areas they do not provide services in, or using personal names of other individuals or names similar to those of other operators. We have already made clear that we will consider applications for more names on a case by case basis, and will do so for specialist providers to address concerns raised by those groups.

Proposal 14: Private hire drivers should be required to demonstrate a certain standard of English, with particular emphasis on ability on spoken communication.

(i) Original consultation proposal

We proposed to make regulations that will require drivers to be able to demonstrate they have sufficient knowledge of English language at an intermediate level. The requirement will be applied to all new driver applicants and renewals. In the interim, as part of our review of the topographical test, we have reviewed whether the topographical test centres are properly assessing the ability of candidates to communicate in English. This review demonstrated that a large proportion of applicants for private hire driver's licences did not have the required level of English to pass the test. We consider that it is necessary for drivers to be able to communicate in English particularly so to discuss a fare or route but more importantly to be able to brief a passenger on a public safety issue like the use of a seat belt or what happens in an emergency.

(ii) Summary of consultation response to the proposals

There was strong and near universal support in the consultation from both customers and the industry on this proposal with 80 per cent of consultees in favour of it as it would ensure that drivers are able to converse with passengers to an adequate standard to take direction from them (for example, where to go/park safely on reaching a destination) and especially in the case of an incident (e.g. road traffic accident or passenger emergency). Sixty nine per cent of private hire drivers supported the proposal with 13 per cent against it. Customer groups and our consumer research also strongly supported this requirement. Some respondents raised concerns about discrimination against immigrants and drivers with a low level of English proficiency.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

Improved communication between passengers and drivers may help to improve passenger safety and their perception of safety. As such, this proposal is currently considered a minor beneficial health impact. Some equality groups may disproportionately benefit from improved communication and therefore there have been some minor beneficial equality impacts assessed for passengers.

The introduction of this proposal will affect drivers wishing to enter the trade or renew their licence. This could be significant for those already working in the trade as it could result in reduced income if they do not pass, whilst it could act as a barrier to new drivers. As such the equality impact of this proposal for drivers is assessed as major adverse. Due to the potential impacts on driver income and driver supply, business and economic impacts have been assessed as moderately adverse for both drivers and operators.

(iv) Summary of responses to the IIA consultation

A majority of respondents continue to support this proposal, although some gave different views on the standards of English required – some felt a higher standard was necessary whilst others felt B1 intermediate was too high for the purposes of a private hire driver. One stakeholder felt there was no evidence to support a proposal. There was concern about the impact on existing drivers of a retrospective requirement and concern about the cost to drivers and the loss of earnings while taking the test. One stakeholder felt that British nationals should be exempt from taking the test.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with this proposal which received strong and widespread support across all respondents groups. However, we accept that the standard needs to be proportionate and to the role of a private hire driver, but it is clear from consultees' responses that they support an intermediate level of understanding so that passengers have confidence that they can interact with the driver in English. This will enhance passenger safety and experience when using private hire services. The ability for passengers to communicate even simple information with drivers such as to discuss a fare or a route is important and even more so in the event of an issue occurring while in the vehicle. Whilst passengers should clearly contact the police in an emergency, there are potentially many instances where a passenger may feel unsafe and may need to communicate effectively with the driver.

It has always been a requirement for private hire driver applicants to undertake a topographical assessment in English. Throughout summer 2015 we conducted a mystery shopping exercise at all accredited topographical assessment centres. Through this exercise

we identified serious issues with the way a test was being conducted at a number of centres, including applicants being given answers and being allowed to take the test in their native language. As a result, to date 15 centres had their accreditation suspended and candidates that had recently passed the assessment at one of those centres had to re-sit the test with TfL invigilating. Of the circa 200 applicants that have now re-taken the test, just 36 per cent passed and a significant number of the applicants that failed was due to their inability to understand the simple questions written in English. It has been observed that many of these candidates were also unable to communicate with TfL in English. TfL outsource vehicle licensing inspections to an external service provider, NSL, and it has been observed that on occasion, licensed drivers bring a translator to the inspection centre.

In August 2015 the Home Office announced its intention to introduce an English Language test to ensure all customer facing public sector workers can speak English fluently². We consider it appropriate and justified for this standard to apply to private hire drivers, who will often be responsible for transporting vulnerable passengers. Whilst it is possible that some drivers will work predominately in communities where English is not used as the first language, a private hire licence is valid across the whole of the Capital, and app based operators are increasingly making work available to drivers beyond their immediate geographical area.

Whilst we are minded to progress with requiring English level B1 (intermediate) as a standard of English, as required by the Home Office for immigration purposes, we will take into account the impacts, including the impact on protected groups for the purposes of equalities legislation, when developing the standard of the English to be specified. Many drivers are from majority English speaking countries and in recognition of the cost to the industry we will consider the proposed standard, and any exemptions from the requirement, which will be set out in guidance.

Proposal 16: Driver and Operator licence applicants to provide National Insurance numbers to TfL, which can be shared with relevant government departments

(i) Original consultation proposal

We proposed an application requirement to provide a National Insurance number for private hire driver and operator licences (where the operator is an individual).

² <https://www.gov.uk/government/news/all-public-sector-employees-who-work-directly-with-the-public-to-have-fluent-english>

(ii) Summary of consultation response to the proposals

This proposal received strong customer support and widespread support across the industry and from HMRC. Overall 75 per cent of consultees supported the proposal with six per cent in disagreement.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This was identified as primarily an administrative change with limited resource requirement and therefore is unlikely to have any disproportionate impacts in relation to the four assessment topics.

(iv) Summary of responses to the IIA consultation

This attracted limited comment during consultation, but with a majority expressing support. One consultee had concerns about the timeliness of DWP's investigative processes and felt that there should be parity with the taxi trade who do not currently provide NI numbers.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with this proposal. While a National Insurance number is not proof of identity, it does provide an additional safeguard to other identity checks.

Furthermore, although this is not the primary purpose, the information could be of use to the DWP in certain circumstances with their investigations. Where necessary and justified we will allow appropriate and proportionate data sharing with other government departments to ensure drivers and operators aren't making fraudulent claims for benefits or not declaring income to HMRC.

Proposal 17: A driver's private hire vehicle licence to be considered for revocation if their standard private hire driver's licence is revoked.

(i) Original consultation proposal

Where a licensed driver has their driver's licence revoked, and that driver is the owner of a licensed vehicle, then we propose to also consider revoking the vehicle licence.

(ii) Summary of consultation response to the proposals

This proposal received strong support from customers and most of the industry. Overall 76 per cent of respondents supported the proposal with 9 per cent against although some of the private hire industry and some business groups felt it was disproportionate.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This is likely to have positive health and safety impacts as it offers an additional safeguard to passengers and is therefore assessed as having a minor beneficial impact.

The business and economic impacts are assessed as minor adverse as it could negatively impact drivers who share vehicles.

(iv) Summary of responses to the IIA consultation

A majority of those responding supported this proposal and there were no comments identified regarding the health, equality or environmental impacts. Consultees welcomed the mitigation that TfL would take into account the reasons for driver revocation before deciding whether to revoke the vehicle licence.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with this proposal which was strongly supported by consultees. For clarity, this does not mean that a vehicle licence would be automatically revoked if a PHV driver licence is revoked. However, it may be a basis to do so under some circumstances, for example, if there is evidence that a vehicle could be used for hire or reward by somebody without a PHV driver licence or where the driver is convicted of a serious violent or sexual offence. We have taken into account arguments that an owner/driver could be disproportionately affected financially where the vehicle licence is revoked: however the vehicle still retains its intrinsic value and if sold could be licensed by a new owner.

Furthermore, where a driver is renting a vehicle or using a vehicle belonging to an operator this would not apply. TfL will explore whether (under data protection laws) on line advice regarding driver licence suspensions and revocations (see proposal 9) could be introduced to ensure that a company that rents/leases vehicles will be made aware that one of their drivers is no longer a licensed driver.

Proposal 18: Operator staff in private hire operating centres should be subjected to criminal records checks as part of their application process.

(i) Original consultation proposal

We proposed to seek to add operator staff to the DBS list. As an interim measure we proposed to require operators to ask any person working for them to provide a basic disclosure as part of the application process.

(ii) Summary of consultation response to the proposals

This proposal received strong customer support and widespread support across the industry, but it was also noted that it should be delivered in a proportionate and practical way.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

Thorough checks on operator staff are expected to deliver additional benefits through improved personal safety for passengers, reducing the risk of emotional and/or physical harm. Therefore the health and

equality impacts of this proposal are rated as minor beneficial. Due to the high level of turnover for operator staff, this proposal poses a potential administrative burden and therefore business and economic impacts are estimated to be minor adverse.

(iv) Summary of responses to the IIA consultation

Respondents generally supported this proposal and did not offer any additional information on impacts, although previous concerns about the timing of the DBS process and the costs due to high turnover of staff were raised.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with this proposal which was strongly supported by consultees. It would only apply to operator staff who have face-to-face contact with the public e.g. at minicab offices. Given the regular interaction with the public and access to personal information that such staff have access to, we believe this will help increase public safety. We understand the concerns about delays in processing DBS applications and will continue to support the DBS and local Police forces to ensure that any delays with processing DBS disclosures are minimised.

In terms of business impacts, we have taken into account the additional administrative costs but consider this is outweighed by the strong public safety benefits if those working in face to face roles in the private hire industry should have a standard DBS check.

Proposal 19: TfL to stop accepting payment for licence fees by Postal Order and cheque.

(i) Original consultation proposal

From 1 April 2016 we propose to no longer accept cheques or postal orders as payment for licence fees for PHV drivers, operators and vehicles.

(ii) Summary of consultation response to the proposals

This proposal received widespread support across the industry. Less than one per cent of licensing transactions to TfL are paid by cheque or postal order.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This was identified as primarily an administrative change with limited resource requirements, and therefore unlikely to have a disproportionate impact in relation to the four assessment topics.

(iv) Summary of responses to the IIA consultation

There was little comment on this proposal other than general support.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with this proposal.

Proposal 20: TfL to verify Hire or Reward (H&R) insurance at the point of vehicle licensing, and for it to remain in place for the duration of the licence. No licence can be issued without evidence that H&R insurance is in place.

(i) Original consultation proposal

We proposed to check Hire or reward insurance at the point of vehicle licensing and insurance will be required to remain in place for the duration of the licence. No licence can be issued without evidence that the appropriate insurance is in place.

(ii) Amended consultation proposal

On 20 January we announced our intention to proceed, subject to TfL Board approval, with an amended proposal requiring H&R insurance to be in place at all times whilst a vehicle is registered to an operator. For this amended proposal to be enforceable, it was recognised that it would need to operate in conjunction with proposal 9, which requires operators to regularly provide details of those vehicles that are registered to their operating platforms so that TfL can check these against the Motor Insurers' Bureau database.

(iii) Summary of consultation response to the proposals

The original proposal received strong support during the consultation with 76 per cent of respondents agreeing with the proposal and just 7 per cent not in agreement. Of these respondents, the vast majority of customers and members of the public strongly supported the proposals with 73 per cent and 78 per cent respectively in favour. Private hire drivers responding to the consultation were least in favour with just under half, 48 per cent, supporting the proposal and 28 per cent in disagreement. Of the respondents not in favour of the proposal, the most common comment was that H&R insurance was only necessary for days on which drivers are working. Through the customer research that was conducted as part of the consultation process, customers expressed concern that this requirement was not already in place as they had assumed that to be the case.

(iv) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This proposal is presently considered to be minor beneficial in terms of the health impact for passengers due to the protection provided by insurance. The business and economic impact was rated as major adverse for drivers who own their own vehicle due to the potentially significant additional costs of insuring their vehicle on an annual basis. A minor adverse impact was also identified for operators who own their vehicles and do not have fleet insurance.

(v) Summary of responses to the IIA consultation

Responses to this part of the consultation were mixed with some consultees setting out a clear preference for the original proposal and concerns that the proposal had been amended. One stakeholder argued that certainty of insurance was greater than a “minor beneficial” health impact to passengers.

The private hire trade supported the amendment to the proposal but remained concerned at the availability and cost of short term insurance products. One operator reiterated that it undertook regular checks on insurance but the onus should remain with the driver to demonstrate they had the correct insurance at any time when challenged.

(vi) Final proposal submitted for TfL Board approval

Following a review of all information presented through the extensive consultation process we intend to revert to the original proposal and proceed with requiring H&R insurance in place at the point of vehicle inspection and throughout the duration of the annual licence. This will not negate the existing requirement for PHV operators to check drivers have valid insurance but will ensure a vital extra level of cover which will be checked by TfL when licensing the vehicle and through regular compliance checks to ensure passenger safety which is paramount.

Electronic checks of insurance documents have proved problematic. Whilst the Motor Insurers’ Bureau (MIB) contains a record of whether a vehicle has insurance in place, it can often take several days for this database to be updated and therefore checks cannot be undertaken in real-time. Furthermore, the electronic checks that are available are limited and cannot distinguish between different levels of insurance cover (e.g. 3rd party, social and domestic or H&R).

Given the overwhelming support through the consultation process and the customer feedback through the research conducted, this solution is felt to be the most practical in order ensure public safety. It is important that the private hire industry works with the insurance industry to encourage a reduction in insurance costs for drivers and a modernisation of the approach to providing real-time electronic records which detail the level of insurance. This proposal will bring parity to the H&R insurance requirements on the taxi trade.

The additional costs have been taken into account but it is felt that the public safety benefits of ensuring that vehicles being used as PHVs are insured at all times that they are licensed to be used as such is a justified and proportionate measure.

Proposal 21: Drivers to carry or display a copy of insurance details at all times

(i) Original consultation proposal

We proposed to amend the Drivers Regulations to the effect that private hire drivers must carry a copy of their insurance documents at all times.

(ii) Summary of consultation response to the proposals

This proposal was strongly supported in the consultation with 79 per cent of respondents in favour. Some responses from sections of the private hire trade opposed it with the most common reason for disagreement being that respondents felt records could be checked electronically. However, as covered under proposal 20, while electronic checks can be undertaken, the MIB database does not get updated in real-time and does not record the level of insurance cover.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This was identified as primarily an administrative change with limited resource requirement and therefore is unlikely to have a disproportionate impact in relation to the four assessment topics.

(iv) Summary of responses to the IIA consultation

Respondents were generally supportive of the proposals, with some emphasising the benefits to the wider public of drivers being properly insured. Some respondents felt that displaying insurance was undesirable and suggested further exploration of electronic validation.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with this proposal. For the reasons set out above, it is not currently possible to carry out electronic checks.

Drivers will be required to carry or display a copy of their hire or reward insurance in the vehicles. It will reduce delays to passengers during real-time roadside checks of insurance and provide increased confidence/safety for customers that the vehicle is properly insured. Taxi drivers are required to display a copy of their insurance in the vehicle.

Proposal 23: Introduce new operator licence types that account for larger operators, who would be charged more to cover the extra licensing costs to TfL associated with these licences

(i) Original consultation proposal

We proposed to review the current operator licence type and look to introduce additional category/categories. We currently issue two types of private hire operator licence: Small (less than two PH vehicles available) and Standard (more than two PH vehicles available).

- (ii) Summary of consultation response to the proposals**
There was broad support for this proposal, although PH operators were concerned about the detail of implementation.
- (iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings**
This proposal was not considered by Mott MacDonald as was out of scope of the process.
- (iv) Summary of responses to the IIA consultation**
There was broad support for reviewing the existing charging structure, with various suggestions on the terms of such a review and the potential environmental and business impacts of a new structure.
- (v) Final proposal submitted for TfL Board approval**
We will review the licence type and this will be subject to further consultation

Proposal 24: Exploring measures to ensure that private hire vehicles cannot be used for ride sharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers

- (i) Original consultation proposal**
We proposed to explore measures to ensure that private hire vehicles cannot be used for ride sharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers. There was no specific regulatory proposal in this question.
- (ii) Summary of consultation response to the proposals**
The consultation and customer responses generally supported the principle to explore proposals to promote passenger safety. Overall 55 per cent of respondents supported the proposal with 25 per cent against. Consultees who didn't support the proposal felt that ridesharing should be encouraged and that it should be the passenger's decision if they want to share a journey. Some respondents felt ridesharing is unsafe and should be banned.
- (iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings**
A number of health and safety risks have been identified in relation to ridesharing so controls on this practice could therefore lead to improved passenger safety. This is assessed to have a minor beneficial health impact for passengers and drivers.

The original travel patterns of those using ridesharing prior to using this service are unclear, and therefore it is difficult to estimate whether the modal shift to ridesharing would be from other PHV / taxi / private car trips or from public transport trips. The environmental impact of this proposal is therefore considered neutral. The potential of this

proposal to result in imposed controls which could lead to disruptions on ridesharing means that digital only operators may experience a minor adverse business and economic impact. Business and economic impacts to remaining PHV operators has been assessed as a neutral impact due to lack of historical data on current levels of informal ridesharing.

(iv) Summary of responses to the IIA consultation

There were mixed views on the impacts of ride sharing. Those supportive argued that there would be environmental and consumer benefits; those opposed suggested there would be strong negative impacts for public safety (passengers and drivers).

(v) Final proposal submitted for TfL Board approval

We will work with the DfT to develop guidance for ridesharing. Ridesharing is a big emerging market and there is lots of innovation from both existing providers and new entrants. The purpose of the new guidance would be to; signpost new and existing operators to the right people to discuss business models; and give guidelines around the regulatory parameters for ridesharing (and how to differentiate between car-pooling and ride sharing for hire or reward).

Proposal 25: Clarification of existing regulation regarding advertising, so no advertising is allowed to be displayed inside, from or on the outside, of a private hire vehicle

(i) Original consultation proposal

We proposed a small change to Regulation 8 of the Vehicle Regulations to clarify that advertising displayed “from” as well as “on” a vehicle is subject to the controls set out in that Regulation. TfL regularly engages with the industry on standards relating to both the inside and outside of PHVs. This proposal gives TfL the power to intervene in the event of inappropriate or offensive content, as with advertising on the Bus and Tube and Rail network to ensure no inappropriate adverts are displayed. It would also ensure that no objects within the vehicle can be used to encourage touting or illegal plying for hire.

(ii) Summary of consultation response to the proposals

A majority of respondents supported this proposal although many felt it needed more explanation and/or rationale for why the change was being proposed. Respondents not supporting this proposal either felt it was unnecessary/over-regulatory, or they didn't believe there was enough detail to offer support.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This was identified as primarily an administrative change with limited resource requirement and therefore is unlikely to have a disproportionate impact in relation to the four assessment topics.

(iv) Summary of responses to the IIA consultation

There was limited response during the consultation, although some questioned the wider restriction on private hire advertising contained in legislation.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with this proposal. Private hire trade members have argued for many years that there should be no overt signage on private hire vehicles so as to discourage members of the public approaching the vehicle without a booking. It is in the public interest to be able to regulate material on display inside PHVs used by the public.

B. TfL is seeking approval to implement the following four proposals as amended

Proposal 3: TfL has amended the original proposal to require that operators must inform TfL of changes to their operating model prior to implementation

(i) Original consultation proposal

We proposed that operators will be required to seek TfL approval before changing their operating model. The rationale for this proposal is that, as technology advances and innovation flourishes in the private hire market, there is a risk that an operator makes a change to its operating model that is incompatible with legislation and/or has implications for public safety or enforcement and compliance activity.

(ii) Summary of consultation response to the proposal

While there was some support for this proposal, business groups and parts of the PHV trade raised concerns as they felt it discouraged innovation and would prevent a better service for Londoners. Amongst those supporting the proposal a number thought that this proposal should be applied in a proportionate way so as to minimise the impact on business.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This proposal could result in delays to operators from across the industry seeking to develop their model and respond to passenger demands and has therefore been assessed as having a moderate adverse business and economic impact to PHV operators.

(iv) Summary of responses to the IIA consultation

There was broad support for this proposal. There was limited comment on the specific impacts highlighted in the IIA, and consultees reinforced previous concerns such as the risk that it would stifle innovation and incur additional costs for operators. Some consultees questioned whether the revised proposal – inform TfL rather than seek its agreement to operating model changes could have negative impacts (depending on the change). Concern remained about how “operating model” would be defined.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with an amended proposal, requiring operators to inform TfL of changes to their operating model prior to implementation.

This amended proposal will ensure that TfL, as the regulator, will be able to determine whether the new operating model is compliant with Private Hire Legislation and in the interests of passenger safety. It will help licenced operators ensure that they remain within the regulatory and legislative framework and within the terms upon which their

licence was granted. TfL carry out appropriate checks before licensing an operator and are proposing to carry out the same due diligence ahead of any substantial changes to the way they operate. The proposal is not, and has never intended to be, an attempt to restrict or micro-manage the running of a private hire business.

This amended proposal will mitigate the impacts identified in the IIA conducted by Mott MacDonald by providing TfL with oversight of any proposed new operating model without causing unnecessary delays to operators who wish to develop their operating model. We believe this is a sensible modification that will still ensure compliance with legislation whilst minimising any administrative burden on operators.

Proposal 7: TfL has amended the original proposal to require that customers must be able to speak to an operator verbally at all times when journeys are being undertaken, rather than specifying a landline per se. The requirement will be mandatory for enquiries or complaints in relation to booked journeys, but it will not be compulsory for operators to have to accept bookings by phone.

(i) Original consultation proposal

We proposed that operators must have a fixed landline telephone which must be available for passenger use at all times.

(ii) Summary of consultation response to the proposals

This proposal was supported by a majority of respondents. Many of those who responded, whether supportive or not, sympathised with the importance of customers being able to contact an operator in real-time during a journey. However a significant number of consultees did not necessarily agree that this should be prescribed as being through a landline.

The proposal received mixed views from the PH trade, business groups and consumer organisations. Those opposing suggested that operators should be able to decide the methods by which they interact with customers and that reference to a landline was antiquated. However the ability to speak to a real person at all times when journeys are being undertaken is an important safety requirement and was well supported in the consultation, particularly by groups representing disabled passengers.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

The health and equality impacts for passengers have been assessed as moderate beneficial for passenger safety as it would provide passengers with the ability to contact the operator directly to address concerns 'in real time' rather than relying on less reactive electronic communication. Although aimed primarily at passengers a moderate beneficial health impact for drivers has also been estimated. The business and economic impact on operators has been assessed as

major adverse for operators offering digital only bookings and moderate adverse for all other operators.

(iv) Summary of responses to the IIA consultation

Some respondents supported the revised proposal but some felt that it should not have been amended or 'watered down'. Those in support felt it was particularly beneficial to ensure the safety of passengers. Two stakeholders felt it should be specified that this should be based at the licensed operating centre rather than off-shore to protect customer data and to ensure records can be checked, where necessary, by TfL. One consultee disagreed with the assessment of moderate beneficial health benefits for drivers and felt that the proposal did not address the impact on drivers. Some consultees felt there was a disproportionate negative business impact on app based operators, whilst others felt the revised proposal diluted the impact and that insistence on a landline should be reintroduced.

(v) Final proposal submitted for TfL Board approval

We intend to proceed with an amended proposal, making it clear that the requirement is for a customer to be able to speak to the operator verbally at all times when journeys are being undertaken, rather than specifying a landline per se. The ability to speak in real-time to an operator and not have to rely solely on other communication methods was strongly supported by consultees, including passengers. It will not be compulsory for operators to have to accept bookings by phone.

This amended proposal will mitigate the impacts identified in the IIA by ensuring passengers can speak to an operator in the event of an enquiry or complaint but without the onerous requirement of mandating operators to accept bookings by phone.

The potentially disproportionate impact on small operators including single driver-operators has been taken into account as has the potential impact on app-based providers. It is considered that, despite these impacts, the need for passengers to be able to speak with an operator at all times during their journey is an important public safety issue. If a passenger has a safety concern or there is an incident in a vehicle or involving other vehicles, the ability for a passenger to be able to email or electronically communicate with an operator would not always be sufficient.

Proposal 10: TfL has amended the original proposal to require that an estimated fare must be provided prior to the journey commencing. TfL will work with the trade on the detailed implementation, including accuracy required to implement this effectively

(i) Original consultation proposal

We proposed to require operators to provide a specified fare prior to the booking being accepted.

(ii) Summary of consultation response to the proposals

There was strong support for operators providing a specified fare prior to the booking being accepted from both customers and most of the taxi and private hire industries, whilst business groups were strongly opposed. A significant number of respondents were concerned that this may not allow customers to change their destination/route when on a journey.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This proposal is likely to improve the transparency of PHV fares which will have particular long term benefits for those on low incomes. As several equality groups are more likely to be in low-income households, this is likely to realise moderate beneficial equality impacts; particularly for disabled groups.

The proposal could result in minor adverse impacts to drivers if implementation of this proposal requires the driver to stop and recalculate the fare. It could have a moderate adverse impact on digital only bookings as income loss through under-estimation of a fare could be experienced which may require some changes to the operating model. Impacts on those operators offering bookings via the phone are assessed to be minor adverse. There is a risk that operators will build a contingency into the fare charged to passengers in order to minimise the negative income impacts that are identified above; therefore minor adverse economic impacts for passengers have been identified.

(iv) Summary of responses to the IIA consultation

Respondents generally supported the proposal. One of the stakeholders was supportive of the proposal, claiming that it accorded with the original Private Hire Act and would adapt the regulations to prevent operators utilising technology to circumvent them. They also felt that technology has allowed operators to charge in a similar fashion to taxis but without the passenger safeguard of the regulator setting fares. Another stakeholder suggests that imposing the requirement could have a negative impact on passengers, as operators will be more inclined to price-in additional risk to begin with and therefore inflate fares. They felt that passengers generally have the option of receiving a fare estimate range and if they want a fixed fare rather than an estimate, they can choose from a number of private hire operators that provide a fixed fare. There were mixed views about whether the estimate should be given at time of booking or at commencement of journey.

(v) Final proposal submitted for TfL Board approval

We intend to amend the proposal to require an estimated fare to be provided prior to the journey commencing unless the fare has been fixed in advance. TfL will work with the trade on the detailed

implementation, including accuracy required to implement this effectively.

This amended proposal will mitigate the impacts identified in the IIA conducted by Mott MacDonald by ensuring a transparent fare estimate for passengers while also providing flexibility for operators to provide that estimate before the journey commences. This means that local traffic conditions can be taken into consideration allowing for a more accurate estimate.

The change will mean that operators will be required to provide an estimated fare, rather than only having to do so if one is requested.

Whilst recognising the potential business impact, this change is considered justified in the interests of passengers. We are mindful of the need to ensure that any specification about what such an estimate should consist of needs to take into account the impact on business and competition between service providers.

Proposal 11: TfL has amended the original proposal to require the main destination be recorded by the operator prior to the journey commencing

(i) Original consultation proposal

We proposed to amend the Operators Regulations to require the operator to record the main destination of private hire journeys, which must be specified at the time the booking is made.

Operators already have to record the main destination if specified by the customer at the time of booking, and this proposal will mandate the requirement to take this information prior to the journey commencing. It will ensure a complete record of each journey, thus supporting passenger safety, and would also be an essential requirement to implement proposal 10.

(ii) Summary of consultation response to the proposals

The proposal to record the main destination at time of booking being made had strong customer and industry support, with the majority of operators already recording this information. There was some concern that this will limit journey flexibility/passenger options although the proposal is not intended to prevent a passenger asking for a change to journey destination once the journey has already commenced.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

Mott MacDonald advised that this proposal could improve the safety of all passenger groups, as it has the potential to aid the police in tackling crime which could be significant. The health impact has therefore been rated as moderate beneficial.

A minor adverse impact was identified for business and economic impacts for all types of PHV operators; recognising the difficulty in confirming a main destination in every instance of PHV use.

(vi) Summary of responses to the IIA consultation

The proposal was generally supported. There was a difference of views as to whether the destination should be recorded at time of booking (to allow more accurate route planning and fare estimation) or prior to journey commencing (to allow customer flexibility and avoid destination discrimination).

(iv) Final proposal submitted for TfL Board approval

We intend to proceed with an amended proposal. The original proposal has been amended to require that the main destination of a private hire journey must be recorded by the operator prior to the journey commencing. This amended proposal will mitigate the impacts identified in the IIA conducted by Mott MacDonald by capturing the most up to date information regarding the destination up to the point the journey commences.

C. TfL will undertake further work on the following proposals

Proposal 4: Security of app-based platforms: TfL is not seeking to make an immediate change, but will work with the trade and tech industry during 2016 to develop any necessary security solutions

(i) Original consultation proposal

To prevent unauthorised use of apps, we proposed to make it a requirement that app based platforms could demonstrate during pre-licensing checks and compliance inspections, appropriate security measures to prevent the app being used by a person other than the licensed driver they are allocating bookings to. We also proposed to require operators to demonstrate what security measures they have in place to protect passengers from fraudulent use of their accounts and/or personal data.

(ii) Summary of consultation response to the proposals

This proposal was strongly supported by customers and customer groups. There was concern amongst business groups and the PH trade about how this could be delivered. Consultees suggested a wide range of measures to address security concerns, including identification biometrics. Some consultees highlighted the need to ensure that drivers were properly protected from misuse of information.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

The health impact for passengers is assessed as being moderate beneficial with a minor beneficial equality impact on passengers. Business and economic impacts are assessed as moderate adverse to PHV operators offering digital bookings. Mott MacDonald has identified opportunities to mitigate negative impacts and enhance the positive impacts of this proposal.

(iv) Summary of responses to the IIA consultation

Some consultees felt that the public health benefits warranted the proposal to be taken forward despite any adverse impacts on operators. There was a separate concern about the implications for driver safety.

(v) Final proposal submitted for TfL Board approval

We will not seek to make an immediate change, but will work with the trade and technology industry during 2016 to develop any necessary security solutions. It is important that where a licensed operator uses an app based platform, bookings must only ever be allocated to licensed drivers. TfL will explore options to ensure that where operators use app-based platforms, that these are safe and secure and cannot be fraudulently used.

Proposal 22: Hire or reward fleet insurance in place by operators: TfL is not intending to proceed with this proposal at this time. However, there is broad agreement across the industry that there is an issue with indemnification in the event that a driver, intentionally or not, does not have the appropriate insurance in place. TfL will work with the trade to explore this in more detail and will seek to come forward with a new proposal in due course

(i) Original consultation proposal

We proposed that operators should be required to have Hire or reward fleet insurance.

(ii) Summary of consultation response to the proposals

This proposal was supported by a majority of respondents, although some preferred the alternative insurance related proposals. There were mixed views from PH trade stakeholders: those supporting the proposal felt that it would strengthen the responsibility of operators to ensure that vehicles were properly insured; those opposing argued that fleet insurance was unnecessary if the driver was properly insured, and it would represent a significant financial burden, particularly for smaller operators, which would be passed on to consumers.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This is considered to be a minor beneficial health impact to passengers as the introduction of the proposal is designed to help ensure passengers are not transported without adequate insurance. However, without any data on the extent to which vehicles are being used without appropriate insurance, it can only be assigned a minor beneficial rating. As the proposal would potentially affect all operators which don't currently have fleet insurance and have a long term impact with annual fees, it has been assigned major adverse business and economic impact.

(iv) Summary of responses to the IIA consultation

A majority of respondents supported this proposal and judged there would be a major, not minor, beneficial health impact for passengers from the certainty of insurance being in place. Some stakeholders suggested mitigations against the additional costs through establishing a threshold below which fleet insurance would not be required.

(v) Final proposal submitted for TfL Board approval

We propose to not proceed with this proposal. We will however, work with the trade to explore in more detail the issue with indemnification in the event that a driver, intentionally or not, does not have the appropriate insurance in place.

D. TfL is seeking approval not to proceed with the following proposals

Proposal 2: Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing

(i) Original consultation proposal

We proposed changes to the PHV Regulations that would require operators to ensure that there is a time interval between a booking being accepted and the commencement of that journey. The rationale for this proposal was to allow the driver and vehicle information to be communicated to, and digested by, passengers. The proposed specified time interval was five minutes.

(ii) Summary of consultation response to the proposals

There was strong and widespread opposition to this proposal from customers and the business community, as well as from the main Taxi trade organisation and the Private Hire trade. Consultees argued that the proposal would simply inconvenience customers and would disproportionately affect the operating models of app based operators.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

This has been assessed as a moderate adverse impact to health and equality impacts for passengers and minor adverse impact to drivers. A major adverse impact was assessed for operators offering digital bookings only, whilst this proposal was assessed to have a moderate adverse impact on all remaining operator groups.

(iv) Summary of responses to the IIA consultation

There was limited comment on the impact of this proposal, however some consultees suggested that the benefits to the taxi trade had been ignored and that the proposal would have helped to reinforce the distinction between the private hire and taxi trades thereby generating other potential benefits.

(v) Final proposal submitted for TfL Board approval

We do not intend to proceed with this proposal. The only significant support for this proposal came from sections of the taxi trade and those with an affiliation to the taxi trade. A majority of consultees in other every sector consulted disagreed with the proposal, often in vehement terms. It is not considered that the public safety benefits are sufficient to justify proceeding with this proposal taking into account the potentially disproportionate impact on the private hire market.

Proposal 5: All operators will be required to offer the ability to pre-book up to seven days in advance

(i) Original consultation proposal

We proposed to amend the PHV Regulations to require licensed operators to offer the facility for customers to book a journey up to seven days in advance of that journey.

(ii) Summary of consultation response to the proposals

The majority of consultation respondents did not support this proposal, with users in particular saying there are numerous Private Hire operators in the market who provide this facility already, so there was no need to make it a mandatory requirement for all operators. It was strongly opposed by the business community and by sections of the PH trade as being anti-competitive and clearly aimed at the business model of app based operators.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

The equality impact for passengers has been assessed as minor beneficial as it could make it easier for passengers to plan their journey in advance, this may deliver disproportionate benefits to disabled passengers, particularly given that there are a relatively small number of fully accessible PHVs.

The business and economic impact was identified as major adverse for operators offering digital only bookings as it would require a change to the operating model. A minor adverse impact was also identified for all other operator groups due to loss of market share in offering this service.

(iv) Summary of responses to the IIA consultation

Some consultees challenged the assertion that most operators already offered an advanced booking service. They suggested that mandating this requirement would upgrade the minor beneficial equality impact in the IIA, on the basis that it would provide more options for disabled and other vulnerable passengers. Some stakeholders suggested a mitigation that operators should be required to provide a set percentage of their available cars as fully accessible.

(v) Final proposal submitted for TfL Board approval

We do not intend to proceed with this proposal. It is not considered that the public safety benefits are sufficient to justify proceeding with this proposal taking into account the potentially disproportionate impact on the private hire market.

Proposal 8: Operators must not show vehicles being available for immediate hire, either visibly, for example by signage on the street; or virtually, on an app

(i) Original consultation proposal

We proposed to amend the PHV Regulations to require operators to ensure that private hire vehicles are not visibly shown to be available for immediate hire, whether physically (e.g. signage or otherwise on the street) or via an app, or other means.

(ii) Summary of consultation response to the proposals

This proposal was supported by the taxi trade but there was strong and widespread opposition against this proposal from customer groups and PHV operators.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

The equality impact of this proposal has been rated as minor adverse as the inability to show a vehicle on an app may affect passengers' sense of security. The business and economic impacts have been rated as major adverse for operators offering digital only bookings and minor adverse for operators offering digital and phone/office based bookings.

(iv) Summary of responses to the IIA consultation

A majority of respondents supported the proposal, largely on the basis that it reinforced the two-tier system of taxi and private hire which, in their view, was compromised by vehicles "plying for hire" through being visible on apps or on the street.

Some respondents such as the RMT have suggested that TfL should take this opportunity to introduce a statutory definition of plying for hire in order to address the display of vehicles on Smartphone apps which is considered by some to be unlawful plying for hire. We have noted these concerns. However the Regulations could not be used to legislate for a statutory definition of plying for hire. This is a matter for government primary legislation. In terms of vehicles displaying on apps, we accept this is a difficult issue. However, on balance our view remains that this is not unlawful of itself

(v) Final proposal submitted for TfL Board approval

We do not intend to proceed with this proposal which was opposed by a majority of consultees. It is not considered that the public safety benefits are sufficient to justify proceeding with this proposal taking into account the potentially disproportionate impact on the private hire market.

Proposal 15: Private hire drivers may only be registered to a single operator at any time

(i) Original consultation proposal

We proposed to make it a requirement that a PHV driver must be registered to a licensed operator and may only be registered to a single operator at any time.

(ii) Summary of consultation response to the proposals

Whilst there was general recognition in the consultation that the issue of excessive drivers' hours is one that needs to be addressed, there was mixed support to tackle it in this way. Business groups were strongly opposed as were sections of the private hire industry. Private hire drivers did not agree that they should be prohibited from being available to a number of operators.

(iii) Summary of Mott MacDonald Integrated Impact Assessment (IIA) findings

A moderate beneficial health impact has been identified for both passengers and drivers with this proposal. However engagement as part of this IIA process has indicated that driving for more than one operator is becoming more and more commonplace, especially given developments in technology. Larger operators with higher profile, larger coverage and increased flexibility may benefit from this proposal as engagement highlighted these characteristics appeal to drivers. As a result, locally focused PHV operators with a smaller geographical coverage could be at significant risk of losing drivers as a result of this proposal. This proposal is considered to have a moderate adverse overall business and economic impact on operators.

It is considered that many drivers will be affected by this proposal; it will affect the ability to work and provide services as they do at present and could also have significant effects on their income. For PHV drivers this proposal is assumed to have a major adverse impact.

(iv) Summary of responses to the IIA consultation

A majority of respondents supported the view that this would have moderately beneficial health impacts for drivers and for other road users. Alternatively, other consultees highlighted the negative impacts on drivers being restricted to working for one operator, with the suggestion that minimum fares/wages be used instead as a tool to control working hours.

(v) Final proposal submitted for TfL Board approval

We do not intend to proceed with this proposal. The purpose of this proposal was to address concerns around drivers working excessive hours by working for multiple operators; as many are self employed and not subject to the EU working time directive. However there was a strong view that this was an unacceptable restriction of trade and

discriminated against private hire drivers. Taking this into account, it is not considered that the public safety benefits are sufficient to justify proceeding with this proposal taking into account the potentially disproportionate impact on the private hire market and the effects on the ability of drivers and operators to provide services. .

TfL will instead work with DfT to consider how else to tackle the issue of excessive working hours.

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Private Hire Regulations Review Consultation

March 2015

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1. Introduction

Transport for London (TfL) is a statutory body established by the Greater London Authority Act 1999 and is the licensing authority and regulatory body for London's taxi and private hire industries. It is 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, TfL now licenses and regulates:

- 3,008 private hire operators;
- 61,608 private hire vehicles; and
- 77,346 private hire drivers.

The Private Hire Vehicles (London) Act 1998 (1998 Act), the primary legislation governing private hire services in London, provided for the introduction of licensing of private hire operators, drivers and vehicles in London. A copy of the 1998 Act can be found on our website

www.tfl.gov.uk/cdn/static/cms/documents/private-hire-vehicles-london-act-1998.pdf.

A private hire vehicle (PHV) is a vehicle that can carry fewer than nine passengers plus a driver, offered for hire with a driver. This covers minicabs, chauffeur-driven cars, limousines and other services. It is illegal to offer these services except through a licensed operator, taking bookings at a licensed operating centre and using licensed vehicles and drivers.

Following a comprehensive consultation process, the Private Hire Vehicles (London) (Operators' Licences) Regulations 2000 (2000 Regulations) created a new licensing regime for operators which came into force in 2001.

This was followed by the entry into force of the Private Hire Vehicles (London PHV Driver's Licences) Regulations 2003 and the Private Hire Vehicles (London PHV Licences) Regulations 2004 which made provision for the licensing of drivers and PHVs respectively. Appendices B-D contains the existing Regulations.

Under the 1998 Act, responsibility for implementing and carrying out private hire licensing initially fell to the Public Carriage Office (PCO), the arm of the Metropolitan Police responsible for regulation and licensing of London's taxis. On the creation of the Greater London Authority and TfL as the Mayor's integrated transport authority in 2000, the PCO transferred into the new body, subsequently becoming part of TfL's Surface Transport as London Taxi and Private Hire.

TfL has functions under the 1998 Act as a licensing and regulatory authority and it can also make and amend regulations on private hire services. It does not have powers to amend the 1998 Act which is a matter for Parliament.

Due to a number of developments within the private hire industry including advancements in technology and changes to how people engage and share private hire services, we are reviewing the current regulations that govern the licensing of private hire operators, drivers and vehicles.

This consultation sets out the requirements that are currently in place for licensing of private hire operator, driver and vehicle services and invites comments, information and, where appropriate, suggestions for change. We are seeking the views of those involved in the private hire and taxi trades, users of private hire services and any other interested parties on the following regulations:

- Private Hire Vehicles (London) (Operators' Licences) Regulations 2000 (2000 Regulations) (Appendix B)
- Private Hire Vehicles (London PHV Driver's Licences) Regulations 2003 (2003 Regulations) (Appendix C)
- Private Hire Vehicles (London PHV Licences) Regulations 2004 (2004 Regulations) (Appendix D)

Whilst this document outlines specific regulations and invites responses on some possible changes, respondents are also invited to comment on any aspect of the existing regulations or make other suggestions.

Where possible, respondents are asked to provide evidence or examples in support of their comments and suggestions.

The consultation runs from 27 March 2015 to 19 June 2015.

Enquiries about this consultation can be made by email to consultations@tfl.gov.uk, with 'Private Hire Regulations' in the subject line. To respond to the consultation, please go to the TfL Consultation website at consultations.tfl.gov.uk/tph/private-hire-regulations-review before 19 June 2015.

2. Background

Private hire operators, drivers and vehicles licensed by TfL provide a range of vital services as part of London's transport system which include minicab, chauffeur/executive and specialist accessible vehicle services. Since the introduction of licensing in 2001, the volume of private hire operator, driver and vehicle licensees has grown steadily.

Chart 1 shows the number of active private hire licensees over the last decade.

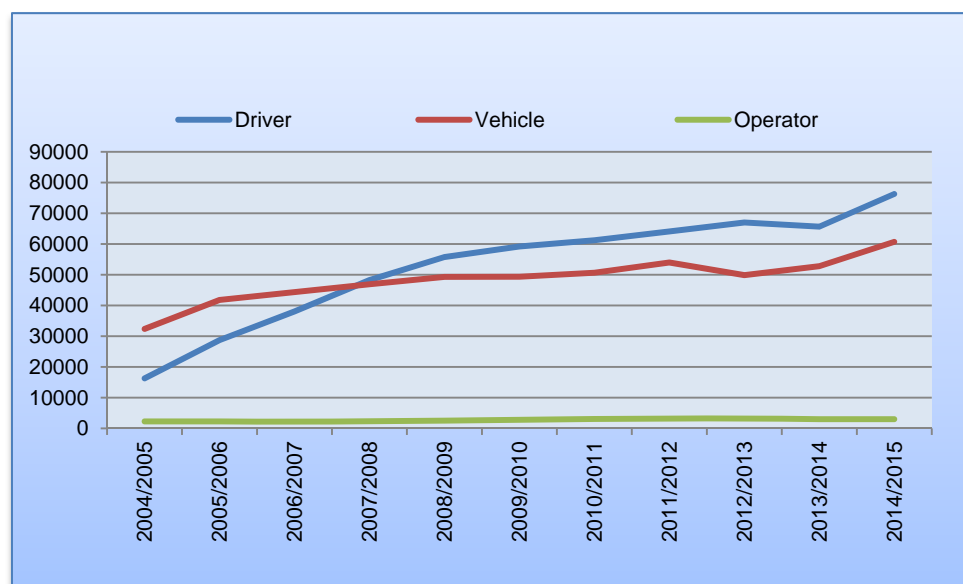


Chart 1 – Active PHV Licensees since April 2004.

Since the introduction of licensing, it has been an offence to make provision for the invitation or acceptance of, or accept, private hire bookings without an operator's licence and bookings must be accepted at a licensed operating centre within London. Operators can have one or more licensed operating centre(s) but must keep records of bookings, complaints and lost property at their licensed centre along with details of drivers and vehicles that are used to fulfil bookings. This includes retaining up to date copies of all documents that prove a driver and vehicle are licensed for private hire work, copies of their DVLA driving licence and proof of valid hire and reward insurance. These records must be available for inspection by TfL staff.

There are two types of operator's licence and both are normally granted for five years:

- 'Small' – the operator is unable to make use of any more than two vehicles at any time; and
- 'Standard' – the operator is able to make use of multiple vehicles

There are approximately 1,000 small and 2,000 standard operators currently licensed in London. Many of the small operators are one-person chauffeur businesses in which the same person is licensed as an operator, driver and vehicle owner. However, some are booking agents that sub-contract the service provision to other licensed operators.

The 1998 Act is different to legislation governing private hire services in the rest of England and Wales and it was passed largely as a result of public safety concerns and campaigning by trade associations and safety groups.

3. Purpose of the consultation

The purpose of the consultation is to review various aspects of the existing regulations covering private hire services, and to invite comments and suggestions where improvements could be made or are deemed necessary. This document sets out and invites comments on these issues.

4. Private Hire Operators

a) Booking records

Background

Regulation 11 of the 2000 Regulations provides that before the commencement of each journey booked at an operating centre specified on his licence, an operator shall enter the following particulars of the booking in the record:

- (a) The date on which the booking is made and, if different, the date of the proposed journey;
- (b) The name of the person for whom the booking is made or other identification of him, or, if more than one person, the name or other identification of one of them;
- (c) The agreed time and place of collection, or, if more than one, the agreed time and place of the first;
- (d) The main destination specified at the time of the booking;
- (e) Any fare or estimated fare quoted;
- (f) The name of the driver carrying out the booking or other identification of him;
- (g) If applicable, the name of the other operator to whom the booking has been sub-contracted, and
- (h) The registered number of the vehicle to be used or such other means of identifying it as may be adopted.

This Regulation was implemented before the introduction and rapid rise of Smartphone technology. The use of Smartphones is changing the way many people organise their lives and passengers and private hire operators are increasingly using “apps” that serve London’s private hire market.

TfL welcomes the use of such technologies to deliver private hire services in London but this is provided that legal requirements are met and that the highest standards of public safety and customer care are maintained.

TfL invites comments on the existing record keeping obligations of private hire operators as well as whether these should be changed in light of new types of data made available by developments in technology.

Issues

The purpose of Regulation 11 is to ensure the safety of passengers and drivers by providing a complete and accurate record of the journey. It also allows the driver to plan the route and the operator to accurately quote a fare.

Regulation 11 (d) requires an operator to record “the main destination specified at the time of the booking”, before the commencement of the journey, not necessarily at the time of the booking itself. If no destination is specified by the customer then the operator is under no legal obligation to record one.

With the advancements in new technology, TfL would like to understand your views on whether operators who are able to provide a full GPS audit trail for the route of the journey may not need to record the main destination where specified of the time of the booking.

In considering these issues further we welcome your views on the following:-

Question 1: Do you consider it necessary to make any changes to this current regulation?

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.

b) Operator Business Names (Trading Names)

Background

Regulation 18(1)(a) of the 2000 Regulations requires TfL issue a replacement licence where it is notified that an operator has 'adopted, altered or dispensed with' a business name.

There are no restrictions on the number of business names that an operator may have on their licence.

Issues

Whilst TfL acknowledges that operators use different names to identify different parts of their business, there are concerns regarding the large number of business names that operators are applying to be specified on their licence. Operators have applied to use the same business names as existing operators in their Borough causing confusion amongst the public as to who they are making a booking with and can also cause issues with police and compliance investigations. There are also examples of operators applying for names containing geographic areas they do not serve, and using personal names of other individuals (not related to the business).

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?

c) Private Hire Complaints

Background

Regulation 14 of the 2000 Regulations requires private hire operators to record details of complaints made by customers. In the first instance, TfL advises complainants to make their complaint to the operator if they have not already done so. If this has been done and the complainant remains dissatisfied, TfL may investigate the complaint including the operator's handling of it.

Issues

To ensure private hire services in London are of a consistently high standard, TfL would like to have a greater understanding of the number and types of complaints about private hire services.

TfL's role in respect of customer complaints is currently limited and we are considering whether and if so, how this should be increased.

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?

d) Preservation of bookings, driver and vehicle records

Background

The 2000 Regulations require operators to keep booking, complaints and lost property records for 6 months but driver and vehicle records for 12 months.

Issues

Having different retention periods for different records causes confusion and consideration is being given to whether retention periods should be made the same.

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?

e) In-venue operators

Background

To facilitate the provision of safe travel for those attending nightclubs and other late night entertainment venues, TfL has allowed private hire operating centres to be licensed for such venues.

Issues

There have been cases in which operators' staff have accepted bookings and touted (approaching prospective customers) outside venues. TfL receive a number of complaints about PHVs parking and waiting in the vicinity of operating centres, particularly late at night.

Customers are typically unaware of the need for a PHV to be booked at an operating centre, and touting has occurred as they approach drivers outside venues as if they were offering a taxi service.

Since the 2010 Private Hire Consultation, TfL has introduced a number of additional requirements for operators particularly those operating from shared premises. These include a requirement for operating centres within shared premises to have a designated booking area and for operators to obtain the appropriate local authority planning consent.

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

f) Ride sharing

Background

Advances in technology have resulted in changes in how private hire services may be delivered. One such change is the expansion of ride sharing services in which passengers share vehicles and pay separate fares.

New technologies which match up passengers who are going to, or through, a particular location have resulted in new ways to deliver ride sharing coming to market. The primary purpose is to offer a prospective passenger the choice of either an exclusive service or a shared service at a lower fare and at the same time potentially increase revenue and flexibility for drivers.

TfL support developments in technology which comply with relevant laws and provide benefits to passengers. The sharing of private hire services has potential to provide a range of benefits such as cheaper individual fares, reduced congestion and greater utilisation of vehicles, thus reducing emissions.

Issues

TfL is currently considering to what extent, if any, existing private hire regulations should be modified in its application to shared private hire services.

There may also be safety concerns in regard to ride sharing in private hire services, especially late at night.

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?

g) Licensing at temporary events

Background

Numerous annual and temporary events are held in London where guests require an adequate transport provision to get the home.

A growing number of licensed private hire operators have contacted TfL seeking approval to set up a 'temporary operating centre' where they can accept and despatch private hire bookings at an event.

Such events include music festivals, St Patrick's Day celebrations, and other stand alone nightclub events. Locations have included an Aerodrome, public parks, Alexandra Palace, as well as smaller venues such as local pubs.

Issues

Whilst private hire operator's licences are normally granted for a 5 year period, there is provision under the 1998 Act for TfL to issue licences for a shorter period.

Licensed operators wishing to operate from premises not on their licence for a temporary event are currently required to add a new centre to their licence by way of a variation. If granted, the variation will remain on the licence until it expires (unless an operator applies to remove it).

TfL does not want to obstruct proposals or ideas to assist people who may otherwise struggle to get home safely.

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?

h) Notification of convictions / cautions of individuals working for private hire operators such as controllers / despatchers / others

Background

Operators are under an obligation to declare convictions against them to TfL as a condition of their licence.

Concerns have been raised regarding the suitability of individuals working for operators whose roles may include having day to day contact with the public and sensitive knowledge of people's movements.

Issues

TfL is considering what measures could be introduced to prevent unsuitable people from working for operators so as to ensure the safety of users and the public more generally.

Question 12: What are your views on whether TfL should explore establishing controls in this area?

i) The types of premises that constitute a suitable operating centre

Background

The 1998 Act provides that bookings must be accepted at an operating centre specified on an operator's licence. An operating centre is defined as 'premises' at which private hire bookings are accepted by an operator.

The term "premises" is not defined in the 1998 Act.

When assessing the suitability of an operating centre, important considerations include that there is a designated area in which bookings can be taken and appropriate provision to store records.

Issues

Since the introduction of licensing in 2001, TfL has been asked to license a number of different types of premises. We have largely taken the view that if the premises are not permanent they should not be licensed which at the moment would preclude a caravan, tent or temporary structure from being licensed.

TfL has the power to prescribe requirements relating to operating centres and we seek your views on the following.

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?

j) Provision of information by the operator to the passenger prior to the commencement of the journey

Background

A significant proportion of licensed private hire operators provide passengers with details of the driver and vehicle dispatched to carry out their booking e.g. by sending a text message.

Issues

It is often difficult for passengers to find their pre-booked licensed vehicles when exiting from busy late night venues and there is a risk that passengers will enter the wrong vehicle by mistake. If the passenger was given in advance the Vehicle Registration Mark (VRM) and Driver photo ID of the person picking them up, the chances of this happening would be reduced.

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?

k) Notification of changes to operating models

Background

When assessing a new operator licensing application, TfL expects applicants to demonstrate how they will meet the requirements of the 1998 Act and associated regulations in regard to the acceptance of bookings, record keeping, maintaining the appropriate insurances etc.

Issues

With advances in new technology such as use of Smartphone applications to engage customers, operators must be mindful when making any changes to their operating model that they are still required to meet the same requirements under which their licence has been issued. This could be for example in relation to bookings and who, where and how they are accepted as well as ensuring that relevant terms and conditions are consistent with regulatory requirements.

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?

5. Private Hire Drivers

a) Proposal for an English Language Requirement

Background

There is currently no requirement for drivers to be able to speak English, although private hire drivers must pass a topographical skills assessment test which must be conducted in English.

However, the Department for Transport (DfT) has stated that “authorities also may wish to consider whether an applicant would have any problems in communicating with customers because of language difficulties”¹.

Other licensing authorities in the UK have introduced a range of different requirements. Examples of those authorities that have a specific English language requirement are included in Appendix E.

Issues

Concerns have been raised that some London PHV drivers do not have a sufficiently high standard of English to enable them to communicate with their customers. If the driver is unable to communicate with the passenger in an emergency situation then the safety of the passenger could be compromised.

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?

b) Additional skills training

Background

Currently private hire drivers must possess an appropriate level of topographical skills. The testing of topographical skills is carried out externally through approximately 100 topographical skills centres and it includes an ability to plan routes.

Issues

To improve the service provided to passengers and to ensure a consistent standard of service provided by private hire drivers, we are considering the introduction of additional training for private hire drivers. This would be in the format of a tailored training programme covering a range of topics including:

- An overview of private hire legislation
- Disability needs of passengers

¹ DfT’s “Taxi and private hire vehicle licensing: Best practice guidance”, March 2010.

- Health and Safety and First Aid
- Customer care
- Network developments (e.g. road works, large coordinated events)
- Forthcoming consultations or proposed legal changes that may impact them
- Running a small business
- Developments in the industry

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.)?

6. Private Hire Vehicles

a) Vehicle Insurance

Background

The 1998 Act provides that TfL shall grant a vehicle licence if satisfied that 'there is in force in relation to the use of the vehicle a policy of insurance or such security as complies with the requirements of Part VI of the Road Traffic Act 1988'. It is furthermore a prescribed condition of London PHV licences that vehicles are covered to carry passengers for hire and reward.

Issues

The legal requirement to be insured in relation to the "use of the vehicle" under the 1998 Act means use of a vehicle for hire and reward.

This is made clear in the 2004 Regulations which provide that it is a condition of a PHV licence that the owner shall not use that vehicle or permit it to be used as a private hire vehicle to carry passengers for hire and reward without such a policy being in place. In light of this requirement, TfL proposes to check that such a policy is in place at the time of licensing.

Question 20: What are your views on this?

7. Proposals for integration of private hire licensing strands

a) Establishing and maintaining a link between drivers and vehicles on TfL's database

Background

Operators are required to retain records of drivers and vehicles which are available to them for carrying out bookings and such records must be retained and made available for inspection. There is currently no requirement however for operators to upload the details of the drivers and vehicles registered with them to TfL's licensing database.

Issues

Private hire drivers have the flexibility to work for multiple operators and it is difficult at present for TfL to determine which operator a private hire driver is working for at any given time. Consideration is being given as to whether and, if so, how such information may be made available to TfL so as to provide a better understanding of the private hire industry and assist its compliance and enforcement functions.

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?

b) Continued fitness of licensed vehicle when its driver has been revoked

Background

There is no 'fit and proper' requirement for the owners of PHVs and the controls under the 1998 Act relate more to the "fitness" of the vehicle as opposed to the owner's suitability to hold a licence.

Issues

There are concerns relating to the sanctions available where a driver who is also a PHV owner has committed an offence.

An individual may be more likely to drive whilst unlicensed if his PHV licence has not been revoked or suspended due to the contrasting licensing requirements.

It should be noted that a PHV licence can be suspended or revoked "for any reasonable cause" which could include a breach of the owner's obligations as a PHV driver.

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

c) Private hire licence application requirements

Background

Applicants are required to fulfil a range of requirements in order to be a private hire operator, driver or PHV licence holder. These include those prescribed by the 1998 Act as well as the relevant regulations and associated application requirements. TfL is exploring whether these requirements are fit for purpose and invites views on whether any changes should be made.

Issues

Examples of requirements for private hire licensees from the 1998 Act, regulations and ancillary requirements include:

Drivers:

- DBS enhanced criminal records check
- Meet DVLA Group II Medical Guidelines
- Topographical skills assessment (PHV)
- Must have held DVLA / NI / EEA licence for minimum of 3 years
- Must have right to reside and work in UK
- Hire and reward insurance required

Vehicles:

- Subject to an annual licence inspection
- Licence valid for one year
- Two MOTs per annum
- 10 years age limit for PHVs

Operators

- TfL need to be satisfied the individual or the company applying for the licence are 'fit and proper applicant'. This includes taking into consideration any previous convictions, conditions of business repute, previous applications
- Right of abode and to work in the United Kingdom
- Prove they have an appropriate radio licence
- At least one 'operating centre' in London. This is the premises where they will take their bookings.
- Proof of planning permission or a certificate of lawful use for their proposed premises from their local authority.
- A fixed landline telephone number.

TfL has no powers to change application requirements prescribed by the 1998 Act but it does have powers to prescribe additional requirements in the private hire regulations.

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?

d) Acceptance of Postal Orders and cheques as methods of payment

Background

Although no longer promoted, from time to time TfL still receives cheques and postal orders as a method of payment for licence applications. This payment method represents less than one percent of total payments received.

Issues

While the combined total of these payments received is small there is an increase in suspected fraudulent transactions of postal orders and bounced cheques which represent a high proportion of the overall postal order and cheque payment volumes.

Removal of this means of payment would enable TfL to process payments more efficiently and remove the administrative burden of checking and recording of bounced cheques and contacting customers for repayments.

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

8. General

We would like to ensure that respondents to this consultation have the opportunity to provide us with thoughts and suggestions on any aspect of Private Hire Regulations.

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

9. Summary of 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.

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?

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?

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?

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

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?

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?

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]?

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?

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?

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?

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?

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.)?

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

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?

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

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?

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

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

Appendix A - Initial Consultation List

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

- **Private Hire Operators**
- **Private Hire Drivers**

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)

Appendix B - Private Hire Operator Regulations

See www.tfl.gov.uk/cdn/static/cms/documents/phv-london-operators-licences-regulations-2000-statutory-instrument-2000.pdf

Appendix C - Private Hire Driver Regulations

See www.tfl.gov.uk/cdn/static/cms/documents/private-hire-drivers-regulations-2003.pdf

Appendix D - Private Hire Vehicle Regulations

See www.tfl.gov.uk/cdn/static/cms/documents/phv-london-phv-licences-regulations-2004.pdf

Appendix E – English Language Requirements – examples from other Licensing Authorities

Bedford Borough Council

A basic English language assessment, delivered by a Council officer, to determine that applicants have a basic level of proficiency in oral and written English and the ability to accurately give change in sterling. All new applicants have to take the assessment.

The assessment includes questions about the applicant, charging fares and change to be given, identifying street names and understanding of licensing conditions.

Bournemouth Borough Council

Provide evidence of an acceptable NQF Level 2 English literacy qualification or to have completed a BTEC/NVQ qualification in Transporting Passengers by Taxi and Private Hire.

Leeds City Council

All applicants must undertake an English comprehension test. The test is set and run by a recognised training organisation and covers the following key areas:

- Speaking clearly: giving information
- Reading signs and documents
- Writing: transferring information
- Dealing with fares

Leicester City Council

Applicants not born in the UK have to undertake an English assessment that meets the requirement of NQF Entry Level 3. The assessment is delivered by a college of further education independent of the licensing authority.

Manchester City Council

Assessment of basic English and maths including verbal questions and responses; reading and comprehending written English; and mental arithmetic. Currently delivered in-house but MCC are looking to find an external partner to deliver it.

Private Hire Regulations review

**Consultation Report
September 2015**

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Annex 1 – Consultation document and questionnaire

Annex 2 - Analysis of responses by Steer Davies Gleave

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 figures¹).

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.

¹ 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) 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
Stakeholder	13	15	28
Other	71	2435	2506
Email campaign	1428		1428
Total	1512	2450	3962

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
Private Hire trade		
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%
Taxi trade	1140	29.0%
Campaign linked to taxi trade	518	13.2%
Member of public	207	5.3%
Not coded	466	11.8%
Total	3934	100.0%

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 5.1².

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 questions³

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 82% disagree 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?	96% agree 3% disagree 1% don't know
Should the retention period of booking, complaints, lost property and driver, and vehicle records be harmonised?	92% agree 5% disagree 3% don't know

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

³ 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?	96% agree 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?	95% agree 3% disagree 2% don't know
Should operators be required to engage with TfL before changing their operating model?	96% agree 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?	99% agree 1% disagree
Do you consider it appropriate for TfL to introduce new training for private hire drivers?	93% agree 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?	97% agree 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?	99% agree 1% disagree
Do you feel that TfL should stop accepting payment by postal order and cheque?	84% agree 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?	87% agree 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
Total	13	15	28

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

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

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Private Hire Regulations
Review Consultation
Analysis

Report
September 2015

Transport for London

Our ref: 22850901
Client ref:

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- B** **Private hire trade campaign email**
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Executive Summary

Overview

Transport for London (TfL) is the licensing authority and regulatory body for London's taxi and private hire industries. It is the largest licensing authority in the country, being responsible for licensing approximately one third of all taxis and private hire vehicles in England.

Due to a number of developments within the private hire industry, including advances in technology and changes to how people engage and share private hire services, TfL are reviewing the current regulations that govern the licensing of private hire operators, drivers and vehicles.

This consultation set out the requirements that are currently in place for the regulation and licensing of private hire operator, driver and vehicle services in London and invited comments, information and, where appropriate, suggestions for change. Through the consultation, TfL sought to garner the views of those involved in the private hire and taxi trades, users of private hire services and any other interested parties.

Topics covered in the consultation included, but were not limited to: the preservation of booking, vehicle and driver records; in-venue operators; ride-sharing; language requirements; additional training; and insurance. Whilst the consultation outlined specific regulations and invited responses on some possible changes, respondents were also invited to comment on any aspect of the existing regulations or make other suggestions.

Overall consultation findings

In total, there were 3,962 responses to the consultation, including 28 stakeholder responses that have been analysed by TfL in a separate report. This report therefore includes 3,934 responses, as detailed below:

- 2,435 responses received via the online survey portal;
- 1,428 responses received via email from a private hire trade campaign; and
- 71 responses received via email from other parties.

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 1.1¹.

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 TfL should seek to revoke vehicle licences in instances where they have had cause to revoke an individual's driver's licence (99% agree).

¹ The figures in Table 1.1 exclude the private hire trade campaign responses, as these did not answer the closed questions.

Table 1.1: Summary of responses to closed questions²

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 82% disagree 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?	96% agree 3% disagree 1% don't know
Should the retention period of booking, complaints, lost property and driver, and vehicle records be harmonised?	92% agree 5% disagree 3% don't know
Should TfL prescribe requirements relating to operating centres?	96% agree 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?	95% agree 3% disagree 2% don't know
Should operators be required to engage with TfL before changing their operating model?	96% agree 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?	99% agree 1% disagree
Do you consider it appropriate for TfL to introduce new training for private hire drivers?	93% agree 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?	97% agree 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?	99% agree 1% disagree
Do you feel that TfL should stop accepting payment by postal order and cheque?	84% agree 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?	87% agree 5% disagree 8% don't know

² 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 pages 38 and 39 for the analysis of the open responses to this question.

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 ANPR 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 TfL's 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.

More details about responses to the open questions can be found in **Chapter 4**, with full codeframes included in **Appendix C**.

1 Introduction

Background

- 1.1 Transport for London (TfL) is a statutory body established by the Greater London Authority Act 1999 and is the licensing authority and regulatory body for London's taxi and private hire industries. It is the largest licensing authority in the country, being responsible for licensing approximately one third of all taxis and private hire vehicles (PHVs) in England. As at August 2015, TfL licenses and regulates nearly 3,000 private hire operators, 68,000 private hire vehicles and more than 86,000 private hire drivers.
- 1.2 The Private Hire Vehicles (London) Act 1998 (1998 Act), the primary legislation governing private hire services in London, provided for the introduction of 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.
- 1.3 TfL is 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.
- 1.4 TfL has 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.
- 1.5 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 address the questions or issues raised in the consultation.
- 1.6 TfL commissioned Steer Davis Gleave to analyse and report on the responses excluding stakeholders. TfL's main consultation report deals with stakeholder responses.

2 Methodology

The consultation

2.1 The consultation ran from 27 March to 19 June 2015. It was designed to enable TfL 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 TfL is 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.

2.2 The objectives of the consultation were:

- To give stakeholders and the public the background to the regulations in question;
- To help TfL 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.

Who was consulted

2.3 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.

2.4 The initial list of organisations is attached as an Appendix to the full Consultation Report. Individuals and organisations were invited to pass the details on to other organisations.

Consultation material, distribution and publicity

2.5 TfL 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 the TfL consultation web site in the form of a structured questionnaire. It was also available as a downloadable file in PDF format.

- 2.6 An email was sent to stakeholders informing them of the consultation, highlighting key issues being discussed, and including a link to the consultation web site. This information was also promoted on the TfL Taxi and Private Hire (TPH) Twitter feed and email distribution list, and circulated to trade press contacts. A reminder email was sent to stakeholders and the TPH email list two weeks before the close of the consultation.
- 2.7 TfL 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.
- 2.8 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.

Analysis of consultation responses

Introduction

- 2.9 TfL commissioned Steer Davies Gleave to analyse the open and closed responses, excluding stakeholders.

Analysis of responses

- 2.10 The table below sets out the number of responses received to the consultation by how the response was received, excluding specified stakeholder responses.

Table 2.1: Responses received by respondent type and channel

	Online portal	Email	Email (via campaign)	Total
Number of responses	2,435	71	1,428	3,934
Share of responses	61.9%	1.8%	36.3%	100.0%

- 2.11 The responses from respondents who have answered the consultation questions, either through the online portal or by email have been analysed in this report. This includes 2,435 respondents through the online portal and some of the 71 email respondents (as some email respondents did not answer the survey questions). In addition, 1,428 near-identical responses were received via email from private hire drivers in a campaign by their operator. These responses did not answer any of the consultation questions directly. The standard content of this campaign email can be found in [Appendix B](#).
- 2.12 Chapter 3 of this report includes analysis of the profile of all respondents detailed in Table 2.1, a total of 3,934 respondents.
- 2.13 Chapter 4 of this report includes analysis of the responses to open and closed questions received through the online portal and by email, a total of 2,506 respondents.
- 2.14 Code frames which quantify responses to the open questions have been developed. The open questions invited respondents to comment on the proposals and explain the reasons for their responses to the closed questions. A separate codeframe, with themes and individual codes, was developed for each of the open questions, for example for Q3: Insufficient regulation - Better company information required online and in vehicle.

- 2.15 Following agreement of the code frames with TfL, all open responses received were coded. During the coding process it was necessary to add additional codes to the code frames as appropriate. Individual comments were coded to one or many of the codes within the code frame as relevant.
- 2.16 To ensure consistency between individuals' coding responses, the first 50 responses coded by each person were checked. A random check of coding on 5% of the responses was also undertaken.
- 2.17 Copies of the code frames are available in [Appendix C](#).

Analysis of stakeholder responses

- 2.18 Responses from stakeholders were received via TfL's online consultation tool, by email and by letter. Stakeholder's responses were flagged and analysed separately by Transport for London and are not included in this report.

3 Profile of respondents

3.1 This chapter describes the profile of the respondents to the consultation. The chapter analyses the responses to the following questions:

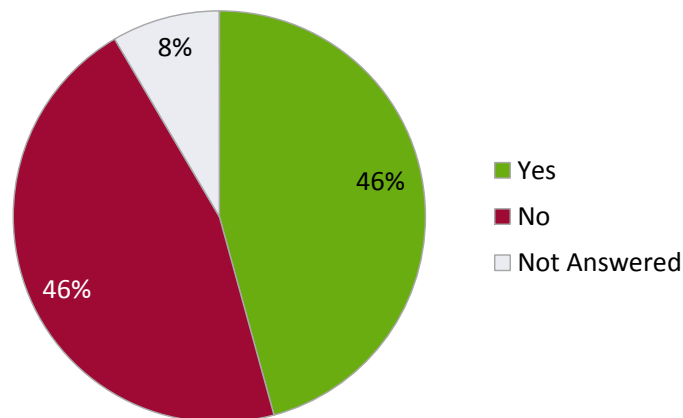
- Are you connected with the private hire trade?
- How did you hear about the consultation?

Connection with the private hire trade

Are you connected with the private hire trade?

3.2 TfL asked respondents whether or not they were connected with the private hire trade. Just under half of all respondents stated that they were connected with the private hire trade, including those who emailed and said they were private hire drivers or operators, as shown in Figure 3.1.

Figure 3.1: Are you connected with the private hire trade?



Sample size: 3,934

3.3 Respondents who completed the online questionnaire were asked which of the following categories³ represented them best:

- Operator

³ A significant number of respondents selected one of these categories and then stated they were part of the Taxi Trade in a later question. These responses have been classified as Taxi Trade.

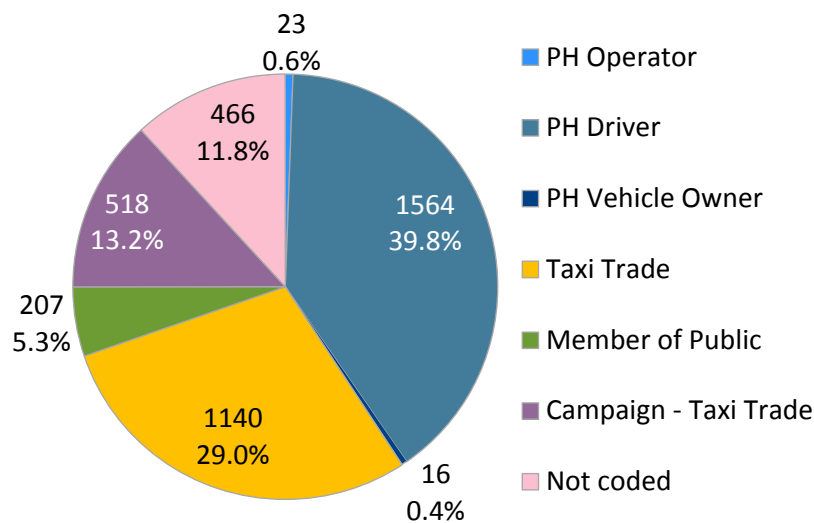
- Vehicle Owner
- Driver
- Other (please specify)

3.4 As there was a high proportion of ‘other’ responses, we have classified the ‘other’ responses using answers to the following questions, as agreed with TfL:

1. Are you connected with the private hire trade – other responses (open question);
2. What is your organisation (open question);
3. Q25: Do you feel that there are any other regulations not covered in this paper that it would be appropriate to review? (open question)⁴; and
4. Email responses were analysed to see if the respondent stated that they had a role in the taxi or private hire trades.

3.5 This process is described in more detail in **Appendix A**. Figure 3.2 shows the proportion of respondents by type. Private hire drivers made up the highest proportion of respondents (40%), including 1,428 responses received via email from a private hire campaign. The second largest group of respondents was the taxi trade with 29% of respondents. It was not possible to identify the respondent type of 12% of responses. The Campaign – Taxi Trade group represents respondents who did not identify themselves as either part of the Private Hire Trade, Taxi Trade or members of the public, but responded with identical text in answer to consultation questions consistent with a Taxi Trade campaign(s).

Figure 3.2: Respondent type



Sample size: 3,934

⁴ This question was used to identify campaign responses which are associated with the Taxi Trade, to classify respondents who did not specify the type of respondent they were in other questions.

How respondents heard about the consultation

How did you hear about the consultation?

- 3.6 Online respondents were asked in an open question how they heard about the consultation. Table 3.1 shows the coding of these responses, including responses received by email. Over one third of respondents heard about the consultation through the private hire trade. The taxi trade informed almost one in five respondents while the media in general (including online and blogs) informed 11% of respondents about the consultation. 8% of respondents heard about the consultation through social media (mostly through Twitter). For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 3.1: How did you hear about the consultation?

Theme	Number of respondents	% of responses
Taxi Trade	760	19.3%
Media	437	11.1%
Social Media	308	7.8%
Word of Mouth	261	6.6%
TfL/GLA	157	4.0%
Email	125	3.2%
Private Hire Trade	1,452 ⁵	36.9%
<i>Not answered</i>	434	11.0%
Total	3,934	100.0%

⁵ The majority of these responses (1,428) were emails from a private hire trade campaign, which did not specifically answer the consultation questions.

4 Regulations review

4.1 This chapter provides detail and analysis of the responses of 2,506 respondents who answered questions asked in the consultation (through Transport for London’s online consultation portal or via email). It excludes the 1,428 responses received via email from private hire drivers in a campaign by their operator, as these responses did not answer any of the consultation questions directly. The table below sets out the number of respondents in each respondent type. It should be noted that not all respondents answered every question.

Table 4.1: Respondents answering consultation questions

Respondent Type	Number of respondents	Share of respondents
Private Hire Operator	23	0.9%
Private Hire Driver	136	5.4%
Private Hire Vehicle Owner	16	0.6%
Taxi Trade	1,140	45.5%
Member of Public	207	8.3%
Campaign – Taxi Trade	518	20.7%
Not coded	466	18.6%
Total	2,506	100.0%

4.2 The questions asked in the online questionnaire were:

- Q1 Do you consider it necessary to make any changes to the current regulation on booking records?
- Q2 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?
- Q3 What are your views on the use of business names and do you consider that current arrangements should be changed?
- Q4 Should operators continue to be allowed to specify an unlimited number of business names on their licence?
- Q5 What is your experience of making complaints about private hire services and have you any suggestions for how current arrangements could be improved?
- Q6 Should the retention period of booking, complaints, lost property and driver, and vehicle records be harmonised?
- Q7 (in relation to Q6) If so, what should the retention period be?
- Q8 What are your views on current arrangements for regulation of in-venue operators and how they may be improved?

- Q9 How are shared private hire services different to exclusive hires and how should this be reflected in the requirements that apply to them?
- Q10 What are your views on licensing of private hire services at temporary events?
- Q11 What changes to the current licensing requirements could be made for TfL to better serve members of the public who attend such events?
- Q12 What are your views on whether TfL should explore establishing controls in the area of employee suitability?
- Q13 Should TfL prescribe requirements relating to operating centres?
- Q14 (in relation to Q13) If so, what requirements for operating centres should be prescribed in the regulations?
- Q15 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?
- Q16 Should operators be required to engage with TfL before changing their operating model and, if so, what is the best way to achieve this?
- Q17 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?
- Q18 Do you consider it appropriate for TfL to introduce new training for private hire drivers and if so, what topics should be covered?
- Q19 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.)?
- Q20 What are your views on the proposal to check that a hire and reward insurance policy is in place at the time of [vehicle] licensing?
- Q21 Should it be mandatory for operators to supply and electronically upload details of their drivers and vehicles to TfL and, if so, how frequently?
- Q22 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?
- Q23 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?
- Q24 Do you feel that TfL should stop accepting payment by postal order and cheque?
- Q25 Do you feel that there are any other regulations not covered in this paper that it would be appropriate to review?

4.3 For each table detailing open responses, respondents' themes are detailed in the first column with key codes under each theme (those with a high number of responses) detailed in the next column. For each theme and key code the number of respondents and share of respondents who provided these comments is detailed. If a respondent makes more than one comment they are counted multiple times.

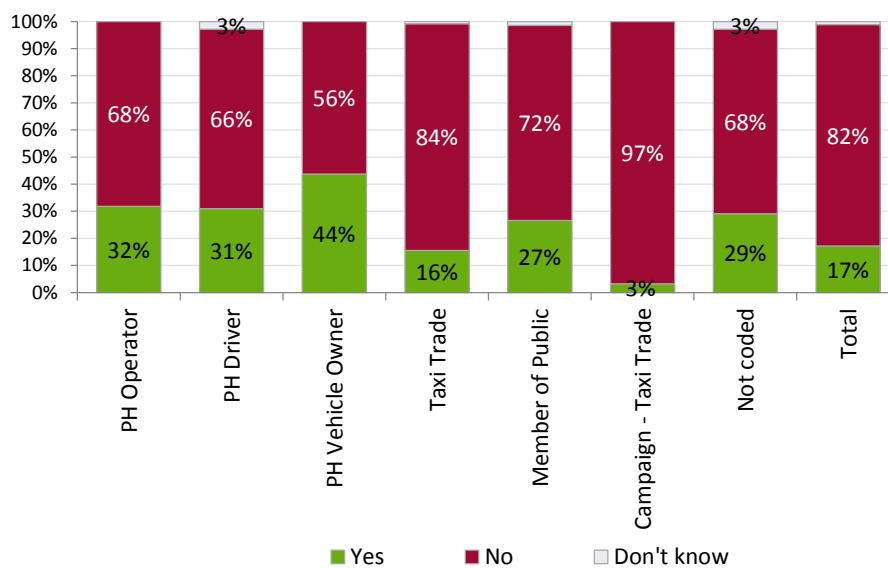
Changes to current regulations on booking records

- 4.4 The consultation detailed Regulation 11 of the 2000 Regulations which provides that, before the commencement of each journey booked at an operating centre specified on his/her licence, an operator shall enter the following particulars of the booking in the record:
- The date on which the booking is made and, if different, the date of the proposed journey;
 - The name of the person for whom the booking is made or other identification of him, or, if more than one person, the name or other identification of one of them;
 - The agreed time and place of collection, or, if more than one, the agreed time and place of the first;
 - The main destination specified at the time of the booking;
 - Any fare or estimated fare quoted;
 - The name of the driver carrying out the booking or other identification of him;
 - If applicable, the name of the other operator to whom the booking has been sub-contracted, and
 - The registered number of the vehicle to be used or such other means of identifying it as may be adopted.
- 4.5 The Regulation was implemented before the introduction of smartphone technology with private hire operators increasingly using “apps” that serve London’s private hire market. The consultation asked respondents whether they thought it necessary to make changes to the current regulation and also whether it is necessary to make it mandatory for an operator to record the main destination for every booking, before the commencement of each journey.

Q1 – Do you consider it necessary to make any changes to the current regulation?

- 4.6 Respondents were asked to respond to the above closed question regarding Regulation 11. Overall, 82% of respondents, when first questioned, did not consider it necessary to make changes to the current regulation. Whilst private hire operators and vehicle owners were most likely to consider it necessary to make changes to the regulation, the majority of these respondents thought that changes were not necessary.

Figure 4.1: Do you consider it necessary to make any changes to the current regulation?

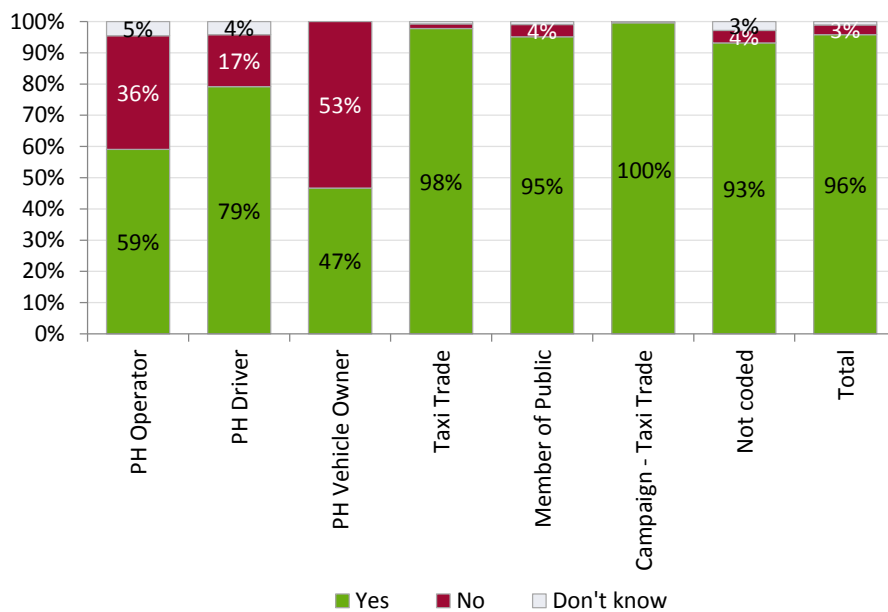


Q2 – In particular do you consider it necessary to make it mandatory for an operator to record the main destination for every booking, before the commencement of each journey?

4.7 Question two asked respondents to consider in more detail whether it was necessary to make it mandatory for operators to record the main destination for every booking, before the commencement of the journey.

4.8 Figure 4.2 shows that, overall, the majority of respondents (96%) considered it necessary to make it mandatory for an operator to record the main destination for every booking, before the commencement of the journey. However, around a third of private hire operators, a quarter of private hire vehicle owners and one in ten private hire drivers disagreed with the proposal.

Figure 4.2: In particular do you consider it necessary to make it mandatory for an operator to record the main destination for every booking, before the commencement of each journey?



4.9 Table 4.2 overleaf shows a summary of the open responses received to this question. Respondents strongly agreed that it was necessary to record the main destination for every booking before the start of the journey with less than 1% of all respondents considering this to be unnecessary. Just under two thirds of respondents commented that they thought current regulations were sufficient.

4.10 For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.2: Do you consider it necessary to make it mandatory for an operator to record the main destination for every booking, before the commencement of each journey?

Theme	Key Codes	Number of respondents	% of respondents
Necessary		1,963	80.4%
	<i>To enable a price to be quoted</i>	1,552	63.7%
	<i>To enable the driver to plan a route</i>	1,522	62.5%
	<i>To protect the personal safety of passengers</i>	228	9.4%
Unnecessary		14	0.6%
Enforcement suggestion		126	5.2%
General suggestion		52	2.1%
<i>Not answered</i>		365	15.0%

Necessary

4.11 More than three quarters of respondents commented that it was necessary to make it mandatory for operators to record the main destination for every booking. The most common reasons included:

- To enable a price to be quoted (64% of respondents);
- To enable the driver to plan a route (63% of respondents); and
- To protect the personal safety of passengers (9% of respondents).

Unnecessary

4.12 Of the 14 respondents who thought that recording the main destination for passengers was unnecessary reasons include:

- Some passengers change their mind about their destination;
- It is not practical; and
- It is not necessary to record the destination before the journey, as it can be recorded after.

Enforcement suggestion

4.13 A number of respondents noted suggestions for enforcing recording journey details. These included enforcement through regular or random checks on operating centres or drivers (2.1% of respondents).

Business names

4.14 Currently there are no restrictions on the number of business names that an operator may have on their licence. Through two open questions respondents were asked whether there should be any changes to this arrangement.

Q3 – What are your views on the use of business names and do you consider that current arrangements should be changed?

4.15 More than 60% of all respondents stated that the current arrangements for business names were not appropriate. This contrasts with less than 5% of respondents who felt that the current arrangements were sufficient. Table 4.3 shows the number of respondents who commented on each theme.

4.16 For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.3: What are your views on the use of business names and do you consider that current arrangements should be changed?

Theme	Key Codes	Number of respondents	% of respondents
Insufficient regulation		1,517	62.3%
	<i>Current regulations insufficient</i>	1,374	56.4%
	<i>Public safety</i>	104	4.3%
	<i>Better company information required online and in vehicle</i>	102	4.2%
Sufficient regulation		100	4.1%
Limit the number of business names		438	18.0%
	<i>Only one business name per licence should be allowed</i>	369	15.1%
Regulations (other)		90	3.7%
Form of business names		87	3.6%
Restrictions/penalties		54	2.2%
<i>Not answered</i>		270	11.1%

Insufficient regulation

- 4.17 More than half of respondents who answered this question stated that the current regulations regarding business names were insufficient. More common specific comments were regarding public safety (104 respondents) and the need for better company information required both in vehicles and on company websites (102 respondents).

Limit the number of business names

- 4.18 Almost one in five respondents noted that there should be a limit to the number of business names per licence. The most common response was only one business name per licence should be allowed (369 respondents). Other respondents noted that a business name should only be allowed to be used on one licence (56 respondents) and there should be a cap on the number of names per licence (23 respondents).

Regulations (other)

- 4.19 Better legislation was noted to be required by 73 respondents, with new technologies such as Uber specifically mentioned.

Form of business names

- 4.20 Respondents noted that business names should not be ambiguous/confusing (54 respondents) with 24 respondents commenting that business names should not be allowed to imply that Hackney cab services are available.

Restrictions/penalties

- 4.21 Thirty five respondents suggested that if business names are changed, a new licence should be required.

Q4 – Should operators continue to be allowed to specify an unlimited number of business names on their licence?

- 4.22 More than 90% of respondents stated that operators should not be able to continue to specify unlimited names on their licence. The most common reason for this was that having multiple

names was confusing for the public (1,532 respondents). It was also noted that multiple names can be an issue for public safety (84 respondents) and can make operators difficult to trace (51 respondents).

4.23 Only 30 respondents (1% of respondents) thought that operators should continue to be allowed to specify an unlimited number of names, provided they are:

- Held accountable;
- There are no other operators with the same name.

4.24 Table 4.4 shows the number of respondents who commented on each theme. For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.4: Should operators continue to be allowed to specify an unlimited number of business names on their licence?

Theme	Key Codes	Number of respondents	% of respondents
No		2,207	90.6%
	<i>Multiple names is confusing for the public</i>	1,532	62.9%
	<i>Public safety</i>	84	3.4%
	<i>Operators can be difficult to trace</i>	51	2.1%
Yes		30	1.2%
<i>Not answered</i>		199	8.2%

Complaints

4.25 Respondents were asked about their experiences making complaints about private hire services and whether they had any suggestions for improving current arrangements.

Q5 – What is your experience of making complaints about private hire services and have you any suggestions for how current arrangements could be improved?

Table 4.5 shows popular responses to this question. The most common responses include that complaints should be shared with TfL (1,399 respondents), that complaints about drivers should be made directly to the operator (1,327 respondents), that better information about how to complain about services should be available on or in private hire vehicles (1,298 respondents) and comments that taxi trade organisations often receive complaints about private hire services (1,231 respondents).

4.26 For a complete list of the key codes, please see [Appendix C](#).

Table 4.5: What is your experience of making complaints about private hire services and have you any suggestions for how current arrangements could be improved?

Key Codes	Number of respondents	% of respondents
Complaints should be shared with TfL	1,399	57.4%
Complaints about drivers should be made directly to operators	1,327	54.5%
Better information on/in vehicles e.g. how to complain	1,298	53.3%
PH complaints are received by Taxi Trade Association	1,231	50.5%
TfL should investigate complaints, not the operators	263	10.8%
Improved monitoring, regulation and enforcement	107	4.4%
Ability to provide feedback online including photos e.g. app or section on TfL website	100	4.1%
Required to have a UK -based office and/or contact methods	87	3.6%
Difficulties contacting operators/making complaints e.g. Uber	69	2.8%
Complaints not taken seriously/ignored	54	2.2%
TfL aren't interested in/ignore complaints about private hire	54	2.2%
<i>Not answered</i>	323	13.3%

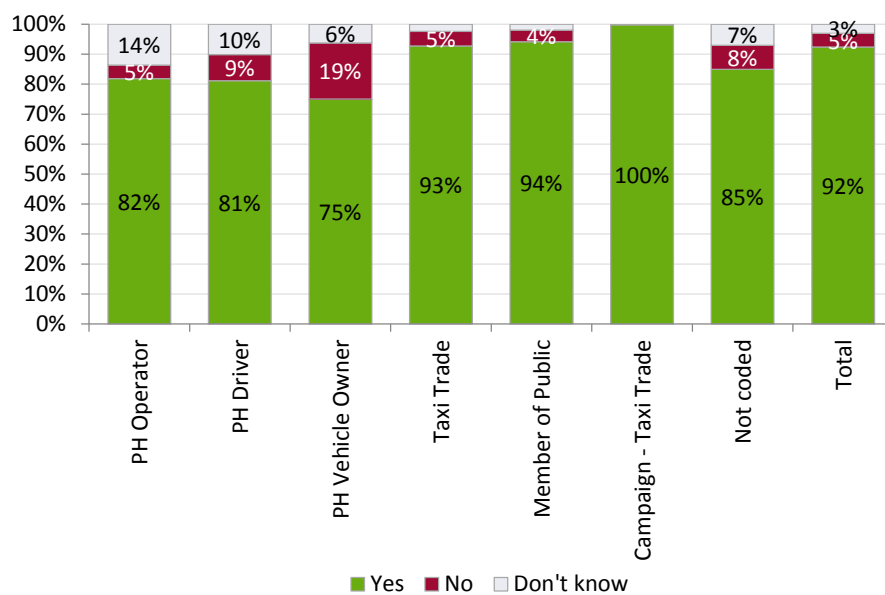
Booking retention period

4.27 Respondents were asked two questions regarding booking records, a closed question as to whether the retention period of booking, complaints, lost property, driver and vehicle records should be harmonised and an open question as to what the retention period should be.

Q6– Should the retention period of booking, complaints, lost property and driver, and vehicle records be harmonised?

4.28 The chart in Figure 4.3 shows that respondents are generally very positive to the proposal to harmonise retention periods with relatively little variation by respondent type.

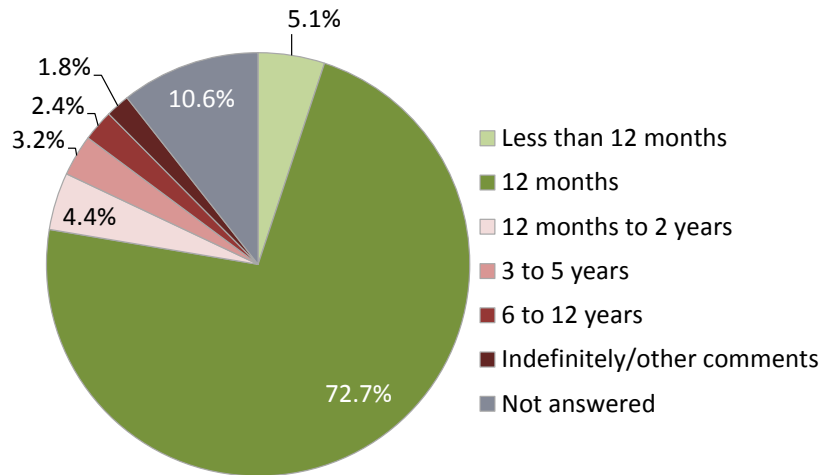
Figure 4.3: Should the retention period of booking, complaints, lost property and driver, and vehicle records be harmonised?



Q7 – If so, what should the retention period be?

4.29 Respondents were asked in an open question how long they thought the retention period should be. Figure 4.4 shows the majority of respondents (73%) thought that records should be held for a period of 12 months. It should be noted that very few respondents made a distinction between the retention period for different types of records.

Figure 4.4: What should the retention period be?



In-venue operations

4.30 To facilitate the provision of safe travel for those attending nightclubs and other late night entertainment venues, TfL has allowed private hire operating centres to be licensed for such venues. The consultation asked respondents for their views on current arrangements for regulation of in-venue operators.

Q8 – What are your views on current arrangements for regulation of in-venue operators and how they may be improved?

4.31 The majority of respondents (83%) were not supportive of current regulation of in-venue operators. Only 15 respondents were supportive of the current regulations. Whilst just over half of these individuals were connected with the private hire trade, they represented a small proportion of all respondents connected with the private hire trade who answered the question, the majority of whom were not supportive of current regulation. Table 4.6 shows the themes that were mentioned by respondents and the number of respondents noting each theme.

4.32 For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.6: What are your views on current arrangements for regulation of in-venue operators and how they may be improved?

Theme	Key Codes	Number of respondents	% of respondents
Not supportive		2,020	82.9%
	<i>Encourage plying for hire/touting</i>	1,729	71.0%
	<i>Confusing for public</i>	1,428	58.6%
	<i>Satellite offices difficult to police</i>	1,360	55.8%
	<i>Contrary to the intention of the 1998 Act</i>	1,341	55.0%
	<i>Stop in-venue operations</i>	252	10.3%
	<i>Public safety at risk</i>	144	5.9%
	<i>Arrangements open to abuse</i>	65	2.7%
Supportive		15	0.6%
Greater regulation/limits		244	10.0%
	<i>Provide stricter regulation/enforcement</i>	198	8.1%
Suggestion		175	7.2%
	<i>Dedicated booking area</i>	57	2.3%
	<i>Provide taxi ranks outside these venues</i>	51	2.1%
Don't know		4	0.2%
<i>Not answered</i>		185	7.6%

Not supportive

4.33 Key reasons for the 83% of respondents who were not supportive of current regulation included:

- Current regulations encourage plying for hire or touting (1,729 respondents);
- Current regulations are confusing for the public (1,428 respondents);
- Satellite offices are difficult to police (1,360 respondents); and
- Current regulations are contrary to the 1998 Act (1,341 respondents).

Supportive

4.34 Fifteen respondents were supportive of the current arrangements with comments including the important role that in-venue operators have in getting passengers home safely, reducing noise disturbance to local residents and the time/convenience benefit for customers.

Greater regulation/limits

4.35 One in ten respondents commented that the current arrangements needed greater regulation or limits. In particular, 198 respondents (8%) stated that stricter regulation or enforcement was required.

Suggestion

4.36 A number of respondents added suggestions to improve the current situation. Most common suggestions included having a dedicated booking area at the venue, for example a licensed office inside the venue (57 respondents) and providing taxi ranks at venues (51 respondents).

Shared services

4.37 Respondents were asked their views about shared private hire services, how they are different from exclusive hires and how this should be reflected in the requirements that apply to them.

Q9 – How are shared private hire services different to exclusive hires and how should this be reflected in the requirements that apply to them?

- 4.38 A high proportion of respondents (2,005 respondents, or 82%) stated that they were against shared private hire services, with only 29 respondents supportive of shared private hire services. Table 4.7 shows the themes mentioned by respondents to this question.
- 4.39 For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.7: How are shared private hire services different to exclusive hires and how should this be reflected in the requirements that apply to them?

Theme	Key Codes	Number of respondents	% of respondents
Against sharing		2,004	82.3%
	<i>Problems of safety/security/disputes</i>	1,836	75.4%
	<i>Reliance on satellite navigation</i>	1,400	57.5%
	<i>Issues that do not apply to exclusive hirings</i>	1,389	57.0%
	<i>PH drivers not sufficiently trained/equipped</i>	73	3.0%
	<i>Against – no further reason</i>	69	2.8%
For sharing		28	1.1%
Comment		86	3.5%
Suggestion		79	3.2%
Query		3	0.1%
Don't know		13	0.5%
<i>Not answered</i>		281	11.5%

Against sharing

- 4.40 Amongst those respondents who were against shared private hire services the most common reasons were concern about safety, security and disputes (1,836 respondents) and concern about reliance on satellite navigation (1,400 respondents). Respondents also noted that for shared services there were potential issues which did not apply to exclusive hiring such as charging structures, compliance and record keeping (1,389 respondents).

For sharing

- 4.41 Those people who were supportive of sharing suggested that it would enable passengers to save money and that it would potentially be as safe, or safer, than public transport options.

Temporary events

- 4.42 Respondents were asked their views about the licensing of private hire services at temporary events, for example music festivals and stand-alone sporting events.

Q10 – What are your views on licensing of private hire services at temporary events?

- 4.43 Overall, respondents were not in favour of current licensing arrangements for private hire services at temporary events with more than three quarters of respondents providing comments that were categorised as 'not supportive'. By comparison, only 35 respondents (1.4%) were in favour of current arrangements. Table 4.8 shows the themes mentioned by respondents to this question.
- 4.44 For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.8: What are your views on licensing of private hire services at temporary events?

Theme	Key Codes	Number of respondents	% of respondents
Not supportive		1,902	78.1%
	<i>Encourages immediate hires/touting</i>	1,633	67.0%
	<i>Results in rank of private hire vehicles</i>	1,445	59.3%
	<i>Can pre-order minicab in normal way</i>	161	6.6%
	<i>Temporary licences should not be allowed</i>	90	3.7%
	<i>Undermines law</i>	88	3.6%
Supportive		35	1.4%
Enforcement		1,463	60.1%
	<i>Difficult to police</i>	1,423	58.4%
Suggestion		262	10.8%
	<i>Temporary ranks for taxis, with marshal</i>	124	5.1%
Unfair Market		133	5.5%
	<i>Discriminates against black cabs</i>	117	4.8%
Safety	<i>Puts public safety at risk</i>	85	3.5%
Congestion		25	1.0%
Accessibility		5	0.2%
Don't know		5	0.2%
<i>Not answered</i>		162	6.7%

Not supportive

4.45 For the 78% of respondents who noted that they were not supportive of the current licensing of private hire at temporary events the most popular comment was that the current arrangements encourage immediate hires or touting at events (1,633 respondents). Respondents also commented that the current arrangements can effectively result in ranks of private hire vehicles at venues (1,445 respondents).

4.46 Other comments included that the public could alternatively pre-order a minicab in the normal way (161 respondents), that temporary licences should not be allowed (90 respondents) and that current arrangements undermine the law (88 respondents).

Supportive

4.47 Of those respondents who were in support, they vast majority didn't offer any other qualifying statements although there was some sentiment that licensing private hire services at temporary events should only be for large events and not clubs/pubs. Whilst a third of those who were in support were individuals connected with the private hire trade, they represented a small proportion of all respondents connected with the private hire trade who answered the question, the majority of whom were not supportive of the current licensing arrangements.

Enforcement

4.48 The most common comment regarding enforcement was that current arrangements are difficult to police (1,423 respondents).

Suggestion

- 4.49 There was a range of suggestions from respondents regarding private hire licensing at temporary events. The most common comment was that there should be temporary ranks at events for taxis with marshals (124 respondents).

Q11 – What changes to the current licensing requirements could be made for TfL to better serve members of the public who attend such events?

- 4.50 Table 4.9 shows the themes mentioned by respondents to this question. Overall the most common response was that changes should be made to *operations* for providing private hire at events, with this theme mentioned by almost three quarters of respondents.
- 4.51 For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.9: What changes to the current licensing requirements could be made for TfL to better serve members of the public who attend such events?

Theme	Key Codes	Number of respondents	% of respondents
Operations		1,785	73.3%
	<i>PH operators able to advertise their services prior to events by arrangement with the organisers</i>	1,427	58.6%
	<i>Separate, temporary ranks for taxis</i>	198	8.1%
	<i>Temporary events should be policed by enforcement officers</i>	109	4.5%
	<i>Separate waiting areas for Private Hire Vehicles</i>	53	2.2%
Regulations		1,646	67.6%
	<i>No change to licensing is required</i>	1,598	65.6%
Enforcement		102	4.2%
	<i>Touting should be more rigorously policed</i>	58	2.4%
Awareness		56	2.3%
Suggestion		12	0.5%
Don't know		8	0.3%
<i>Not answered</i>		309	12.7%

Operations

- 4.52 Over half of respondents to this question stated that private hire operators are able to advertise their services prior to events by arrangement with the organisers, potentially via the online ticket ordering process (1,427 respondents). This comment was invariably paired with the most common statement listed under the Regulations theme: that no change to licensing is required.
- 4.53 Other comments included that there should be separate, temporary ranks for taxis (198 respondents), that temporary events should be policed by enforcement officers and marshals (109 respondents) and that there should be separate waiting areas for pre-booked vehicles (53 respondents).

Regulations

- 4.54 As mentioned above, the most common statement relating to regulations was that no change to the current licensing arrangements is required (1,598 respondents).

Enforcement

- 4.55 The policing and prevention of touting was the most popular enforcement concern, mentioned by 58 respondents.

Convictions and employee suitability

- 4.56 As a condition of their licence, operators are under an obligation to declare any individuals with convictions against them to TfL. Concerns have been raised regarding the suitability of individuals working for operators whose roles may include having day to day contact with the public and sensitive knowledge of people's movements. Respondents were therefore asked for their views on TfL introducing new measures to prevent unsuitable people from working for operators.

Q12 – What are your views on whether TfL should explore establishing controls in the area of employee suitability?

- 4.57 The majority of respondents were supportive of TfL's proposal to establish controls around employee suitability, particularly for safety reasons. Table 4.10 overleaf shows the themes mentioned by respondents to this question.
- 4.58 For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.10: What are your views on whether TfL should explore establishing controls in the area of employee suitability?

Theme	Key Codes	Number of respondents	% of respondents
Supportive – safety		1,967	80.7%
	<i>All staff to be checked via DBS⁶ enquiry</i>	1,740	71.4%
	<i>Private hire operators and control room staff are privileged to sensitive information</i>	1,428	58.6%
	<i>Safety of travelling public</i>	80	3.3%
	<i>Better background checks required (unspecified type)</i>	55	2.3%
	<i>If operator/staff cannot provide full background information, they should not have a licence</i>	52	2.1%
Supportive – general	<i>General support for establishing controls</i>	179	7.3%
Supportive – regulations		170	7.0%
	<i>Controls should be consistent with those applied to taxi drivers</i>	76	3.1%
	<i>Staff must have been resident in the UK for a minimum number of years before being granted a licence</i>	67	2.8%
Supportive – enforcement		59	2.4%
Supportive – additional tests		35	1.4%
Supportive – operations		5	0.2%
Not supportive		29	1.2%
Other		8	0.3%
Don't know		2	0.1%
<i>Not answered</i>		175	7.2%

Supportive - safety

- 4.59 The most common assertion in response to this question was that all private hire staff should be checked via a Disclosure and Barring Service (DBS, formerly the Criminal Records Bureau) enquiry (1,740 respondents).
- 4.60 Other comments included the statement that private hire operators and control room staff are privileged to sensitive information (1,428 respondents), that public safety is important (80 respondents), that better background checks are required in general (55 respondents) and that if operators/staff cannot provide full background information, they should not receive a licence (52 respondents).

Supportive - regulations

- 4.61 Introducing controls that are consistent with those required for taxi drivers was the most common comment under the regulations theme (76 respondents). A similar number of respondents thought that staff should have to be resident in the UK for a minimum number of

⁶ Disclosure and Barring Service (DBS) – previously Criminal Records Bureau (CRB).

years before being allowed to work in the private hire industry (67 respondents). Frequently mentioned minimum durations of residency were three and five years.

Not supportive

4.62 There were 29 respondents who were not supportive with a number saying that these controls are not TfL’s responsibility and others suggesting the police should undertake any checks.

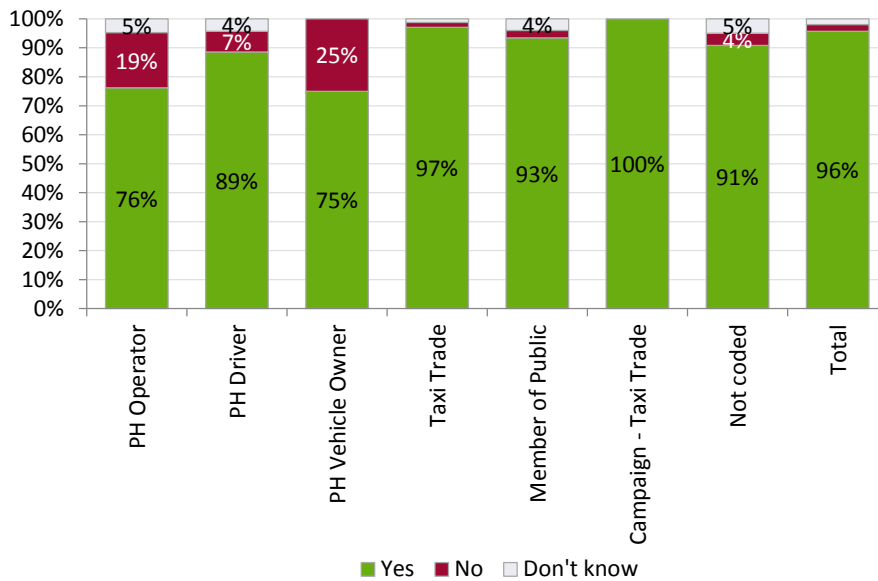
Premises

4.63 The 1998 Act provides that bookings must be accepted at an operating centre specified on an operator’s licence. An operating centre is defined as a “premises” at which private hire bookings are accepted by an operator. The term “premises” is not defined in the 1998 Act. Since the introduction of licensing in 2001, TfL has been asked to license a number of different types of premises. TfL has largely taken the view that if the premises are not permanent they should not be licensed, which would preclude a caravan, tent or temporary structure from being licensed. TfL has the power to prescribe requirements relating to operating centres and sought respondents’ views on this via the following two questions.

Q13 – Should TfL prescribe requirements relating to operating centres?

4.64 As shown in Figure 4.5, the majority of respondents (96%) were in favour of TfL prescribing requirements relating to operating centres. Private hire operators and vehicle owners were most likely to disagree with this proposal.

Figure 4.5: Should TfL prescribe requirements relating to operating centres?



4.65 Respondents were then asked the following open question.

Q14 – If so, what requirements for operating centres should be prescribed in the regulations?

4.66 Table 4.11 overleaf shows a summary of the responses received to this question. The main response was that operating centres should be based at permanent premises (more than three quarters of respondents). For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.11: What requirements for operating centres should be prescribed in the regulations?

Theme	Key Codes	Number of respondents	% of respondents
Premises		1,963	80.6%
	<i>All operating centres should be permanent structures</i>	1,893	77.7%
	<i>All operating centres should be of suitable design and size for number of employees</i>	1,365	56.0%
	<i>Operating centres should be permanent to allow complaints to be traced back</i>	63	2.6%
Technology		1,564	64.2%
	<i>All operating centres should have fixed landline</i>	1,559	64.0%
Regulations		1,471	60.4%
	<i>All operating centres should have necessary local authority planning permission/health and safety regulations</i>	1,451	59.6%
Location		52	2.1%
	<i>Operating centres should be based in UK / London / city in which they primarily operate</i>	51	2.1%
Operations		121	5.0%
No change required		28	1.1%
Enforcement		23	0.9%
No requirements		2	0.1%
Other		1	<0.1%
Don't know		6	0.2%
<i>Not answered</i>		283	11.6%

Premises

- 4.67 Over 80% of respondents made comments related to premises with 1,893 respondents (78%) recommending that operating centres should be a permanent structure. Over half of all respondents (1,365 or 56%) felt that operating centres should be suitably designed for the number of people that would be working there.

Technology

- 4.68 The primary comment, from 1,559 respondents, was that operating centres should be required to have a fixed landline.

Regulations

- 4.69 Just under 60% of respondents made a comment relating to regulations, with 1,451 suggesting that operating centres should have to receive planning permission from the local authority and adhere to health and safety regulations.

Location

- 4.70 A small number of respondents (51) stated that a company's operating centre should be based where they do business i.e. London private hire operators should have an operating centre in London.

Operations

- 4.71 The most common comment under the operations theme was that all booking records should be stored effectively and safely (43 respondents), followed by the assertion that all operating centres should be able to receive customers and have a place for them to wait (32 respondents).

No change required

- 4.72 Of the 28 respondents who were happy with the existing requirements for operating centres, some respondents stated that current rules should be enforced and a limited number of suggestions for additional requirements such as all bookings being taken through the centre or offering a different licence for chauffeuring premises.

Enforcement

- 4.73 Twenty three respondents suggested that TfL should be carrying out regular compliance checks and inspections on operating centres.

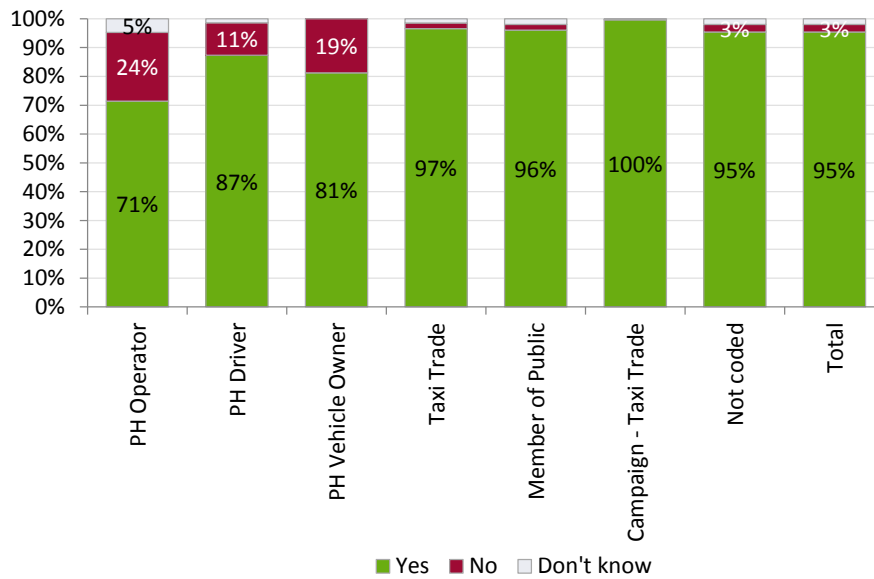
Provision of information prior to a journey

- 4.74 It is often difficult for passengers to find their pre-booked licensed vehicles when exiting from busy late night venues and there is a risk that passengers will enter the wrong vehicle by mistake. Respondents were therefore asked their views on whether customers should automatically be provided with driver and vehicle details via text or e-mail, having supplied their mobile phone number or e-mail address.

Q15 – 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?

- 4.75 Respondents were presented with both closed response options and an open text box to answer this question. Figure 4.6 shows the responses to the closed options and that, overall, 95% of respondents agreed with the proposal. A quarter of private hire operators did not agree with the proposal.

Figure 4.6: 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?



4.76 Table 4.12 shows a summary of the open responses received to Q15. As with the closed question, the majority of respondents were in favour of the proposal with only 30 respondents (1.2%) disagreeing.

4.77 For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.12: 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?

Theme	Key Codes	Number of respondents	% of respondents
Agree		1,841	75.6%
	<i>Vehicle information e.g. registration, colour, make etc.</i>	1,475	60.6%
	<i>Full details of driver should be provided (e.g. name, telephone number)</i>	1,442	59.2%
	<i>Photo of driver should be provided</i>	1,434	58.9%
	<i>The responsibility should be with the operator to record/provide information</i>	1,405	57.7%
	<i>Private hire licence details should be provided</i>	1,357	55.7%
	<i>Would contribute to overall safety and enforcement</i>	131	5.4%
	<i>Agree - no further comment</i>	82	3.4%
	<i>Details needed to prevent touting</i>	58	2.4%
Disagree		30	1.2%
Operations		104	4.3%
Suggestion		30	1.2%
Abuse of system		26	1.1%
Enforcement		6	0.2%
<i>Not answered</i>		467	19.2%

Agree

- 4.78 For the 76% of people who were in agreement with this proposal, the main comments concerned the types of information that should be provided to passengers. The most popular were vehicle details (1,475 respondents), followed by driver details (1,442 respondents) and driver photo (1,434 respondents). A common sentiment was that information provision should be the responsibility of the operator rather than the driver (1,405 respondents).

Disagree

- 4.79 Of those respondents who disagreed, some suggested that drivers shouldn't be provided with personal details of any passenger or that it would be very expensive for small operators to introduce such a system. Other suggested that it was simply too bureaucratic or unnecessary.

Operations

- 4.80 33 respondents stated that, with regard to operations, such information would result in less confusion over which minicab was for which individual. Ten respondents also pointed out that such a system is already in place for certain private hire companies.

Suggestion

- 4.81 A number of respondents offered alternative suggestions for the proposal. The most popular suggestion was that the requirement to send a photo of the driver should be removed due to fears they could be misused e.g. on social media and compromise driver safety.

Abuse of system

- 4.82 Just over 1% of respondents were concerned about such a system being abused by either the operator or the driver, for example through the sharing of driver IDs and/or licences.

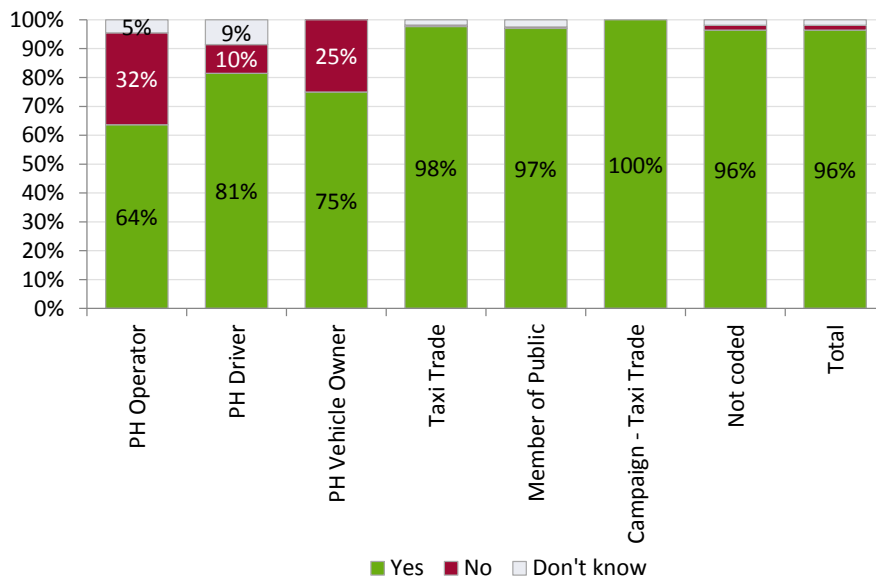
Changes to operating models

- 4.83 In light of advances in new technology, such as use of smartphone applications to engage customers, respondents were asked the following closed question.

Q16 – Should operators be required to engage with TfL before changing their operating model and, if so, what is the best way to achieve this?

- 4.84 Overall, 96% of respondents thought that operators should be required to engage with TfL before changing their operating model. Private hire operators and vehicle owners were less likely to consider it necessary for operators to engage with the regulator prior to changing their operating model.

Figure 4.7: Should operators be required to engage with TfL before changing their operating model?



4.85 Respondents were asked an open question on what might be the best way to engage with operators that are considering changing their operating model.

4.86 Table 4.13 shows a summary of the responses received to this question. For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.13: Should operators be required to engage with TfL before changing their operating model? If so, what is the best way to achieve this?

Theme	Key Codes	Number of respondents	% of respondents
Supportive		1,697	69.7%
	<i>TfL to detail the processes and terms of reference</i>	1,389	57.0%
	<i>TfL should receive notice from operator prior to any change</i>	157	6.4%
Not supportive		31	0.4%
Regulations		1,568	64.4%
	<i>All proposed changes must comply with 1998 Act and various Cab Acts</i>	1,439	59.1%
	<i>Provide stricter regulation/enforcement</i>	75	3.1%
Comment		95	3.9%
	<i>Comment about apps/e-hailing</i>	62	2.5%
Suggestion		26	1.1%
Don't know		6	0.2%
Not answered		429	17.6%

Supportive

4.87 For the 70% of respondents who noted that they were supportive of engagement, the most popular comment was that TfL should set down clear procedures detailing the processes for changing an operating model and the terms of reference (1,389 respondents). Respondents were also in favour of operators giving TfL notice of any changes that they plan to make to their operating models (157 respondents).

Not supportive

- 4.88 There were 31 respondents who were not supportive of this proposal. They felt that either the operator should be responsible for ensuring the model complies with the regulation or that operators should be able to make any changes they like provided they are within the regulatory framework. However, other suggested that operators shouldn't be allowed to change the conditions of their licence at all.

Regulations

- 4.89 The most common comment regarding regulations was that any changes proposed by an operator to their operating model must comply with the 1998 Act and various other Cab Acts (1,439 respondents). Seventy five respondents (3%) commented that stricter regulation or enforcement was required.

Comment

- 4.90 A number of respondents (65) made comments about the existence of smartphone apps, their legal status and operators that use them.

Suggestion

- 4.91 The most common suggestion (11 respondents) was that TfL should consult with the public, the private hire/taxi trade and/or legal experts on any changes to an operator's operating model.

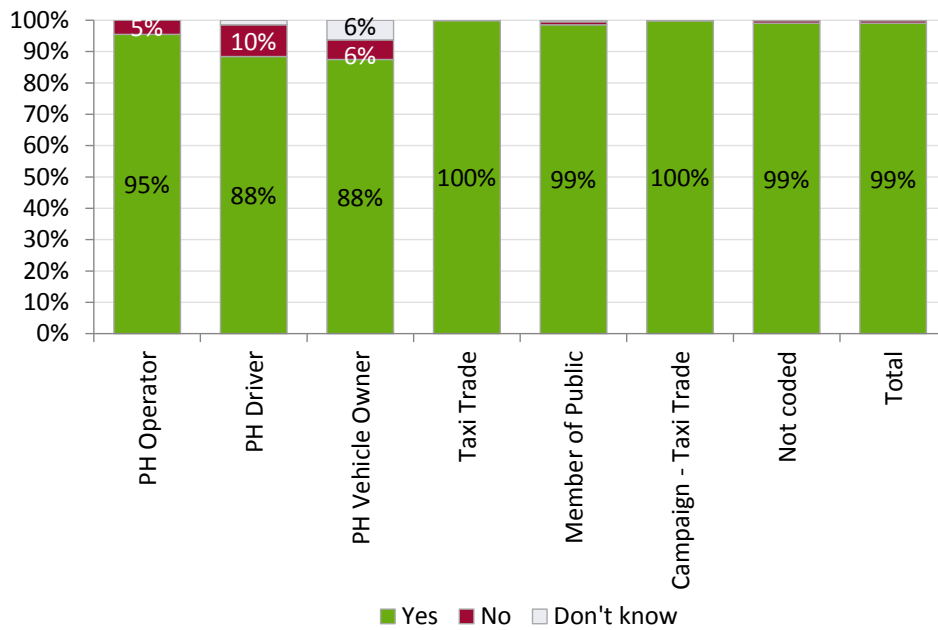
English language skills

- 4.92 There is currently no requirement for private hire drivers to be able to speak English and concerns have been raised that some drivers do not have a sufficiently high standard of English to enable them to communicate with their customers. Respondents were therefore asked the following closed question.

Q17 – Do you consider that TfL should introduce a requirement for private hire driver applicants to be able to speak English to a certain standard?

- 4.93 As shown in Figure 4.8 overleaf, there was almost unanimous agreement that TfL should introduce an English language requirement for private hire drivers.

Figure 4.8: Do you consider that TfL should introduce a requirement for private hire driver applicants to be able to speak English to a certain standard?



4.94 This closed question was followed up with an open question as below.

Q17 – If so, what should this requirement be and what criteria should we set to determine how applicants meet it?

4.95 Table 4.14 shows a summary of the responses received to this question, themed, in the first instance, according to how respondents answered the closed question (Yes/No). A further category, ‘Other’, is included to cover comments related to the process of assessing language capability.

4.96 For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.14: 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 the English language requirement be and what criteria should we set to determine how applicants meet it?

Theme	Key Codes	Number of respondents	% of respondents
Yes		2,202	90.4%
	<i>Ability to communicate essential, especially to public safety</i>	1,531	62.8%
	<i>English language qualification to at least NQF Level 3</i>	1,359	55.8%
	<i>Regular auditing process to ensure consistency and uniformity in standards</i>	1,291	53.0%
	<i>Fluency/good/conversational level of English required</i>	216	8.9%
	<i>Written and/or verbal assessment</i>	104	4.3%
	<i>All drivers should be tested for language skills (method and level unspecified)</i>	100	4.1%
	<i>Drivers should possess English language qualification (level unspecified)</i>	59	2.4%
No		15	0.6%
Other		129	5.3%
	<i>Test should be conducted by TfL/independent of operator</i>	62	2.5%
	<i>Assessment must be done face to face</i>	55	2.3%
Don't know		3	0.1%
Not answered		179	7.3%

Yes

- 4.97 For the 90% of respondents who were supportive of an English language requirement for drivers, the most popular comment was that the ability to communicate is essential, especially to public safety (1,531 respondents). With regard to the level of requirement, the most popular comment was that drivers should be qualified to at least National Qualification Framework (NQF) Level 3, which is equivalent to AS/A Level, NVQ Level 3 or BTEC Diploma Level 3 (1,359). Respondents also commented that there should be regular auditing processes to ensure consistency and uniformity in standards (1,291 respondents).

No

- 4.98 For those respondents who said no, there were suggestions that this should be left to market forces whilst others thought the driving test or first aid training were more important. Others suggested that the proposal amounted to indirect discrimination or put deaf drivers at a disadvantage. Whilst those who said no were most likely to be individuals connected with the private hire trade, they represented a small proportion of all respondents connected with the private hire trade who answered the question, the majority of whom were supportive of an English language requirement for drivers.

Other

- 4.99 The most common comment regarding the language assessment process was that all tests should be conducted by TfL or a third party i.e. independently of the operator (62 respondents). Respondents were also keen for assessments to be done face to face, rather than online, to prevent fraud (55 respondents).

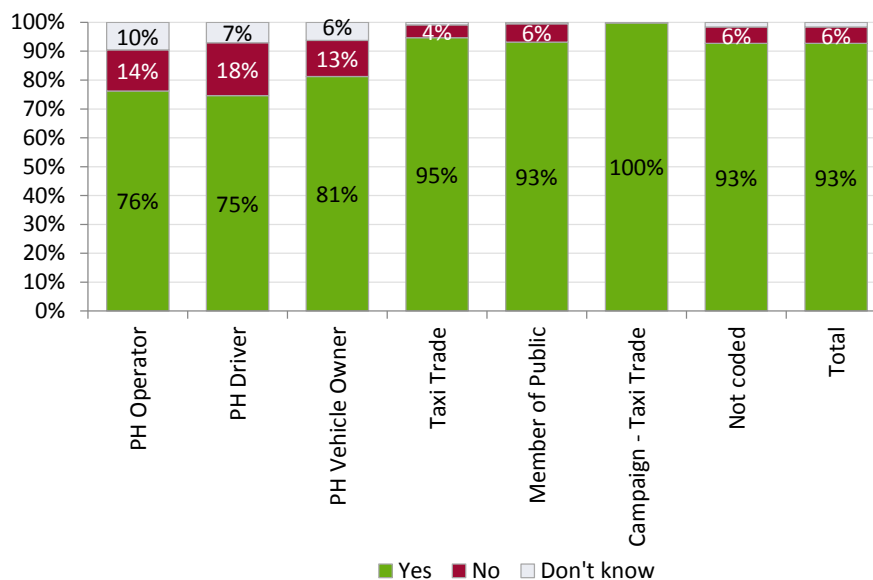
Skills training

4.100 Currently, private hire drivers must possess an appropriate level of topographical skills. To improve the service provided to passengers and to ensure a consistent standard of service provided by private hire drivers, TfL are considering the introduction of additional training for private hire drivers. Respondents were asked to answer both a closed and an open question in relation to this topic.

Q18 – Do you consider it appropriate for TfL to introduce new training for private hire drivers and if so, what topics should be covered?

4.101 As shown in Figure 4.9, the majority of respondents (93%) agreed that TfL should introduce new training for private hire drivers. Private hire operators and drivers were less likely to agree with the proposal, although support didn't fall below 75% amongst any respondent type. It should be noted that, in addition to the responses reported here, the emails submitted by drivers as a campaign by a private hire operator gave support to keeping the standard of private hire drivers high.

Figure 4.9: Do you consider it appropriate for TfL to introduce new training for private hire drivers?



4.102 This support was also captured in responses to the open question where it was clear that respondents were overwhelmingly in favour of new training: only 63 respondents (2.6%) were not in support, compared to almost 90% of respondents in favour. Table 4.15 shows a categorised summary of the responses received to this question. For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.15: Do you consider it appropriate for TfL to introduce new training for private hire drivers and if so, what topics should be covered?

Theme	Key Codes	Number of respondents	% of respondents
Yes		2,096	86.0%
	<i>Disability awareness and handling training</i>	1,678	68.9%
	<i>Better topographical knowledge/testing</i>	1,574	64.6%
	<i>Enhanced driving test (similar to that required for taxi drivers)</i>	1,560	64.0%
	<i>Knowledge of basic PH regulations/legislation</i>	1,552	63.7%
	<i>Numeracy skills</i>	1,339	55.0%
	<i>Incorporate training into a Vocational Related Qualification (VRQ)</i>	1,315	54.0%
	<i>Requirement to undertake NVQ Level 2 within 3 years of being licensed</i>	1,295	53.2%
	<i>Health and safety/first aid</i>	189	7.8%
	<i>Customer care</i>	164	6.7%
	<i>Running a small business</i>	139	5.7%
	<i>Forthcoming consultations or proposed legal changes that may impact trade</i>	134	5.5%
	<i>Network developments</i>	132	5.4%
	<i>Language training/test</i>	108	4.4%
	<i>The Knowledge (or simplified version)</i>	63	2.6%
	<i>Knowledge of Highway Code</i>	51	2.1%
No		63	2.6%
Not answered		279	11.5%

Yes

- 4.103 Of those respondents who felt that new training was required, the most popular responses were for greater disability awareness (1,678 respondents), better topographical knowledge/testing (1,574 respondents), an enhanced driving test (1,560 respondents) and basic knowledge of private hire legislation (1,552 respondents). There was some overlap between response themes with those who thought there should be an advanced driving test also commenting that better topographical knowledge was important. Over half of respondents thought that training should result in a qualification - either an NVQ or VRQ.

No

- 4.104 Those respondents who thought there was no need for additional training commented that it should not be responsibility of the regulator to train drivers, it should be the operator (13 respondents). Other comments included that additional training is unnecessary or a waste of time/money (12 respondents).

Q19 – Who should provide the training and have you any suggestions as to how it is delivered?

- 4.105 The next question asked respondents who should be responsible for any driver training and the best methods for delivery. Table 4.16 overleaf shows a categorised summary of the responses received to this question. For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.16: Who should provide the training and have you any suggestions as to how it is delivered?

Theme	Key Codes	Number of respondents	% of respondents
How		1,926	79.1%
	<i>Training must be face to face (recognition and protect against abuse)</i>	1,794	73.6%
	<i>Training centres vetted and audited by TfL to prevent abuse/fraud</i>	1,445	59.3%
Who		1,747	71.7%
	<i>Training centres run by accredited provider</i>	1,434	58.9%
	<i>Training to be provided by TfL</i>	224	9.2%
Other	<i>Investigate tests (topological) offering guaranteed passes.</i>	1,287	52.8%
Don't know		5	0.2%
Not answered		289	11.9%

How

- 4.106 There was broad agreement from respondents that training must occur face to face (1,794 respondents) and that all training centres should be vetted by TfL (1,445 respondents) to protect against fraud and abuse. There was, however, some sentiment that all of the training (14 respondents) or parts of it (19 respondents) could be delivered online.

Who

- 4.107 The majority of respondents (59%) felt that training centres should be run by an accredited provider with a smaller proportion (9%) suggesting that TfL should be providing the training. Other respondents mentioned a number of alternative providers including the DVLA, the police and the AA or RAC.

Other

- 4.108 Over half of all respondents (1,287) commented that there should be an investigation into testing centres that are offering “guaranteed passes” for the topographical test.

Insurance

- 4.109 The 2004 Private Hire Vehicles Regulations state that it is a condition of a private hire vehicle licence that the owner shall not use a vehicle, or permit it to be used, as a private hire vehicle to carry passengers without a hire and reward insurance policy being in place. In light of this requirement, TfL proposes to check that such an insurance policy is in place at the time of licensing.

Q20 – What are your views on the proposal to check that a hire and reward insurance policy is in place at the time of licensing?

- 4.110 In response to this question the majority of respondents (75%) emphasised the regulatory requirement for private hire drivers/vehicles to be properly insured, as shown in the summary Table 4.17. For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.17: What are your views on the proposal to check that a hire and reward insurance policy is in place at the time of [vehicle] licensing?

Theme	Key Codes	Number of respondents	% of respondents
Regulations		1,835	75.3%
	<i>A valid insurance certificate should be displayed in the vehicle</i>	1,637	67.2%
	<i>All private hire vehicles should have valid hire and reward insurance at all times</i>	1,537	63.1%
	<i>Insurance needed for protection of passengers</i>	69	2.8%
Operations		179	7.3%
	<i>Insurance certificate to be checked at time of licensing/renewal</i>	125	5.1%
Enforcement		178	7.3%
	<i>TfL to carry out checks to ensure policies are present and correct</i>	138	5.7%
Abuse of system		103	4.2%
	<i>Common problem of drivers cancelling hire and reward policies and replacing with domestic insurance</i>	100	4.1%
Supportive	<i>No further comment</i>	68	2.8%
Other		71	2.9%
	<i>Comment expressing surprise that insurance checks are not already in place</i>	67	2.8%
Not supportive		21	0.9%
Don't know		4	0.2%
<i>Not answered</i>		222	9.1%

Regulations

- 4.111 Answers given by respondents relating to the regulatory requirements for hire and reward insurance can be seen as broadly supportive of TfL's proposal to check that the correct policy is in place at the time of licensing. Most respondents did not address the question directly but made comments about the importance of how insurance and how it could be checked. The most common comment was that a valid insurance certificate should be displayed in the vehicle (1,637 respondents) and that all vehicles being used for private hire should be covered by valid hire and reward insurance at all times (1,537 respondents). Respondents also noted the need for insurance in order to protect passengers in the event of a collision or unexpected event.

Operations

- 4.112 A number of respondents (125) agreed that insurance certificates should be checked at the point of issuing or renewing a licence.

Enforcement

- 4.113 The most common comment in relation to enforcement was that TfL should carry out regular checks to ensure that drivers/vehicles are insured and that the insurance is of the correct type i.e. hire and reward, not domestic (138 respondents).

Abuse of system

4.114 Some respondents commented on the ways in which the insurance and licensing arrangements are open to abuse including drivers cancelling their hire and reward policies and replacing them with domestic insurance (the latter being cheaper) after a license has been issued or purchasing hire and reward insurance to avoid paying the congestion charge (100 respondents).

Not supportive

4.115 Twenty one respondents were not supportive of checking hire and reward insurance policies. Some felt it was unreasonable if the vehicle was rented to a third party or if it wasn't used as a private hire vehicle all of the time.

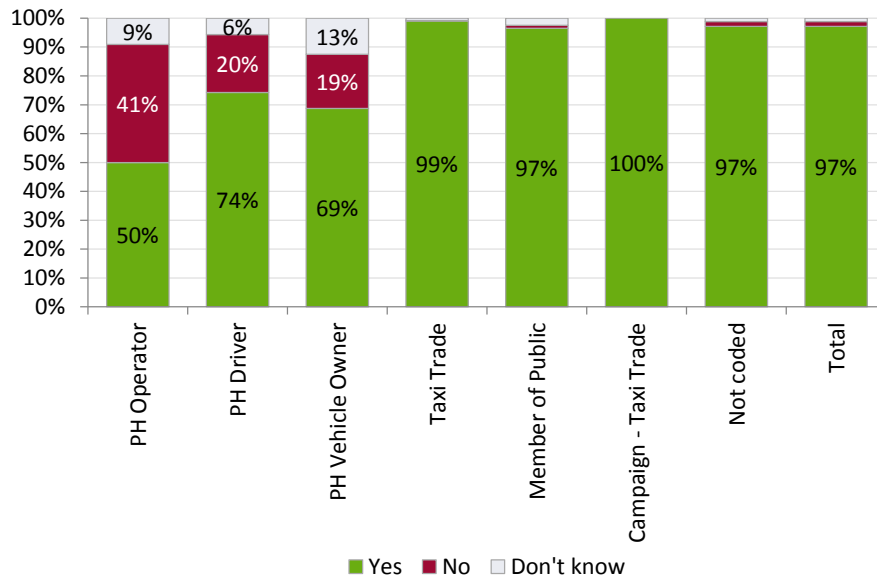
Records of drivers and vehicles

4.116 Operators are required to retain records of drivers and vehicles which are available to them for carrying out bookings and such records must be retained and made available for inspection. There is currently no requirement, however, for operators to upload the details of the drivers and vehicles registered with them to TfL's licensing database. Respondents were therefore asked the following question which had a closed and open element.

Q21 – Should it be mandatory for operators to supply and electronically upload details of their drivers and vehicles to TfL and, if so, how frequently?

4.117 As shown in Figure 4.10, the majority of respondents (97%) agreed that it should be mandatory for operators to supply and upload details of their drivers and vehicles to TfL. Private hire operators were less likely to agree with this proposal, with 39% against this proposal.

Figure 4.10: Should it be mandatory for operators to supply and electronically upload details of their drivers and vehicles to TfL?



4.118 With regard to frequency of uploads, respondents' answers to the open element of the question show that there is greatest support for weekly or fortnightly uploads, as shown in summary Table 4.18. For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.18: Should it be mandatory for operators to supply and electronically upload details of their drivers and vehicles to TfL and, if so, how frequently?

Theme	Key Codes	Number of respondents	% of respondents
Supportive		663	27.2%
	<i>Allows TfL to monitor drivers working for multiple operators</i>	583	23.9%
	<i>Improve/aid public safety</i>	63	2.6%
Not supportive		21	0.9%
Frequency		2,057	84.4%
	<i>Weekly/fortnightly</i>	1,509	61.9%
	<i>Monthly</i>	115	4.7%
	<i>Daily</i>	93	3.8%
	<i>As soon as a driver starts at/leaves operator</i>	84	3.4%
	<i>Every six months</i>	71	2.9%
	<i>Every three months</i>	59	2.4%
	<i>Immediately if a change occurs</i>	57	2.3%
Regulation		1,398	57.4%
	<i>If driver has not registered with an operator within 28 days their licence should be suspended</i>	1,330	54.6%
Method		12	0.5%
Enforcement		6	0.2%
Suggestion		3	0.1%
Don't know		2	0.1%
Not answered		221	9.1%

Frequency

4.119 Almost two thirds of respondents who answered this question (1,509) stated that operators should supply and upload details of their drivers and vehicles to TfL on a weekly or fortnightly basis. The next most common frequency was monthly (115 respondents), followed by daily (93 respondents).

Regulation

4.120 Just over a half of respondents (1,330) stated that if a driver has not registered with an operator within 28 days of being licensed then their licence should be suspended.

Supportive

4.121 Respondents were particularly supportive of the potential for the proposal to allow TfL to monitor whether drivers are working for multiple operators (583 respondents). This would help to improve tracking and accountability, in addition to public safety, which was mentioned separately by 63 respondents.

Not supportive

4.122 Twenty one respondents were not supportive of the proposal. Comments included that it would be an unnecessary administrative burden or that it would be impractical due to high staff turnovers.

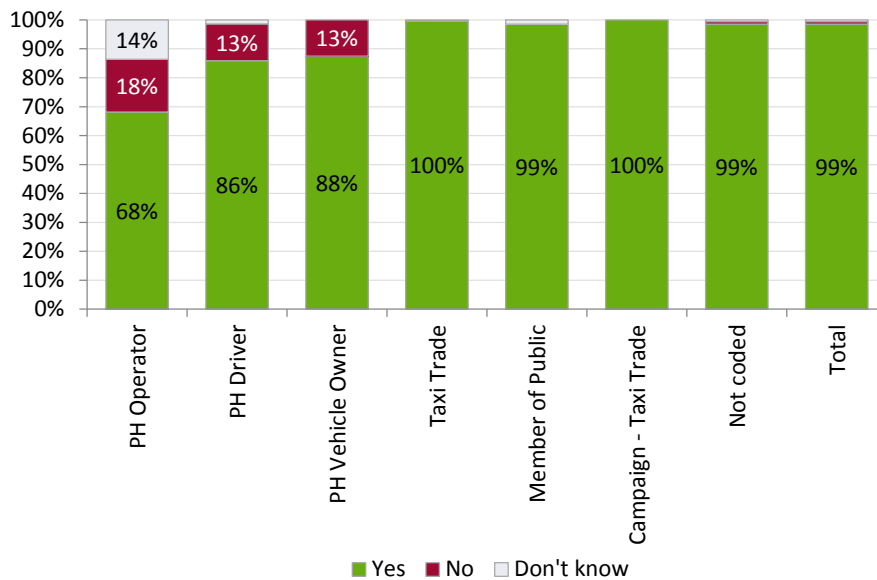
Revocation of vehicle licences

4.123 There is no ‘fit and proper’ requirement for the owners of private hire vehicles and the controls under the 1998 Act relate more to the “fitness” of the vehicle as opposed to the owner’s suitability to hold a licence. In light of this, respondents were asked whether TfL should explore revoking *vehicle* licences in instances where there has been a cause to revoke an individual’s *driver’s* licence.

Q22 – 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?

4.124 The graph in Figure 4.11 shows that, at an overall level, support for this proposal was virtually unanimous (99% agree). Private hire operators were however less likely to support the proposal, with one in five answering ‘no’ to the question.

Figure 4.11: 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?



Private hire licence application requirements

4.125 Applicants are required to fulfil a range of requirements in order to be a private hire operator, driver or vehicle licence holder. TfL is exploring whether these requirements are fit for purpose and invited respondents’ views on whether any changes should be made. A closed question was also asked, in the same format as the open question. Due to the ambiguity generated by the question (two questions were asked with only one opportunity for response), the analysis of the closed question has been excluded.

Q23 – 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?

4.126 Table 4.19 shows a summary of the responses received to this question. For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.19: Do you consider that TfL should prescribe further requirements in the private hire regulations and, if so, what should these be?

Theme	Key Codes	Number of respondents	% of respondents
Regulation		1,858	76.3%
	<i>Minimum years residency requirement in the UK before a driver can be granted a PH licence</i>	1,464	60.1%
	<i>Current regulations not sufficiently strenuous to ensure public safety</i>	1,406	57.7%
	<i>Minimum years residency requirement for operators to enable a UK DBS⁷ check (expectation for operator domiciled in and paying tax in UK)</i>	1,323	54.3%
	<i>Permanent structure for operations centre - based in UK</i>	55	2.3%
	<i>Current regulations are sufficient</i>	51	2.1%
Operations		1,447	59.4%
	<i>Fixed landline at operation centres (answer calls and complaints)</i>	1,310	53.8%
Enforcement		319	13.1%
	<i>Better enforcement of existing rules/regulations and regular checks</i>	182	7.5%
	<i>More rigorous DBS check including foreign nations - liaison with their country of origin</i>	77	3.2%
Don't know		47	1.9%
Not answered		279	11.5%

Regulation

- 4.127 More than half of respondents who answered this question asserted that drivers should have held UK residency for a certain number of years before being granted a private hire licence (1,464 respondents). A similar number of respondents thought that this requirement should apply to operators too (1,323 respondents). Whilst almost two thirds of respondents felt that the current regulations were not sufficiently strenuous to ensure public safety, a small number of respondents (51) felt that the current regulations were sufficient.

Operations

- 4.128 From an operational perspective, the majority of comments expressed the view that operators should have a fixed landline at their operations centre to handle calls and complaints (1,310 respondents). This comment was sometimes made with reference to specific operators who allegedly don't have such a facility.

Enforcement

- 4.129 Respondents stated that there should be better enforcement of the current regulations and ensure that regular spot checks are completed (182 respondents). A further 77 respondents also suggested that DBS checks should be more rigorous and that if the driver is a foreign national, there should be some liaison with their country of origin.

⁷ Disclosure and Barring Service (DBS) – previously Criminal Records Bureau (CRB).

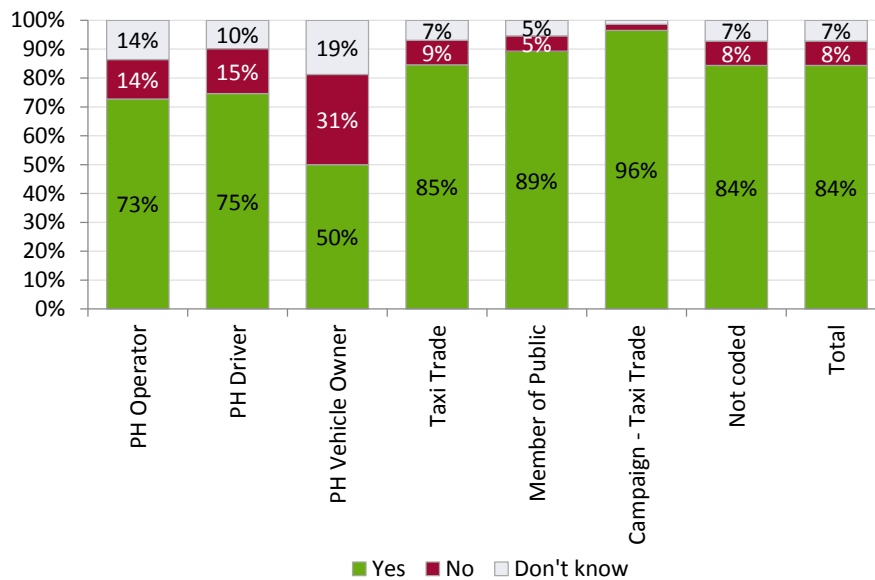
Payment methods

4.130 Although no longer promoted, from time to time TfL still receives cheques and postal orders as a method of payment for licence applications. This payment method represents less than one percent of total payments received but represents a disproportionate amount of suspected fraudulent transactions.

Q24 – Do you feel that TfL should stop accepting payment by postal order and cheque?

4.131 The majority of respondents (84%) stated that they thought TfL should stop accepting payment by postal order and cheque. Members of the public were most likely to support the proposal whilst private hire vehicle owners were least likely. This question also generated some uncertainty, with between 1% and 19% of respondents choosing the option “don’t know”.

Figure 4.12: Do you feel that TfL should stop accepting payment by postal order and cheque?



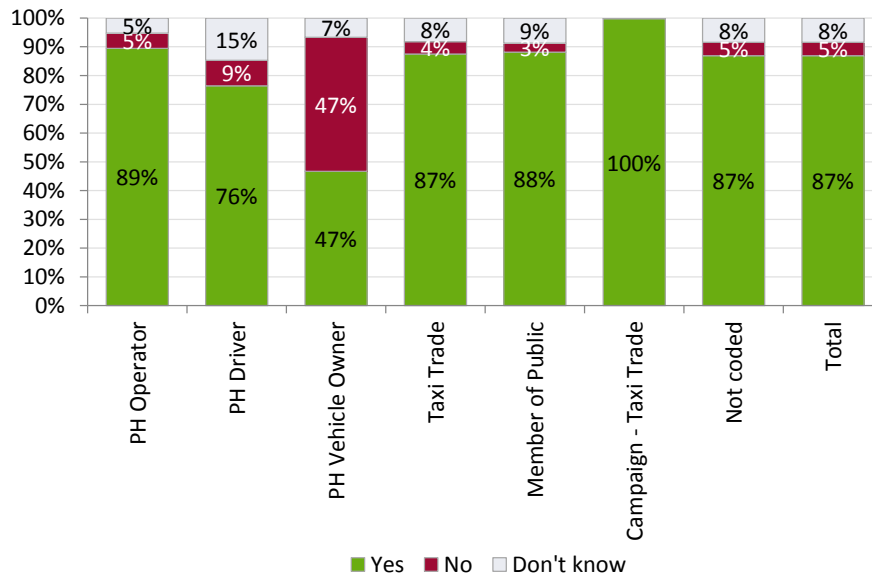
General

4.132 To ensure that respondents to the consultation had the opportunity to provide TfL with thoughts and suggestions on any aspect of Private Hire Regulations, the following question was asked.

Q25 – Do you feel that there are any other regulations not covered in this paper that it would be appropriate to review?

4.133 The question contained both closed and open response elements. Responses to the closed question are shown in Figure 4.13. The majority of respondents (87%) stated that they felt there were other regulations that it would be appropriate to review. Private hire vehicle owners were most likely to state that there were not any other regulations requiring review.

Figure 4.13: Do you feel that there are any other regulations not covered in this paper that it would be appropriate to review?



4.134 Responses provided in the open text box accompanying this question are summarised in Table 4.20 overleaf. For a complete list of the themes and more detailed codes, please see [Appendix C](#).

Table 4.20: Do you feel that there are any other regulations not covered in this paper that it would be appropriate to review?

Theme	Key Codes	Number of respondents	% of respondents
Regulations		1,924	79.0%
	<i>Limit the number of private hire licences</i>	1,458	59.9%
	<i>National Insurance number to be provided at point of licensing</i>	1,368	56.2%
	<i>Time delay requirement between booking and start of journey</i>	1,278	52.5%
	<i>Private hire operators should offer a pre-booking service</i>	1,259	51.7%
	<i>Operators responsible for ensuring staff adhere to regulations</i>	1,253	51.4%
	<i>Smartphone operators should not show vehicles available for immediate hire</i>	1,230	50.5%
	<i>Requirement to record an accurate pick up position at time of a booking</i>	1,229	50.5%
	<i>Stop unlicensed drivers signing into an app using a registered driver's details</i>	1,227	50.4%
	<i>Consider prohibiting cross border hiring</i>	1,227	50.4%
	<i>Only licensed private hire drivers should be driving private hire vehicles</i>	1,225	50.3%
	<i>Drivers should only be registered with one operator at a time</i>	1,219	50.0%
	<i>Private hire regulations must reflect the intention of Parliament and the 1998 Act</i>	1,214	49.8%
	<i>Change sliding scale charging practice for operator licensing</i>	1,210	49.7%
	<i>A private hire operator's licence must be in place for all premises where bookings take place</i>	1,200	49.3%
	<i>Do not permit ehailing/review legislation around apps</i>	98	4.0%
<i>Address the issue of the smartphone meter</i>	69	2.8%	
Enforcement		149	6.1%
	<i>TfL must enforce existing regulations/increase enforcement personnel</i>	97	4.0%
	<i>Address the problem of touting/plying for hire</i>	55	2.3%
Suggestion		37	1.5%
	<i>TfL should create an app for both private hire vehicles and taxis</i>	32	1.3%
Operations		26	1.1%
Safety	<i>Public safety must be ensured (TfL's responsibility)</i>	22	0.9%
Other		20	0.8%
Don't know		6	0.2%
<i>Not answered</i>		384	15.8%

Regulations

- 4.135 The most popular comment relating to regulations was placing a limit on the number of private hire licences being issued in London (1,456 respondents). Respondents cited congestion, emissions, an excess of supply (relative to demand) and touting as reasons for regulating private hire licences. Other regulations mentioned included a requirement for a driver to produce his/her National Insurance number at the point of licensing to prevent illegal working and tax/benefit fraud (1,368 respondents), a time delay requirement between a

booking and the start of a journey e.g. as introduced in Paris at the start of 2014 (1,278 respondents), a way to stop unlicensed drivers signing into an app using a registered driver's details (1,227 respondents) and that drivers should only be registered with one operator at a time (1,210 respondents).

Enforcement

- 4.136 The most common comment in relation to enforcement was that TfL must enforce the *existing* regulations and/or increase the number of people employed for this purpose (97 respondents). The need to specifically tackle touting was also raised by 55 respondents.

Suggestion

- 4.137 One suggestion which was more popular amongst the responses to this question was that TfL should take the opportunity to create an app, with both private hire vehicles and taxis on it. The idea is that this would provide an income for TfL, an in-app complaints procedure for customers and improve TfL's ability to respond to regulatory infringements.



A Classification of ‘other’ responses

A.1 This appendix details how we have classified the ‘other’ responses using answers to the following questions, as agreed with TfL:

- Are you connected with the private hire trade – other responses (open question);
- What is your organisation (open question);
- Q25: Do you feel that there are any other regulations not covered in this paper that it would be appropriate to review? (open question)⁸; and
- Email responses were analysed to see if the respondent stated that they had a role in the taxi or private hire trades.

The paragraphs that follow detail this process.

Are you connected with the private hire trade (closed question)

A.2 Using this closed question it was possible to allocate 194 of the 2,506 responses, as detailed in Table A.1.

Table A.1: Respondents allocated using the private hire connection closed question

Category	Responses	Proportion
PH Operator	20	0.8%
PH Vehicle Owner	32	1.3%
PH Driver	142	5.7%
Not coded	2,312	92.3%
Total	2,506	100.0%

Are you connected with the private hire trade (open question)

A.3 Using this open question it was possible to allocate a further 403 of the 2,506 responses, as detailed in Table A.2.

⁸ This question was used to identify campaign responses which are associated with the Taxi Trade, to classify respondents who did not specify the type of respondent they were in other questions.

Table A.2: Respondents allocated using the private hire connection open question

Category	Responses	Proportion
PH Operator	22	0.9%
PH Vehicle Owner	33	1.3%
Member of Public	39	1.6%
PH Driver	144	5.7%
Taxi Trade	359	14.3%
Not coded	1,909	76.2%
Total	2,506	100.0%

What is your organisation (open question)

- A.4 Using this open question it was possible to allocate a further 858 of the 2,506 responses, as detailed in Table A.3.

Table A.3: Respondents allocated using the organisation open question

Category	Responses	Proportion
PH Operator	23	0.9%
PH Vehicle Owner	16	0.6%
PH Driver	72	2.9%
Member of Public	207	8.3%
Not coded	1,051	41.9%
Taxi Trade	1,137	45.4%
Total	2,506	100.0%

Q25 Do you feel that there are any other regulations not covered in this paper that it would be appropriate to review? (open question)

- A.5 Using this open question, and analysing campaign responses, it was possible to allocate a further 518 of the 2,506 responses, as detailed in Table A.4.

Table A.4: Respondents allocated using Q25 (open question)

Category	Responses	Proportion
PH Operator	22	0.9%
PH Vehicle Owner	16	0.6%
PH Driver	72	2.9%
Member of Public	207	8.3%
Not coded	533	21.3%
Campaign	518	20.7%
Taxi Trade	1,138	45.4%
Total	2,506	100.0%

Email responses

- A.6 By analysing the email responses, it was possible to allocate a further 67 of the 2,506 responses, as detailed in Table A.5 overleaf.

Table A.5: Respondents allocated from email responses

Category	Responses	Proportion
PH Operator	23	0.9%
PH Vehicle Owner	16	0.6%
PH Driver	136	5.4%
Member of Public	207	8.3%
Not coded	466	18.6%
Campaign	518	20.7%
Taxi Trade	1,140	45.4%
Total	2,506	100.0%

B Private hire trade campaign email

B.1 1,428 responses were received via email from a private hire trade campaign. The standard content of this campaign email is shown below.

To whom it may concern,

I am a licensed private hire vehicle driver - my PCO licence number is XXX.

I drive for Uber and I am responding to this consultation to show my support for the company. Uber brings huge benefits to London: improving mobility, helping to reduce congestion and emissions, and bringing new opportunities for people like me to work throughout London. The service I provide gives Londoners quick and affordable access to safe transport, gives drivers more flexibility in how we work, and gives me the confidence that I can provide for my family. Reducing people's reliance on private cars means Uber helps reduce the total number of cars on the road. And, as most of the cars on the Uber platform are hybrid, lowers CO₂ emissions and improves air quality. Uber works with over 15,000 drivers in London and over 20,000 in cities across the country. Uber has benefitted me through offering me flexible work, something I value greatly.

As an Uber partner-driver, the constant comments about Uber in the press and by politicians worry me. I rely on Uber and anything done to change things unnecessarily and without proper consideration of its potential impact will mean I have a harder time making money to provide for those I love and care about. I also support keeping the standard of Private Hire drivers high. I hope that TfL takes the drivers' views into account when deciding on the future of our trade. Please consider the benefits Uber – and similar platforms – bring to the capital, the thousands of people who rely on Uber for a job and the millions of people who count on the affordable and convenient service we provide every day.

Thanks for your time.

C Codeframes

Table C1: Q1 and Q2 Codeframe

Q1. Do you consider it necessary to make any changes to the current regulation on booking records?

Q2. 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?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents			
Necessary	2. To enable price to be quoted	1,552	63.7%	1,963	80.6%			
	2. To enable driver to plan route	1,522	62.5%					
	1. Current regulations are sufficient	1,425	58.5%					
	2. To protect passengers (personal safety)	228	9.4%					
	2. Keep record of destinations/quotes at operating centre/online - make available to authorities	98	4.0%					
	2. To prevent touting/plying for hire/immediate hire	76	3.1%					
	2. To prevent customers being overcharged	30	1.2%					
	2. To prevent disputes	17	0.7%					
	2. For insurance/licensing purposes	2	0.1%					
	2. It's impractical/unnecessary	14	0.6%			14	0.6%	
Unnecessary								
Enforcement suggestion	2. Enforce by regular/random checks/visits on operating centres/drivers and/or fines/de-licencing	53	2.2%	126	5.2%			
	2. Technology (GPS) can provide audit trail/record destination/calculate fare	22	0.9%					
	2. Invest in enforcement team/system	22	0.9%					
	2. Entering destination could be condition of app usage/this to be recorded inc any changes	18	0.7%					
	2. Require every operator who is licensed to have a landline telephone number/bookings	16	0.7%					
	Other comments	2. Drivers using sat navs etc. get distracted (dangerous)/can be incorrect/result in congestion	30			1.2%	63	2.6%
		2. All PH companies should have central booking office (in country of operation)	12			0.5%		
		2. Risk of GPS signals being lost/switched off/battery dying/manipulated	7			0.3%		
		2. Outlaw on-demand apps	5			0.2%		
		2. Require app-based drivers to return to a base whilst waiting for jobs	4			0.2%		
2. Help operators utilise their fleets more efficiently		3	0.1%					
2. Cap PHV licences		2	0.1%					
1. Blacked out windows on PHV should not be allowed for passenger safety		1	0.0%					
2. Test purchase apps to check for breaches of regulation		1	0.0%					
General suggestion		2. A 15 minute booking rule should apply to PHVs to allow time for details to be recorded/route planned	25	1.0%	52	2.1%		
	1. Current regulations open to corruption/abuse	20	0.8%					
	2. A booking delay should apply to PHVs to allow time for details to be recorded/route planned	13	0.5%					
	2. Allow drivers to record destination rather than operator, including any changes	10	0.4%					
Not answered		365	15.0%	365	15.0%			
	TOTAL	5,593						

Table C2: Q3 Codeframe

Q3. What are your views on the use of business names and do you consider that current arrangements should be changed?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents			
Insufficient	Current regulations insufficient	1,374	56.4%	1,517	62.3%			
	Public safety concerns	104	4.3%					
	Better information both online and in vehicle around operating company, address, employment details etc.	102	4.2%					
	Greater transparency/accountability	8	0.3%					
Sufficient	Current regulations sufficient	100	4.1%	100	4.1%			
Limit number of business names	Only one business name per licence should be allowed	369	15.1%	438	18.0%			
	A business name can only be used once	56	2.3%					
	Cap on the number of business names per licence	23	0.9%					
	Remove business names altogether	3	0.1%					
Regulation	Better legislation/enforcement/regulation (inc. new technology-based systems like Uber)	73	3.0%	90	3.7%			
	TfL/LA approval	9	0.4%					
	Business should be licenced in London	4	0.2%					
	All companies should have a central office	3	0.1%					
	Names /change of name should be verified	2	0.1%					
	Reviewed by another body other than TfL	2	0.1%					
	Database of registered company names	1	0.0%					
	Form of business names	No ambiguous/confusing company names e.g. locations	54			2.2%	87	3.6%
	Should not be made to look like Hackney Carriage e.g. not allowed to the words Taxi/Cab	24	1.0%					
	Business name should be linked to license address or IP/MAC address of phone (Uber)	6	0.2%					
Alternative names should be allowed within reason	3	0.1%						
Restrictions on number of operators with same/similar names	2	0.1%						
Restrictions/Penalties	Restrictions on change of business name e.g. new licence required if changed	35	1.4%	54	2.2%			
	Better penalties/restrictions for non-compliance	3	0.1%					
	Restrictions on advertising (on vehicle and online)	3	0.1%					
	Default cancellation of licenses if any wrong doing	2	0.1%					
	Business names should be kept	2	0.1%					
	Limits on the number of PH companies	2	0.1%					
	Restrictions on PH operation	2	0.1%					
	Limits on number of companies a driver can work for	1	0.0%					
	Limits on the number of drivers per license	1	0.0%					
	Make it easier to make complaints	3	0.1%					
If operation type changes, a new license should be issued	1	0.0%						
Not Answered		270	11.1%	270	11.1%			
	TOTAL	2,647						

Table C3: Q4 Codeframe

Q4. Should operators continue to be allowed to specify an unlimited number of business names on their licence?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
No	Multiple business names is confusing for the public - all licensed operators should be clearly identifiable	1,532	62.9%	2,207	90.6%
	No	479	19.7%		
	Public safety	84	3.4%		
	Can avoid blame / not accountable because hard to trace company	51	2.1%		
	Corruption / open to abuse	49	2.0%		
	HMRC to decide / Tax evasion / legitimate business	40	1.6%		
	Unspecified cap	13	0.5%		
	Harder to regulate	11	0.5%		
	Max 2	7	0.3%		
	Harder to enforce/control	6	0.2%		
	One business, one licence, one name	5	0.2%		
	Max 3	5	0.2%		
	Only 1 name per part of business e.g. PHV, Chauffeur, Wedding, Executive	2	0.1%		
	Max 5	2	0.1%		
	Operator should be located in London	1	0.0%		
	Max 10	1	0.0%		
	Too much paperwork	1	0.0%		
	Too many cars on street	1	0.0%		
	Encourages satellite offices	1	0.0%		
	Simpler to issue bearer licences	1	0.0%		
	Place name should only be allowed where operator has physical office in that area	1	0.0%		
Yes	Yes	19	0.8%	30	1.2%
	As long as they are accountable	5	0.2%		
	Providing no other operator with same name - register name	3	0.1%		
	Helps businesses grow	1	0.0%		
	To help sort out liability issues/disputes	1	0.0%		
	Providing a large admin fee is paid to cover costs	1	0.0%		
Not Answered		199	8.2%	199	8.2%
	TOTAL	2,522			

Table C4: Q5 Codeframe

Q5. What is your experience of making complaints about private hire services and have you any suggestions for how current arrangements could be improved?

Code	Count	Share
Complaints should be shared with TfL	1,399	57.4%
Complaints about drivers should be made directly to operators	1,327	54.5%
Better information on/in vehicles e.g. how to complain	1,298	53.3%
PH complaints received by Taxi Trade Association	1,231	50.5%
TfL should investigate complaints, not the operators	263	10.8%
Improved monitoring, regulation and enforcement	107	4.4%
Ability to provide feedback online including photos e.g. app or section on TfL website	100	4.1%
Required to have a UK -based office and/or contact methods	87	3.6%
Difficulties contacting operators/making complaints e.g. Uber	69	2.8%
Complaints not taken seriously/ignored	54	2.2%
TfL aren't interested in/ignore complaints about PH	54	2.2%
Dedicated complaints handler/regulator for all PH operators	32	1.3%
Poor experience of complaints procedure	21	0.9%
Companies should be keep auditable records of complaints	20	0.8%
Escalation process if company don't adequately respond	20	0.8%
Ensure complaints are actually followed up	15	0.6%
More information on how to complain	15	0.6%
No change to current arrangements required	12	0.5%
Greater transparency e.g number of complaints per operator	8	0.3%
Police should manage complaints	5	0.2%
Act on every complaint	4	0.2%
Complaints should be handled within a set timeframe	1	0.0%
Drivers should be able to complain about poor treatment by operators	1	0.0%
Not Answered	323	13.3%
TOTAL	6,466	

Table C5: Q7 Codeframe

Q7. What should the retention period of booking, complaints, lost property and driver, and vehicle records be?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Less than 12 months	less than 1 month	12	0.5%	124	5.1%
	6 weeks	1	0.0%		
	2 months	2	0.1%		
	3 months	11	0.5%		
	6 months	48	2.0%		
	6 to 12 months	15	0.6%		
	7 to 12 months	35	1.4%		
12 months	12 months	1,772	72.7%	1772	72.7%
12 months to 2 years	12 to 18 months	7	0.3%	107	4.4%
	18 months	15	0.6%		
	2 years	85	3.5%		
3 to 5 years	3 years	50	2.1%	77	3.2%
	4 years	1	0.0%		
	5 years	26	1.1%		
6 to 12 years	6 years	10	0.4%	58	2.4%
	7 years	13	0.5%		
	10 years	2	0.1%		
	12 years	33	1.4%		
Indefinitely	Indefinitely	22	0.9%	22	0.9%
Other comments	Stay same	9	0.4%	20	0.8%
	Same as taxi trade	3	0.1%		
	Different period for each	3	0.1%		
	Same as operators' licence	1	0.0%		
	Based on longest complain period	1	0.0%		
	No need to keep records	1	0.0%		
	Same as operator licence plus one year	1	0.0%		
	Police should specify	1	0.0%		
Don't know		3	0.1%	3	0.1%
Not Answered		259	10.6%	259	10.6%
	TOTAL	2,442			

Table C6: Q8 Codeframe

(Continued overleaf)

Q8. What are your views on current arrangements for regulation of in-venue operators and how they may be improved?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents			
Unsupportive	Current arrangements encourage plying for hire/touting	1,729	71.0%	2,020	82.9%			
	Confusing for public	1,428	58.6%					
	Satellite offices difficult to police	1,360	55.8%					
	Contrary to the intention of the 1998 Act	1,341	55.0%					
	Stop in-venue operations	252	10.3%					
	Public safety at risk	144	5.9%					
	Arrangements open to abuse	65	2.7%					
	Congestion/parking offences caused by minicabs plying for hire	44	1.8%					
	Technology removes need for satellite offices	39	1.6%					
	Arrangements need reviewing/inadequate	11	0.5%					
	In-venue operations discriminate against black cabs	9	0.4%					
	Supportive of in-venue operations	15	0.6%			15	0.6%	
	Greater Regulation/Limits	Provide stricter regulation/enforcement	198			8.1%	244	10.0%
		Every PH journey should be prebooked	33			1.4%		
Limit the number of satellite offices		5	0.2%					
Operators should record name of the passenger and the name and number of the PH car		3	0.1%					
Vehicles should be listed and allied to driver records		2	0.1%					
Introduce maximum charge per mile for all operators		2	0.1%					
The MET to take charge of enforcement		2	0.1%					
Limit number of PH licences issued		1	0.0%					
Planning consent essential		1	0.0%					
Make it criminal offence for passenger to enter a PHV if not pre-booked		1	0.0%					
One private hire operator per club with correct record keeping		1	0.0%					
Ranks must be in TfL/Local Authority agreed locations		1	0.0%					
Standard operating procedure for PH at all times of day		1	0.0%					
Prohibit PHVs from waiting near a late night venue unless they have a legitimate reason to be there		1	0.0%					
All bookings should be recorded and forwarded to TfL	1	0.0%						

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Suggestion	Dedicated booking area (inc. inside venue/licensed office/direct phone line to PH operator)	57	2.3%	175	7.2%
	Provide taxi ranks outside these venues	51	2.1%		
	PHVs parked away from venue	21	0.9%		
	Public awareness initiative needed to inform the public of the law	12	0.5%		
	Ranks should be manned by a TfL/venue marshal	13	0.5%		
	Operator reps should only be allowed to take business inside venues	11	0.5%		
	All PH bookings subject to time delay	8	0.3%		
	Make venues/operators liable for touting	8	0.3%		
	Have escorts to vehicles to prevent touting	4	0.2%		
	CCTV for preventing touting	4	0.2%		
	Enable venues to have contacts within the Black Taxi Trade	2	0.1%		
	In venue operators should provide both PH and taxi options	2	0.1%		
	TfL rep to make bookings	2	0.1%		
	PH operators should have specific premises (off-road parking etc)	2	0.1%		
	Allow operator reps to take business outside venues (to protect customers)	1	0.0%		
	Give passengers ability to check if a driver is licensed	1	0.0%		
	Allow PHV drivers to pick up from any place at any time	1	0.0%		
	Operators should have responsibility to report illegal touts	1	0.0%		
	Ticket system showing which passenger has booked a vehicle	1	0.0%		
	Allow Licensed Radio Taxi operating centres inside venues	1	0.0%		
	Venues contact TfL for PH support on an event-by-event basis	1	0.0%		
	Create a TfL approved app for PHV hirings	1	0.0%		
	Drivers to display email addresses that bookings can be sent to	1	0.0%		
Don't know		4	0.2%	4	0.2%
Not Answered		185	7.6%	185	7.6%
	TOTAL	7,085			

Table C7: Q9 Codeframe

(Continued overleaf)

Q9. How are shared private hire services different to exclusive hires and how should this be reflected in the requirements that apply to them?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents			
Against Ride Sharing	Problems of safety/security/disputes	1,836	75.4%	2,004	82.3%			
	Reliance on sat nav (issues of road safety, ability to plan routes)	1,400	57.5%					
	Issues relating to charging structures, compliance and record keeping that do not apply to exclusive hirings	1,389	57.0%					
	PH drivers not sufficiently trained/equipped to carry out Ride sharing (route mapping, charging etc.)	73	3.0%					
	Against - No further reason	69	2.8%					
	Only taxis/public vehicles (e.g. bus) should offer shared rides	30	1.2%					
	Too complex to regulate	1	0.0%					
For Ride Sharing	For - No further reason	16	0.7%	28	1.1%			
	Sharing enables passengers to save money	4	0.2%					
	Ride sharing potential to be as safe/safer than some alternatives (bus/train)	4	0.2%					
	Embrace technologies allowing Ride sharing	1	0.0%					
	Providing pick-ups/destinations within 0.5/1 miles of each other and within licensing area	2	0.1%					
	Reduces congestion	1	0.0%					
	TfL to find regulations which protect consumers while ensuring that ride sharing is viable/competitively priced	1	0.0%					
	Ride sharing apps ok providing they adhere to regulations	1	0.0%					
	Comment	Regulate shared in the same way as exclusive	18			0.7%	86	3.5%
		Immediate hiring amongst PH/via ridesharing apps is illegal	14			0.6%		
Decision for customer/driver at own risk (could provide warnings)		11	0.5%					
Consider liability for anything that happens to passengers - driver/operator		12	0.5%					
Tighten existing regulation		9	0.4%					
Shared and exclusive PH trips must be pre-booked (allow time to plan etc)		7	0.3%					
Congestion/emissions is result of increase in PHV licensing		6	0.2%					
Will result in decreased public transport patronage		3	0.1%					
Encourages drivers to avoid single fares for more lucrative multiple destinations.		2	0.1%					
Ride sharing should only be allowed if bus services cut		1	0.0%					
Shared hire regulated to allow multiple pick-up/drop-offs		1	0.0%					
Primary legislation prevents private hire to ride share		1	0.0%					
Ride Sharing will only work on a specific route (like a bus)		1	0.0%					
Shared rides takes business away from other drivers		1	0.0%					
No difference between shared/exclusive hires		1	0.0%					

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Suggestion	Destination and/or details of all passengers to be recorded	25	1.0%	79	3.2%
	Option to share or have an exclusive hire should be given to passenger at outset	11	0.5%		
	A fixed price/pay up front system should be provided for shared trips	8	0.3%		
	Ride sharing vehicles to be are licensed (e.g. for hire and reward insurance)	7	0.3%		
	Registration requirement for passengers (perhaps inc dbs check) and blacklist for those acting inappropriately	7	0.3%		
	Only allow shared hire during the day	5	0.2%		
	Make shared ride price calculation transparent	5	0.2%		
	PH metered, fares set by TfL	5	0.2%		
	Ride share providers to undergo the Knowledge	4	0.2%		
	Only operators with proven safety record allowed to operate shared services	2	0.1%		
	Keep details of ride sharing on record	3	0.1%		
	Option for women-only rides	3	0.1%		
	Fit CCTV to ride share vehicles	3	0.1%		
	Require all PHVs to be zero emission compliant by set date (like taxis)	2	0.1%		
	Verify customers' details prior to journey	2	0.1%		
	Train drivers to identify potential dispute situations	2	0.1%		
	Market/identify Ride sharing vehicles separately (as in Europe).	1	0.0%		
	Panic system in place in case of emergency	1	0.0%		
	Shared ride fares could be held in escrow for a limited time in case of dispute	1	0.0%		
	Make buses cheaper	1	0.0%		
	TfL app for private hire	1	0.0%		
	Ride sharing permitted for long trips only	1	0.0%		
Query	How do you pre-book a shared ride?	3	0.1%	3	0.1%
Don't Know		13	0.5%	13	0.5%
Not Answered		281	11.5%	281	11.5%
	TOTAL	5,313			

Table C8: Q10 Codeframe

Q10. What are your views on licensing of private hire services at temporary events?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Unsupportive	PH licensing at public events encourages immediate hires/touting	1,633	67.0%	1,902	78.1%
	Results in rank of PH vehicles	1,445	59.3%		
	Can pre-order minicab in normal way (phone/app)	161	6.6%		
	Temp licences should not be allowed	90	3.7%		
	Undermines law	88	3.6%		
	No need for temp event licensing	10	0.4%		
	PHV can charge what they want	3	0.1%		
Supportive	It's a good thing	35	1.4%	35	1.4%
Enforcement	Difficult to police	1,423	58.4%	1,463	60.1%
	Needs to be properly enforced/regulated by TfL	46	1.9%		
Suggestion	Temporary ranks for taxis, with marshal	124	5.1%	262	10.8%
	Temp licences for 1 event only	47	1.9%		
	Taxi have priority over PHVs	32	1.3%		
	Inform taxi drivers prior to events	28	1.1%		
	Work with current providers	21	0.9%		
	PH shorter term temp licence	18	0.7%		
	Use 24hr public transport instead	10	0.4%		
	Booking time delay should be applied to PHVs	3	0.1%		
	PHVs apply for temp licence in advance	3	0.1%		
	PH allowed, but not to sub contract	1	0.0%		
	Unfair Market	Discriminates against black cabs	117		
Will only benefit big PH companies - unfair to local PHVs		17	0.7%		
Safety	Puts public safety at risk	85	3.5%	85	3.5%
Congestion	Waiting PHV causes traffic congestion	25	1.0%	25	1.0%
Accessibility	PH licensing would reduce wheelchair accessibility	5	0.2%	5	0.2%
Don't know		5	0.2%	5	0.2%
Not Answered		162	6.7%	162	6.7%
	TOTAL	5,637			

Table C9: Q11 Codeframe

Q11. What changes to the current licensing requirements could be made for TfL to better serve members of the public who attend such events?

Theme	Code	Count	Share of respondents	Theme Count	Share of respondents
Operations	PH operators able to advertise their services prior to events by arrangement with the organisers	1,427	58.6%	1,785	73.3%
	Separate ranks for taxis	198	8.1%		
	Separate waiting areas for PHVs	53			
	Temporary events should be policed by enforcement officers	109	4.5%		
	Temp events could be served by Taxis with notice given to trade organisations	47	1.9%		
	TfL should promote the Licenced Taxi Trade	38	1.6%		
	Cost to organise marshalls or temporary ranks should be covered with licence fee or by operators	8	0.3%		
	Better signage and information	8	0.3%		
	Does not support satellite offices	5	0.2%		
	Agree fixed prices with black cabs	4	0.2%		
	Quicker turnaround for temporary licensing requests	4	0.2%		
	A temporary central booking facility run by TfL	4	0.2%		
	Taxis to offer ride sharing	3	0.1%		
	Park and Ride/shuttle bus facilities	2	0.1%		
	Local operators to hire more drivers on a temporary basis. TfL to facilitate.	2	0.1%		
	Make safety of the public a priority	2	0.1%		
	A centralised phone number for getting taxis	1	0.0%		
	Have more taxi lanes so that taxis can get to events quicker	1	0.0%		
	Charge taxis for using ranks	1	0.0%		
Regulations	No change to licensing is required	1,598	65.6%	1,646	67.6%
	Only license black cabs for temporary events	23	0.9%		
	Licence valid per event only	17	0.7%		
	Approve temporary licences with conditions e.g. after paying a fee/ if agree to share with licenced taxis	7	0.3%		
	Licensing should be more flexible	1	0.0%		
	Time limited premises	1	0.0%		
	TfL to set out procedure more clearly	2	0.1%		
Enforcement	Touting should be more rigorously policed	58	2.4%	102	4.2%
	More compliance / regulation / law enforcement to existing situation	49	2.0%		
Awareness	Make public more aware that PH needs to be prebooked	38	1.6%	56	2.3%
	Yes but advertise all travel options to users (buses, tubes, black cabs etc.)	18	0.7%		
Suggestion	Technology (not actual temporary offices) can do the job (apps etc)	12	0.5%	12	0.5%
Don't know		8	0.3%	8	0.3%
Not Answered		309	12.7%	309	12.7%
	TOTAL	4,058			

Table C10: Q12 Codeframe

Q12. What are your views on whether TfL should explore establishing controls in the area of employee suitability?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Supportive - Safety	PH operators and control room staff are privileged to sensitive information	1,428	58.6%	1,968	80.8%
	All staff to be checked via Disclosure and Barring Service enquiry	1,740	71.4%		
	Safety of travelling public	80	3.3%		
	Better background checks are required	55	2.3%		
	If operator/staff cannot provide full background information, they should not have a licence	52	2.1%		
	Anyone found to have a criminal record should not be given a licence to work/operate	36	1.5%		
	Certificates of good conduct from abroad should not be sufficient	15	0.6%		
	Only fit and proper/those of good character should have licence	9	0.4%		
	Convictions must be declared	8	0.3%		
Supportive - General	General support of establishing controls	179	7.3%	179	7.3%
Supportive - Regulations	Controls should be consistent with those applied to taxi drivers	76	3.1%	170	7.0%
	Staff must have been resident in the UK for a number of years	67	2.8%		
	Expression of concern that such controls are not already in place.	25	1.0%		
	Some form of ID badge is required	2	0.1%		
	Control room staff to comply with data protection act	2	0.1%		
Supportive - Enforcement	TfL should be responsible for greater enforcement of any controls	34	1.4%	59	2.4%
	Regular checks should be undertaken in order to monitor staff	21	0.9%		
	Revocation of licences if breaches are discovered	5	0.2%		
Supportive - Additional tests	An additional driving test for PH drivers	10	0.4%	35	1.4%
	Some form of English language test should be required	24	1.0%		
	Appropriate insurance checks required	5	0.2%		
Supportive - Operations	The expense of undertaking checks should be paid by the operator/driver	5	0.2%	5	0.2%
Against	No changes are required	16	0.7%	29	1.2%
	Not TfL's responsibility	6	0.2%		
	Should be responsibility of the police to undertake such controls.	7	0.3%		
Other	Support for licensed taxi drivers	6	0.2%	8	0.3%
	Put CCTV in cabs	1	0.0%		
	Confidentiality of high profile customers should be retained	1	0.0%		
Don't Know		2	0.1%	2	0.1%
Not Answered		175	7.2%	175	7.2%
	TOTAL	4,092			

Table C11: Q14 Codeframe

Q14. What requirements should be prescribed in the regulations for operating centres?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Premises	All operating centres should be permanent structures	1,893	77.7%	1,963	80.6%
	All operating centres should be of suitable design and size for number of employees	1,365	56.0%		
	Operating centres should be permanent to allow complaints to be traced back	63	2.6%		
	All operating centres should have enough parking for vehicles	20	0.8%		
	Allow temporary premises for special events (such as festivals)	10	0.4%		
	Allow temporary premises to be licensed	7	0.3%		
	Minimum lease period on building	6	0.2%		
	Do not permit offices on busy main roads (congestion/emissions)	1	0.0%		
	Operating centres should only be licenced for a given number of cars	1	0.0%		
	Technology	All operating centres should have fixed landline	1,559		
	All operating centres should have a suitable and reliable computer system	3	0.1%		
	All operating centres should have CCTV	3	0.1%		
Regulations	All operating centres should have necessary local authority planning permission/H&S regs	1,451	59.6%	1,471	60.4%
	Operators/drivers/employees vetted by appropriate authority (CRB check, criminal record, etc)				
		15	0.6%		
	Ensure all drivers have proper/appropriate training	1	0.0%		
	Local consultation before permission granted for operating centre	1	0.0%		
	Licences displayed at premises	2	0.1%		
	Refuse planning permission for operating centres in proximity to taxi ranks	1	0.0%		
Location	Operating centres should be based in UK / London / city in which they primarily operate	51	2.1%	52	2.1%
	Offices should be sited away from double or single yellow line parking restrictions	1	0.0%		
No change required	Retain current requirements	28	1.1%	28	1.1%
	All operating centres should record all their bookings/store their records effectively and safely				
Operations		43	1.8%	121	5.0%
	All operating centres should be able to receive customers face to face (waiting area etc.)	32	1.3%		
	No operating centres premises should be "dual business" (e.g. nightclub with minicab business)		0.9%		
		23	0.9%		
	All bookings should be taken by a person (not computer)	17	0.7%		
	Drivers to return to operating centres rather than drive around London looking for jobs	5	0.2%		
	All bookings to be taken at licensed premises/number	4	0.2%		
	Drivers can only pick up in a certain licensed area	2	0.1%		
	All cab journeys start from the cab office	1	0.0%		
	Enforcement	TfL inspections/checks (compliance, complaints etc.)	23		
No requirements	No requirements for operating centres	2	0.1%		
Other	Measures that ensure public safety	1	0.0%	1	0.0%
Don't Know		6	0.2%		
Not Answered		283	11.6%	283	11.6%
	TOTAL	6,924			

Table C12: Q15 Codeframe

Q15. 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?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agree	Vehicle information e.g. registration, colour, make etc.	1,475	60.6%	1,841	75.6%
	Full details of driver should be provided (e.g. name, telephone number)	1,442	59.2%		
	Photo of driver should be provided	1,434	58.9%		
	The responsibility should be with the operator to record/provide information	1,405	57.7%		
	PH Licence details should be provided	1,357	55.7%		
	Would contribute to overall safety and enforcement	131	5.4%		
	Agree - no further comment	82	3.4%		
	Details needed to prevent touting	58	2.4%		
	Drivers must display their details in vehicle including licence and insurance	35	1.4%		
	Any information to be held securely and in accordance with data protection	7	0.3%		
	Drivers should be under an obligation to identify themselves to passengers	3	0.1%		
	Call for immediate application	2	0.1%		
	Disagree	Disagree - no further comment	5		
Drivers should not be provided with any personal passenger details		10	0.4%		
Expensive for small operators to introduce these systems		8	0.3%		
Unnecessary/bureaucratic		5	0.2%		
No change required		2	0.1%		
Operations	Less confusion over which vehicle is for which person	33	1.4%	104	4.3%
	PHVs should be distinctive - easily identifiable	26	1.1%		
	Technology exists to do this	15	0.6%		
	Currently used by some companies/operators	10	0.4%		
	Allows proper records to be kept	10	0.4%		
	Use a code to identify passenger and allocated driver	4	0.2%		
	Driver should display the passenger's name on name-board	4	0.2%		
	Passenger's responsibility to find the right vehicle	4	0.2%		
	Details should be centrally recorded by TfL	1	0.0%		
	Abuse of System	Sharing of photo IDs/licences/vehicles occurs	26		
Enforcement		Enforcement to ensure compliance	6	0.2%	6
Suggestion	Photo of driver should not be required to be provided prior to booking (including concerns about misuse/personal safety)	11	0.5%	30	1.2%
	Prebooking mandatory	8	0.3%		
	All information should be provided in a set time limit after booking (time delay comment)	5	0.2%		
	Passenger details should be provided to driver	4	0.2%		
	No personal information should be provided to passengers to protect the driver	4	0.2%		
Not Answered		467	19.2%	467	19.2%
	TOTAL	8,099			

Table C13: Q16 Codeframe

Q16. Should operators be required to engage with TfL before changing their operating model and, if so, what is the best way to achieve this?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Supportive	TfL should set down clear procedures detailing the processes and terms of reference	1,389	57.0%	1,697	69.7%
	TfL to receive notice from/be engaged with by operator prior to any change to enable decision to be made/compliance with regulation to be checked	157	6.4%		
	Operator to re-apply for licence if any changes made / changes void current licence	42	1.7%		
	Written application	39	1.6%		
	Interview / face-to-face meeting	27	1.1%		
	To ensure public safety	26	1.1%		
	Fine/de-licensing if operator changes their model without contacting TfL	16	0.7%		
	No further response	14	0.6%		
	Process needs to be flexible to keep pace with changing technology	11	0.5%		
	TfL to take enquiries from operators/enact changes to changing models	4	0.2%		
Unsupportive	Operator should be free to make changes provided within regulatory framework	10	0.4%	31	1.3%
	Operator's responsibility to ensure model complies with regulations	10	0.4%		
	Operator should not be able to change conditions of their original licence	8	0.3%		
	Engagement not needed/no change to current arrangements	3	0.1%		
Regulations	All proposed changes must comply with 1998 Act and various Cab Acts	1,439	59.1%	1,568	64.4%
	Enforce regulations/legislation	75	3.1%		
	Inspection/checks/monitoring/audits for compliance	53	2.2%		
	Operators should be required to be as transparent as Licensed London Taxi drivers	4	0.2%		
	Separate licence for smartphone booking permission	2	0.1%		
	Review requirements of 1998 Act	1	0.0%		
Suggestion	Consultation (public, within trade, legal experts) on an operator's changes to business model	11	0.5%	26	1.1%
	Online portal for registering changes	7	0.3%		
	Probation period to trial any changes before approval	4	0.2%		
	Charge for a change of operating model	2	0.1%		
	Make it easier to be able to contact TfL	2	0.1%		
Comment	Comment about apps/e-hailing	62	2.5%	95	3.9%
	TfL should revoke Uber's license for not following its rules	33	1.4%		
Don't Know		6	0.2%	6	0.2%
Not Answered		429	17.6%	429	17.6%
	TOTAL	3,886			

Table C14: Q17 Codeframe

Q17. 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?

Theme	Code	Count	Share of respondents	Theme Count	Share of respondents
Yes	Ability to communicate essential (esp. to public safety)	1,531	62.8%	2,202	90.4%
	English language qualification to at least National Qualification Framework (NQF) level 3	1,359	55.8%		
	Regular auditing process to ensure consistency and uniformity in standards	1,291	53.0%		
	Fluency/good/conversational level of English required	217	8.9%		
	Written and/or verbal assessment	104	4.3%		
	No further response	100	4.1%		
	All drivers should be tested for language skills	100	4.1%		
	Drivers should possess English language qualification	59	2.4%		
	Basic English required	46	1.9%		
	To GCSE-Level standard	35	1.4%		
	Impose length of residence/citizenship requirement also	29	1.2%		
	To A-Level standard	22	0.9%		
	Same/similar test as UK citizenship	12	0.5%		
	English ESOL test	12	0.5%		
	To standard expected of any public service employee	6	0.2%		
	Same standards as Hackney carriage drivers	4	0.2%		
	PH drivers to take Knowledge (to assess lang skills)	4	0.2%		
	PLAB test (NHS requirement)	2	0.1%		
	Undertake spot checks to reduce and potential fraud / non-compliance	1	0.0%		
	Publish anonymised results of compliance tests	1	0.0%		
	Licencing period of 3 years to allow language to be learnt	1	0.0%		
	To IELTS standard	1	0.0%		
	No	Unnecessary	4		
Should be left to market forces		4	0.2%		
Passing a driving test more important		3	0.1%		
Indirect discrimination		1	0.0%		
Introduces expensive regulation		1	0.0%		
Private hire needn't account for this-not required to serve the public in the same way as taxis		1	0.0%		
Impose length of residence requirement		1	0.0%		
Discriminates against deaf drivers		1	0.0%		
First Aid/ability to liaise with emergency services more important		1	0.0%		
Enable customers to book drivers with specific language skills		1	0.0%		
Other	Test should be conducted by TfL/independent of operator	62	2.5%	129	5.3%
	Assessment must be done face to face	55	2.3%		
	Withhold licence from those who cannot prove language capability	32	1.3%		
	Interpreters/translators should be banned from assessments	2	0.1%		
Don't Know		3	0.1%	3	0.1%
Not Answered		179	7.3%	179	7.3%
	TOTAL	5,288			

Table C15: Q18 Codeframe

(Continued overleaf)

Q18. Do you consider it appropriate for TfL to introduce new training for private hire drivers and if so, what topics should be covered?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Yes	Disability awareness and handling training	1,678	68.9%	2,096	86.0%
	Better topographical knowledge/testing	1,574	64.6%		
	Enhanced driving test (similar to that required for taxi drivers)	1,560	64.0%		
	Knowledge of basic PH regulations/legislation	1,552	63.7%		
	Numeracy skills	1,339	55.0%		
	Incorporate training into a Vocational Related Qualification (VRQ)	1,315	54.0%		
	Requirement to undertake NVQ Level 2 within 3 years of being licensed	1,295	53.2%		
	Health and Safety/First Aid	189	7.8%		
	Customer care	164	6.7%		
	Running a small business	139	5.7%		
	Forthcoming consultations or proposed legal changes that may impact trade	134	5.5%		
	Network Developments	132	5.4%		
	Language training/test	108	4.4%		
	The Knowledge (or simplified version)	63	2.6%		
	Knowledge of Highway Code	51	2.1%		
	Training in appropriate and professional conduct/customer care	44	1.8%		
	Training/Tests should be regulated/monitored by TfL	38	1.6%		
	Yes - no further response	34	1.4%		
	Driving Lessons	27	1.1%		
	Personal Hygiene	26	1.1%		
	Possess a UK driving licence/test	20	0.8%		
	Diversity/Equality training	18	0.7%		
	CRB check	15	0.6%		
	Health/Eye check	8	0.3%		
	Vehicle maintenance	6	0.2%		
	Drivers must have been a UK resident for a set period of time	6	0.2%		
	Regular checks and monitoring	3	0.1%		

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
No	No - no further response	13	0.5%	63	2.6%
	Unnecessary/waste of time/money	12	0.5%		
	Not regulator's responsibility to provide training, just uphold the standards	13	0.5%		
	Knowledge already exists - make PH drivers take this	13	0.5%		
	Make operators build training into their business models	5	0.2%		
	Taxi drivers do not receive training help from TfL so PH shouldn't either	5	0.2%		
	Just check broad understanding of London geography	4	0.2%		
	PH equivalent of the 'Knowledge' would be poor	3	0.1%		
	Just check language skills	3	0.1%		
	Not possible to learn topographical knowledge in classroom	2	0.1%		
	Just check criminal history	2	0.1%		
	Not unless it is tested	1	0.0%		
	This training would narrow gap between taxi and PH	1	0.0%		
	Other issues more important	1	0.0%		
Not Answered		279	11.5%	279	11.5%
	TOTAL	11,895			

Table C16: Q19 Codeframe

Q19. 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.)?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
How	Training must be face to face (recognition and protect against abuse)	1,794	73.6%	1,926	79.1%
	Training centres vetted and audited by TfL to prevent abuse/fraud	1,445	59.3%		
	Some elements of training could be provided online	19	0.8%		
	Training delivered online only	14	0.6%		
	No training	7	0.3%		
	Self-funded by drivers	9	0.4%		
	Provide same level of testing as black cab drivers receive	8	0.3%		
	Drivers should seek out their own training (tests done by TfL)	1	0.0%		
	Training delivered via leaflet	1	0.0%		
	Assessment centre (day long)	1	0.0%		
Who	Training centres run by accredited provider	1,434	58.9%	1,747	71.7%
	Training to be provided by TfL	224	9.2%		
	Training delivered by a "third party"	32	1.3%		
	Training to be provided by Police	24	1.0%		
	Training delivered by the DVLA	19	0.8%		
	Training delivered by Knowledge Schools	9	0.4%		
	Training delivered by taxi drivers	6	0.2%		
	Training delivered by "Government"	4	0.2%		
	Training delivered by carriage office	3	0.1%		
	Training delivered by Operator	3	0.1%		
	Training delivered by AA/RAC	2	0.1%		
	Training delivered at Topographical Skills Training centres	1	0.0%		
	Training delivered by existing colleges	1	0.0%		
Other	Investigate tests (topological) offering guaranteed passes.	1,287	52.8%	1,287	52.8%
Don't Know		5	0.2%	5	0.2%
Not Answered		289	11.9%	289	11.9%
	TOTAL	6,642			

Table C17: Q20 Codeframe

Q20. What are your views on the proposal to check that a hire and reward insurance policy is in place at the time of [vehicle] licensing?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Regulation	A valid insurance certificate should be displayed in the vehicle	1,637	67.2%	1,835	75.3%
	All PH vehicles should have valid hire and reward insurance at all times	1,537	63.1%		
	Insurance needed for protection of passengers	69	2.8%		
	Insurers/DVLA/Operators should be compelled to notify if and when policies are cancelled in relation to licensed vehicles	20	0.8%		
	Only full insurance certificates should be accepted , not cover notes	11	0.5%		
	H&R should only be allowed to be bought as a annual policy (also perhaps non-refundable)	7	0.3%		
	Drivers/operators should all have public liability insurance	2	0.1%		
	Limit the number of insurers from which PH operators/drivers can get H&R (easier to detect fraud)	1	0.0%		
	Need for better system as some insurance companies won't insure a vehicle, unless it's licensed as a PHV first - circular	1	0.0%		
	Scrap the 1998 Act	1	0.0%		
	Non-UK drivers should have evidence of having driven in the UK for a year before they can apply for licence	1	0.0%		
	TfL should require operators to provide secondary insurance for all bookings, in case of the vehicle insurance being invalid	1	0.0%		
	Insurers to be prevented from taking advantage of drivers (H&R expensive)	1	0.0%		
	Operations	Check insurance certificate at time of licensing/renewal	125		
Insurance details should be linked to ANPR systems to allow TfL/police to determine if PH vehicle has Hire and Reward Insurance		28	1.1%		
TfL should keep a database of PH vehicles and their live insurance status		22	0.9%		
Insurance should be checked every 6/12 months		17	0.7%		
Details of insurance should be checkable online by anyone for safety reasons		6	0.2%		
A linking system (similar to pay by phone parking) which joins the mobile device, the driver, the vehicle and current appropriate insurance		1	0.0%		
Enforcement		TfL to carry out checks to ensure policies are present and correct	138	5.7%	178
	Anyone without H&R insurance or with forged insurance to have licence revoked/be fined	49	2.0%		
Abuse of System	Common problem of drivers cancelling hire and reward policies and replacing with domestic insurance/purchasing H&R to avoid congestion charge pricing	100	4.1%	103	4.2%
	Problem of forged/photocopied PHV insurance policies	3	0.1%		
Supportive	No further comments	68	2.8%	68	2.8%
Other	Express surprise that this process not already in place	67	2.8%	71	2.9%
	Comments on insurance arrangements of specific minicab operator	4	0.2%		
Unsupportive	No changes needed	17	0.7%	21	0.9%
	Unreasonable if vehicle is to be rented to third party/not being used as PHV all the time	4	0.2%		
Don't Know		4	0.2%	4	0.2%
Not Answered		222	9.1%	222	9.1%
	TOTAL	4,164			

Table C18: Q21 Codeframe

Q21. Should it be mandatory for operators to supply and electronically upload details of their drivers and vehicles to TfL and, if so, how frequently?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Frequency	Weekly/Fortnightly	1,509	61.9%	2,057	84.4%
	Monthly	115	4.7%		
	Daily	93	3.8%		
	As soon as driver starts at/leaves a company	84	3.4%		
	Every six months	71	2.9%		
	Every three months	59	2.4%		
	Immediately if change is made	57	2.3%		
	Annually	55	2.3%		
	Updates in real time	20	0.8%		
	Often as possible	12	0.5%		
	Operators to inform TfL when a new driver starts working for them	9	0.4%		
	When required	6	0.2%		
	As required for taxi trade	5	0.2%		
	Every 24 months	1	0.0%		
	Longer than every 24 months	1	0.0%		
	Every time insurance expires	1	0.0%		
	Whenever a complaint is made	1	0.0%		
As required for lorry drivers	1	0.0%			
Regulation	If PH driver has not registered with an operator within 28 days the licence should be suspended	1,330	54.6%	1,398	57.4%
	TfL require information on every PHV driver (monitoring, complaints etc.)	37	1.5%		
	Drivers should only be allowed to work with one operator at a time	32	1.3%		
Supportive	Would allow TfL to monitor drivers working for multiple operators	583	23.9%	663	27.2%
	Improve/aid public safety	63	2.6%		
	No further answer	20	0.8%		
Unsupportive	Unnecessary/bureaucratic/admin burden	18	0.7%	21	0.9%
	Impractical due to high turnover	3	0.1%		
Method	Online system	7	0.3%	12	0.5%
	Framework could be put in place to show 'new' drivers, drivers who have 'left' and existing drivers	5	0.2%		
Enforcement	More inspection/enforcement required	3	0.1%	6	0.2%
	Prevent touting	3	0.1%		
Suggestion	Allow disclosure of information to other Government agencies	3	0.1%	3	0.1%
Don't know		2	0.1%	2	0.1%
Not Answered		221	9.1%	221	9.1%
	TOTAL	4,430			

Table C19: Q23 Codeframe

(Continued overleaf)

Q23. 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?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Regulation	Minimum years residency requirement in the UK before a driver can be granted a PH licence	1,464	60.1%	1,858	76.3%
	Current regulations not sufficiently strenuous to ensure public safety	1,406	57.7%		
	Minimum years residency requirement for operators to enable a UK DBS check (expectation for operator domiciled in and paying tax in UK)	1,323	54.3%		
	Permanent structure for operations centre - based in UK	55	2.3%		
	Current regulations are sufficient	51	2.1%		
	Not fit for purpose	45	1.8%		
	Comment regarding Uber's legality	41	1.7%		
	Limit/cap on number of licences	28	1.1%		
	Minimum vehicle specifications and maintenance	25	1.0%		
	Good character/fit and proper assessment	19	0.8%		
	UK/EU Driving licence held for a defined period	14	0.6%		
	Hire and reward insurance checked on vehicle inspection and copy displayed in vehicle	12	0.5%		
	All bookings should come through an operator rather than an individual	8	0.3%		
	Drivers required to display applicable licences in-vehicle	7	0.3%		
	No satellite offices	7	0.3%		
	No app-based bookings - should all be controlled by a central office	5	0.2%		
	All PHV bookings should be for the future and not immediate	5	0.2%		
	Existing requirements are too stringent	4	0.2%		
	Planning permission/certificate for lawful use of premises	3	0.1%		
	Drivers should be employees of the company they are working for	3	0.1%		
	One operator - one licence	3	0.1%		
	Removal of age limit on vehicles	2	0.1%		
	Non-UK residents should not be exempt from DBS check	2	0.1%		
	Drivers can only work for one operator at a time	2	0.1%		
	Minimum price-per-mile - PHV wouldn't be allowed to charge under it	2	0.1%		
	Lack of ability to pre-book should render licence invalid	1	0.0%		
	PHV vehicles should pay the congestion charge	1	0.0%		

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Operations	Fixed landline at operation centres (answer calls and complaints)	1,310	53.8%	1,447	59.4%
	Advanced driving skills test	46	1.9%		
	Good command of English	44	1.8%		
	TfL led topographical/Knowledge test	22	0.9%		
	Better PHV identification	14	0.6%		
	Better record keeping	12	0.5%		
	Operators responsibility to ensure their drivers are adhering to the law	10	0.4%		
	Removal of outdated requirements e.g. phonenumber, radio licence	5	0.2%		
	Presentational standards e.g. standard uniform	4	0.2%		
	First aid/H&S training	3	0.1%		
	Topographical testing not required	2	0.1%		
	Driver medical	2	0.1%		
	Knowledge of private hire laws	2	0.1%		
	Driver should have to reapply for licence if they leave an operator	2	0.1%		
	All offices should have an internet site where customers can complain online (with TfL having access to	1	0.0%		
	All bookings should come through a TfL controlled system	1	0.0%		
	Removal of on-vehicle advertising for operator	1	0.0%		
	External Risk Management experts to oversee licencing	1	0.0%		
	Diversity/Equality training	1	0.0%		
Enforcement	Better enforcement of existing rules/regs and regular checks	182	7.5%	319	13.1%
	More rigorous DBS check including foreign nations - liaison with their country of origin	77	3.2%		
	Companies/individuals should be forced to pay UK taxes - provide NI numbers	44	1.8%		
	Clamp down on touting and ehailing	28	1.1%		
	Accountability, associated monitoring/enforcement	5	0.2%		
	Cross checking for illegal activity/misuse of licence in other UK cities	2	0.1%		
	Take drivers fingerprints to confirm identity at licencing	1	0.0%		
Don't Know		47	1.9%	47	1.9%
Not Answered		279	11.5%	279	11.5%
	TOTAL	6,686			

Table C20: Q25 Codeframe

(Continued overleaf)

Q25. Do you feel that there are any other regulations not covered in this paper that it would be appropriate to review?

Theme	Code	Count	Share of Respondents	Grouped Count	Share of Respondents
Regulation	Limit the numbers of PH licences	1,458	59.9%	1,927	79.1%
	All PH drivers and Operator licence applicants to provide a National Insurance number at the time of the initial application or relicensing (share with DWP)	1,368	56.2%		
	Time delay requirement between a booking and the beginning of the journey	1,278	52.5%		
	All Private Hire Operators should offer a pre-booking service for any future time and date (i.e. not ply for hire)	1,259	51.7%		
	Operators must be responsible for ensuring staff adhere to PH regulations	1,253	51.4%		
	Booking app operators should not show vehicles available for immediate hire to the public prior to a booking being made	1,230	50.5%		
	Further to Q2, Booking Records, there should be a requirement to record an accurate pick up position at the time of the booking	1,229	50.5%		
	Stop unlicensed drivers signing into an app using a registered driver's details (e.g. biometric login)	1,227	50.4%		
	Any plans to legislate the number of licences must be considered in conjunction with a prohibition of cross border hiring, otherwise operators could be based outside of Greater London, avoiding the legal requirements set by TFL.	1,227	50.4%		
	Only licensed private hire drivers should be driving licensed PH vehicles	1,225	50.3%		
	PH driver can only be registered to work for one operator at a time, this prevents 'double' or 'triple' shifting	1,219	50.0%		
	Private Hire regulations must reflect the intention of Parliament and the 1998 Act.	1,214	49.8%		
	Change sliding scale charging practice for operator licensing. Charge per vehicle thus ensuring the largest operators pay the most	1,210	49.7%		
	A Private Hire Operators Licence must be in place for every premises where any part of a booking, hiring or transaction takes place	1,200	49.3%		
	Do not permit/review legislation around ehailing/apps	98	4.0%		
	Address the issue of the smartphone meter	69	2.8%		
	Only drivers that are resident in the uk/pass dbs checks/fit and proper/have driving licence/insurance should be licensed	45	1.8%		
	ID/licensing/insurance/roundel/pre-booked only sticker should be visible in the vehicle	42	1.7%		
	Comment regarding Uber's legality	33	1.4%		
	Better regulation of satellite offices/operations outside venues	24	1.0%		
	Ban tinted windows	22	0.9%		
	Prohibiting PH drivers licensed outside London operating in London	21	0.9%		
	Address use of mobile phones/sat-nav whilst driving	19	0.8%		
	Define ply for hire/pre-booking	17	0.7%		
	PH drivers should have to do the Knowledge (or equivalent)/advanced driving test	16	0.7%		
	PHV should be fixed price only (ban surge pricing)	16	0.7%		
	Operators/drivers to be required to demonstrate that they're paying tax in UK	16	0.7%		
	Phone number/landline to call (e.g. if customers have a complaint)	16	0.7%		
	PH Operators/App to be based in UK/London	15	0.6%		
	Ban/regulate rickshaws/pedicabs	11	0.5%		
	Fare structure (standardised within PH/give taxis more flexibility in pricing)	11	0.5%		
Review/regulate the amount of hours a driver is permitted to work (long hours pose risks)	11	0.5%			

Theme	Code	Count	Share of Respondents	Grouped Count	Share of Respondents
Regulation	A physical premises/place of business	9	0.4%		
	Make PH operations better for the elderly/disabled	9	0.4%		
	Reducing the regulations on PHV blurs the line between PHV and London Black Cabs	8	0.3%		
	All drivers should be employed by the company they work for (stop tax evasion/claiming tax credits/better treatment)	6	0.2%		
	Review PH model in its entirety	4	0.2%		
	Recognise (and perhaps regulate separately) the branches of PH operators and drivers (e.g. Local Minicab, Chauffeur, Professional Tour Guides, Executive Drivers)	4	0.2%		
	Request for extension on maximum age of taxis (10 years)	4	0.2%		
	Set minimum per mile rate for PH without cap on higher limit (encourage competition/provide reasonable earning)	5	0.2%		
	Law to be brought in line with current technology	3	0.1%		
	Tfl to make public the details of companys who are applying for private hire licences	3	0.1%		
	PH drivers should pay congestion charge	3	0.1%		
	The regulations should be open ended and specified that Tfl have the power to change laws due to evolving technology and loopholes	3	0.1%		
	Regulations are currently too strict/consider deregulation	2	0.1%		
	Operators must pay minimum wage	2	0.1%		
	If taxis are having to have zero emissions PHD vehicles should be the same/vehicle environmental standards	2	0.1%		
	Asylum seekers and refugees should be excluded from applying for a licence	1	0.0%		
	No changes required	1	0.0%		
	Booking centers should not be licensed on clearways, red routes or near bus stops (interferes with bus operations)	1	0.0%		
	PHV vehicle should be able to operate a meter	1	0.0%		
	The options for operators' names when applying for a licence should be tightened and restricted	1	0.0%		
	All taxi and minicab and taxi drivers should be trained to at least Bikability Level 2	1	0.0%		
	Proof of planning permission to be exempt for those applying for a "small" operator's licence	1	0.0%		
	Drivers should not be allowed to discriminate based on racial/sexual grounds	1	0.0%		
	Vehicles should only be licensed from manufacture to be used as a taxi or minicab	1	0.0%		
	Need an outfit to regulate Tfl	1	0.0%		
	Review the types of vehicle being licensed	1	0.0%		
	Concern regarding accountability of smartphone operators	1	0.0%		
Concern of potential for monopoly on industry from one or two large companies	1	0.0%			
Regulations to be future-proof for technology such as autonomous vehicles	1	0.0%			
Enforcement	Tfl must enforce existing regulations/increase enforcement personnel	97	4.0%	149	6.1%
	Address the problem of touting/plying for hire	55	2.3%		
	Harsher punishments for PHV drivers/operators flouting law	15	0.6%		
	Regular HMRC & Benefit fraud checks	5	0.2%		
	Revoke licences of any PH drivers who refuse guide dogs in their vehicles	2	0.1%		
	System to monitor drivers' behaviour/driving when on jobs	1	0.0%		
	Charge/fine members of the public who get into touted/un-booked vehicles	1	0.0%		

Theme	Code	Count	Share of Respondents	Grouped Count	Share of Respondents
Suggestion	TFL should create a TFL app with both PHV and Taxis on it (income for TFL and provide an in app complaints procedure)	32	1.3%	37	1.5%
	Rename private hire to pre-booked to clarify difference between trades	1	0.0%		
	Process to step up the career path from Private Hire to Licensed Taxi Driver (path of transition rather than two-tier system)	1	0.0%		
	Time to make black cabs and The Knowledge defunct (progress with technology)	1	0.0%		
	Use cab drivers as enforcement officers (in same way that they're asked to be examiners for the Knowledge)	1	0.0%		
	Special exemptions for Chauffeurs to not have to wear ID badge when greeting a client	1	0.0%		
Operation	Members of the public should be aware of difference between private hire and taxis	6	0.2%	26	1.1%
	Ensure that roundels/licence are handed back to TFL when expired or when vehicle licence is revoked	5	0.2%		
	Credit/debit cards to be accepted in all ph and taxis	5	0.2%		
	All complaints to be forwarded to Tfl/clearer complaints procedure	4	0.2%		
	Employ more staff to make it easier to contact Tfl	2	0.1%		
	Bring in Transport Police/Met to run Taxi and PH operations	2	0.1%		
	Smart presentation of drivers	2	0.1%		
	Train PH and Taxi drivers in first aid	1	0.0%		
	Vehicle Licence Plate exemption should be easier to obtain	1	0.0%		
	Public safety must be ensured (Tfl's responsibility)	22	0.9%		
Safety	Negative comment regarding consultation/Tfl	9	0.4%	20	0.8%
	Tfl need to better support taxi trade	9	0.4%		
Other	PH treated unfairly compared with taxis (not allowed to use bus lanes/forced to have fixed fare)	2	0.1%		
	Tfl to provide rest areas, with toilets for Private Hire Trade	1	0.0%		
Don't Know		6	0.2%	6	0.2%
Not Answered		384	15.8%	384	15.8%
	TOTAL	18,854			

Control Sheet

Document Title

Private Hire Regulations Review Consultation Analysis

Document Type

Report

Client Contract/Project No.

SDG Project/Proposal No.

22850901

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Issue No.	Date	Details
1	14/08/15	Draft Report
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3	10/09/15	Final Draft
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Review

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Project Team



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APPENDIX 5: Engagement with customers

To support our consultation process we undertook a range of quantitative and qualitative analysis to gauge the views of Londoners and users of private hire services.

The qualitative essentially answers the 'why' questions and is based on a small number of people answering in depth questions. In contrast the quantitative survey addresses the 'how many people believe/do...' and is based on a large number of people – representative of Londoners - who answer a few questions.

Qualitative research

The qualitative analysis comprised nine Customer Focus Groups to discuss the proposals in detail and understand customers' views and reactions to specific proposals. This was supported by a further eight interviews with people with accessibility issues/ carer of someone with accessibility issues. The profile of users included those accessing local and pan-London operators, different levels of frequency of use, and different booking modes (e.g. on line, by phone or at an operator's premises).

The research showed that, on balance, customers found the current PH experience to be positive and improving. Factors that contributed to this feeling included the choice of operators available and the means by which they could be contacted.

Customers were broadly satisfied with the breadth of coverage of the proposals which would meet the objectives of delivering a more consistent PHV experience. Customers considered some of our proposal concerned areas which should already be in place, such as:

- Operators to have Hire and Reward fleet insurance in place
- Vehicle licence revoked if drivers licence revoked
- Hire and Reward insurance checked at point of licensing

The proposals that attracted most support were:

- Private hire drivers to demonstrate a certain level of English
- Operators to provide booking confirmation containing driver and vehicle details
- Operators to provide a specified fare prior to booking being accepted.

Proposals which customers felt did not carry a clear benefit to customers included:

- Five minute delay between booking and commencement of journey
- Private hire drivers registered to a single operator only
- Operators not showing vehicles available for immediate hire

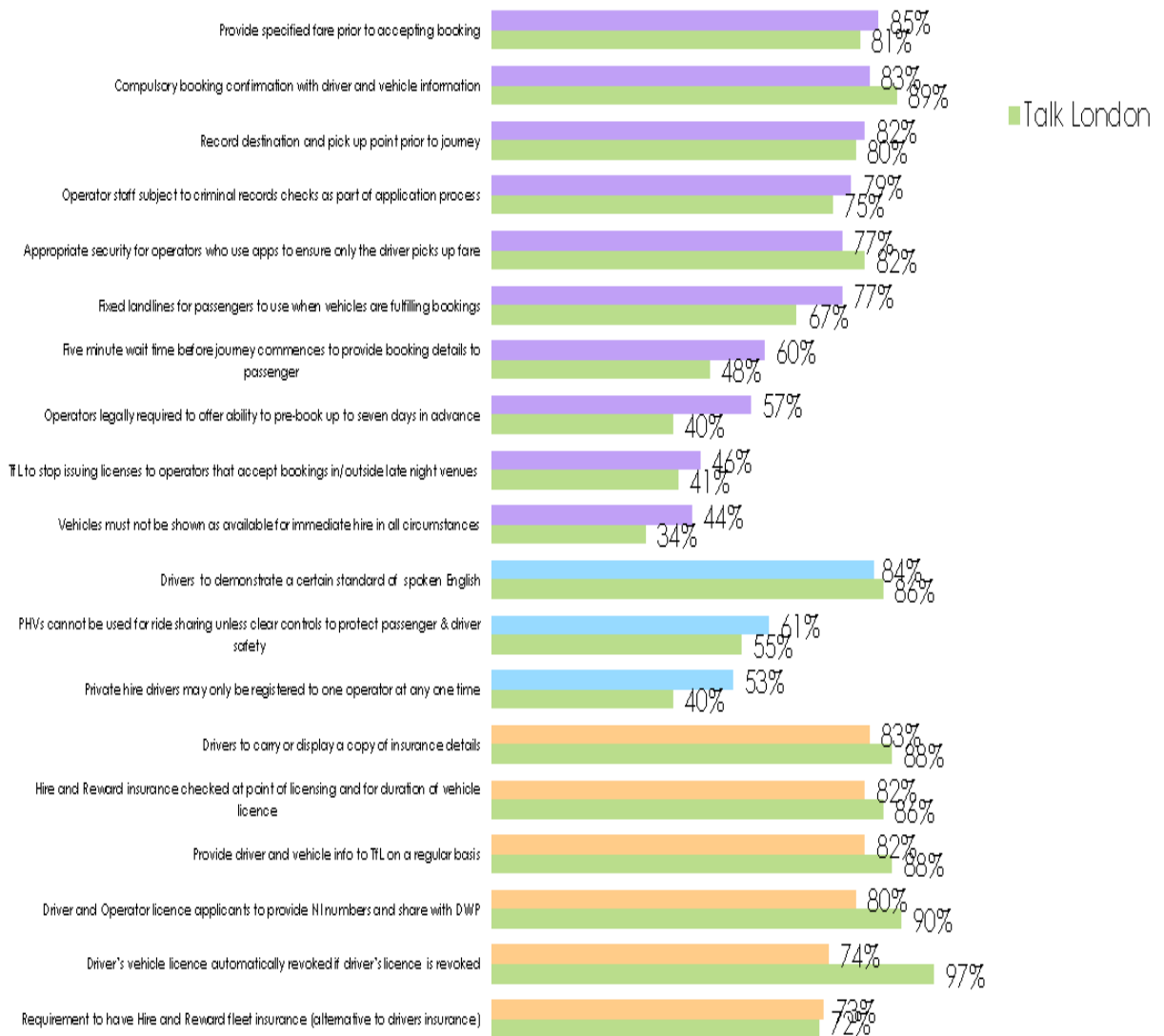
Of less importance to customers, but still thought of as generally useful proposals, were

- Drivers to carry insurance documents
- Operators must have a fixed landline
- Operators must record the main destination and pick up location for each booking
- Operational staff subject to criminal records checks
- No longer licence in-venue operators/ temporary events
- Operator to offer booking facility 7 days in advance

Quantitative research

The quantitative research comprised an online survey via research by Future Thinking where over 2,500 responses were received, supported by a further 100 telephone interviews with customers aged 65+.

Separately, an online survey via the GLA Talk London website. Fieldwork ran from to 23 November 2015 to 16 October 2015. An invitation to complete was emailed to the 10,000+ Talk London membership on 27 October 2015, with a reminder email on 19 November 2015. A sample size of 869 was achieved.



Summary of Future Thinking and Talk London survey results

Perceptions of PHVs

Future Thinking

Perceptions of PHVs
De-brief
January 2016
TfL number: 15093
FT number: 1881a
VI.6





Contents

- Objectives and method
- Summary
- Operator proposals
- Drivers' proposal
- Technical proposals
- Use and contact of PHVs
- Demographics

Objectives & Method

Business Objectives

Following a Consultation in March 2015, TfL have set out a number of proposals for a second consultation for the Autumn of 2015. Following on from the Talk London survey, TfL commissioned research with a representative sample of Londoners to gauge support for the various proposals put forward

Regulations
for private
hire
operators

Regulations
for private
hire drivers

Technical
changes to
the
regulations

Method

Survey of London residents consisting of **2,628** interviews

Page 198

Online Survey:



2,528

Interviews with a representative sample of Londoners aged 16+

Boost telephone survey



100

A boost telephone survey conducted with those aged over 65+ to ensure that all Londoners were well represented

Fieldwork dates:



4 Dec 15 -
4 Jan 16

Method note:

- Online and telephone data combined and corrective weights applied to London demographic profile
- Participants completing online responded to 19 proposals
- For ease of administration, participants completing the survey on the telephone responded to 10 proposals

Technical note:



Only statistically significant sub group analysis is shown in report. A green arrow denotes significantly higher and red denotes lower within subgroup

A slide on reading and understanding the PHV proposals is included in the appendices

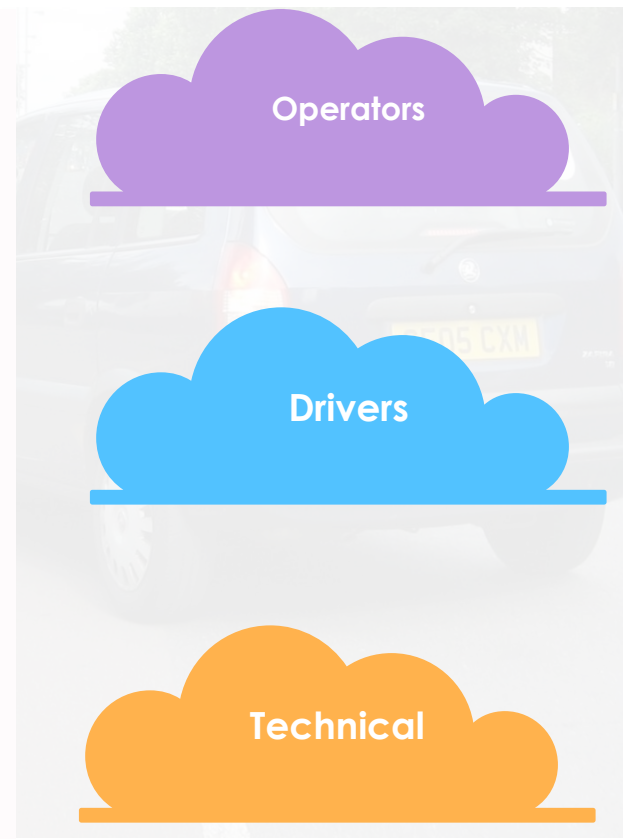
Summary



There is broad support for the PHV proposals

Page 200

- Londoners tend to support proposals that have a focus on improving user experience
- Technical changes to the way PHVs operate are supported by Londoners; this may be due to the fact that these changes are perceived as measures that should already be in place
- Age is a key differentiator; with older respondents more likely to support PHV proposals than those in younger age groups
- Disabled Londoners are more likely to be supportive of proposals than those without a disability
- The method typically used to book PHVs also influences likelihood to support proposals; those who book using a landline are more supportive than those who book using apps. However, this is also linked to age



Londoners are generally receptive to the proposals for PHVs; however some are perceived more positively than others

*Denotes proposals included in both online and telephone surveys

No asterisk denotes proposal included in online survey only

*Provide **specified fare** prior to accepting booking

***Compulsory booking confirmation** with driver and vehicle information

*Record **destination and pick up point** prior to journey

Operator staff subject to **criminal records checks** as part of application process

*Appropriate **security for operators who use apps** to ensure only the driver picks up fare

***Fixed landlines** for passengers to use when vehicles are fulfilling bookings

***Five minute wait time** before journey commences to provide booking details to passenger

*Operators legally required to **offer ability to pre-book up to seven days in advance**

TfL to stop **issuing licenses** to operators that accept **bookings in/outside late night venues**

*Vehicles must **not** be shown as **available for immediate hire** in all circumstances

Drivers to demonstrate a certain **standard of spoken English**

* PHVs cannot be used for **ride sharing** unless clear controls to protect passenger & driver safety

*Private hire **drivers may only be registered to one operator** at any one time

Drivers to carry or display a **copy of insurance details**

Hire and Reward insurance checked at point of licensing and for duration of vehicle licence

Provide **driver and vehicle info to TfL** on a regular basis

Driver and Operator licence applicants to **provide NI numbers** and share with DWP

Driver's **vehicle licence automatically revoked** if driver's licence is revoked

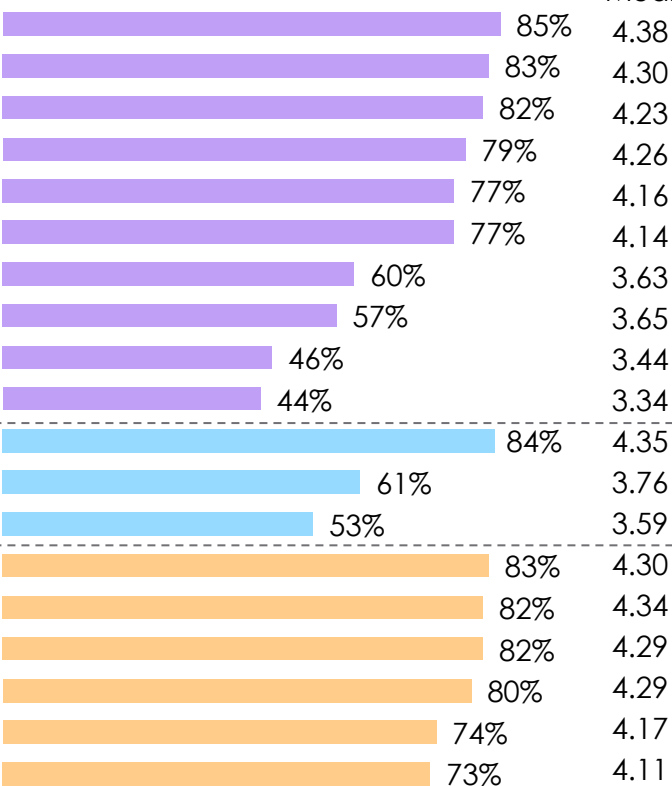
Requirement to have **Hire and Reward fleet insurance** (alternative to drivers insurance)

Mean

Operators

Drivers

People



To what extent do you agree or disagree with this proposal? Scale: Strongly agree (+5), Tend to agree (4), Neither agree nor disagree (3), Tend to disagree (2), Strongly disagree (1); Percentages shown represent combined Strongly agree and Tend to agree scores; All respondents (2,628), Online (2,628)

Overall, there is a degree of consistency with Talk London findings although Talk London has greater support for Technical proposals

*Denotes proposals included in both online and telephone surveys

*Asterisk denotes proposal included in online survey only

*Provide **specified fare** prior to accepting booking

***Compulsory booking confirmation** with driver and vehicle information

*Record **destination and pick up point** prior to journey

*Operator staff subject to **criminal records checks** as part of application process

Appropriate **security for operators who use apps** to ensure only the driver picks up fare

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Requirement to have **Hire and Reward fleet insurance** (alternative to drivers insurance)

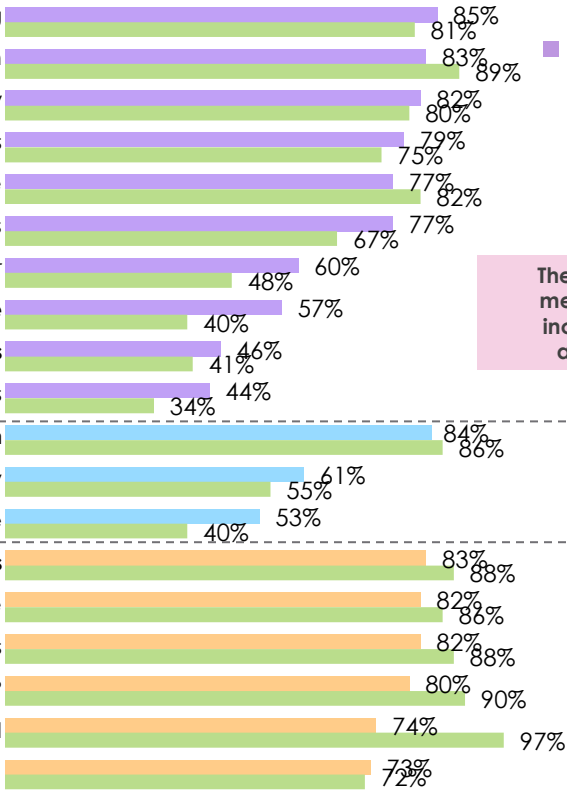
Future Thinking
Talk London

The Talk London methodology is included in the appendices

Operator

Drivers

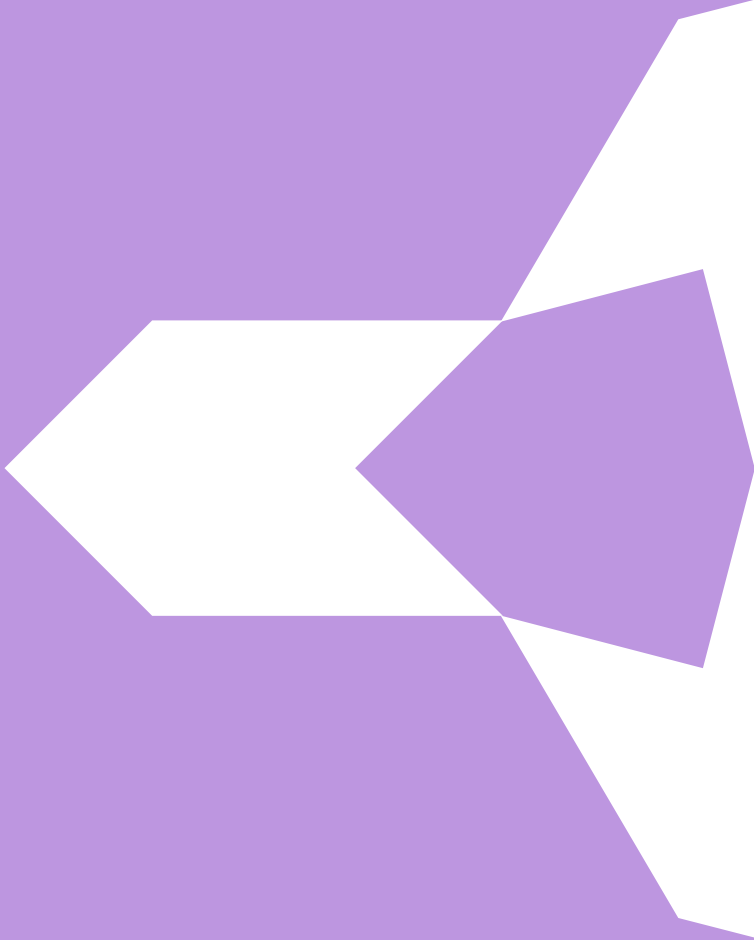
Technical



To what extent do you agree or disagree with this proposal? Scale: Strongly agree (+5), Tend to agree (4), Neither agree nor disagree (3), Tend to disagree (2), Strongly disagree (1); Percentages shown represent combined Strongly agree and Tend to agree scores. Base: FT (2,628), Online (2,628), *Talk London (869)

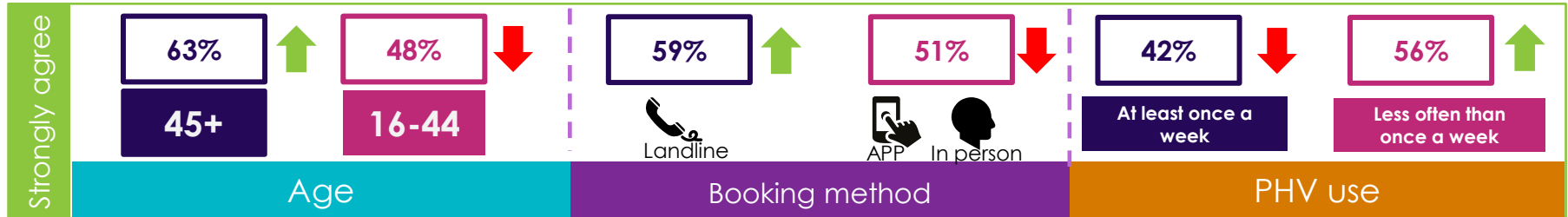
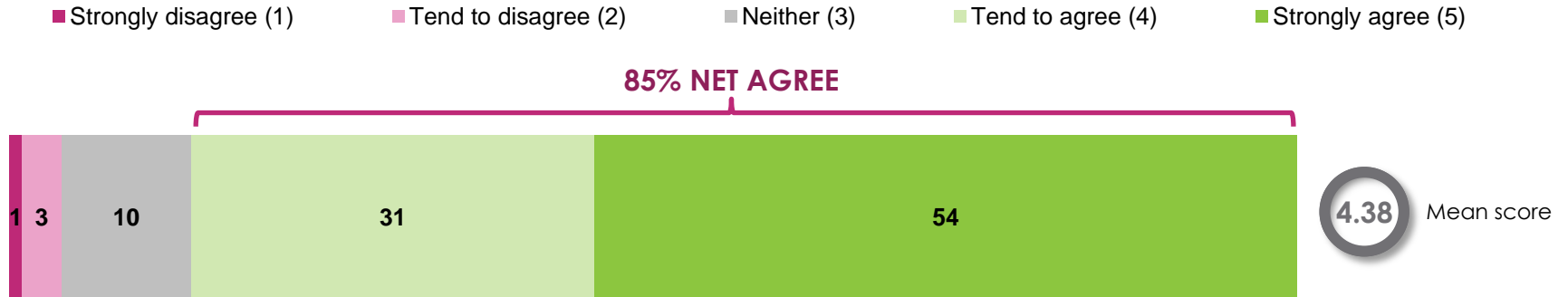


Operators



Private hire operators must provide a specified fare prior to the booking being accepted

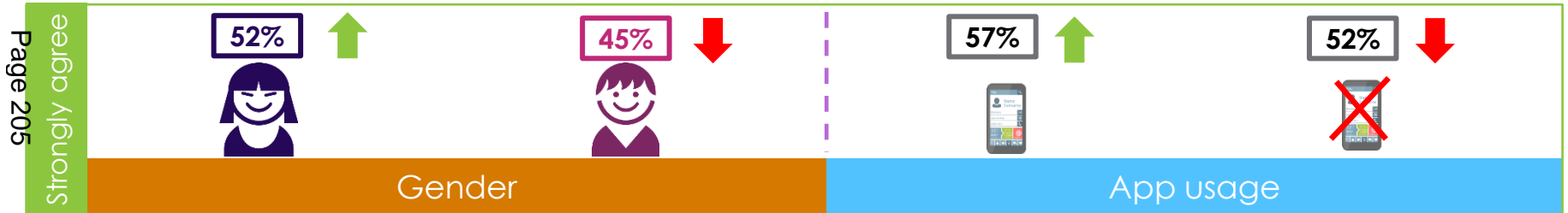
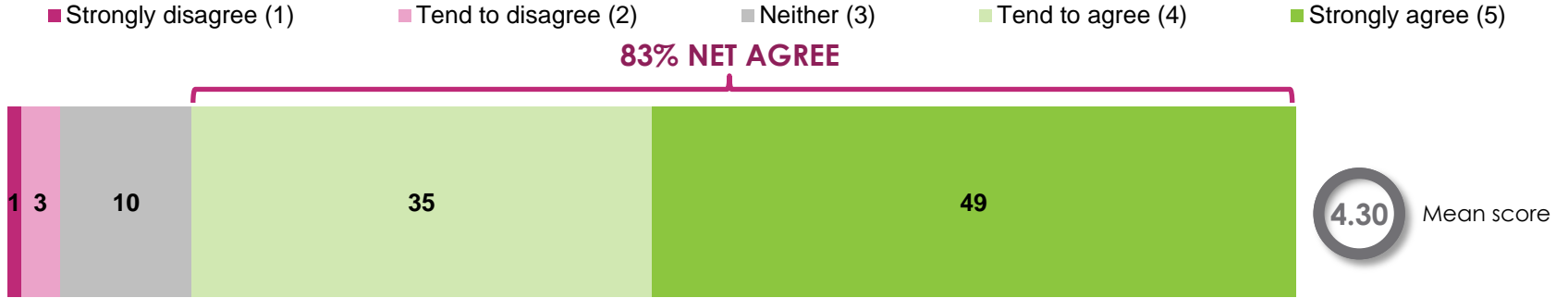
Londoners value fare transparency, this is particularly important for older Londoners



Q12. All respondents (2,628)
Online and Telephone sample

It would be compulsory for operators to provide a booking confirmation to passengers containing the driver's name and vehicle registration number. If booked via a smartphone, it would also be compulsory to provide a photograph of the driver.

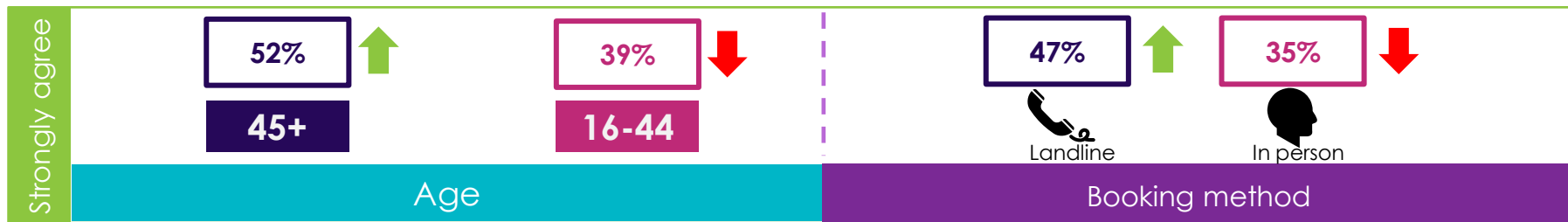
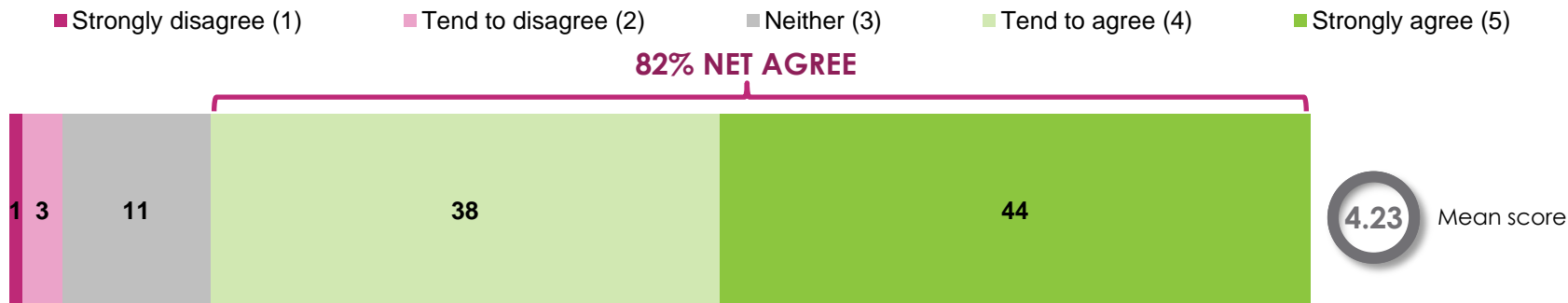
Strong sense that booking confirmation containing vehicle and driver information should be provided to passengers



Q3. All respondents (2,628)
Online and Telephone sample

Operators must record the main destination and pick-up location for each booking, at the time the booking is made and before the journey starts

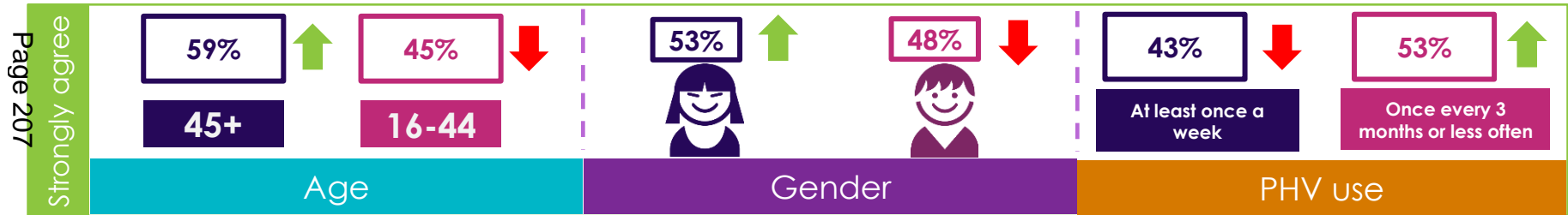
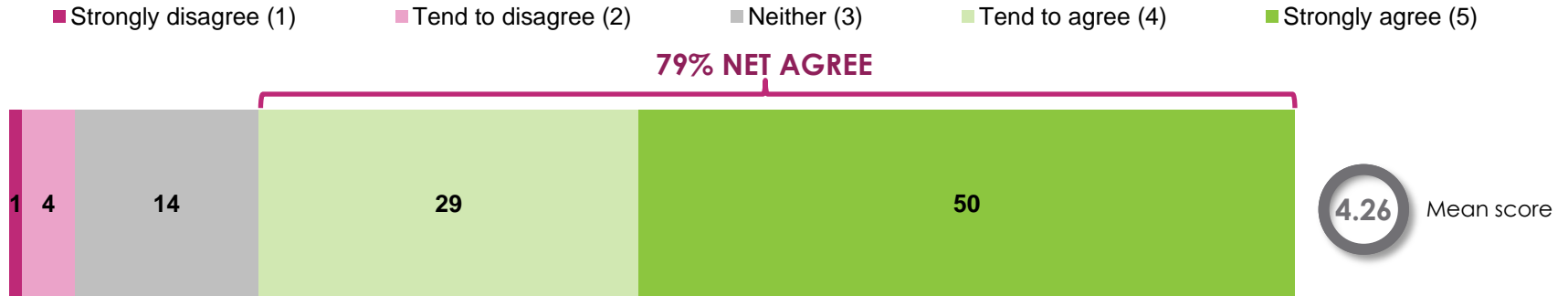
Recording the main destination and pick-up locations at the time of booking is favoured, particularly among the 45+ age group



Q11. All respondents (2,628)
Online and Telephone sample

Operator staff should be subjected to criminal records checks as part of their application process. This amended proposal does not apply to drivers (as checks are already a requirement for them), but to customer-facing staff in private hire offices

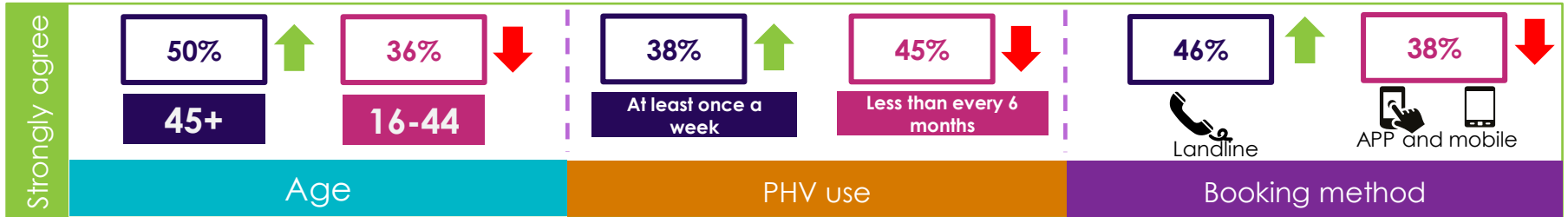
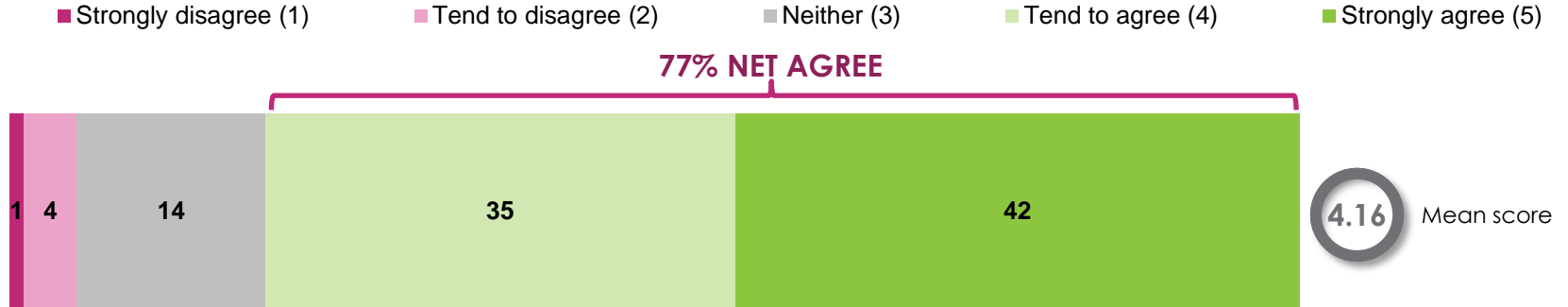
Support for criminal record checks of operator staff is high, particularly among older and female Londoners



Q13. All respondents (2,528)
Online sample

Operators who use apps to allocate drivers to a fare must have appropriate security measures to prevent the app being used by a person other than the licensed driver

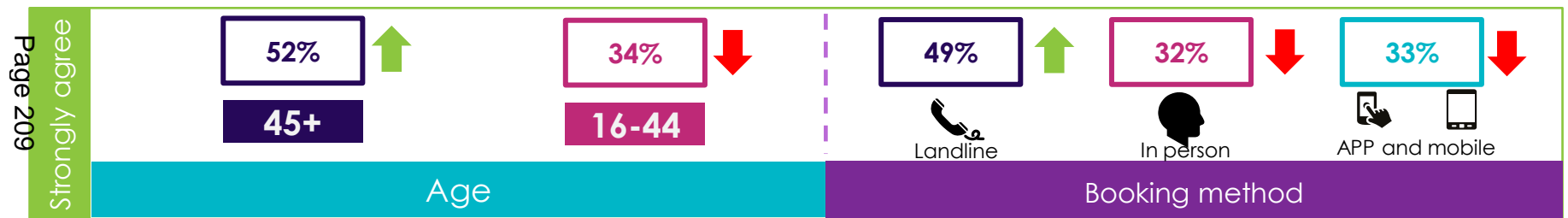
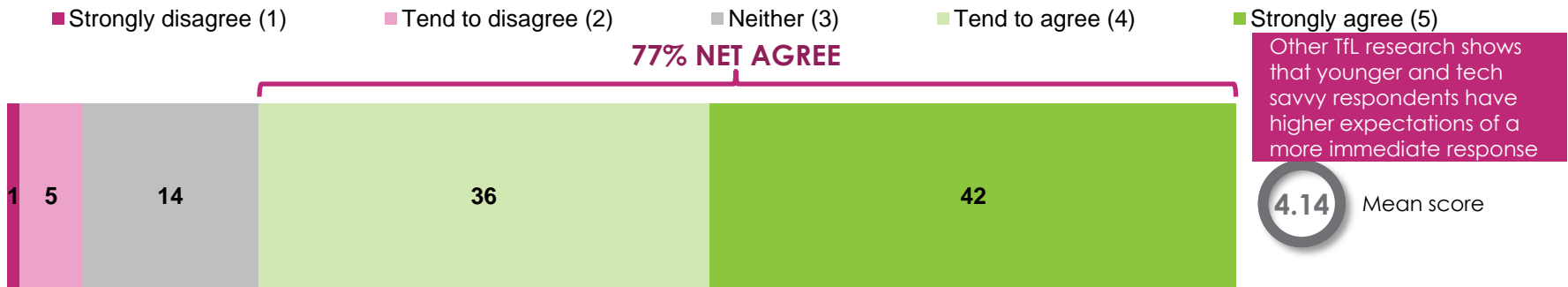
Although overall support for appropriate app security to prevent use by unlicensed individuals is high, app users are less likely to agree strongly with this proposal



Q5. All respondents (2,628)
Online and Telephone sample

Operators must have a fixed landline number available for passenger use at all times when their vehicles are fulfilling or accepting bookings

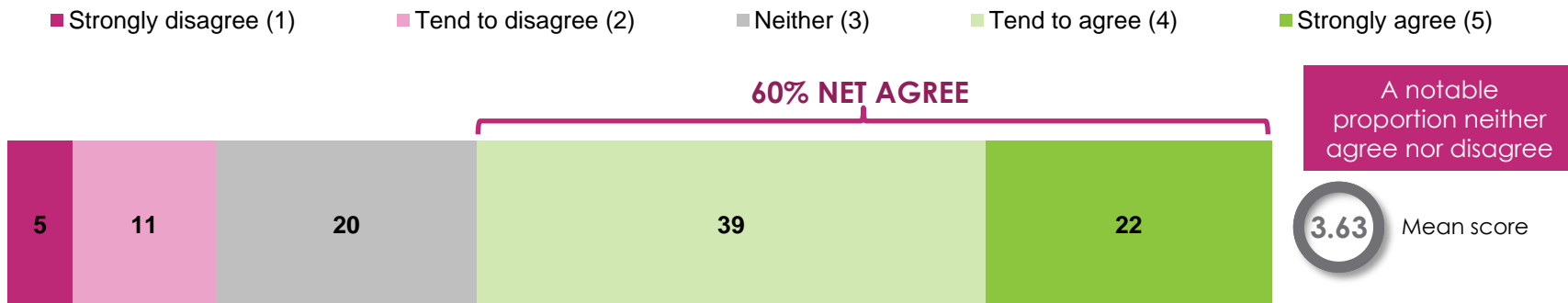
The availability of landlines is seen as important, particularly by those who are aged 45+. This age group is also the most likely to use landline for bookings



Q8. All respondents (2,628)
Online and Telephone sample

There must be at least a five minute wait period before a private hire journey commences in order for operators to provide booking confirmation details to passengers

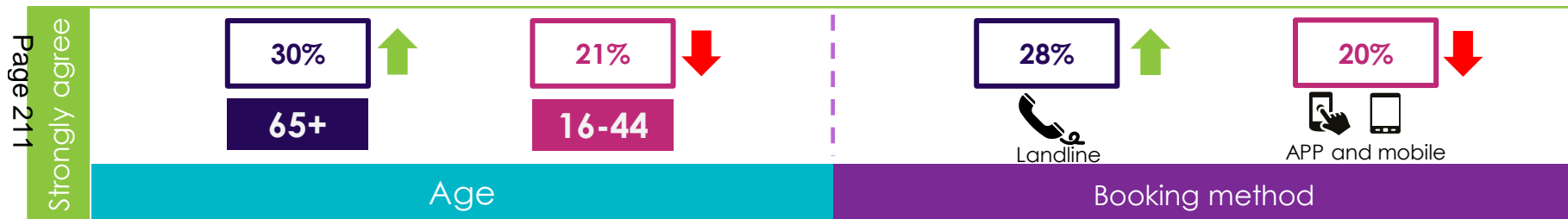
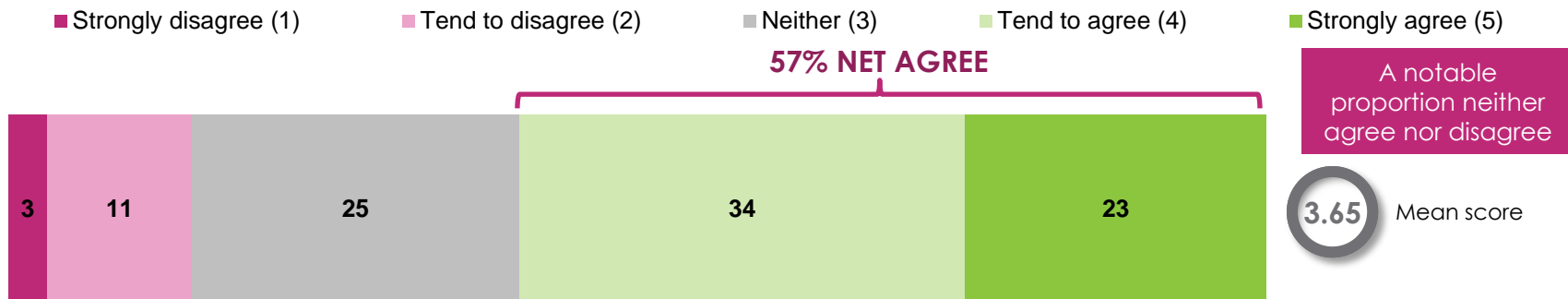
Views of this proposal not as strong, with older Londoners and those who book using a landline more likely to favour a five minute wait time



Q4. All respondents (2,628)
Online and Telephone sample

All operators must be legally required to offer the ability to pre-book up to seven days in advance

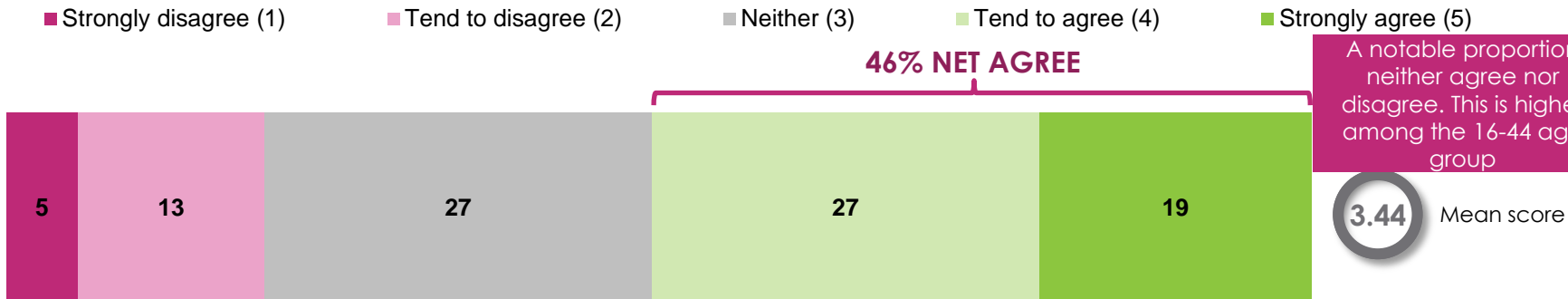
The ability to pre-book well in advance is not as high a priority as other proposals. However, older Londoners are more likely to value such a service



Q6. All respondents (2,628)
Online and Telephone sample

TfL will no longer issue licenses to private hire vehicle operators that accept bookings inside or outside late-night venues with the vehicles themselves parked nearby

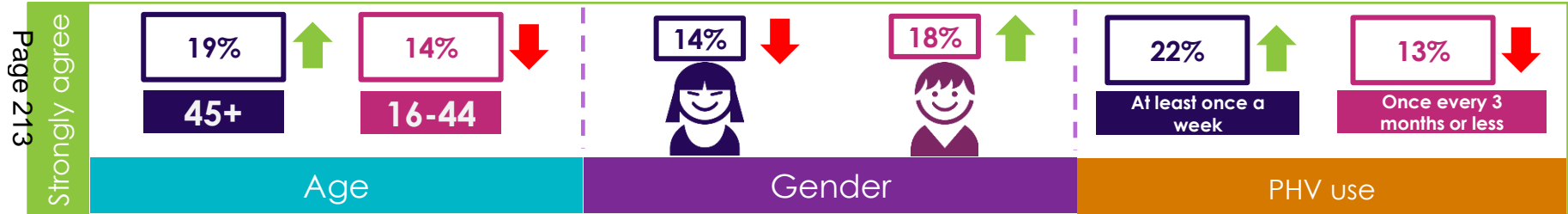
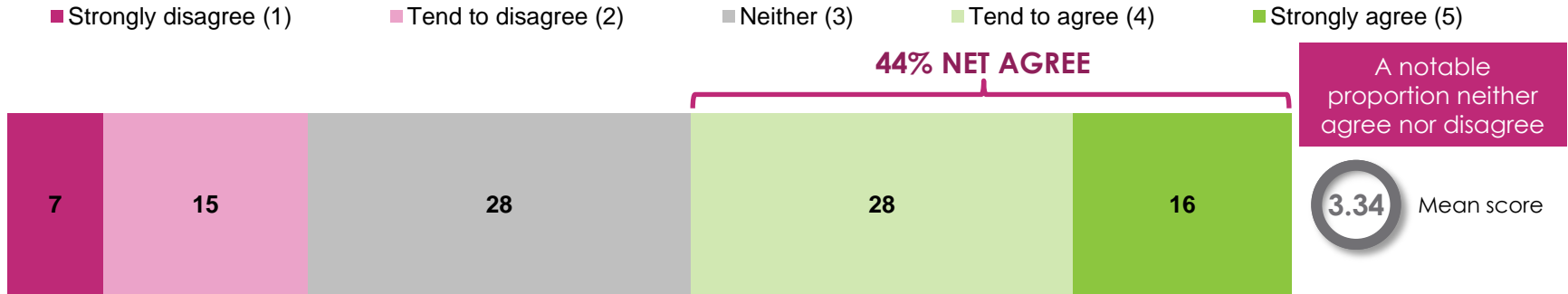
The proposal does not resonate as strongly with Londoners, with younger people less likely to agree strongly



Q7. All respondents (2,528)
Online sample

Operators must not show vehicles being available for immediate hire, either visibly, for example by signage on the street; or virtually, on an app

Londoners are least likely to agree with visible or virtual display of immediate hire of vehicles not being shown

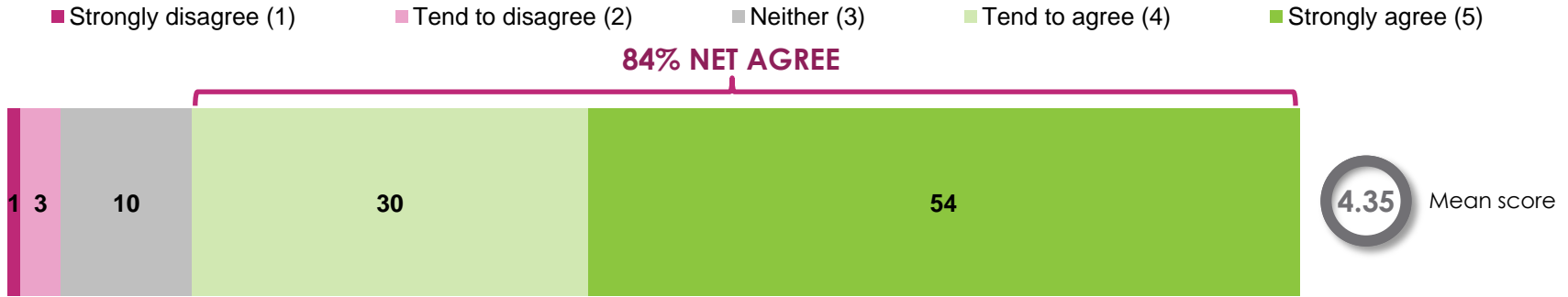


Q10. All respondents (2,628)
Online and Telephone sample

Drivers

Private hire drivers should be required to demonstrate a certain standard of English, with particular emphasis on ability on spoken communication

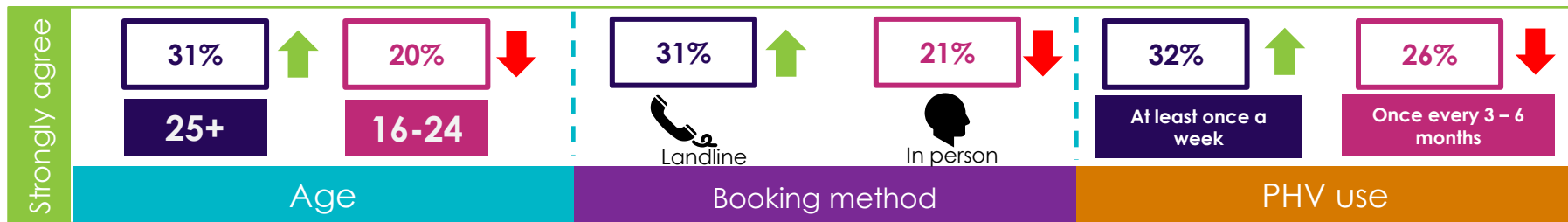
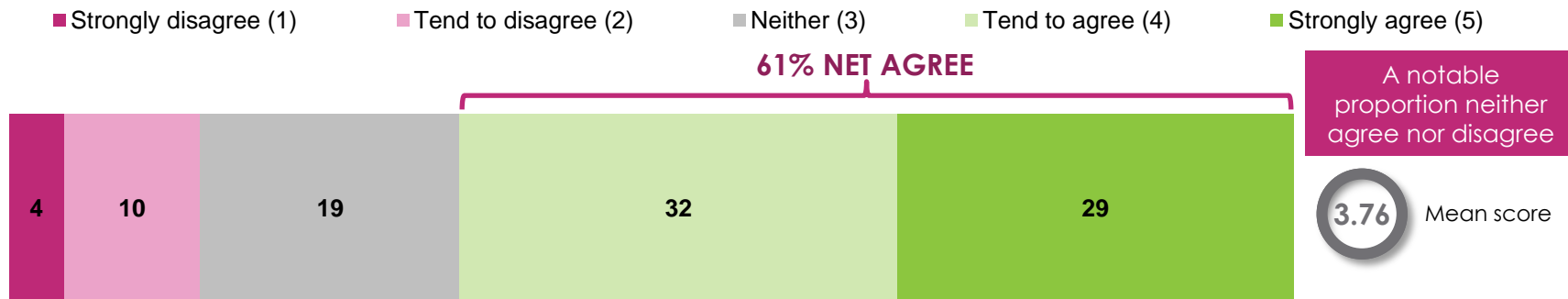
A certain standard of spoken English among drivers is a priority for Londoners, especially important for those aged 45+ and those who make their booking over the phone



Q14. All respondents (2,528)
Online sample

Private hire vehicles cannot be used for ride-sharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers

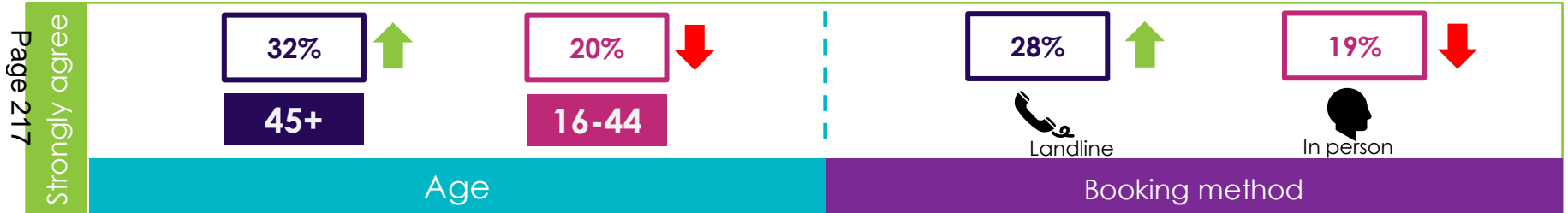
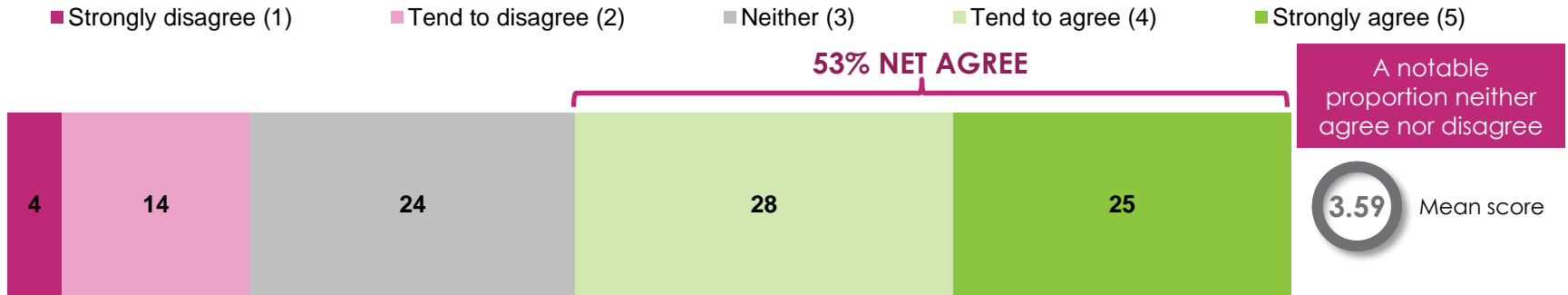
Ride-sharing controls to protect passenger and driver safety is not as high a priority as other proposals. However, frequent PHV users are more likely to value this service



Q16. All respondents (2,628)
Online and Telephone sample

Private hire drivers may only be registered to a single operator at any one time

Londoners show some concern with regards private hire drivers only being registered to a single operator

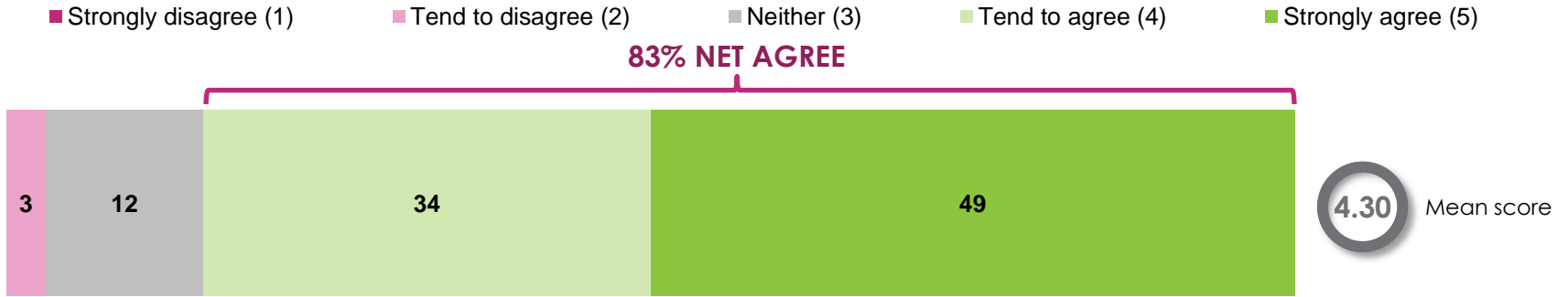


Q15. All respondents (2,628)
Online and Telephone sample

Technical

Drivers to carry or display a copy of insurance details at all times

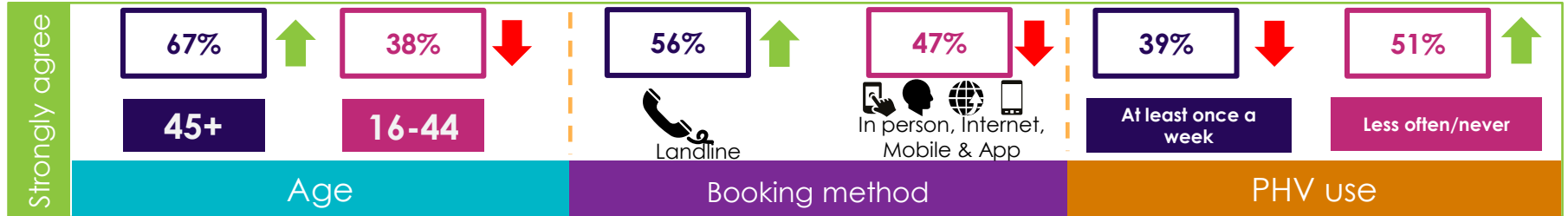
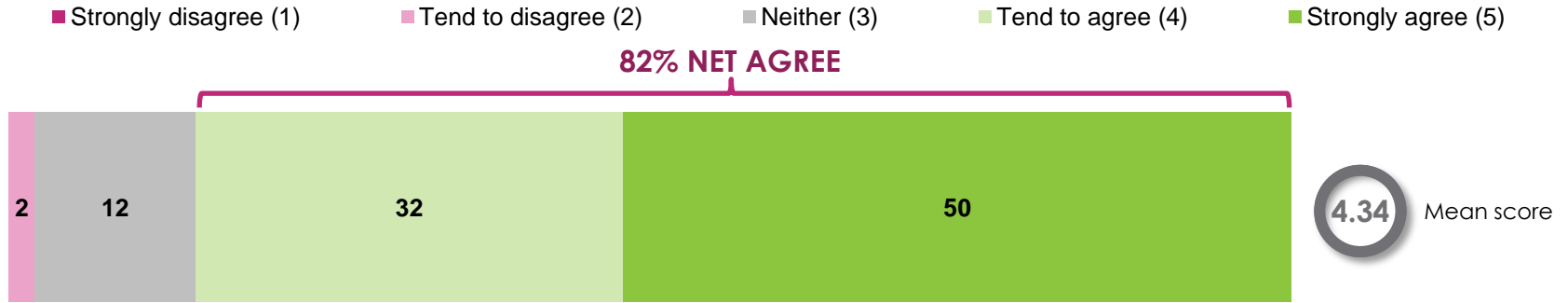
Strong sense that insurance details should be carried or displayed at all times, particularly among older Londoners



Q17C. All respondents (2528)
Online sample

Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence.

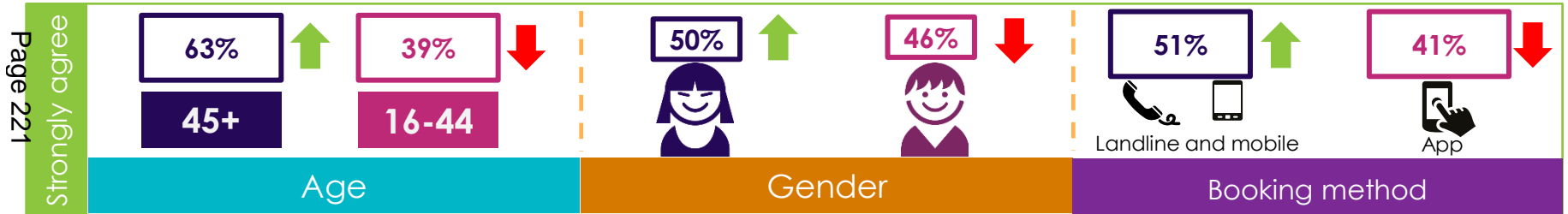
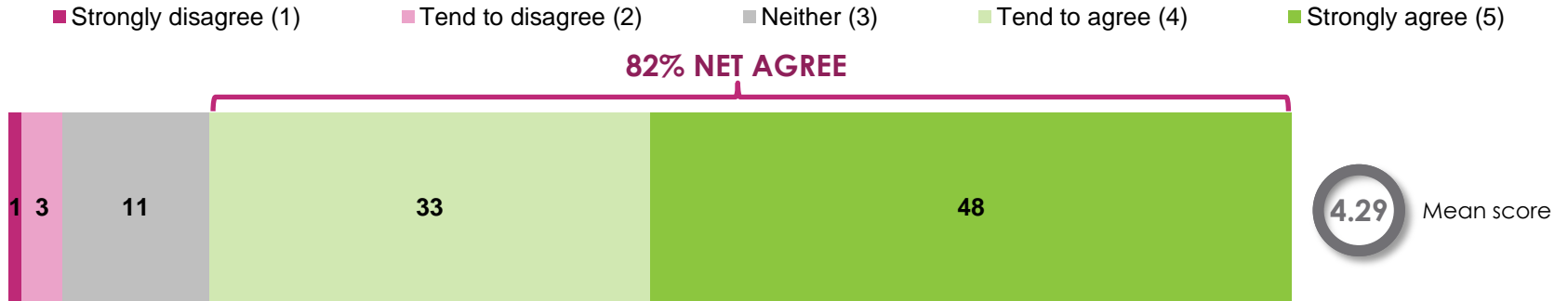
Checking Hire and Reward insurance at point of licensing is regarded as important, especially for those aged 45+



Q17B. All respondents (2,528)
Online sample

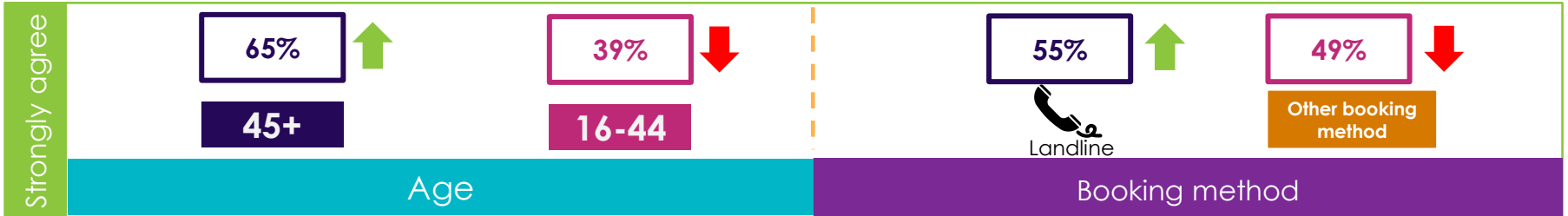
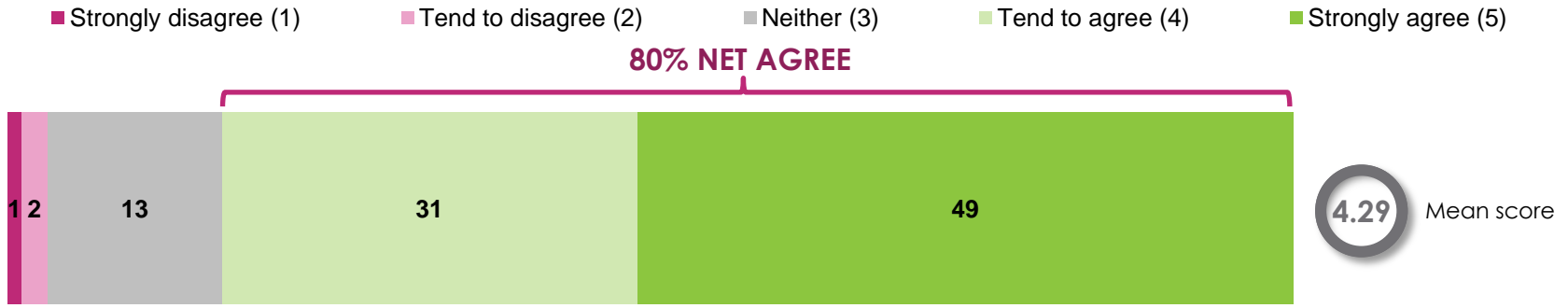
Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis

Londoners strongly support the idea to have operators provide specified information to TfL on a regular basis



Q17E. All respondents (2,528)
Online sample

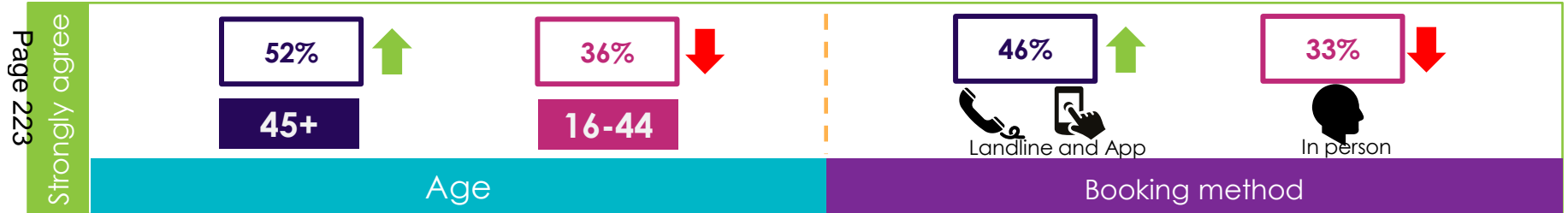
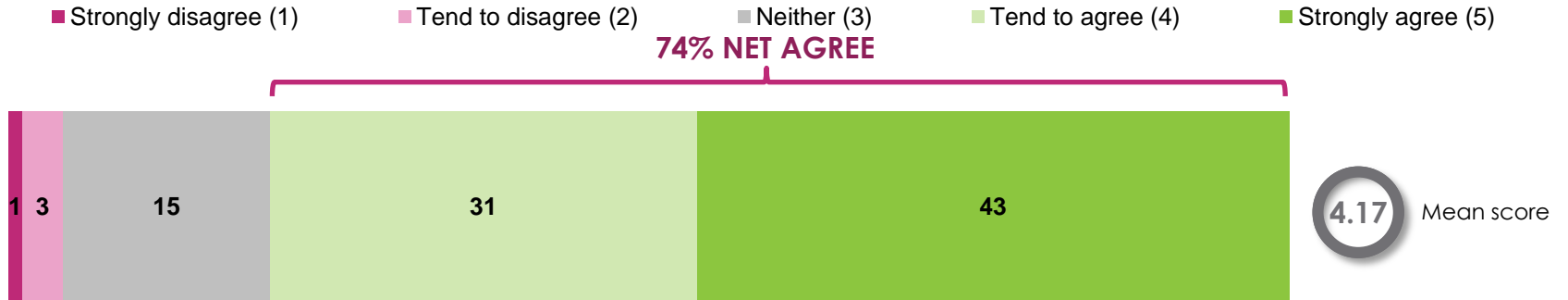
The proposal to have licence applicants provide National Insurance numbers receives high support, particularly among older Londoners



Q17F. All respondents (2,528)
Online sample

A driver's private hire vehicle licence to be automatically revoked if their private hire driver's licence is revoked

Strong support to revoke vehicle licenses automatically if a driver's licence is revoked, particularly among older Londoners

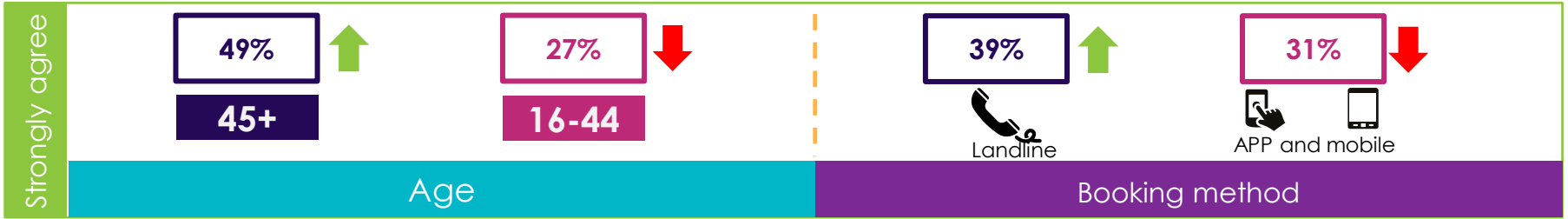
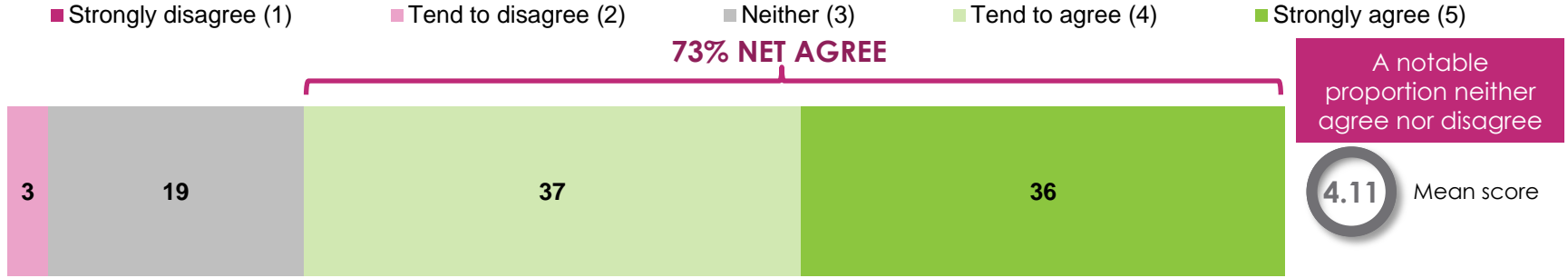


Q17A. All respondents (2528)
Online sample

Operators to be required to have Hire and Reward fleet insurance. This is an alternative to drivers being responsible for their own Hire and Reward insurance. Some operators already have fleet insurance in place, this would make it compulsory. Hire and Reward insurance is a type of insurance that allows holders to legally carry people and/or other people's goods for payment

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Hire and Reward fleet insurance is not as big a concern as other insurance-related matters



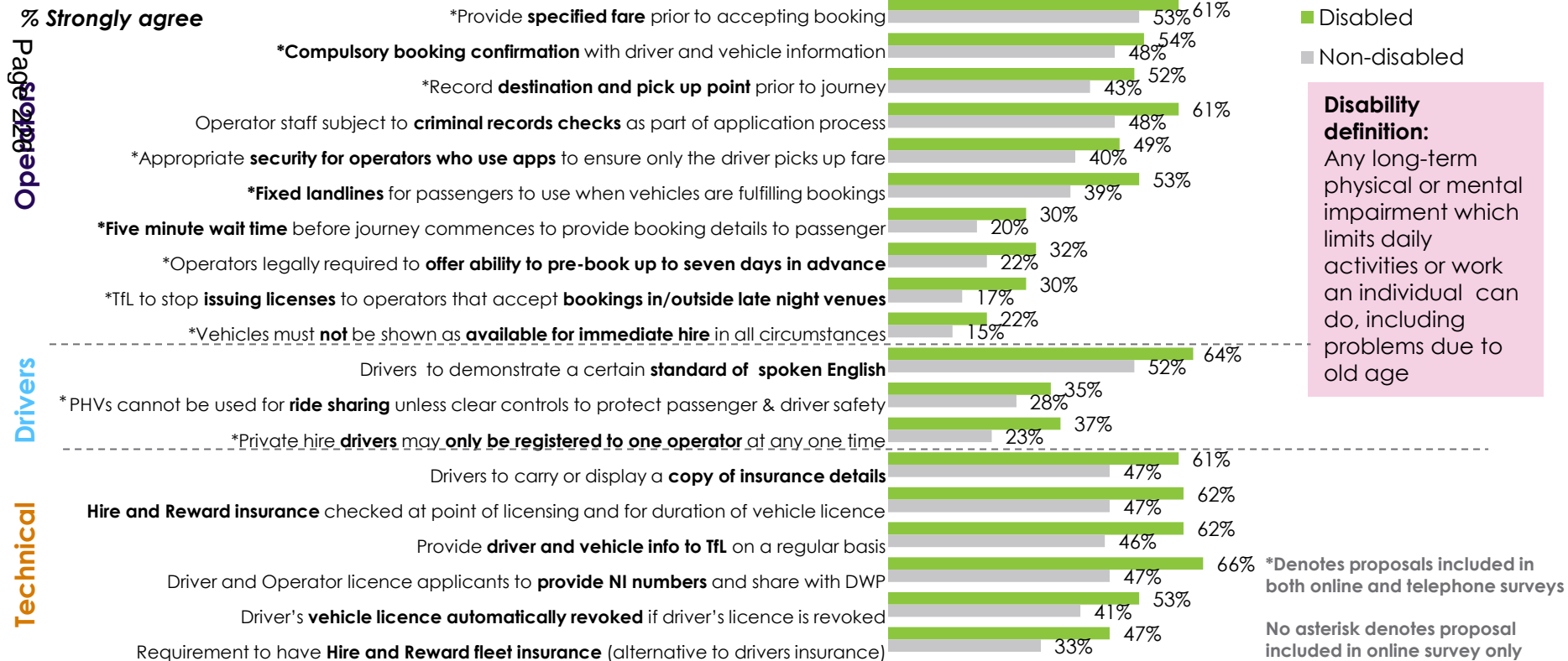
Q17D. All respondents (2,528)
Online sample



Comparisons

- Disabled Londoners
- Use of PHVs

Disabled Londoners are significantly more likely to support all proposals compared to non-disabled Londoners



To what extent do you agree or disagree with this proposal? Scale: Strongly agree (+5), Tend to agree (4), Neither agree nor disagree (3), Tend to disagree (2), Strongly disagree (1). Base: Disabled (401), Non-disabled (2,227)

There are some differences between those who use PHVs at least once a month and those who use less often/never use

% Strongly agree

Operators

Drivers

Passengers



Use of PHV

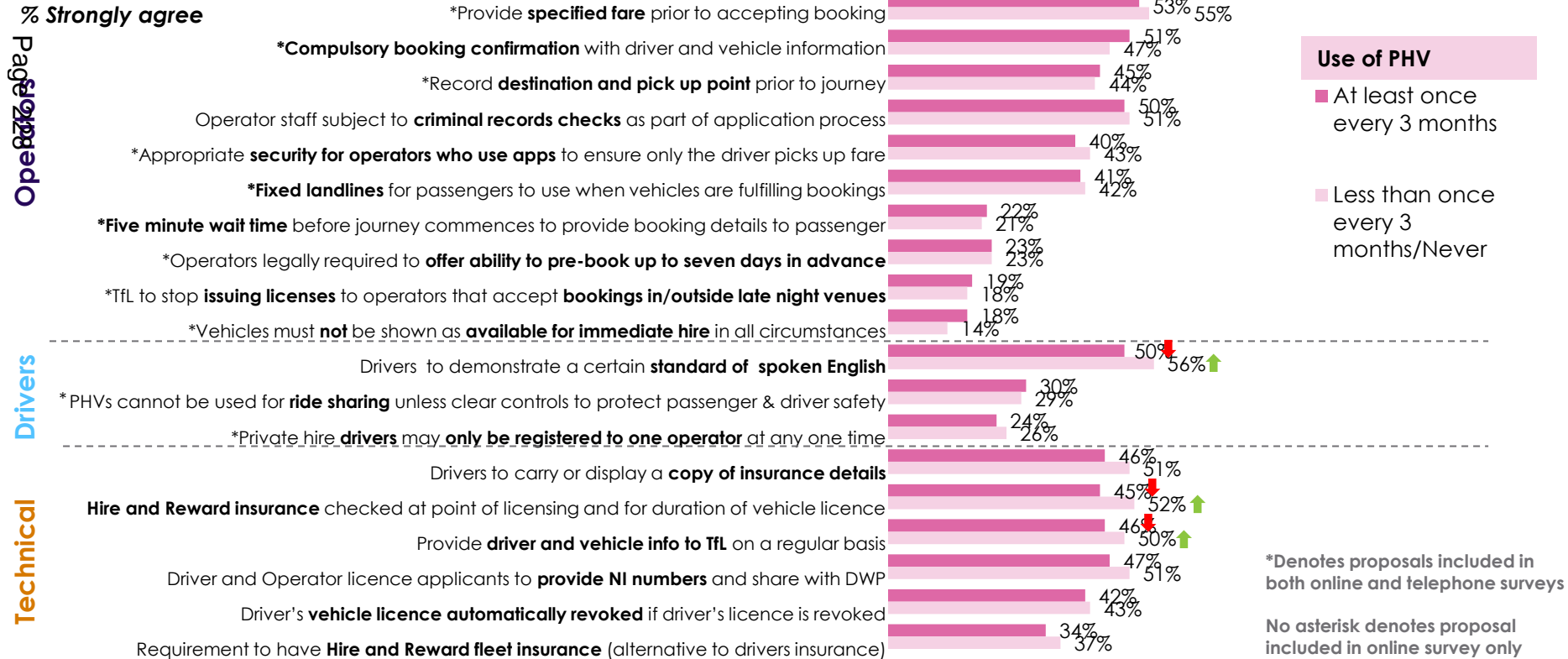
- At least once a month
- Less often than once a month/never

*Denotes proposals included in both online and telephone surveys

No asterisk denotes proposal included in online survey only

To what extent do you agree or disagree with this proposal? Scale: Strongly agree (+5), Tend to agree (4), Neither agree nor disagree (3), Tend to disagree (2), Strongly disagree (1). Base: At least once a month(784)/(739 online), Less often than once a month/never (1,844)/(1,789 online)

There are few differences between those who use at least once every 3 months and those who use less often/never use

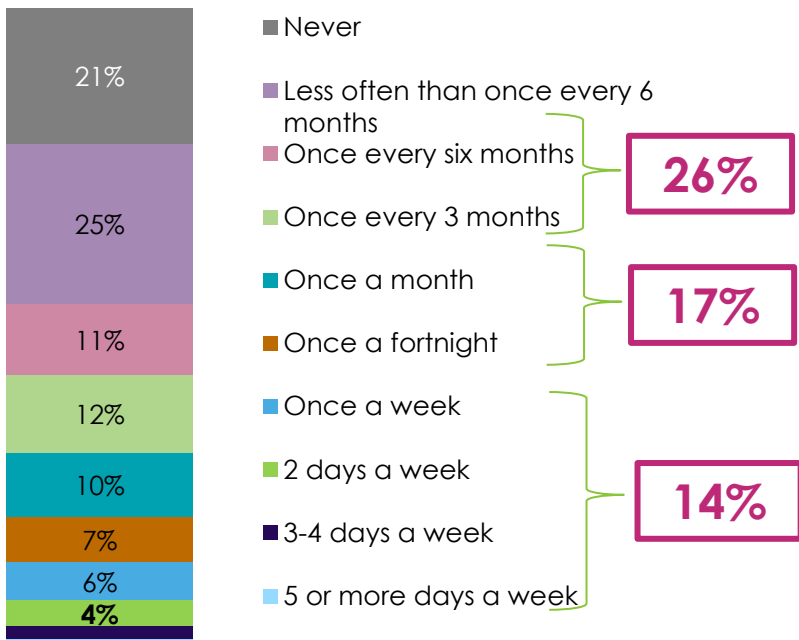


To what extent do you agree or disagree with this proposal? Scale: Strongly agree (+5), Tend to agree (4), Neither agree nor disagree (3), Tend to disagree (2), Strongly disagree (1). Base: At least once every 3 months (1,091)/(1,028 online) , Less often than once every 3 months/Never (1,537)/ (1,500 online)

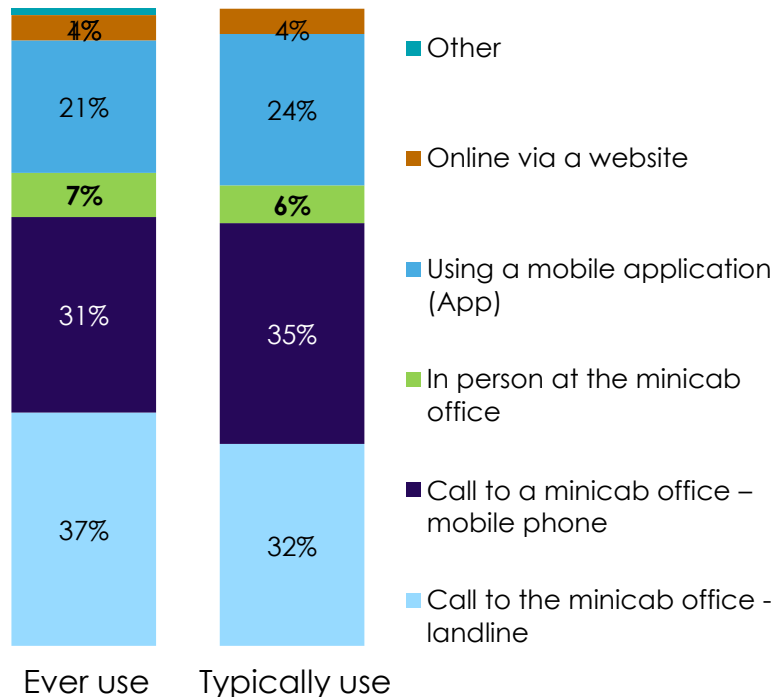
PHV use & contact

Use of PHVs is widespread

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Calling the PHV office either on landline or mobile are the most commonly used booking methods



Frequency of usage Minicab/ PHV

Q1; All respondents (2,628)
Online and Telephone sample










Methods used for booking minicab/ PHV

Q2a; Q2bAll respondents (2,059)
Online and Telephone sample

Landline and mobile are the two methods that Londoners are most likely to use if an issue arises with their journey

In the event of an issue emerging with your journey, which of the following methods of communication are you willing to use to contact the private hire operator? (please rank your top three preferred methods):

Those who would communicate using a landline are also likely to use a landline to book a PHV; similarly, those who would use an app also use this method for bookings

	Any method of contact	Rank 1	Rank 2	Rank 3
 Landline number	72%	45%	18%	9%
 Mobile phone number	83%	37%	36%	11%
 Via an app	31%	7%	9%	16%
 SMS	40%	4%	15%	21%
 Email	33%	4%	12%	18%
 In person	33%	3%	8%	22%
 Twitter	4%	0%	1%	2%
Other	1%	0%	0%	1%








Q9. All respondents (2,528)

Online sample

Regardless of how often Londoners use PHVs, contact via phone would be the most used method to communicate should an issue arise

In the event of an issue emerging with your journey, which of the following methods of communication are you willing to use to contact the private hire operator? (please rank your top three preferred methods):

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			Rank 1 - by use of PHV	
	Any method of contact	Rank 1	Use a PHV at least once a month	Use a PHV less than once a month/Never
 Landline number	72%	45%	35%	49%
 Mobile phone number	83%	37%	40%	36%
 Via an app	31%	7%	11%	5%
 SMS	40%	4%	6%	3%
 Email	33%	4%	5%	3%
 In person	33%	3%	2%	3%
 Twitter	4%	0%	1%	0%
Other	1%	0%	0%	0%

Favoured method of booking varies by age...

In the event of an issue emerging with your journey, which of the following methods of communication are you willing to use to contact the private hire operator?
(please rank your top three preferred methods):



Landline

High among those aged 35+ although higher among 55+



SMS

Highest among the 16-44 age group



App

Highest among 16-34 age group and particularly low among 65+ group



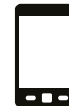
Email

Highest among 45+ age group



In person

Higher among 55+ age group

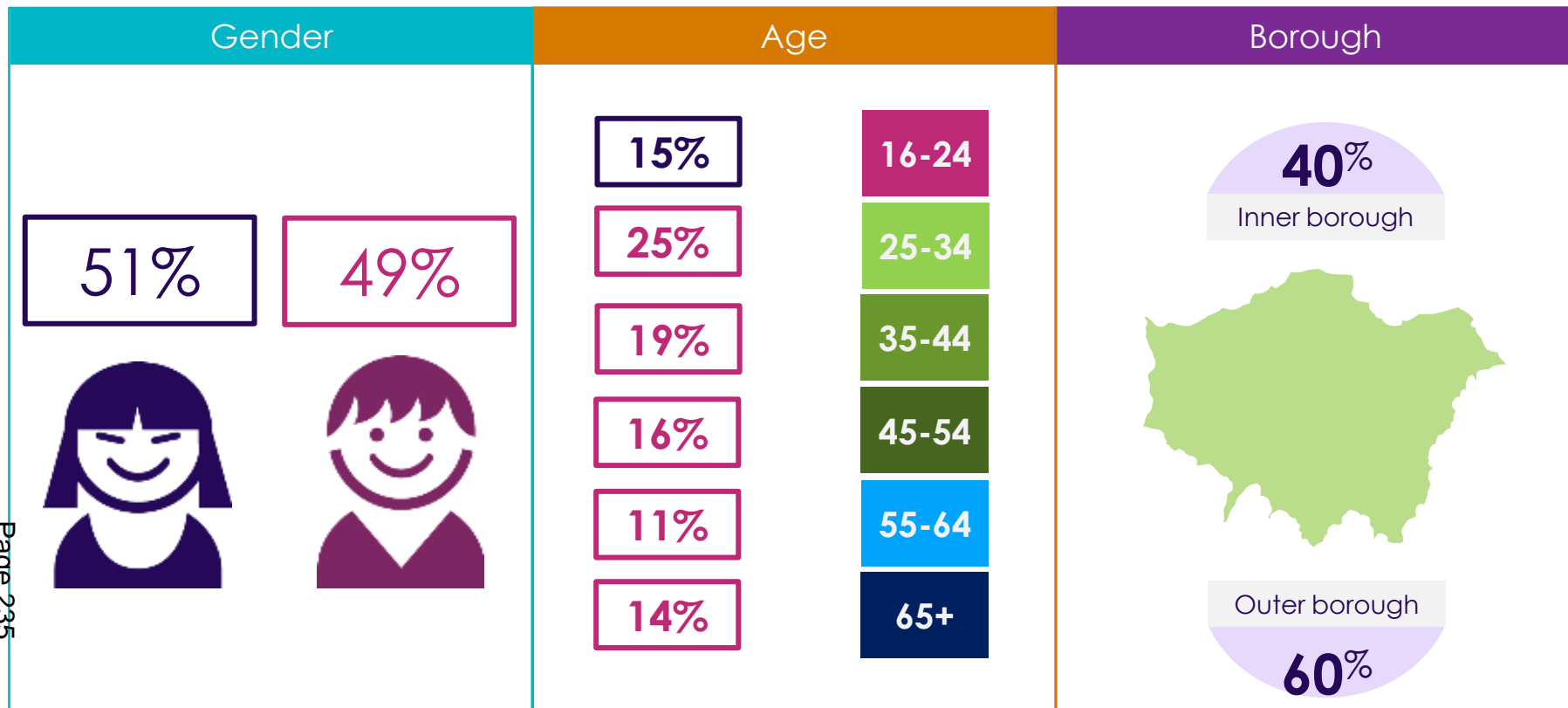


Mobile

High across the board, although slightly lower among 65+

Demographics

Demographic breakdown profile

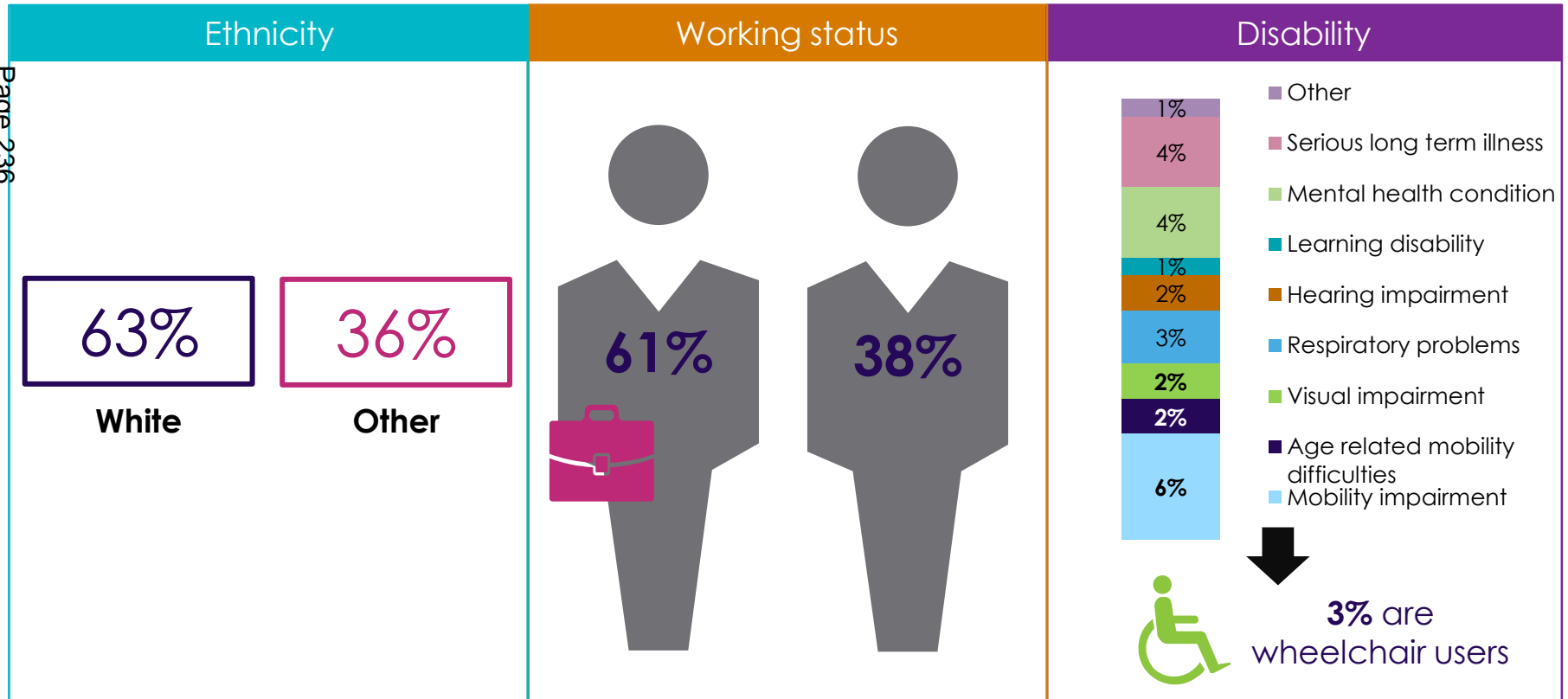


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S2 ; S3; S4. All respondents (2,628)
Online and Telephone

Demographic breakdown

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D1; D2; D4a; D4b. All respondents (2,628)
Online and Telephone

Appendices

Weighting profile

Data are weighted to representative London profile

Weighting applied on:

- Gender
- Age
- Ethnicity
- Working Status
- Borough

2,628

Interviews conducted with Londoners aged 16+

Gender	% of survey results	London proportion weighting %
Gender		
Male	47%	49%
Female	53%	51%
Age		
16-24	12%	15%
25-34	22%	25%
35-44	19%	19%
45-54	17%	16%
55-64	12%	11%
65+	18%	14%
Ethnicity		
White	74%	63%
Non White	25%	37%
Working Status		
Working	64%	61%
Not Working	36%	39%
Borough		
Inner	39%	40%
Outer	61%	60%

A total of 19 proposals were evaluated in the online survey, with 10 being evaluated in the telephone survey

	Online	Telephone
Provide specified fare prior to accepting booking	✓	✓
Compulsory booking confirmation with driver and vehicle information	✓	✓
Record destination and pick up point prior to journey	✓	✓
Operator staff subject to criminal records checks as part of application process	✓	✗
Appropriate security for operators who use apps to ensure only the driver picks up fare	✓	✓
Fixed landlines for passengers to use when vehicles are fulfilling bookings	✓	✓
Five minute wait time before journey commences to provide booking details to passenger	✓	✓
Operators legally required to offer ability to pre-book up to seven days in advance	✓	✓
TfL to stop issuing licenses to operators that accept bookings in/outside late night venues	✓	✗
Vehicles must not be shown as available for immediate hire in all circumstances	✓	✓
Drivers to demonstrate a certain standard of spoken English	✓	✗
PHVs cannot be used for ride sharing unless clear controls to protect passenger & driver safety	✓	✓
Private hire drivers may only be registered to one operator at any one time	✓	✓
Drivers to carry or display a copy of insurance details	✓	✗
Hire and Reward insurance checked at point of licensing and for duration of vehicle licence	✓	✗
Provide driver and vehicle info to TfL on a regular basis	✓	✗
Driver and Operator licence applicants to provide NI numbers and share with DWP	✓	✗
Driver's vehicle licence automatically revoked if driver's licence is revoked	✓	✗
Requirement to have Hire and Reward fleet insurance (alternative to drivers insurance)	✓	✗

✓ Proposal included in survey

✗ Proposal not included in survey

Reading survey results

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The PHV proposals are colour coded to represent the type of proposal (Operational proposals are in lilac, Driver proposals are in blue and Technical proposals are in orange). The proposals are always shown at the very top of the page in the relevant section

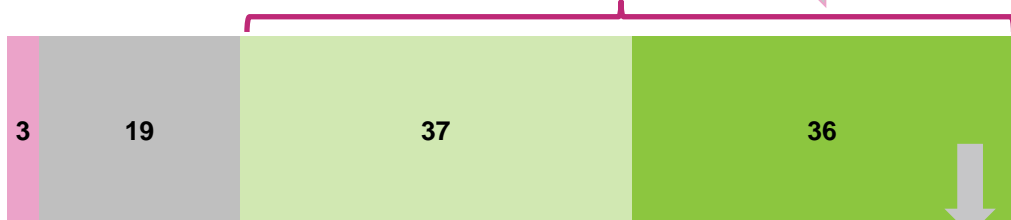
The commentary relating to each of the proposals is shown just below the proposal

Headline finding

At the top of each bar; there is a NET AGREE percentage shown. This is a combination of the *Tend to agree* and *Strongly agree* responses

■ Strongly disagree (1) ■ Tend to disagree (2) ■ Neither (3) ■ Tend to agree (4) ■ Strongly agree (5)

73% NET AGREE

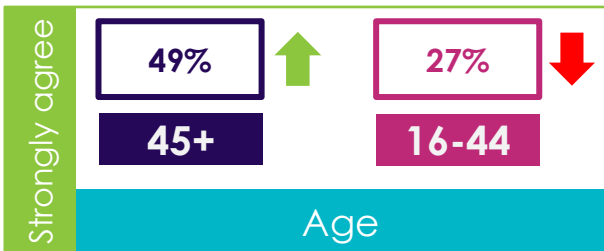


4.17

Mean score

The mean score is derived from a 5 point scale ranging from *Strongly disagree* which has been allocated a nominal score of 1 to *Strongly agree* which has a score of 5. The legend at the top of the bar shows the score for each of the responses on the scale. A high mean score demonstrates a strong strength of feeling to the proposal

The bar chart shows the results to each of the proposals. Don't know responses are not shown in the charts



At the bottom of the chart we show the subgroups of Londoners who particularly agree strongly and significant differences are greatest

Statistically significant results

A statistically different result means that we can be 95% certain that this difference is larger than can reasonably be explained as a chance occurrence. A green arrow denotes significantly higher and red denotes lower within subgroup

Talk London survey methodology

Talk London is an inclusive, vibrant online community of 15,000 Londoners that supports City Hall in placing citizens needs at the centre of its strategies and programmes by involving them in meaningful research, debate and consultation about how to improve the capital. Talk London was launched in July 2012.

Details of this particular Talk London survey:-

- Results are based on interviews with 869 respondents aged 18+
- Interviews were carried out online via the Talk London community between 19 October and 23 November 2015
- Participants were self-selecting. 96% of respondents identified themselves as members of the public

Respondents were presented with each proposal, along with commentary to outline the implications of the change or maintaining the status quo, approved by TfL's Taxi & Private Hire team and the GLA's Transport Team. Respondents were asked the degree to which they agree or disagree with each proposal. Consideration was given to demographic differences in opinion during the analysis stage, particularly for those proposals which could be expected to impact on particular groups, but given the non-random sample, these conclusions were indicative-only, with further research required to understand the drivers behind perceptions.

future thinking

Main Contacts

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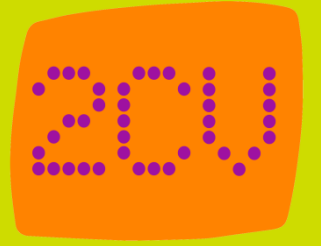
Joy Mhonda, Associate Director
Joy.mhonda@futurethinking.com

+44(0) 207 843 9777



Private Hire Vehicle Consultation: Qualitative Research

2CV

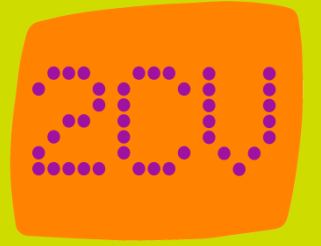


Private Hire Vehicle Consultation: Qualitative Research

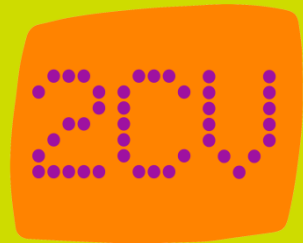
Debrief

November 2015

Contents

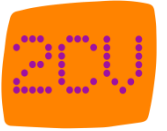


- 1 Introduction
- 2 Research headlines
- 3 Minicabs: Current experiences
- 4 Responses to PHV Proposals



Introduction

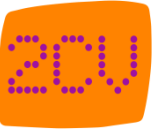
Background



- Transport for London (TfL) has carried out a wide-ranging review of private hire vehicle (PHV) regulations in March and June 2015.
- This consultation reviewed the regulations and requirements currently in place for private hire services. After analysing responses to the first consultation, TfL is now conducting a second and final consultation in respect of this review.
- TfL has developed a more detailed set of proposals before deciding whether or not to implement any regulatory changes.
- Dedicated qualitative research was commissioned to explore the issues in the consultation document and give some detailed customer feedback



Objectives



Business question

To what extent do TfL's proposals on private hire regulations improve safety and customer experience, private hire reputation and keep up with customer expectations?

Research questions

To ascertain customers' views and supporting reasoning for each of the proposals relevant in the consultation

A qualitative methodology to understand customers' views in depth

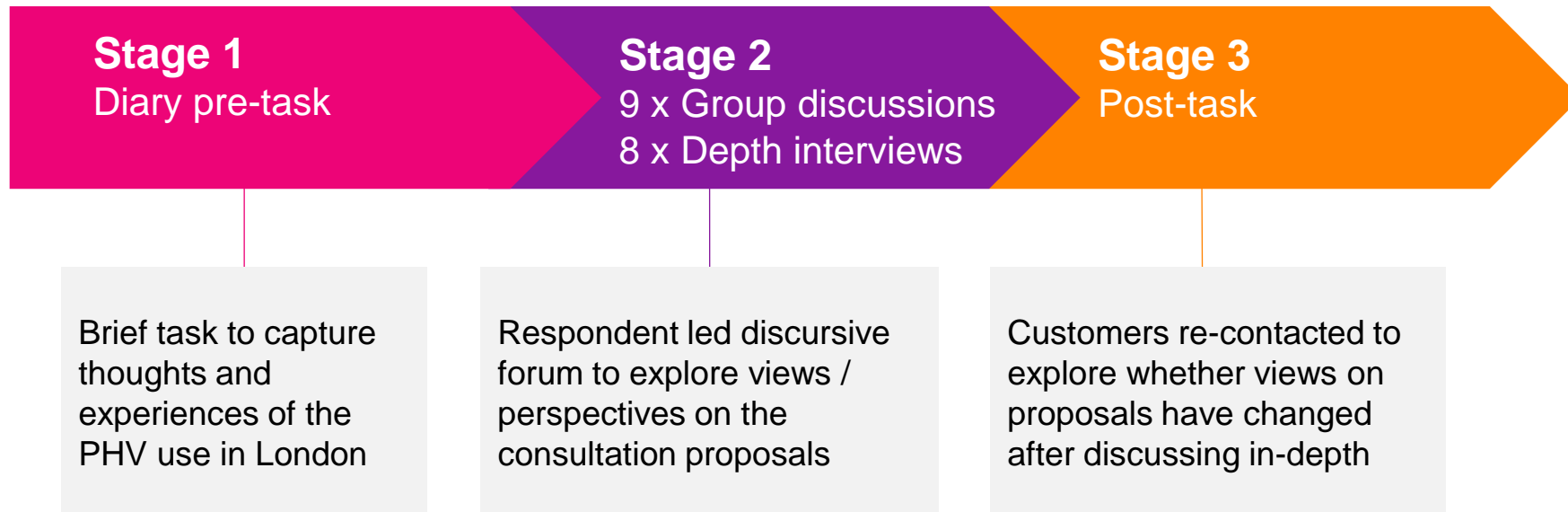
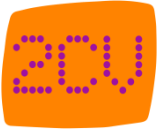
The goal of qualitative research is to explore and understand people's feelings, *behaviours*, *attitudes* and *opinions*, in order to understand how their beliefs ultimately shape and influence their decisions

Qualitative research helps explain **WHY** people believe and act the way they do, rather than place emphasis on **HOW MANY** believe or act the way they do



Discussion around the proposals were respondent led and focused on the areas that customers were most interested in and thought would have *most impact* on their day to day PHV experiences

Research approach



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A broad and inclusive sample (including customers with accessibility issues)

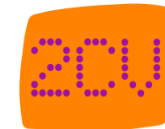
- All users of PHVs
- Range of frequencies (frequent = min once in last two weeks; less frequent = min once a month)
- A mix of operators used (local firms vs pan London)
- A mix of pre-booking modes (mobile phone, app, walk-in taxi office bookers, land line users)
- Equal mix of gender in each group (4 x male, 4 x female)

Fieldwork was conducted between 3rd - 19th November

- Viewed groups: Tues 3rd November
- Non-viewed groups: Mon 9th, Wed 11th, Thurs 12th
- Depths: Mon 16th – Wed 25th.

All fieldwork was conducted in London

Sample summary



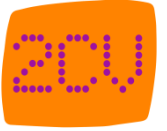
Group	Frequency	Journey type	Life stage	Respondent location
1	Frequent	Business	Pre-family	Inner
2	Frequent	Leisure	Family	Inner
3	Frequent	Business	Family/Post family	Outer
4	Frequent	Leisure	Empty nester	Outer
5	Less frequent	Business	Pre-family	Inner
6	Less frequent	Leisure	Family	Inner
7	Less frequent	Business	Family/Post family	Outer
8	Less frequent	Leisure	Empty nester	Outer
9	To fall out	Leisure	Retiree	Outer



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Depth	Accessibility issue	Journey type	Frequency
1	Mobility impaired	No set quotas	No set quotas
2	Mobility impaired	No set quotas	No set quotas
3	Visually impaired	No set quotas	No set quotas
4	Visually impaired	No set quotas	No set quotas
5	Hearing impaired	No set quotas	No set quotas
6	Hearing impaired	No set quotas	No set quotas
7	Carer	No set quotas	No set quotas
8	Carer (of child)	No set quotas	No set quotas

Proposals explored*



‘Ordering my PHV’

Q3: Compulsory for operators to provide a booking confirmation containing the driver’s name and vehicle registration number.

Q4: At least a five minute wait period before a private hire journey commences in order for operators to provide booking confirmation details to passengers**

Q6: All operators must be legally required to offer the ability to pre-book up to seven days in advance.

Q7: TfL will no longer issue licences to private hire vehicle operators that accept bookings inside or outside late-night venues with the vehicles themselves parked nearby.

Q10: Operators must not show vehicles being available for immediate hire, either visibly, for example by signage on the street; or virtually, on an app.

Q11: Operators must record the main destination and pick-up location for each booking, at the time the booking is made and before the journey starts.

‘Operators’ Rules’

Q5: Operators who use apps to allocate drivers to a fare must have appropriate security measures to prevent the app being used by a person other than the licensed driver.

Q8: Operators must have a fixed landline number available for passenger use at all times when their vehicles are fulfilling or accepting bookings.

Q9: Select preferred methods of communication most likely use to contact the private hire operator in the event of an issue emerging

Q12: Private hire operators must provide a specified fare prior to the booking being accepted.

Q13: Operational staff subjected to criminal records checks as part of their application process.

Q11: Operators must record the main destination and pick-up location for each booking at the time the booking is made and before the journey starts.

Q17/18H: Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence.

Q17/18J: Operators to be required to have Hire and Reward fleet insurance**

‘Drivers’

Q14: Private hire drivers should be required to demonstrate a certain standard of English, with particular emphasis on ability on spoken communication

Q15: Private hire drivers may only be registered to a single operator at any time

Q16: Private hire vehicles cannot be used for ride-sharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers.

Q12: Private hire operators must provide a specified fare prior to the booking being accepted.

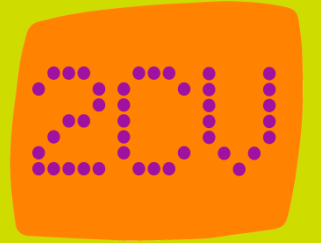
Q17/18F: A driver’s private hire vehicle licence to be automatically revoked if their standard driver’s licence is revoked **

Q17/18I: Drivers to carry or display a copy of insurance details at all times

*Full text of proposals explored appended to this document

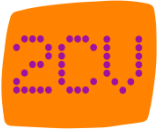
**Wording for these proposals were altered as a result of customers not understanding the consultation wording. The revised wording was devised and subsequently successfully used.

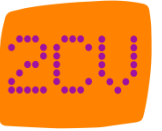
Re proposal **Q17/18** – It was decided to only include questions felt pertinent to a consumer audience. **F, H, I J.** The other questions were excluded as they mainly related to technical changes to the regulations and unlikely to provoke a strong consumer response



Minicabs: Current experiences

Hierarchy of needs for a PHV experience





There are key need states that deliver a positive PHV experience

EASE OF JOURNEY

It's either get a minicab [PHV] home or a night bus that stops at every stop & that I can't face

A good minicab [PHV] is like having your own chauffeur. You sit back and they get you where you need to go. No hassles

Nothing stresses me out more than a driver that doesn't know where he is going or if he takes a route I know is longer

STRESS LEVELS

You're paying more to get somewhere. It shouldn't be an effort.

Using a company you don't know can be a risk because you don't know if you can rely on them

RELIABILITY

I use my local cab company because I know I can trust them to turn up on time and know how to get me from A to B the quickest way possible

It's really important that the car is clean and comfortable. I'm paying a premium. I expect it be that at least .

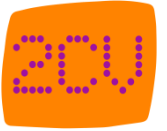
COMFORT

It's important a driver is courteous and professional

PERSONAL

Some [drivers] see I'm in a wheelchair and don't even get out of the car to help

Experiences can be variable but a prevailing sense of improvement

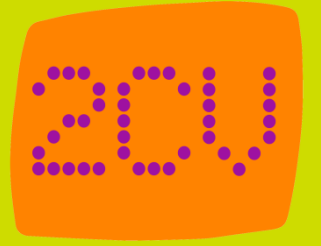


- While customers feel the London PHV offer is largely good, there is felt to be a **lack of consistency** with regard to operators and the overall experience
- And customers do still have bad experiences including...
 - **Problem drivers** (rude, unprofessional, driving too fast, little English spoken, talking on the phone while driving, not knowing their way, unclean vehicles)
 - **Unreliable operators** (PHVs not turning up; variation between fare quoted and final cost)
- On balance customers feel that, overall, PHV experiences are much improved broadly (particularly older Londoners who reference how things 'used to be')
 - Customers feel more likely to have positive experiences if they have a pre-existing relationship with operators
- Factors that have **driven improvements** include:
 - Number of firms/consumer choice means operators have had to 'lift' their game
 - Larger pan-London operators have set standard
 - Advances in mobile phone technology, primarily apps (Uber, Hailo etc)

There's more choice for us as consumers. I think that's driven up the standard. Uber has changed things – for the better

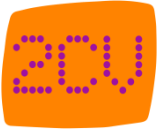
I think experiences are broadly more positive than negative to be honest. But it depends on a lot. Time of day or night. What your driver is like. Whether it's a company you've used before. A load of factors

You can still have a nightmare journey every now and then. Usually when you've not used that company before. I suppose you're more heightened to things going wrong



Responses to PHV proposals

A broadly positive response to the concept of more regulation



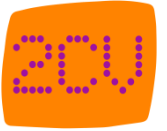
- All customers respond favourably to the **broad idea of more regulations** for PHVs
- And there is a favourable response to a number of the proposals as they **directly address some of the issues** people have with PHVs
- The notion TfL is looking to implement rules demonstrates
 - They prioritise customers' PHV experiences and safety and
 - They are carefully considering the issues
- Customers also believe that the impact of more regulation will be a greater standardisation of operators and drivers which will **deliver a more consistent PHV experience**
- Broadly customers are happy with the areas the proposals focus on and do not feel that there are any obvious areas missing
- This said, there are some proposals they feel **should already be established** as regulations



These give a consistency and a uniformity to all cabs in London. If every company is doing this there is a standard everyone has to adhere to. It feels safer and regulated

I'm happy that companies will have to have a duty to regulate drivers. It's more incumbent on operators to regulate their staff and this is what these do

But questions arise regarding motivation, timing and implementation



While the concept of regulation is welcomed the proposals prompt questions from customers

A significant number question why some of the proposals are only being put forward now and are not already established regulatory requirements

Why are they doing this now? I mean, I'm glad they're coming down on drivers, but some of this stuff I assumed was already in place.

Q17/18J: Operators required to have Hire and Reward fleet insurance.

Certain proposals fail to resonate with customers and they struggle to understand their relevance and what positive impact they will have on their PHV experience - they then question the true motivation behind them

What's brought this about? Based on some of these proposals, it feels like it might be about a row with black cabs and TfL keeping them sweet?

Q10: Operators must not show vehicles being available for immediate hire, either visibly or virtually

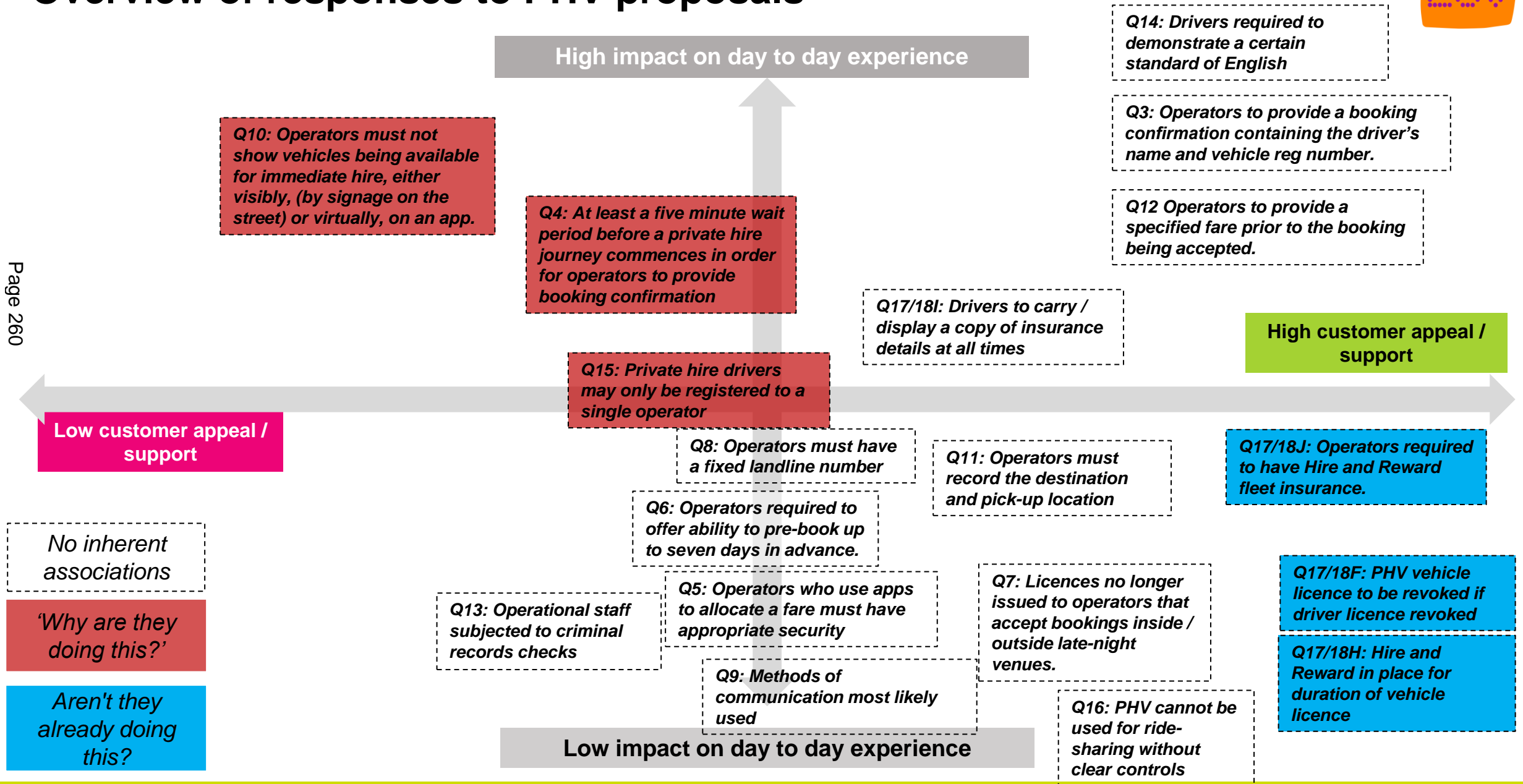
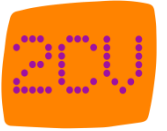
While customers understand that TfL will ultimately be responsible for regulation, some want reassurance on how they will be practically administered

I do think these things are a step in the right direction and will improve safety but how will TfL ensure they happen?

Q7: Licences no longer issued to operators that accept bookings inside / outside late-night venues.

Allaying concerns regarding proposals would help avoid potential negative impact

Overview of responses to PHV proposals





A number of proposals are clearly popular

These are widely welcomed by customers and they feel they would make a significant impact on their experiences

Q14: Private hire drivers should be required to demonstrate a certain standard of English

- A key benefit – and lack of **English is often mentioned spontaneously** as a problem area with PHVs.
- Affects lots of areas – emergencies, just feeling comfortable – and of particular importance to older people and those with a disability– as it is even more important for them to be able to be understood to allow them to travel comfortably and safely.

I've had problems in the past with things being lost in translation because they can't speak English fluently. Taking me to the wrong road or address. It ruins your journey. If they can't understand me, then it's an issue.

Q3: Operators to provide a booking confirmation containing the driver's name and vehicle registration number.

- People are aware that some operators already do this, but welcomed it becoming compulsory. It is **reassuring for customers** and is felt to put PHVs on a more professional footing. This would help customer safety and improve the customer experience.

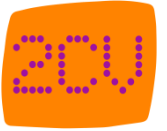
I really like this – Uber does it and it makes me feel safe and like they're accountable. I'd feel more comfortable letting my 15 year old daughter take a cab if this was in place

Q12 Operators to provide a specified fare prior to the booking being accepted.

- This is well received and would help **rectify some of the main causes of dissatisfaction**, uncertainty and stress around using a PHV – being over-charged for their journey .
- There are some queries around what would happen in the event of traffic, road closures etc

There's no risk and no surprises in terms of what you pay. Everything you buy, you know the price before you buy it. It's normal. It's standardising a normal transaction

Some proposals carry no clear benefit to customers



People struggle to see a clear benefit to customers of these propositions. This in turn leads them to think there might be an ulterior motive behind them.

Q10: Operators must not show vehicles being available for immediate hire, either visibly, for example by signage on the street; or virtually, on an app.

- Customers like the fact that apps can show them where their vehicle is and don't want to lose out. They feel it is unlikely that someone would see a PHV on an app and then flag it down
- However, there is some appreciation that having vehicles parked outside an office *might* tempt people to go straight to the driver, but the assumption is that **drivers would direct them to the office**

It doesn't really make sense to me. If you were to go up to a person outside a cab office, they would tell you to go into the office and make a booking. If I see who's available [on Uber] I'll book it then, not try and hail him in the street. It seems a bit protectionist for the black cabs to me.

Q4: At least a five minute wait period before a private hire journey commences in order for operators to provide booking confirmation

- Most of the time, this is unlikely to have much of an impact on people – few of their journeys start within five minutes of booking. However, they do not understand **why they should have to wait**, if a PHV was available sooner, especially if they had received a booking confirmation text, or were at an operator's office.
- Rationale / benefit put forward seems disingenuous. Thought more important to ensure people receive booking confirmation, and to push for greater safety and security through eg being insured etc

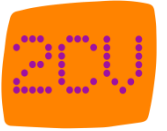
I think 5 minutes is a long time to have wait. If he can get there sooner, why not? There's no benefit to me for this

Q15: Private hire drivers may only be registered to a single operator at any time

- Responses to this proposal are mixed. People welcome moves to ensure drivers are not working extreme hours, and this also seems a more professional way to work. However, working for multiple operators does not mean drivers are working too many hours, and it seemed unfair to **restrict drivers' ability to earn money** if an operator was not generating them enough work

I don't want someone to drive me who has been on the road for 19 hours but equally I don't want to stop someone making a wage

People are surprised that some proposals are not already in force



People feel these proposals are essential to ensure passenger safety and presumed that they are already in place. This leads some to question why they are not

Q17/18J: Operators required to have Hire and Reward fleet insurance.

- A good idea to do this – better than relying on people’s word that they have it. People are used to providing proof when opening accounts etc, so why not for this? They are felt to be providing a public service after all.
- Holding **operators accountable for the insurance feels more reassuring** than relying on the driver

If the operator is involved you know they will be more accountable because a company won't want to get in trouble with the law

Q17/18F: Vehicle licence to be revoked if driver licence revoked

- Revoking vehicle licence, along side PHV driver’s licence considered sensible
- Customers are concerned about a **driver with no valid PHV driver’s licence continuing to work** using a licensed car

Off course! If they haven't got a valid [PHV] driver's licence, they can't carry on and drive a licensed car and pretend to be one. Simple as that.

Q17/18H: Hire and Reward in checked at licensing

- Considered **sensible precaution** that is thought likely to reassure customers.
- Again a number of customers are surprised that this is not already a requirement

Wow - that means someone could be driving without insurance. That is scary. You just assume this is law

The remainder appeal but have low impact on day to day experience

These are felt to be useful ideas for TfL to implement, but they tend to address smaller issues, or potentially are only of relevance occasionally / in particular circumstances

Q17/18I: Drivers to carry or display a copy of insurance details at all times

- Displaying their insurance would **provide some reassurance** to customers, although there is an acceptance that it must be easy to forge such documents

It's added reassurance. In Spain they have their insurance and their ID on show next to each other. So it's plain to see that these people are bona fide

Q8: Operators must have a fixed landline number available

- People (more older than younger) think this is good for operators to offer - fixed landlines provide a **greater degree of certainty**, most likely tied to an office/address, which would then make things more professional/accountable
- Younger customers are less engaged and feel that making it compulsory is excessive

I just think this feels more secure. As I'm disabled, most of my calls are from my home to a landline

Q11: Operators must record the main destination and pick-up location for each booking

- Appreciated by most. Customers can imagine it would be a useful record in case there are any problems, although **most assume this is already done**

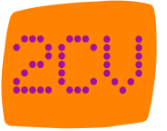
I guess from a female perspective at least there would be a record of the journey in case something happened

Q13: Operational staff subjected to criminal records checks

- Appeals to vulnerable audiences who feel PHVs are effectively a public service, and they would expect other people working in such positions to have had a criminal records check.
- Some (typically younger) customers **feel checks are unnecessary** and have the potential to exclude ex offenders from working

I'd be happy for staff to be CRB checked. If I'm ordering a cab for a holiday, they know my house is empty. I'd feel better if the people I give this info to aren't criminals

The remainder appeal but have low impact on day to day experience



These more fundamental propositions are generally supported, although they were not felt to have a major impact on their experiences.

Q16: Private hire vehicles cannot be used for ride-sharing without clear controls in place

- Some awareness of ride-sharing but many have concerns, mainly around personal safety – *how do you know who you are in a minicab with?* Other concerns centre around the journey experience plus potential conflicts regarding payment
- While most unenthusiastic about idea of ride-sharing, all agree it would **necessitate robust regulation**

It's not something I'd do, but you'll need something in place to keep people safe and stop any disagreements on drop offs and how to split fares

Q7: TfL will no longer issue licences to private hire vehicle operators that accept bookings inside or outside late-night venues

- People tend to agree that not tackling this could create an environment where touting could thrive
- They agree that most people will could always use phones/apps, plus they venues could always have a phone line to a PHV firm in the lobby, as they do in many public places eg hospitals etc

It wouldn't bother me if this was introduced. Companies could have 'hotlines' installed like they do at supermarkets etc. I'm less sure how they'd [TfL] police this

Q6: Operators required to offer ability to pre-book up to seven days in advance.

- People generally welcome this idea – they would like to be able to order a minicab up to seven days in advance. However, some did not feel it was necessary to make it compulsory.
- In addition, many think there is enough choice for customers and that **compulsion is unnecessary**

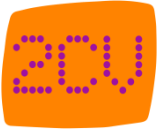
I think there's already enough choice for people to use companies where you can pre-book. I don't think it needs to be a legal requirement

Q5: Operators who use apps to allocate a fare must have appropriate security

- Considered a **sensible precaution**. An assumption that drivers currently utilise security functions to 'lock' phone but regulation to enforce this is welcomed

This is just common sense. You're entrusting your life to a cab driver you need a system in place to protect that information

The remainder appeal but have low impact on day to day experience (ii)



These more fundamental propositions, are generally supported, although they were not felt to have a major impact on their experiences.

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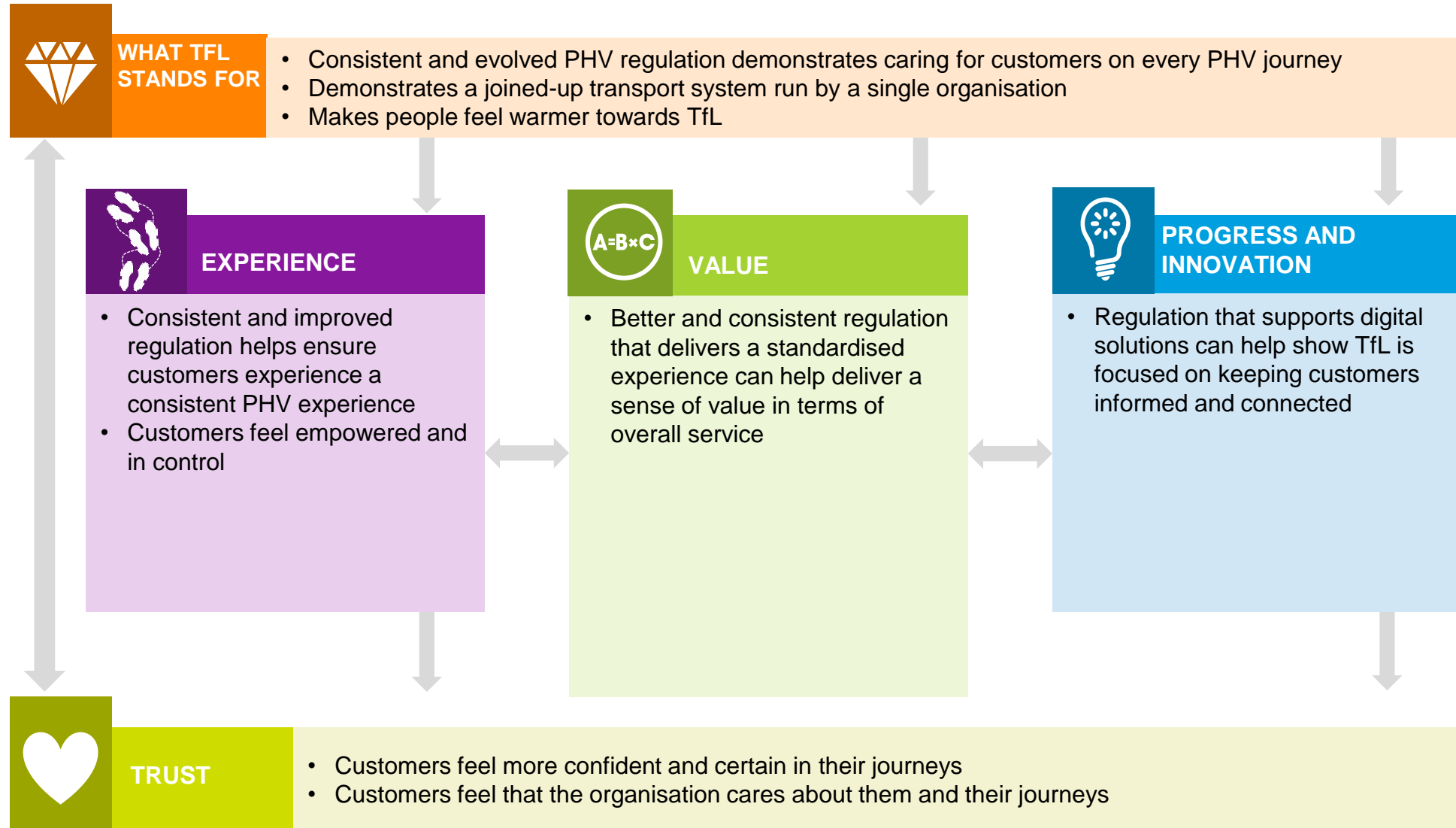
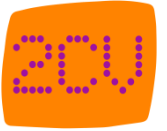
Q9: Preferred methods of communication most likely used to contact the private hire operator



- Customers are consistent in their preferred methods of communication and typically choosing:
 1. Mobile
 2. Landline
 3. SMS/App
- These are selected as they offer quick/immediate means to resolve issues one might have with providers

I don't think you'd email them. You'd just want it sorted straight away not faff around writing a long email

Greater PHV regulation can benefit customers



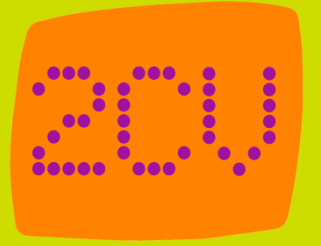
Moving forwards



- The introduction of more guidelines/rules to regulate London's PHVs is widely welcomed
 - Greater regulation and more consistent application/enforcement is thought likely to deliver a more consistent PHV experience

- While research has identified proposals that perform well on a desirability / impact matrix based on delivering against existing frustrations / issues, some proposals are less well received because...
 1. Customers feel there should already be established PHV regulations
 2. They seem to deliver no clear benefit to customers which leads them to question the rationale behind them

- To help counter customer uncertainty on proposals / new regulations it is important
 - Customers feel that the proposals are a continuation of a programme designed to formalise rules intended to benefit Londoners
 - To be overt and explain the rationale behind their introduction
 - Invite customer feedback / dialogue on regulations

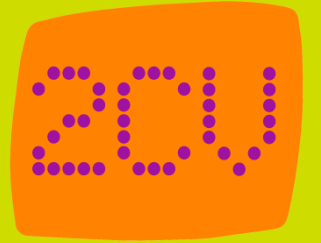


Thank you

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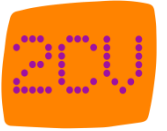
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Appendix:

- i) Proposals explored in sessions**
- ii) PHV Online Questionnaire**

Proposals not included in the qualitative sessions were as follows



- **Q1:** *Which of the following best describes your interest in this consultation? (compulsory, randomise, choose one only)*
- **Q2:** *Prior to signing up or logging in to complete this survey, were you a member of the Talk London online research community? (compulsory, choose one only)*
- The following from **Q17/18** – Proposals that mainly relate to technical changes to the regulations or measures that could assist with TfL’s enforcement/compliance work,
 - *A: Operators will be required to seek TfL approval before changing their operating model*
 - *B: Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis*
 - *C: Operators should be required to keep all records for a period of 12 months*
 - *D: TfL to impose a limit of 5 business names allowed to be attached to each Operator’s licence*
 - *E: Driver and Operator licence applicants to provide National Insurance numbers and share with Department for Work and Pensions (DWP)*
 - *G: TfL to stop accepting payment for licence fees by PO and cheque*
 - *K: Introduce new operator licence types that account for larger operators, who would be charged more to cover the extra costs to TfL to enforce these licences*
 - *L: Introduce new operator licence types that incentivise zero emission vehicles/disabled access with lower licence fees*
 - *M: A small change to clarify the existing regulation regarding advertising, so that no advertising is allowed to be displayed inside, from or on the outside of a private hire vehicle*
- **Q19** – Any further comments
- **Qs 20-27** - Demographic questions

Ordering my cab

Q3

It would be compulsory for operators to provide a booking confirmation to passengers containing the driver's name and vehicle registration number.

If booked via a smartphone, it would also be compulsory to provide a photograph of the driver.

Many operators already do this, but this change to the regulations would make it compulsory.

Q4

There must be at least a five minute wait period before a private hire journey commences in order for operators to provide booking confirmation details to passengers**

Some people argue that providing booking confirmation and details of the car and driver at least 5 minutes in advance of the driver picking up the passenger will reduce the risk of a passenger getting into the wrong car, and allow the driver time to plan the journey.

Other people argue that this will inconvenience passengers or undermine their safety if they have to wait longer to be collected, particularly at night.

****Original wording - Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing**

Q6

All operators must be legally required to offer the ability to pre-book up to seven days in advance.

Some operators currently offer the ability to pre-book journeys up to or more than 7 days in advance. Other operators choose not to provide this service. This change would make it compulsory.

Some argue that legally requiring that operators offer booking up to 7 days in advance would improve choice for customers, particularly those with a disability who, owing to the more limited supply of fully accessible private-hire vehicles, often have to book in advance.

Others argue that there is already sufficient choice for customers between operators who do offer advance booking and those who don't, and that operators should choose which services they offer.

Q7

TfL will no longer issue licences to private hire vehicle operators that accept bookings inside or outside late-night venues with the vehicles themselves parked nearby.

Some people argue that having licensed operators in late night venues with vehicles parked outside encourages illegal cabs or 'touting' and that they are no longer required with so many other legitimate ways to book a private hire vehicle.

Others believe that making this change would mean customers may have to wait longer and it would hinder traveller safety as people would have to book a private hire by phone/an app, use a black cab via an app or from a rank or street hail, or use public transport instead.

Q10

Operators must not show vehicles being available for immediate hire, either visibly, for example by signage on the street; or virtually, on an app.

Some people argue that by showing vehicles through apps or lining up cars on the street outside a local minicab office, private hire operators create the impression of vehicles being available for immediate hire direct from the driver, which is illegal.

Other people argue that displaying the availability of vehicles is necessary for operators to advertise their services, and improves convenience for customers by allowing them to check availability

Q11

Operators must record the main destination and pick-up location for each booking, at the time the booking is made and before the journey starts.

This would ensure a complete record of each journey and allow a specified fare to be provided.

If implemented, the customer would need to specify their destination at the time of booking, which is not currently required by some operators.

Operators' rules

Q5

Operators who use apps to allocate drivers to a fare must have appropriate security measures to prevent the app being used by a person other than the licensed driver.

Some people argue that this would improve passenger safety by lessening the chance of people other than the licensed driver driving the vehicle.

People have also said that this may impose additional costs to private hire drivers and operators, for example investing in smartphones with fingerprint technology, which might result in operators setting higher fares.

Q8

Operators must have a fixed landline number available for passenger use at all times when their vehicles are fulfilling or accepting bookings.

Operators are already required to provide a landline number as part of their application for an operator's licence. This proposal would extend that requirement to make it compulsory for operators to have a landline number that is available for passengers to contact at all times when bookings are being undertaken.

Some people argue that this will improve safety and customer service by ensuring that passengers always have a place to contact about their booking.

Other people argue that operators should choose their own way of communicating with customers.

Q9

In the event of an issue emerging with your journey, which of the following methods of communication would you most likely use to contact the private hire operator? (Please rank your top three preferred methods.)

- 1. Landline number**
- 2. Mobile phone number**
- 3. SMS**
- 4. Email**
- 5. Twitter**
- 6. Via an app**
- 7. In person**
- 8. Other**

Q12

Private hire operators must provide a specified fare prior to the booking being accepted.

The regulations already require operators to provide an estimated fare, but only if specifically requested by the customer.

This proposal would make it compulsory to specify the fare to the customer, prior to the journey commencing.

Q13

Operator staff should be subjected to criminal records checks as part of their application process. This amended proposal does not apply to drivers (as checks are already a requirement for them), but to customer-facing staff in private hire offices

This is being considered given the regular interaction with the public and access to personal information that staff in this capacity have.

Drivers

Q14

Private hire drivers should be required to demonstrate a certain standard of English, with particular emphasis on ability on spoken communication

There is currently no specific language requirement for private hire vehicle drivers, although their topographical test (a skills test involving map reading, awareness of London's geography that all drivers must complete to receive a licence) is delivered in English.

Some people argue it is necessary in the case of a passenger emergency that the driver is able to understand English. Others argue that that drivers should only need to demonstrate a level of English required to understand the laws of the road (ie that required by their drivers' licence).

Q15

Private hire drivers may only be registered to a single operator at any time.

Currently, private hire drivers are permitted to work for a number of operators. Under this proposal there would be no limit to the number of times a driver could change the operator they work for, but they could only work for one at a time.

Some people argue that restricting drivers to working for a single operator at one time will reduce the risk of drivers working excessive hours and help TfL enforce regulations by making it clear who a driver is taking a booking for. Other people argue that drivers are self-employed and should be able to choose the hours they work and who they work for.

Q16

Private hire vehicles cannot be used for ride-sharing (more than one passenger being carried with each passenger paying a separate amount and generally involving people who don't know each other sharing the vehicle) purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers.

Some operators are exploring ride-sharing models, where multiple customers (who would generally not know each other) would share the same vehicle. This differs from existing 'split fare' practices, whereby passengers travelling together on the same route/same journey (who would generally know each other) agree to split the fare between themselves.

Some people argue that regulations are required for passenger and driver safety, given the potential for disputes between strangers sharing a journey.

Other people argue that new technologies that comply with existing laws, offering cost benefits to passengers and potentially reduce emissions by encouraging more multiple passenger journeys, should be supported.

To what extent do you agree or disagree this proposal?

A driver's private hire vehicle licence to be automatically revoked if their standard driver's licence is revoked**

Original wording - *A driver's private hire vehicle licence to be automatically revoked if their PHV licence is revoked

To what extent do you agree or disagree this proposal?

Drivers to carry or display a copy of insurance details at all times

To what extent do you agree or disagree this proposal?

Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence.

Hire and Reward insurance is a type of insurance that allows holders to legally carry other people's goods and/or other people for payment.*

**Original wording - Hire and Reward insurance is a type of insurance that allows holders to legally carry people and/or other people's goods for payment*

To what extent do you agree or disagree this proposal?

Operators to be required to have Hire and Reward fleet insurance. This is an alternative to drivers being responsible for their own Hire and Reward insurance.

Some operators already have fleet insurance in place, this would make it compulsory. Hire and Reward insurance is a type of insurance that allows holders to legally carry other people's goods and/or people for payment

Introductory text:

London has a large and vibrant private hire vehicle sector, which has existed since the 1960s to cater for a wide range of journeys. In 2009/10, there were 55,000 drivers operating in London, offering traditional minicab services as well as executive and specialist vehicle services. The private hire industry has been regulated by primary legislation since the late 1990s, to ensure improved public safety and higher customer standards.

In recent years, new technology has emerged and app-based platforms now offer near instantaneous private-hire bookings at the touch of a button. This has triggered a rapid growth in the sector and now there are 89,000 private hire vehicle drivers in London.

This new technology can be very beneficial for customers, but has also given rise to a number of wider issues. These include rising traffic congestion, illegal parking and impacts on air quality. 1 in 11 vehicles entering the Central London Congestion Charge zone is now a private hire vehicle. This time two years ago, it was about 1 in 100 vehicles.

Transport for London (TfL) is now seeking to bring the regulations, which have not been comprehensively updated in almost two decades, up to date to ensure they take into account recent developments in technology and are fit for the future.

TfL wants to know whether Londoners think these changes would effectively address issues caused by the changes in the private hire market and further improve the safety and overall standard of their services in London.

Please note that this survey refers only to private hire vehicles and their operators, or minicabs, that can be pre-booked either by phone, online, or using a mobile phone app. Black cabs are governed by different regulations to private hire vehicles, not covered in this questionnaire.

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The full documentation and proposals can be viewed at the TfL consultation site here <insert link>

This survey takes around 8-10 minutes to complete.

Filter questions up front:

TALK SURVEY Q1 Which of the following best describes your interest in this consultation? (compulsory, randomise, choose one only)

- Private hire driver
- Private hire operator
- Black cab driver
- Member of the public
- Other

Part 1: Private Hire Operators

This first section of the survey focuses on regulations for private hire operators – the companies through which private hire journeys must be booked.

TALK SURVEY Q3 Proposal: It would be compulsory for operators to provide a booking confirmation to passengers containing the driver's name and vehicle registration number. If booked via a smartphone, it would also be compulsory to provide a photograph of the driver.

Many operators already do this, but this change to the regulations would make it compulsory.

To what extent do you agree or disagree with this proposal?

Strongly agree / Tend to agree / Neither agree nor disagree / Tend to disagree / Strongly disagree / Don't know

TALK SURVEY Q4 Proposal: Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing.

Some people argue that providing booking confirmation and details of the car and driver at least 5 minutes in advance of the driver picking up the passenger will reduce the risk of a passenger getting into the wrong car, and allow the driver time to plan the journey. Other people argue that this will inconvenience passengers or undermine their safety if they have to wait longer to be collected, particularly at night.

To what extent do you agree or disagree with the proposal?

Strongly agree / Tend to agree / Neither agree nor disagree / Tend to disagree / Strongly disagree / Don't know

TALK SURVEY Q5 Proposal: Operators who use apps to allocate drivers to a fare must have appropriate security measures to prevent the app being used by a person other than the licensed driver.

Some people argue that this would improve passenger safety by lessening the chance of people other than the licenced driver driving the vehicle. People have also said that this may impose additional costs to private hire drivers and operators, for example investing in smartphones with fingerprint technology, which might result in operators settings higher fares.

To what extent do you agree or disagree with this proposal?

Strongly agree / Tend to agree / Neither agree nor disagree / Tend to disagree / Strongly disagree / Don't know

TALK SURVEY Q6 Proposal: All operators must be legally required to offer the ability to pre-book up to seven days in advance.

Some operators currently offer the ability to pre-book journeys up to or more than 7 days in advance. Other operators choose not to provide this service. This change would make it

compulsory. Some argue that legally requiring that operators offer booking up to 7 days in advance would improve choice for customers, particularly those with a disability who, owing to the more limited supply of fully accessible private-hire vehicles, often have to book in advance. Others argue that there is already sufficient choice for customers between operators who do offer advance booking and those who don't, and that operators should choose which services they offer.

To what extent do you agree or disagree with this proposal?

Strongly agree / Tend to agree / Neither agree nor disagree / Tend to disagree / Strongly disagree / Don't know

TALK SURVEY Q7 Proposal: TfL will no longer issue licenses to private hire vehicle operators that accept bookings inside or outside late-night venues with the vehicles themselves parked nearby.

Some people argue that having licensed operators in late night venues with vehicles parked outside encourages illegal cabs or 'touting' and that they are no longer required with so many other legitimate ways to book a private hire vehicle. Others believe that making this change would hinder traveller safety as people would have to book a private hire by phone/an app, use a black cab via an app or from a rank or street hail, or use public transport instead.

To what extent do you agree or disagree with this proposal?

Strongly agree / Tend to agree / Neither agree nor disagree / Tend to disagree / Strongly disagree / Don't know

TALK SURVEY Q8 Proposal: Operators must have a fixed landline number available for passenger use at all times when their vehicles are fulfilling or accepting bookings.

Operators are already required to provide a landline number as part of their application for an operator's licence. This proposal would extend that requirement to make it compulsory for operators to have a landline number that is available for passengers to contact at all times when bookings are being undertaken. Some people argue that this will improve safety and customer service by ensuring that passengers always have a place to contact about their booking. Other people argue that operators should choose their own way of communicating with customers.

To what extent do you agree or disagree with this proposal?

Strongly agree / Tend to agree / Neither agree nor disagree / Tend to disagree / Strongly disagree / Don't know

TALK SURVEY Q9 In the event of an issue emerging with your journey, which of the following methods of communication are you willing to use to contact the private hire operator? (please rank your top three preferred methods)

- Landline number
- Mobile phone number
- SMS
- Email

- Twitter
- Via an app
- In person
- Other

TALK SURVEY Q10 Proposal: Operators must not show vehicles being available for immediate hire, either visibly, for example by signage on the street; or virtually, on an app.

Some people argue that by showing vehicles through apps or lining up cars on the street outside a local mini-cab office, private hire operators create the impression of vehicles being available for immediate hire direct from the driver, which is illegal. Other people argue that displaying the availability of vehicles is necessary for operators to advertise their services, and improves convenience for customers by allowing them to check availability.

To what extent do you agree or disagree with this proposal?

Strongly agree / Tend to agree / Neither agree nor disagree / Tend to disagree / Strongly disagree / Don't know

TALK SURVEY Q11 Proposal: Operators must record the main destination and pick-up location for each booking, at the time the booking is made and before the journey starts.

This would ensure a complete record of each journey and allow a specified fare to be provided. If implemented, the customer would need to specify their destination at the time of booking, which is not currently required by some operators.

To what extent do you agree or disagree with this proposal?

Strongly agree / Tend to agree / Neither agree nor disagree / Tend to disagree / Strongly disagree / Don't know

TALK SURVEY Q12 Proposal: Private hire operators must provide a specified fare prior to the booking being accepted.

The regulations already require operators to provide an estimated fare, but only if specifically requested by the customer. This proposal would make it compulsory to specify the fare to the customer, prior to the journey commencing.

To what extent do you agree or disagree with this proposal?

Strongly agree / Tend to agree / Neither agree nor disagree / Tend to disagree / Strongly disagree / Don't know

TALK SURVEY Q13 Proposal: Operator staff should be subjected to criminal records checks as part of their application process. This amended proposal does not apply to drivers (as checks are already a requirement for them), but to customer-facing staff in private hire offices.

This is being considered given the regular interaction with the public and access to personal information that staff in this capacity have.

To what extent do you agree or disagree with this proposal?

Strongly agree / Tend to agree / ~~Neither~~ agree nor disagree / Tend to disagree / Strongly disagree / Don't know

Part 2: Private Hire Drivers

This second section of the survey focuses on regulations for private hire drivers themselves, rather than the operators they work for.

TALK SURVEY Q14 Proposal: Private hire drivers should be required to demonstrate a certain standard of English, with particular emphasis on ability on spoken communication

There is currently no specific language requirement for private hire vehicle drivers, although their topographical test (a skills test that all drivers must complete to receive a licence) is delivered in English.

Some people argue it is necessary in the case of a passenger emergency that the driver is able to understand English. Others argue that that drivers should only need to demonstrate a level of English required to understand the laws of the road (ie that required by their drivers' licence).

To what extent do you agree or disagree with this proposal?
Strongly agree / Tend to agree / ~~Neither~~ agree nor disagree / Tend to disagree / Strongly disagree / Don't know

TALK SURVEY Q15 Proposal: Private hire drivers may only be registered to a single operator at any time.

Currently private hire drivers are permitted to work for a number of operators. Under this proposal there would be no limit to the number of times a driver could change the operator they work for, but they could only work for one at a time. Some people argue that restricting drivers to working for a single operator at one time will reduce the risk of drivers working excessive hours and help TfL enforce regulations by making it clear who a driver is taking booking for. Other people argue that drivers are self-employed and should be able to choose the hours they work and who they work for.

To what extent do you agree or disagree with this proposal?
Strongly agree / Tend to agree / ~~Neither~~ agree nor disagree / Tend to disagree / Strongly disagree / Don't know

TALK SURVEY Q16 Proposal: Private hire vehicles cannot be used for ride-sharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers.

Some operators are exploring ride-sharing models, where multiple customers (who would generally not know each other) would share the same vehicle. This differs from existing 'split fare' practices, whereby passengers travelling together on the same route/same journey (who would generally know each other) agree to split the fare between themselves. Some people argue that regulations are required for passenger and driver safety, given the

potential for disputes between strangers sharing a journey. Other people argue that new technologies that comply with existing laws, offering cost benefits to passengers and potentially reduce emissions by encouraging more multiple passenger journeys should be supported.

To what extent do you agree or disagree with this proposal?
Strongly agree / Tend to agree / ~~Neither~~ agree nor disagree / Tend to disagree / Strongly disagree / Don't know

TALK SURVEY Q17 & 18 The following proposals have also been devised following consultation with the taxi and private hire trades. They mainly relate to technical changes to the regulations or measures that could assist with TfL's enforcement/compliance work, but we are also interested in Londoners' views. For more detail on these proposals, you can view the full TfL documentation here <insert link>

To what extent do you agree or disagree with each proposal?

	Proposal	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
A	Operators will be required to seek TfL approval before changing their operating model						
B	Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis						
C	Operators should be required to keep all records for a period of 12 months						
D	TfL to impose a limit of 5 business names allowed to be attached to each Operator's licence						
E	Driver and Operator licence applicants to provide National Insurance numbers and share with Department for Work and Pensions (DWP)						
F	A driver's private hire vehicle licence to be automatically revoked if						

	their standard driver's licence is revoked						
G	TfL to stop accepting payment for licence fees by PO and cheque						
H	Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence. Hire and Reward insurance is a type of insurance that allows holders to legally carry other people's goods for payment.						
I	Drivers to carry or display a copy of insurance details at all times						
J	Operators to be required to have Hire and Reward fleet insurance. This is an alternative to drivers being responsible for their own Hire and Reward insurance. Some operators already have fleet insurance in place, this would make it compulsory. Hire and Reward insurance is a type of insurance that allows holders to legally carry other people's goods for payment						
K	Introduce new operator licence types that account for larger operators, who would be charged more to cover the extra costs to TfL to enforce these licences.						
L	Introduce new operator licence types that incentivise zero emission vehicles/disabled access with lower licence fees						

M	A small change to clarify the existing regulation regarding advertising, so that no advertising is allowed to be displayed inside, from or on the outside of a private hire vehicle.						
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TALK SURVEY Q19. If you have any other comments to make regarding private hire regulations and the proposed changes, please write them in the box below. (free text)

Part 3: Demographic questions

You're almost finished...finally, a few more questions about you. We're asking these questions to help ensure that policies made at City Hall represent Londoners from all walks of life. This information will be saved in your account area on Talk London. All of your personal information will be strictly confidential.

TALK SURVEY Q20 Gender

TALK SURVEY Q21 Age

TALK SURVEY Q22 Ethnicity

TALK SURVEY Q23 Work status

TALK SURVEY Q24 Borough/

TALK SURVEY Q25 Postcode

TALK SURVEY Q26 Housing tenure

TALK SURVEY Q27 Disability

(these demographic characteristics are collected compulsorily for all Talk London members)

Private Hire Regulations Consultation

Talk London Survey

Private Hire Regulations Consultation

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Talk London Survey – Oct-Nov
2015

Methodology

The purpose of the research was to:

- Further to the existing TfL-run consultation which is largely focused on an industry audience, TfL and the GLA Transport commissioned additional research on Talk London to understand the views of Londoners in general, particularly private hire/taxi service users. Results should be considered in conjunction with TfL's own survey.
- The questionnaire sought to understand levels of agreement/disagreement which each proposed change to existing regulations, or proposed new regulations.
- Respondents were presented with each proposal, along with commentary to outline the implications of the change or maintaining the status quo. They were asked the degree to which they agree or disagree with the proposal.

Fieldwork ran from 23 November 2015 to 16 October 2015. An invitation to complete was emailed to the 10,000+ Talk London membership on 27 October 2015, with a reminder email on 19 November 2015. A sample size of 869 was achieved, the respondent demographic profile is detailed in this slide deck.

Given the non-random and non-representative nature of this sample, it is not possible to highlight significant differences between the sub-groups with respect to specific proposals. This was not identified by TfL and the GLA Transport team as an insight requirement for this research. That said, where regulations are expected to impact on specific sections of the population, differences in perceptions have been highlighted. These should be regarded as indicative-only, with further research required to understand the drivers behind perceptions and behaviours.

Please note that these results have not yet been published and are for internal use only. **If you wish to circulate these results to anyone outside the GLA/TfL, or to use them publicly, please double-check usage of figures with the ORS team.**

Research question and summary findings

The question:

High levels of support are expected for proposals that most overtly concern passenger safety. It is anticipated that respondents will favour measures such as operators providing driver/vehicle details. Lower levels of support are expected for proposals that alter the current consumer experience (for example, a compulsory 5 minute wait or not allowing private hire operators to display cars as available for immediate hire). In general, it is expected that public perceptions will vary from views from the private hire and black cab trades. It is acknowledged that public knowledge of the distinction between private hire and black cabs and their separate regulations is not likely to be high, which may

The findings:

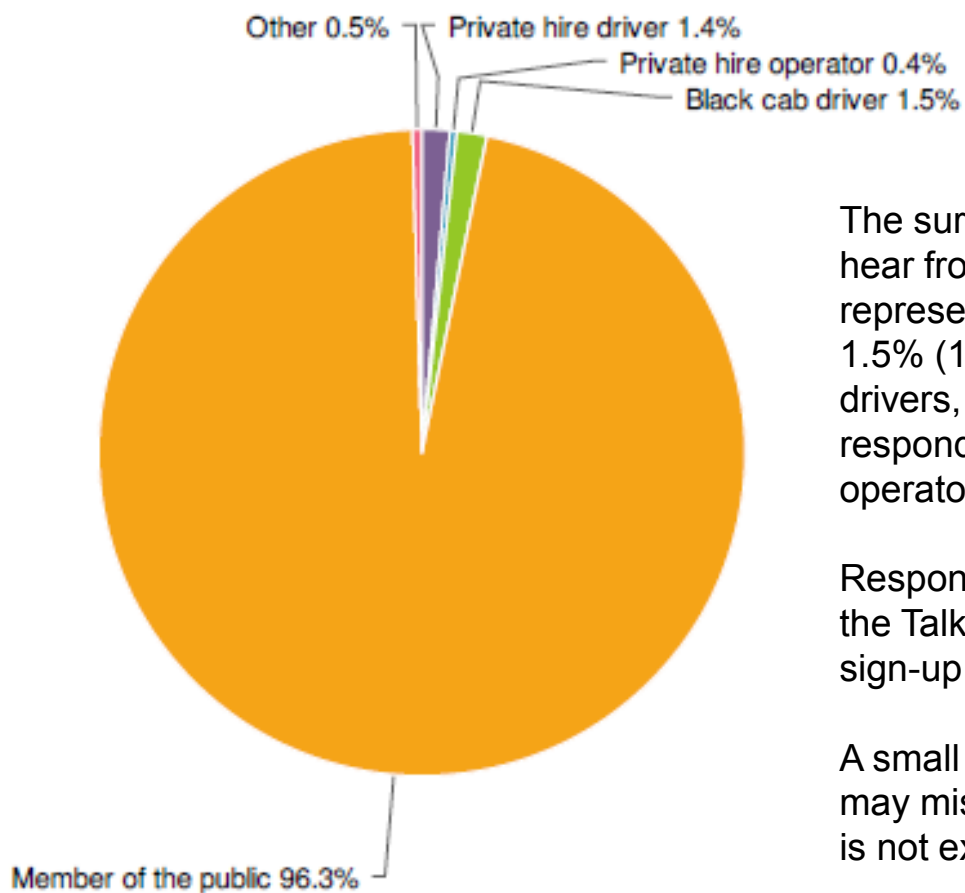
The highest levels of net agreement were seen with respect to:

- Operators providing driver/vehicle details in advance (89% - slide 5)
- Drivers meeting a minimum standard of English (86% - slide 14)
- Measures relating to insurance/driver licence compliances (90+% - slide 21-22)

The lowest levels of net agreement were seen with respect to:

- Information provided to passengers 5 mins before start of journey (48% - slide 6)
- Compulsory for operators to offer pre-booking upto 7 days in advance (40% - slide 8)
- Ending licences for operators at late night venues (41% - slide 9)
- Operators must not show vehicles being available for immediate hire (34% - slide 11)
- Private hire drivers may only be registered to a single operator at any time (40% - slide 15)

Interest in this survey

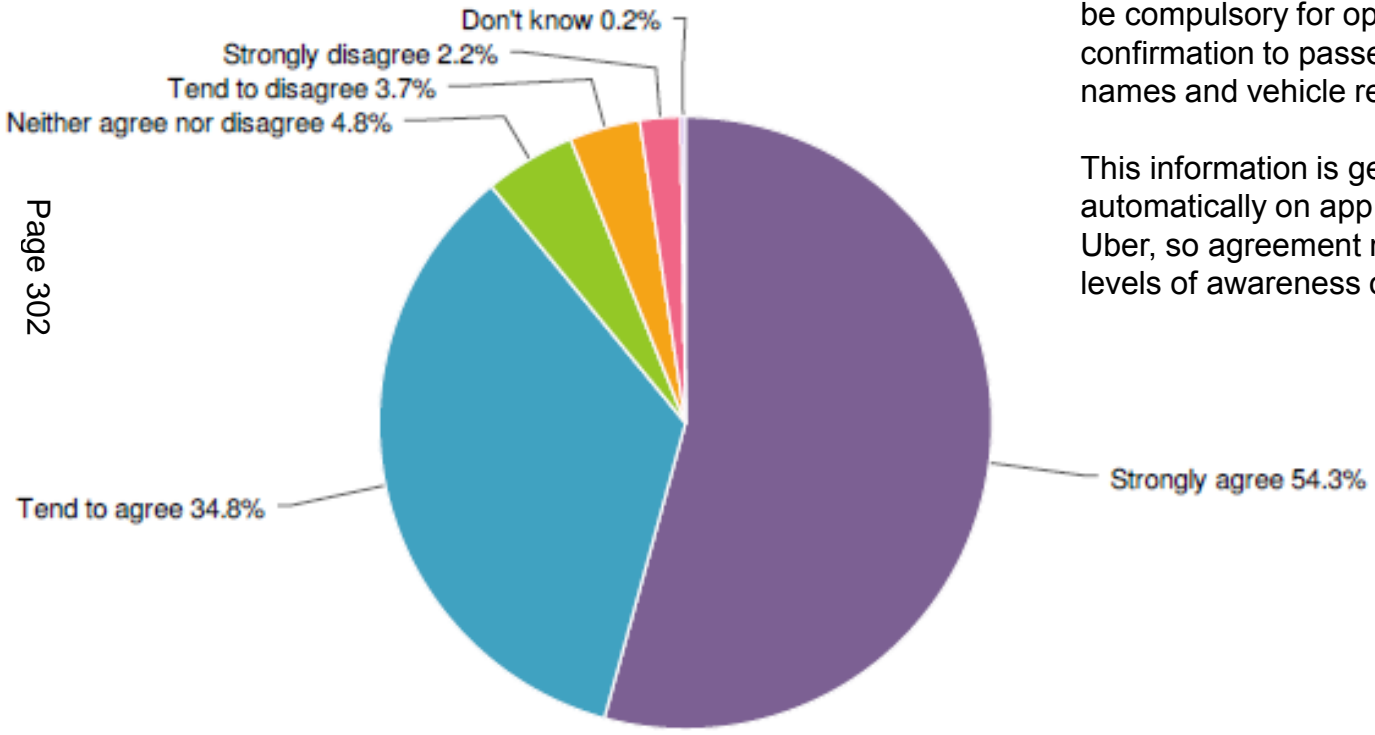


The survey appears to have met its objective to hear from Londoners in general rather than representatives from the taxi/private hire trade. 1.5% (13 respondents) identified as black cab drivers, 1.4% as private hire drivers (12 respondents) and 3 respondents are private hire operators.

Respondents who were not previously members of the Talk London research community were able to sign-up using a short registration form.

A small possibility exists that trade respondents may misidentify as members of the public but this is not expected to influence overall findings.

Proposal: It would be compulsory for operators to provide a booking confirmation to passengers containing the drivers name and vehicle registration number

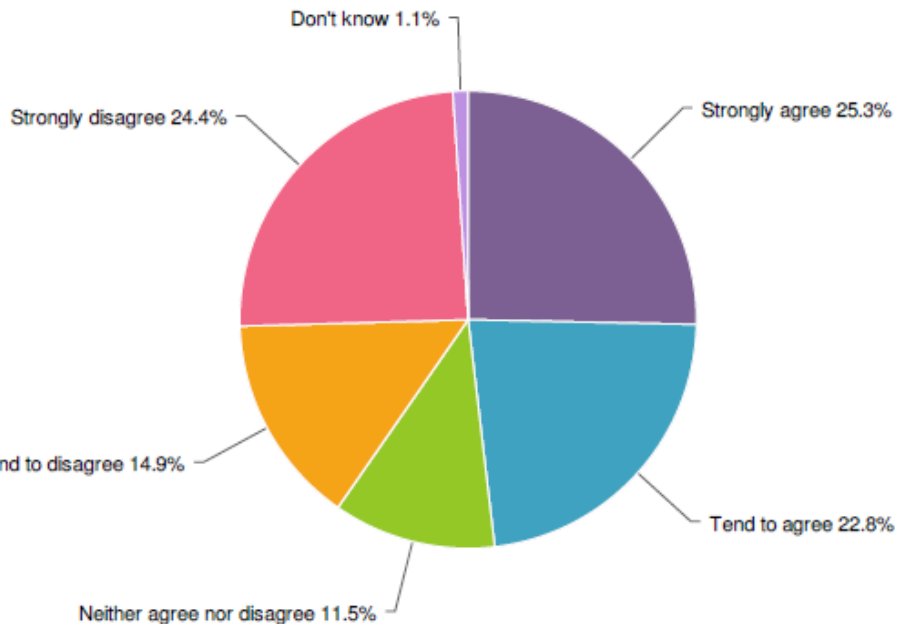


Almost 9-in-10 respondents agree that it should be compulsory for operators to provide booking confirmation to passengers with the drivers names and vehicle registration number.

This information is generally already provided automatically on app based platforms such as Uber, so agreement may reflect consumers' high levels of awareness of this measure.

NET AGREE: 89% **NEITHER: 5%** **NET DISAGREE: 6%**

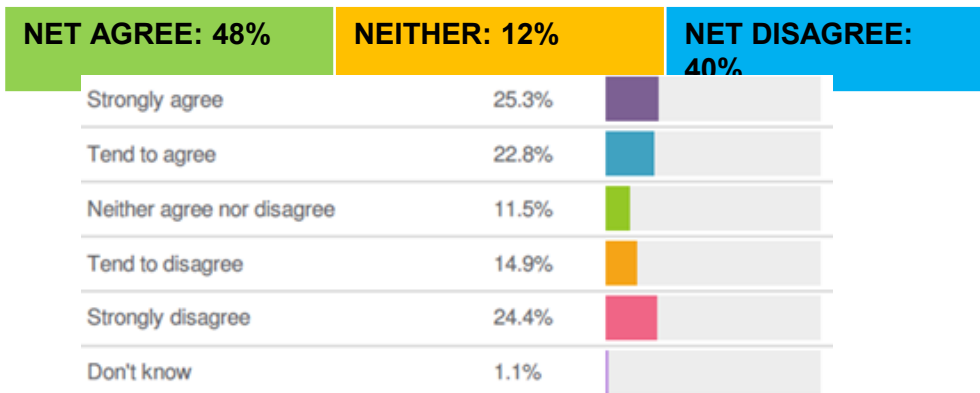
Proposal: Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing



This is among the more divisive proposals. While NET agreement is greater than NET disagreement by 8 percentage points, only a minor swing would reverse this.

Roughly the same proportion of respondents choose strongly disagree as chose strongly agree (c. 25% for each). The bar chart below highlights how closely matched both sides of this proposal are.

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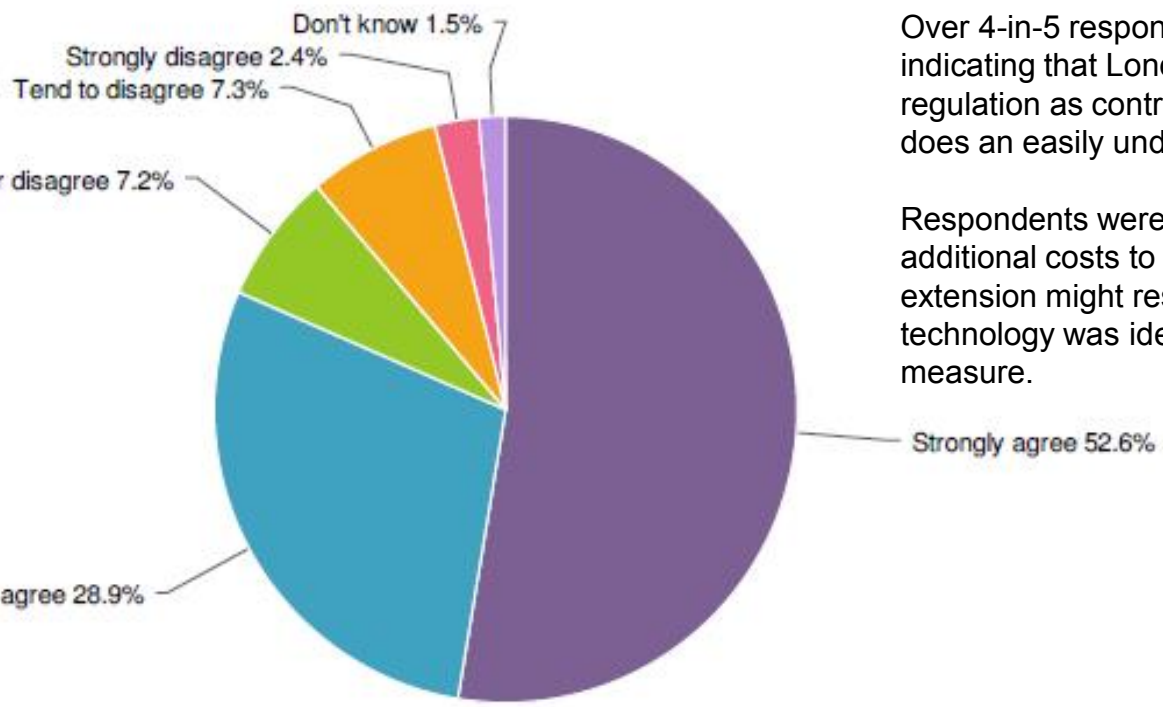
Demographic insight*

Despite the hypothesis that this proposal would be less positively received by women, given that it may involve a longer wait on the street for a cab to arrive - women are far more likely to agree with this proposal than men.

*nb – this survey sample is not representative of the London population. Comparisons between sub-groups should be treated as indicative only. Further research should be undertaken to understand perceptions and behaviours at the sub-group level.

Proposal: Operators who use apps to allocate drivers to a fare must have appropriate security measures to prevent the app being used by a person other than the licensed driver

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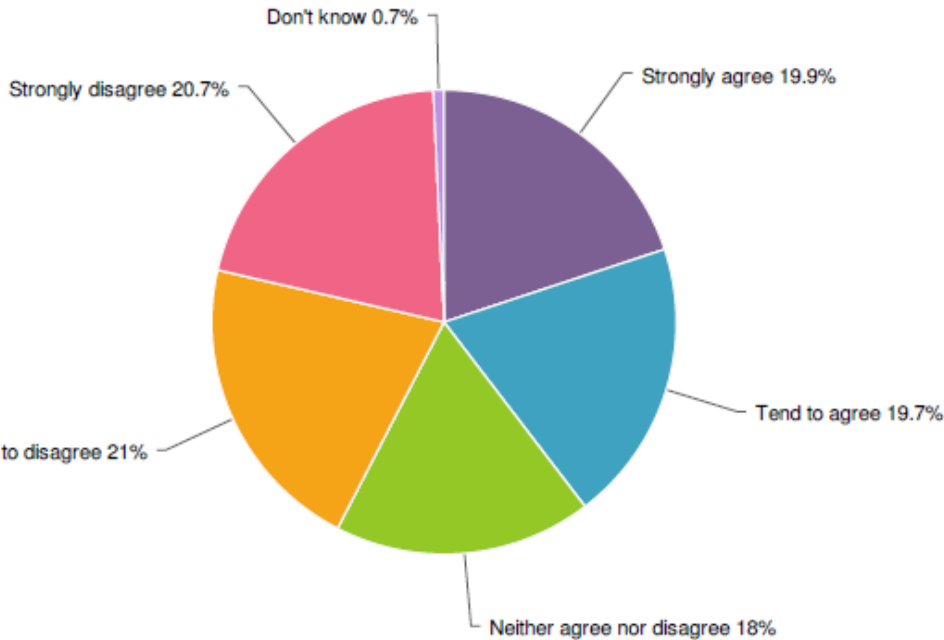


Over 4-in-5 respondents agree with this proposal, indicating that Londoners do not see this regulation as controversial, representing as it does an easily understandable security measure.

Respondents were informed that this may impose additional costs to operators/drivers, which by extension might result in higher fares. Fingerprint technology was identified as one possible measure.



Proposal: All operators must be legally required to offer the ability to pre-book up to 7 days in advance



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NET AGREE: 40%		NEITHER: 18%		NET DISAGREE: 42%	
Strongly agree	19.9%				
Tend to agree	19.7%				
Neither agree nor disagree	18.0%				
Tend to disagree	21.0%				
Strongly disagree	20.7%				
Don't know	0.7%				

Similar to the regulation proposing a 5-minute delay between booking and arrival, the proposal to require operators to offer pre-booking up to 7 days in advance is also divisive.

Similar proportions of Londoners agree and disagree indicating a lack of consensus among Londoners as to the need for this regulation. This may indicate satisfaction with the status quo – ie that some operators offer pre-booking, some don't, according to the needs of their business and customer base.

Demographic insight*

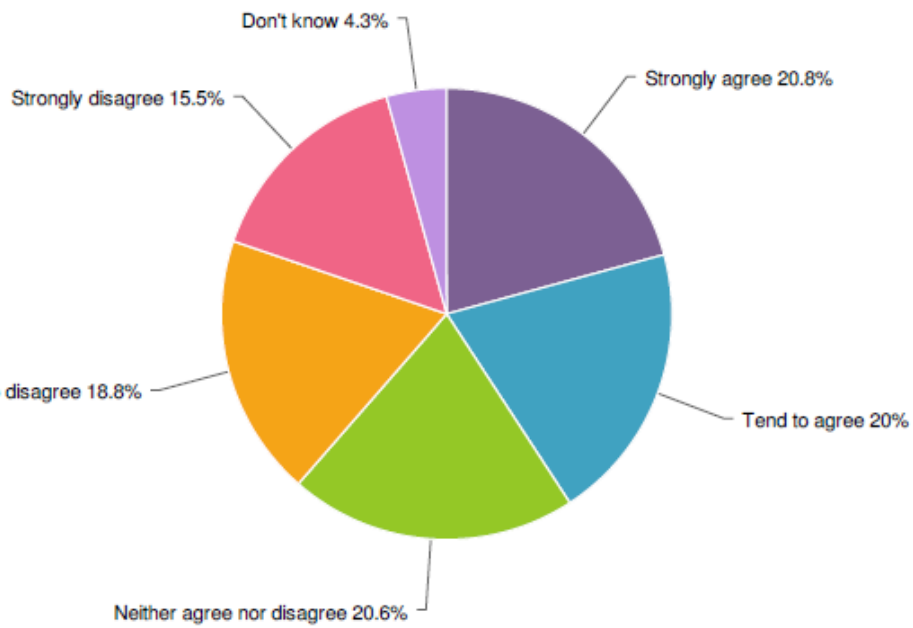
Respondents were informed of possible benefits to disabled travellers (ie in terms of accessing the more limited supply of accessible vehicles).

30 respondents in the survey identified as having a disability. 57% agreed with the proposal, higher than 40% among all respondents (nb – low sample size means this result should be regarded as indicative only)

*nb – this survey sample is not representative of the London population. Comparisons between sub-groups should be treated as indicative only. Further research should be undertaken to understand perceptions and behaviours at the sub-group level.

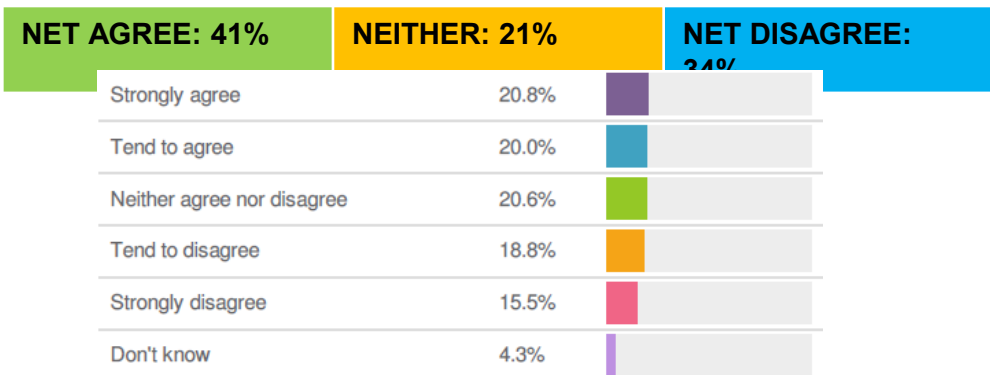
Proposal: TfL will no longer issue licences to private hire vehicle operators that accept booking inside or outside late-night venues with the vehicles themselves parked nearby

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Another divisive proposal with respondents leaning towards NET agreement by only 7 percentage points. Over 1-in-5 (21%) expressed neither agreement nor disagreement. Strength of opinion is broadly similar at either end of the scale.

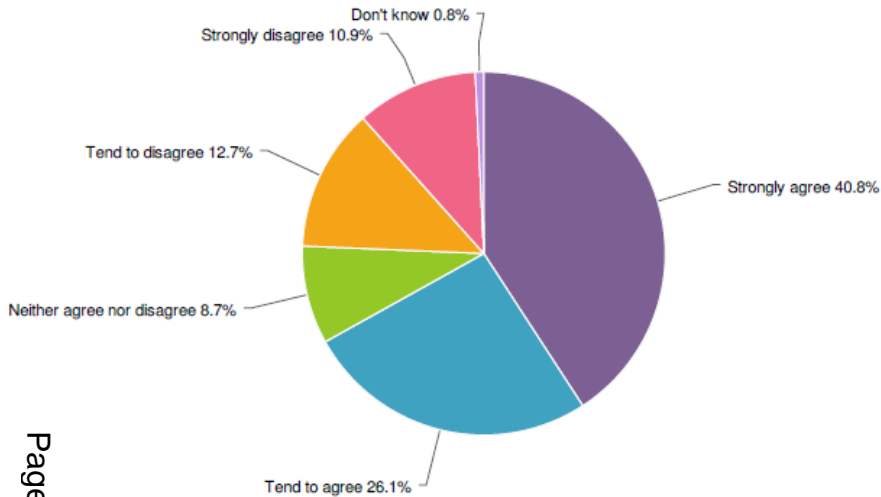
Given that this proposal largely concerns late night venues, it affects a specific cross-section of the population likely to take cabs home from late-night venues (ie younger, affluent). Further research may be required to understand the views of regular private hire/taxi users from such venues. Additionally, the eventual introduction of the night tube may change perceptions and behaviours with respect to this proposal.



Demographic insight*
 Women are more likely to agree with this proposal than men, which may reflect concern about unlicensed cabs plying for trade outside late-night venues.

*nb – this survey sample is not representative of the London population. Comparisons between sub-groups should be treated as indicative only. Further research should be undertaken to understand perceptions and behaviours at the sub-group level.

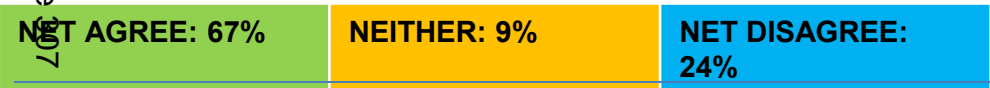
Proposal: Operators must have a fixed landline number available for passenger use at all times when their vehicles are fulfilling or accepting bookings



Over two-thirds of respondents agree with the proposal that operators should have a fixed landline number available for passenger use.

Booking apps such as Uber, primarily use email/online forms of communication. Other major private hire operators offer multiple methods.

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Respondents were also asked to specify up to 3 preferred methods of communication should an issue emerge on their journey. Landline was the highest ranking method, followed by mobile phone number, then via an app on a Smartphone, suggesting willingness among Londoners to use any of those methods.

Email, text message, in person and social media methods are less popular.

In the event of an issue emerging with your journey which of the following methods of communication are you willing to use to contact the private hire operator?

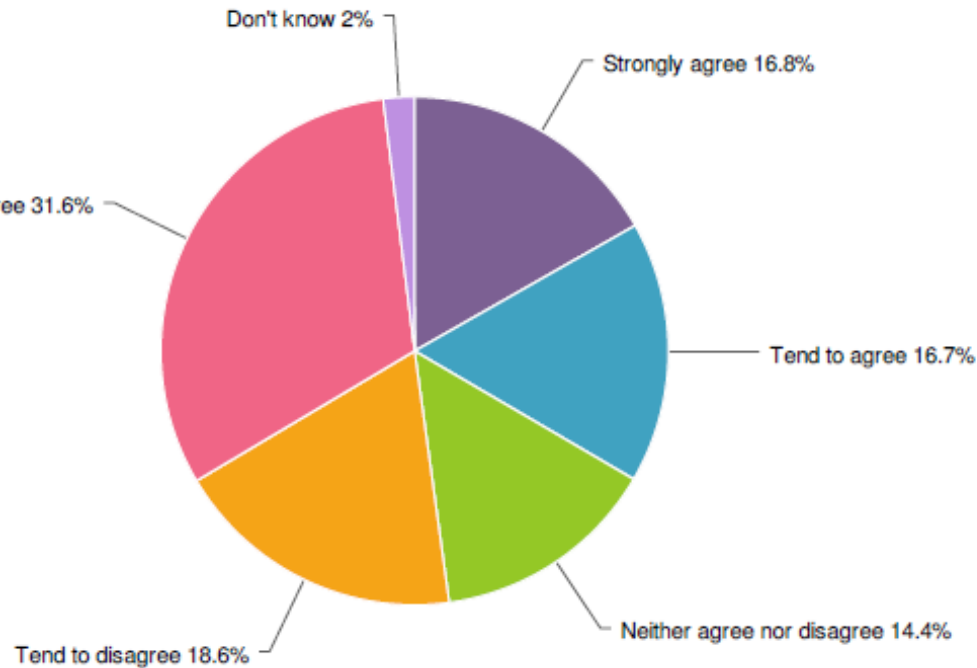
Method	Score*	Overall Rank
Landline number	1450	1
Mobile phone number	1184	2
Via an app on a smartphone	653	3
Email	634	4
SMS/Text message	583	5
In person	180	6
Twitter	29	7
Other	13	8

Total Respondents 793

*Score is a weighted calculation. Items ranked first are valued higher than the following ranks, the score is the sum of all weighted rank counts.

Proposal: Operators must not show vehicles being available for immediate hire, either visibly (for example by signage on the street), or virtually on an app

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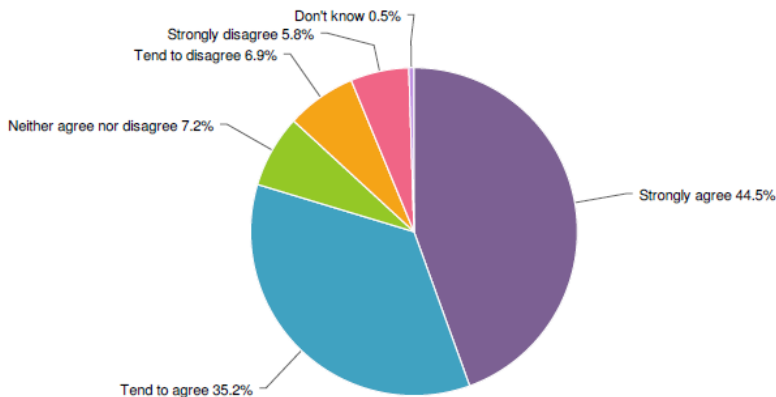
Half of respondents disagreed with this proposal, with only a third expressing agreement. Nearly a third (32%) chose 'strongly disagree' alone.

This appears to indicate support for operators advertising their services in similar ways to black cabs. Coupled with the lack of consensus for the introduction of a 5 minutes delay between booking and arrival, this suggests that members of the public do not favour regulations that limit the speed of service being provided.

Further research would need to be conducted to understand if this was due to safety concerns (ie avoiding waiting on the street for too long) or simply convenience.



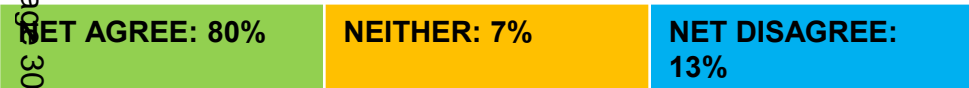
Proposal: Operators must record the main destination and pick-up location for each booking, at the time the booking is made and before the journey starts
Proposal: Operators must provide a specified fare prior to the booking being accepted



4-in-5 respondents agree with the proposal that operators must record the main destination and pick-up location for each booking, with very low disagreement at 13%.

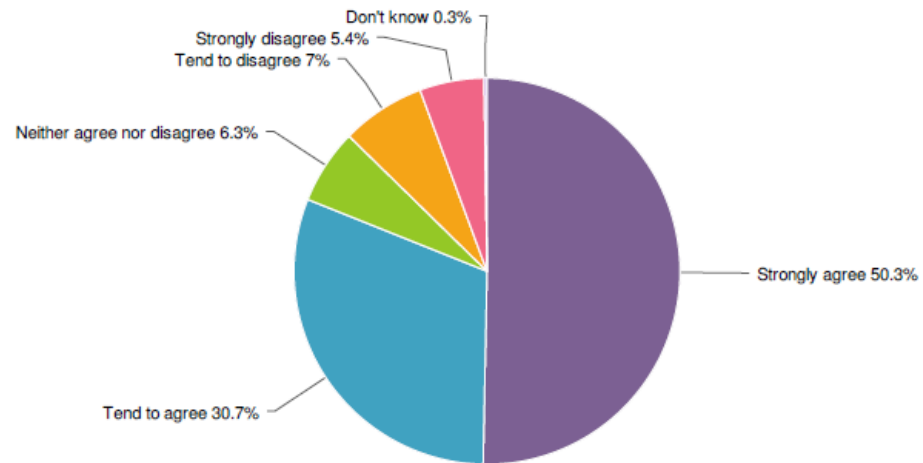
Respondents were notified that this would require them to specify their destination at the time of booking, which is not currently required by some operators. This proposal is understood in the context of the proposal below.

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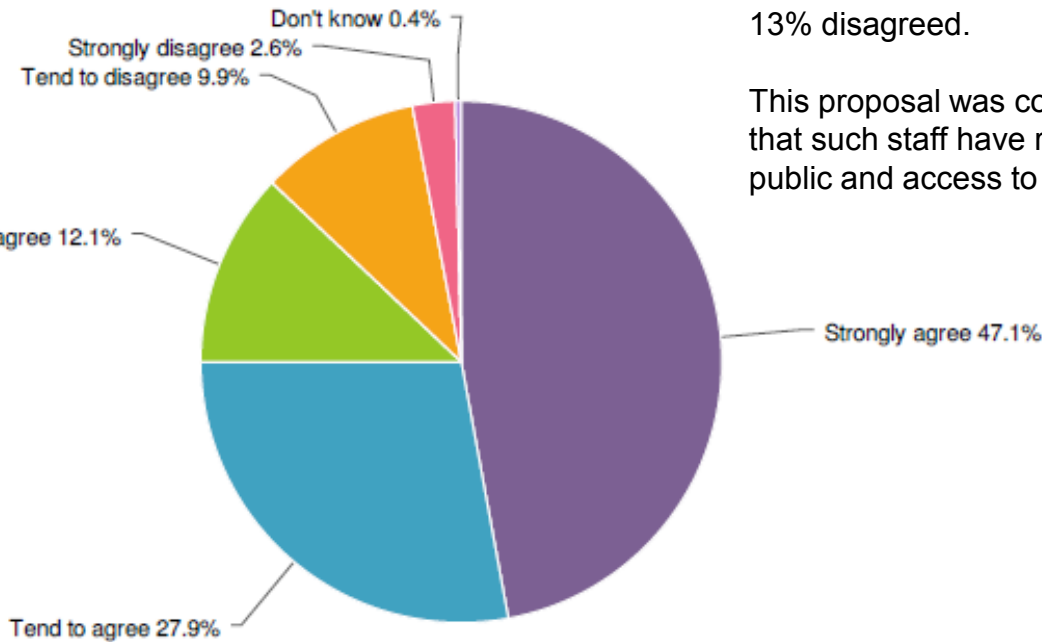
4-in-5 respondents also agree with the proposal that operators must provide a specified fare prior to the booking being accepted, perhaps highlighted the close connection with the proposal above (ie the above is required for this proposal to be implemented).

Despite high support among respondents, indicating a desire for transparent fares at the time of booking, this regulation is not required of black cabs, which generally operate a meter system.



Proposal: Operator staff should be subjected to criminal records checks as part of their application process

Page 8 of 10



Three-quarters of respondents agree with the proposal that operator staff should be subjected to criminal records checks, in addition to drivers. Only 13% disagreed.

This proposal was contextualised with the rationale that such staff have regular interaction with the public and access to personal information.

NET AGREE: 75%

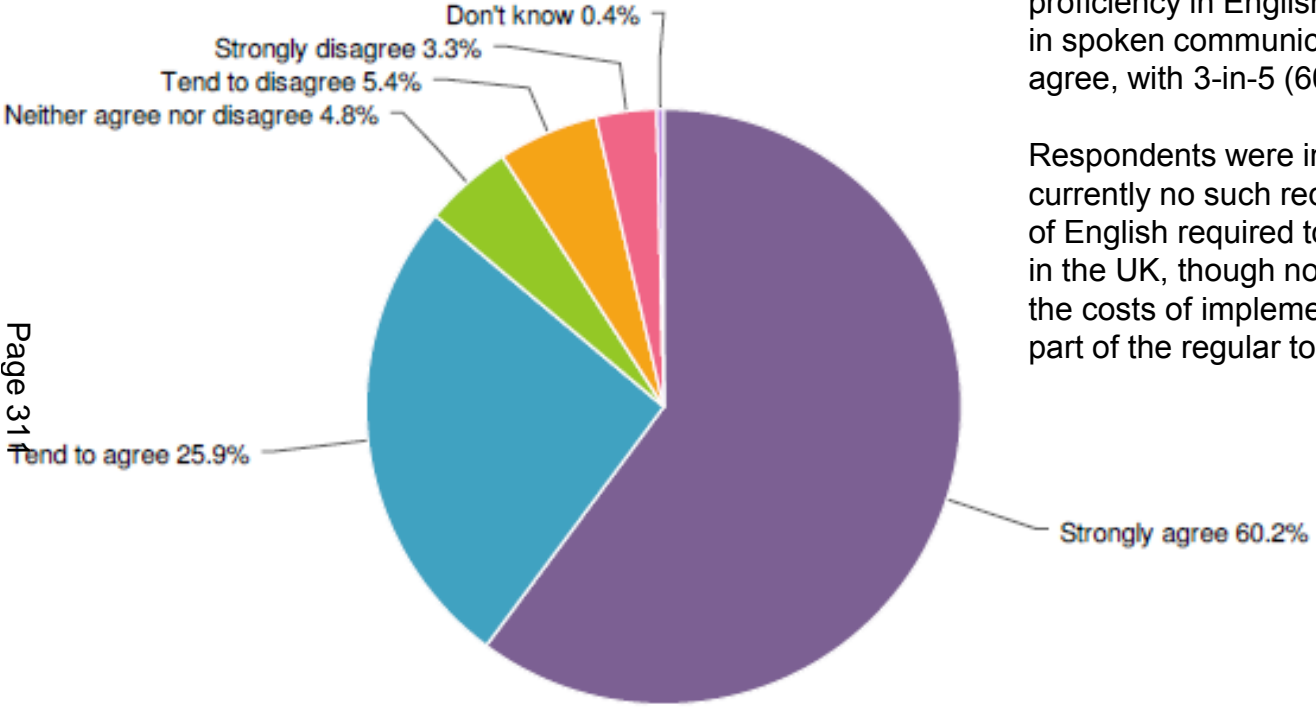
NEITHER: 12%

**NET DISAGREE:
13%**

Proposal: Private hire drivers should be required to demonstrate a certain standard of English, with particular emphasis on ability in spoken communication

There is strong agreement with the proposal that drivers should be required to demonstrate proficiency in English, with particular emphasis in spoken communication. Nearly 9-in-10 (86%) agree, with 3-in-5 (60%) in strong agreement.

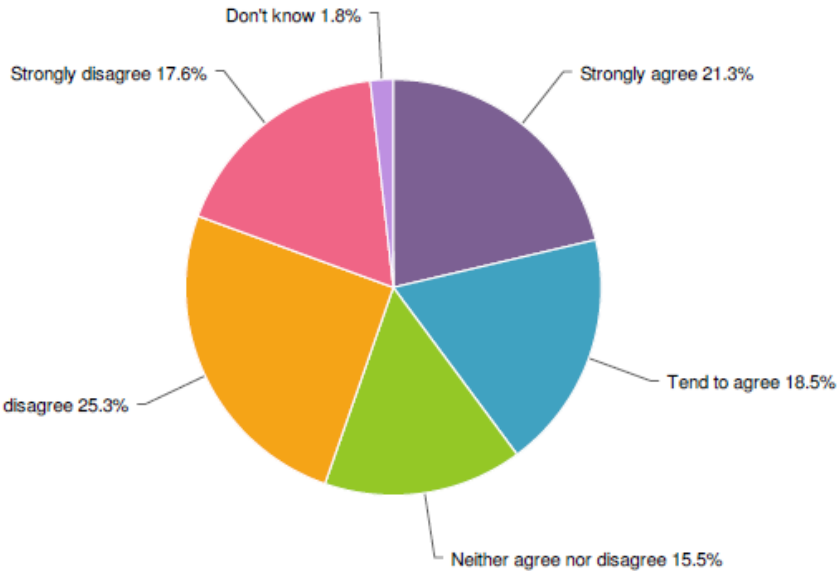
Respondents were informed that there is currently no such requirement, beyond the level of English required to pass tests to legally drive in the UK, though no information was given on the costs of implementing a language test as part of the regular topographical test.



NET AGREE: 86% **NEITHER: 5%** **NET DISAGREE: 9%**

Proposal: Private hire drivers may only be registered to a single operator at any time

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NET AGREE: 40%

NEITHER: 16%

NET DISAGREE: 43%

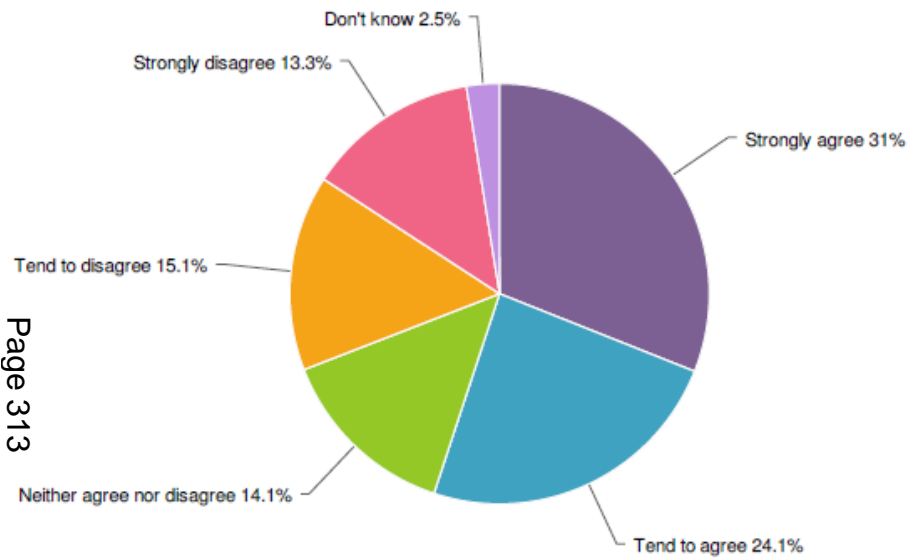
Strongly agree	21.3%		168
Tend to agree	18.5%		146
Neither agree nor disagree	15.5%		122
Tend to disagree	25.3%		199
Strongly disagree	17.6%		139
Don't know	1.8%		14

The proposal to require drivers to only work for a single operator at any single time is divisive. Similar proportions of respondents agree and disagree with this proposal. Strong agreement/disagreement is also relatively even, at around 20% for each, suggesting a lack of consensus for the introduction of such a regulation.

Respondents were informed that there would be no limit on the number of times a driver could change the operator they work for, but limiting them to one at a time would limit the risk of drivers working excessive hours (thereby increasing accident risk).

Proposal: Private hire vehicles cannot be used for ride-sharing purpose in London unless there are very clear controls in place to protect the safety of passengers and drivers

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NET AGREE: 55%

NEITHER: 14%

NET DISAGREE: 28%

Over half of all respondents agree that clear controls are required with respect to ride-sharing. A significant proportion (28%, over a quarter) do not agree that private hire vehicles can't be used for ride-sharing purposes without controls.

This was not presented as a finalised proposal, so further research is required to understand perceptions of different measures and the nature of how and to what extent Londoners use ride-sharing services in general.

Demographic insight*

For the regulation proposing no more late-night outside-venue bookings, women were more in agreement than men, alluding to safety concerns. Here though, there is no difference in response by gender.

*nb – this survey sample is not representative of the London population. Comparisons between sub-groups should be treated as indicative only. Further research should be undertaken to understand perceptions and behaviours at the sub-group level.

Proposal: Operator licencing proposals

These proposals were considered of lower interest to members of the public, pertaining to technical regulations concerning the mechanics of licensing of drivers and operators. As such they were grouped together, without detailed explanation. They are presented here in order of NET agreement, highest to lowest. 'Neither' percentages do not include 'don't know' responses.

	NET AGREE	NEITHER	NET DISAGREE
<i>A driver's private hire vehicle licence to automatically revoked if their standard driver's licence is revoked</i>	97%	1%	1%
<i>Operators should be required to keep all records for a period of 12 months</i>	94%	4%	2%
<i>Driver and Operator licence applicants required to provide National Insurance numbers and share with Dept for work and Pensions</i>	90%	5%	3%
<i>Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis</i>	88%	5%	7%
<i>Operators will be required to seek TfL approval before changing their operating model</i>	67%	11%	18%
<i>TfL to impose a limit of 5 business names allowed to be attached to each Operator's licence*</i> <i>*9% 'don't know'</i>	64%	18%	9%

*TfL to stop accepting payment for licence fees by PO and cheque**
**12% don't know*

There is near unanimous agreement that private hire licence vehicles should be revoked for drivers' whose standard licences are also revoked, for requiring operators to keep records for upto 12 months and for licence applicants to provide National Insurance numbers to DWP. This reflects the relatively uncontroversial nature of these proposals.

Nearly 9-in-10 respondents agree that operators should provide specified information on drivers and vehicles to TfL on a regular basis. This is currently only required on request by TfL.

Proposals to limit licences to a maximum of 5 business names and for TfL to stop accepting fees by PO and cheque exhibit much higher levels of 'neither' or 'don't know' responses, suggesting a lack of public interest or understanding in the benefits of these proposals.

Proposal: Operator licencing proposals

These proposals were considered of lower interest to members of the public, pertaining to technical regulations concerning the mechanics of licensing of drivers and operators. As such they were grouped together, without detailed explanation. Definitions of some concepts were given (eg for Hire & Reward Insurance). They are presented here in order of NET agreement, highest to lowest. 'Neither' percentages do not include 'don't know' responses.

	NET AGREE	NEITHER	NET DISAGREE
<i>Drivers to carry or display a copy of insurance details at all times</i>	88%	8%	3%
<i>Hire & Reward insurance to be check at the point of licensing and must be in place for the duration of the vehicle licence</i>	86%	6%	2%
<i>Introduce new operator licence types that incentive zero emission vehicles/disabled access with lower licence fees</i>	83%	10%	5%
<i>Operators to be required to have Hire & Reward fleet insurance. This is an alternative to driver's being responsible for their own insurance. The proposal would make it compulsory* *Also 7% 'don't know'</i>	72%	13%	7%
<i>Introduce new operator licence types that account for larger operators, who would be charged more to cover the extra costs to TfL to enforce these licences</i>	60%	22%	12%
<i>Clarify existing regulation regarding advertising, so that no advertising is allowed to be displayed inside, from or on the outside of a private hire vehicle</i>	38%	25%	32%

Over 8-in-10 respondents favour measures to ensure drivers carry their insurance details with them and that their policy covers the duration of the vehicles private hire licence. 7-in-10 favour a compulsory regulation to ensure that operators have Hire & Reward fleet insurance.

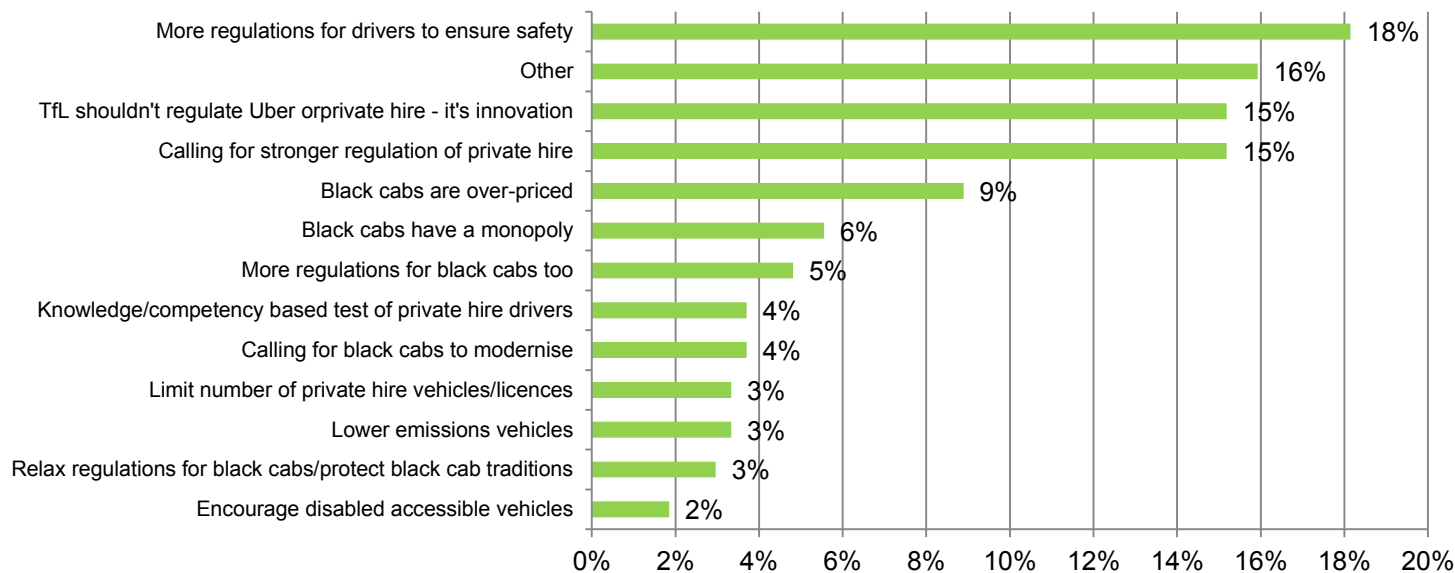
There are high levels of support for amending the licence fee system to incentivise zero emission vehicles and disabled access.

Reflecting the complexity of the proposed changes, there are lower levels of agreement and higher incidences of 'neither'/'don't know' for new operator licence types and amendments to current advertising regulations.

Open comments

If you have any other comments to make regarding private hire regulations and the proposed changes, please write them in the box below (270 comments total)

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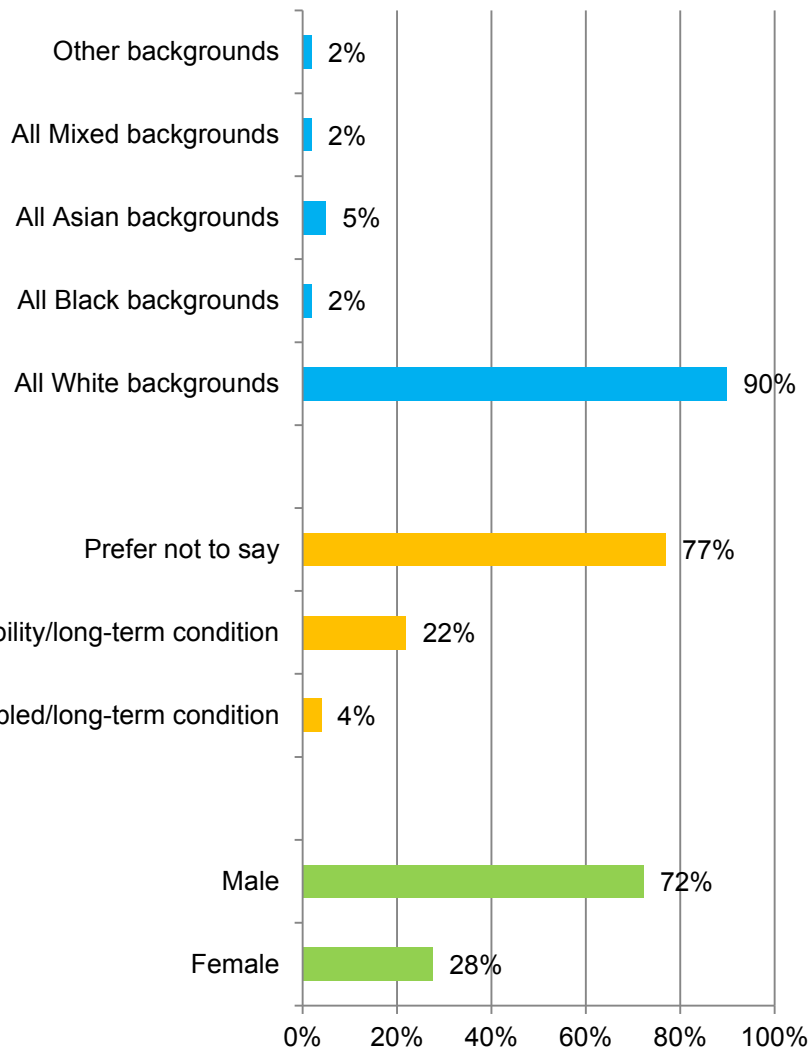
270 respondents left comments on the regulations in general. Responses have been coded into 12 discrete categories based on the overall sentiment of each comment.

18% of these concerned regulations being required to ensure safety. 15% of respondents suggest that TfL shouldn't regulate or that the market should decide, while an equal proportion call for strong regulation of private hire vehicles, highlighting in microcosm the divisive nature of this debate.

24% of respondents mentioned a black cabs negatively – ie having a monopoly, being over-priced, requiring more regulation or needing to modernise. 3% call for more relaxed black cab regulations or measure to protect them as a tradition. Only 4% suggest private hire drivers undergoing a Knowledge-style test.

Demographic profile of respondents

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A representative sample of Londoners was not identified as a research requirement during commissioning. This survey was conducted on a non-random basis, with all Talk London members invited to respond. Weighting of data to mirror the London population was not conducted.

Nonetheless, it is useful to highlight the demographic make-up of respondents, to understand any limitations, under or over-represented groups and target future research to further understand motivations, perceptions and behaviours. 90% of respondents identified as being from a white background, with the remaining 10% being BAME.

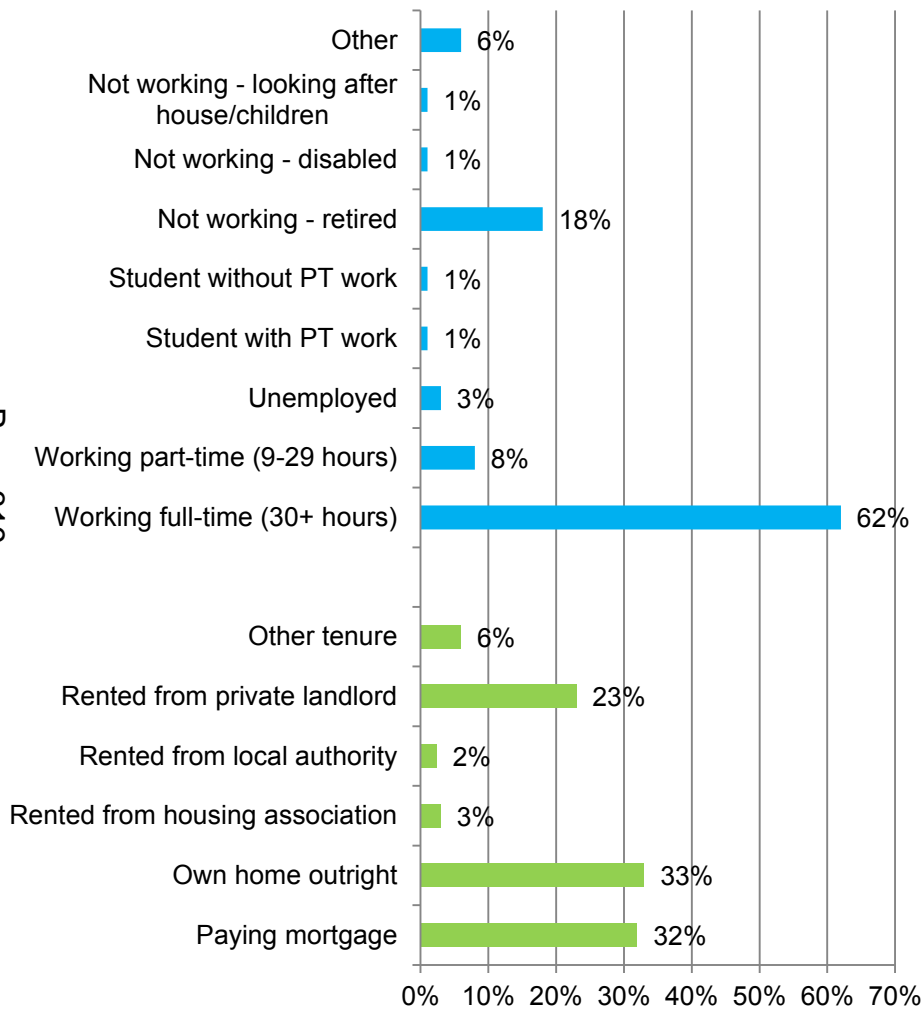
4% (30 respondents) identified as having a disability. Further research may be required to understand how particular regulations impact on this group.

There is a gender imbalance among respondents, with nearly three-quarters being male.

White British Londoners are overrepresented in terms of the proportion of the population they make-up, while a number of BAME groups are underrepresented. It is recommended that for any future research work consideration is given to whether a general London audience is desired or a sample that reflects the make-up of private hire users only.

Demographic profile of respondents

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Nearly two-thirds of respondents are working full-time, with the next largest group being retired Londoners (18%).

In terms of housing tenure, most tenure types are represented in significant numbers. 28% are renters (either private, local authority or housing association), while 65% are homeowners (either outright or through a mortgage). According to ONS data, 50% of Londoners are homeowners (outright or mortgage), while 25% rent from a private landlord. As such, these groups are well-represented in this sample.

23% of Londoners rent from a housing association or local authority, so this group is somewhat underrepresented in this sample.

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Private Hire Regulations Review: Response to consultation and Proposals

Consultation

September 2015

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SUMMARY

Transport for London (TfL) has carried out a wide-ranging review of private hire vehicle regulations and this is the second and final consultation in respect of this review.

The first consultation took place between March and June 2015 and almost 4,000 responses were received and analysed. TfL has subsequently developed a more detailed set of proposals for this consultation before deciding whether or not to implement any regulatory changes.

The consultation will close 23 December 2015 and responses will be analysed in early 2016 ahead of any amendments to the regulations being announced and implemented.

INTRODUCTION

Transport for London (TfL) is a statutory body established by the Greater London Authority Act 1999 and is the licensing authority for London's taxi and private hire industries. It is the largest licensing authority in the country, being responsible for licensing approximately one third of all taxis and private hire vehicles (PHVs) in England.

Private hire operators, drivers and vehicles licensed by TfL provide a range of vital services as part of London's transport system which include minicab, chauffer/executive and specialist accessible vehicle services.

Because of a number of developments within the private hire industry including advancements in new technology and an increase in the different ways people engage and share taxi and private hire services, we are undertaking a review of the current policies and processes that govern the licensing of private hire drivers, vehicles and operators.

We launched a consultation in March 2015 which reviewed the regulations and requirements that are currently in place for private hire services and invited comments, suggestions and information and an indication whether it was felt these should be revised, if at all.

The consultation sought the view of those involved in the private hire trade, users of private hire services and any other interested parties.

Nearly 4,000 consultation responses were received. A report setting out these responses, including those received from the main private hire and taxi trade representatives as well as from large private hire operators and passenger groups, is attached at **Annex A**.

We have carefully considered the responses to this consultation and in this second consultation we set out a number of proposed changes in more detail. Certain of

these proposals were not included in the March 2015 consultation but which we think are appropriate to take forward.

We now invite comments on the proposed changes. Where possible, consultees are asked to provide evidence or examples in support of their comments and suggestions.

Full details of how to respond to the consultation are provided below.

The following abbreviations are used when referencing the private hire regulations (“the PHV regulations”):

Private Hire Vehicles (London) Act 1998 – “the 1998 Act”

Private Hire Vehicles (London) (Operators’ Licences) Regulations 2000 – “Operators Regulations”

Private Hire Vehicles (London PHV Driver’s Licences) Regulations 2003 - “Drivers Regulations”

Private Hire Vehicles (London PHV Licences) Regulations 2004 – “Vehicles Regulations”

BACKGROUND

The Private Hire Vehicles (London) Act 1998 provided for the introduction of licensing of private hire operators, drivers and vehicles in London. The Private Hire Vehicles (London) (Operators' Licences) Regulations 2000 were introduced and licensing of operators commenced in 2001.

Under the 1998 Act as originally enacted, the responsibility for private hire licensing fell to the Public Carriage Office (PCO), the section of the Metropolitan Police responsible for regulation and licensing of London's taxis. Upon the establishment of the Greater London Authority and Transport for London (TfL) as the Mayor's integrated transport authority in 2000, the PCO transferred into TfL, subsequently becoming part of TfL's Surface Transport Directorate as London Taxi and Private Hire.

Since the introduction of operator licensing, it has been illegal to accept a private hire booking without an operator's licence. Operators must have one or more licensed operating centres and bookings can only be accepted at these centres. Records of bookings, complaints and lost property must be held at the operating centre(s) together with details of drivers and vehicles used to fulfil bookings, including copies of documents to prove that the driver and vehicle are licensed for private hire work and covered by the appropriate insurance etc. All these records must be available for inspection by TfL staff.

There are two types of operator's licence and both are normally granted for five years:

- 'Small' – the operator has no more than two vehicles at any time; and
- 'Standard' – the operator has more than two vehicles

There are approximately 1,000 small and 2,000 standard operators currently licensed in London. Many of the small operators are one-person chauffeur businesses in which the same person is licensed as an operator, driver and vehicle owner. However, some are booking agents that sub-contract the service provision to other licensed operators.

The vast majority of operators have one operating centre however there are around 330 with multiple centres.

PURPOSE OF THE CONSULTATION

The purpose of this consultation is to review various aspects of the existing regulations covering private hire services, and to invite comments on proposals for change.

We have identified a number of issues that could be addressed by further amendment to the regulations to ensure that they remain appropriate and fit for purpose. This document sets out these issues and invites comments on proposals to address them.

Consultees are invited to comment on any aspect of the proposals or make other suggestions and, in particular, are invited to provide any evidence relevant to issues or proposals that are discussed.

CHANGES TO PRIVATE HIRE POLICY AND LEGISLATION

After careful consideration of the responses to our initial consultation, we are bringing forward a package of proposals for further consultation that we consider will strengthen the regulation of private hire services in London.

Our overriding concern in developing these proposals is to improve passenger safety. We are also committed to maintaining a clear distinction between the taxi and private hire trades and further improving the quality, safety, accessibility and overall standard of private hire vehicle provision in London. We believe that the proposed measures will contribute to this aim and invite comments and views before making any changes.

PROPOSALS

PART 1: PRIVATE HIRE OPERATORS

1. Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking

Our March 2015 consultation asked if passengers should be provided with driver and vehicle details prior to commencement of a journey.

This proposal was strongly supported by consultees. Whilst many private hire operators already provide this information, we believe it is essential for public safety that all operators should do this for all journeys. It will minimise the risk of a passenger getting into the wrong (and possibly unlicensed) vehicle and will help to deter illegal touting or plying for hire.

We propose that the information to be provided will be the vehicle registration number and the name and photograph of the driver. Clearly the method by which the operator provides this information is dependent on the means by which the customer can receive it. For example, if the customer is using a mobile phone without smartphone technology then it would not be possible to send the driver photograph. However, the proposal is that operators must ensure they provide all passengers with sufficient detail about the driver that is undertaking the booking and the vehicle that will be used.

Proposal

We propose amendments to the PHV Regulations to the effect that operators must provide driver and vehicle identification in advance of the journey commencing. Photographic evidence for the driver must be provided if the customer has provided a means by which such information can be transmitted.

Question 1

Do you agree with the above proposal? If you don't agree, please explain why.

2. Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing

A number of consultees suggested that booking confirmation details (including the vehicle and driver information set out above) should be provided to the passenger within a minimum set period prior to commencement of the journey.

A delay between the booking and commencement of a journey will further reduce the risk of a customer getting into the wrong car and/or into an unlicensed vehicle. It will also enable the driver to ensure the passenger is in a safe pick-up location, i.e. not having to run out into traffic to get into the vehicle. A short time period will give more certainty that the driver and vehicle information has been successfully sent, delivered

and read by the passenger, and that the driver has had sufficient time to plan an appropriate route.

A number of consultees suggested this period should be 15 minutes, 30 minutes or longer. However, there is a contrary view that imposing a significant delay between a booking being made and the passenger being picked up would, in some circumstances, particularly late at night, unnecessarily inconvenience passengers. In our view, the period between booking and commencement of the journey must therefore be long enough to facilitate consideration of the booking confirmation details by passengers whilst short enough not to unnecessarily inconvenience passengers. A period of 15 minutes or longer could present a safety risk to passengers, particularly at night. We therefore propose a period of five minutes.

Proposal

We propose changes to the PHV Regulations that will require operators to ensure that there is a time interval between a booking being accepted and the commencement of that journey to allow the driver and vehicle information to be communicated to passengers.

It is proposed that the specified time interval is five minutes.

Question 2

Do you agree with our proposal for a time delay between journey booking and commencement? If you don't agree, please explain why.

Question 3

Do you think that a different time interval to five minutes is appropriate? If you do, please say what you consider an appropriate time interval to be, and why.

3. Operators will be required to seek TfL approval before changing their operating model

When assessing a new operator licensing application we expect all applicants during a pre-licensing inspection to demonstrate how they will meet the requirements of the 1998 Act and associated regulations.

With the advances in new technology such as mobile phone applications, operators must be mindful when making any changes to their operating business model that they are still required to meet the same requirements under which their licence has been issued.

Our proposal is to place a specific obligation on operators to inform us of changes to specified aspects of their operating model prior to implementing those changes. By requiring operators to provide us with information of these operating model changes prior to them being implemented, we will be able to determine whether the new operating model is compliant with private hire legislation in the interests of passenger safety.

Examples of what may potentially be caught by this requirement include changes to the way in which bookings are accepted, including use of app based booking systems, how records are retained, changes to operating centres etc.

Proposal

We propose to amend the PHV Regulations to require operators to inform TfL prior to implementing specified changes to their operating model.

Question 4

Do you agree with our proposal? If you don't agree, please explain why.

4. Security for app based booking platforms

Where a licensed operator uses an app based platform, bookings must only ever be allocated to licensed drivers

To prevent unauthorised use we propose to make it a requirement that app based platforms have, and can demonstrate during pre-licensing checks and compliance inspections, appropriate security measures to prevent the app being used by a person other than the licensed driver they are allocating bookings to. We also propose to require operators to demonstrate what security measures they have in place to protect passengers from fraudulent use of their accounts and/or personal data.

Our preference is for operators to design a system whereby, whilst available for work for an operator, the driver must periodically log back in to their booking app, for example via facial or fingerprint technology, thus minimising the possibility of the account being passed off for use by another driver.

Question 5

What are your views on ensuring that app based platforms are secure and do not allow passenger or driver fraud?

Question 6

Do you believe that there is sufficient technology available to achieve this and if so what technology do you believe we should consider?

5. Operator must offer a facility to pre-book up to seven days in advance

A number of consultees suggested that an essential part of a private hire operator's role is to offer the facility to accept advance bookings.

Whilst there is currently no requirement for operators to offer an advance booking facility for a specified period, our view is that it is reasonable to expect a private hire operator to offer such a facility. An increasing absence of advance booking facilities will restrict the choice for passengers.

Our proposal is that operators should be required to offer advance booking facilities of up to 7 days. This will widen choice for PHV customers. It may also assist disabled passengers to secure journeys – due to the relatively small number of fully accessible PHVs, disabled passengers often have to book in advance.

Proposal

We propose to amend the PHV Regulations to require licensed operators to offer the facility for customers to book a journey up to seven days in advance of that journey.

Question 7

Do you agree with our proposal? If you don't agree, please say why.

Question 8

Do you consider a period other than seven days to be appropriate? If you do, please say why.

6. TfL proposes to no longer issue licenses for in-venue operators or temporary events

Our March 2015 consultation asked if we should make any changes to the current arrangements for in-venue operators (sometimes called “satellite offices”) and the licensing of temporary events.

A significant number of consultees felt that we should no longer issue licences for these venues and events. There have been issues with operator staff accepting bookings outside venues and touting, particularly late at night; and with PHVs parking and waiting in the vicinity of operating centres. Touting has occurred outside venues because customers, who are typically unaware of the legal distinctions and the need for a PHV to be booked at an operating centre, approach the drivers as if they were offering a taxi service.

There were differences in opinion as to how venue owners and those arranging temporary events could provide safe transport provision for those leaving the venue.

Options suggested included the use of licensed marshals attached to licensed private hire operators, and the provision of more taxi ranks at venues.

TfL has, however, already suspended new applications for these licenses on the recommendation of the GLA Transport Committee, and this proposal would effectively make this permanent.

Proposal

TfL proposes to no longer issue operating licences in respect of in-venue operations and for temporary events. We will continue to assist with arrangements for temporary taxi ranks and parking areas for pre-booked PHVs when requested for major sports and social events.

Question 9

Do you agree with our proposal? If you don't agree, please say why.

Question 10

How would you propose that venues and temporary events ensure safe and adequate transportation options for those attending such events?

7. Operator must have a fixed landline telephone which must be available for passenger use at all times

A number of consultees suggested that licensed operators must have a fixed landline in place at all times.

Operators are already required to provide a landline number as part of their application for an operator's licence. This proposal will mean a landline will have to be available for the use of passengers throughout the duration of an operator's licence, and be operational at all times during the operating hours of the business.

Ensuring that such a number is available at all times during operational hours, will mean that a customer will be able to contact and speak to the operator when concerned about any aspect of the journey. Concerns can be addressed in real time rather than through often less reactive electronic communication.

Proposal

We propose to amend the PHV Regulations to require all licensed private hire operators to have a landline number available at all times so passengers can speak to operator staff for the purposes of customer care, complaints and the booking of private hire journeys. The number of staff managing customer telephone enquiries will be required to be commensurate with the size of the operator and the volume of private hire bookings.

Question 11

Do you agree with our proposal? If you don't agree, please say why.

8. Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app

A number of consultees have suggested that, whether through an app or through physical street ranking, some operators are creating the impression of vehicles being available for immediate hire. This is increasing the risk of unauthorised vehicle/driver "touting" and other illegal cab activity.

Operators with a physical base for their drivers (e.g. a local minicab office) could still have vehicles at the premises awaiting a booked journey.

Proposal

We propose to amend the PHV Regulations to require operators to ensure that private hire vehicles are not visibly shown to be available for immediate hire, whether physically (e.g. signage or otherwise on the street) or via an app, or other means.

Question 12

Do you agree with our proposal? If you don't agree, please say why.

9. Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis

Consultees were mostly supportive of a requirement that operators provided TfL with details of their drivers and vehicles on a regular basis.

At present we do not know for certain which driver is working for which operator. This change would mean that we can quickly trace back the driver to the operator where illegal activity is suspected and/or a complaint is made about a vehicle or driver. It also means we can better monitor whether drivers connected to a particular operator are consistently committing offences or other behavioural indiscretions. This will enhance enforcement and compliance activity.

Although operators are obliged to keep a record of drivers and vehicles, which are inspected as part of any routine (or other) compliance inspection, having a nearer "real-time" record will enable us to react quickly where we have to follow up an enforcement issue and/or identify a pattern of poor operator behaviour.

We do not intend to require booking records to be routinely shared with us due to the huge volume of data that would entail. However the record keeping requirements will still apply and we will continue to review records as part of compliance inspections.

Proposal

We propose to require operators to provide TfL with information in such form, content and at such intervals as TfL specifies including details of drivers and vehicles.

Question 13

Do you agree with our proposal? If you don't agree, please say why not.

10. Operators must specify the fare prior to the booking being accepted

A number of consultees suggested that a private hire operator must specify the fare for each journey prior to commencement of that journey.

The Operator Regulations already require an operator to keep a record of any fare or estimated fare if requested by the passenger. This proposed amendment would provide certainty to customers and minimise the risk of customers being overcharged and/or additional charges/tariffs being applied after the journey has commenced. It will

also mean that the operator will have to properly take into account any ancillary costs (e.g. parking or waiting time) prior to commencement of the journey.

Proposal

We propose to require operators to provide a specified fare prior to the booking being accepted.

Question 14

Do you agree with our proposal? If you don't agree, please say why.

11. Operators must record the main destination for each journey which must be specified at the time the booking is made

This proposal was supported by most consultees. We believe it is important for public safety that the precise details of each journey are recorded.

A number of consultees also suggested that the starting point for each journey should also be recorded so that a full record of the complete journey is made before the journey commences. This will support passenger safety and assist with compliance.

Proposal

We propose to amend the Operators Regulations to require the operator to record the main destination of private hire journeys which must be specified at the time the booking is made.

Question 15

Do you agree with our proposal? If you don't agree, please say why.

12. Harmonise retention periods for records

Having different retention periods for different records causes confusion to operators. Our proposal, which was largely supported by consultees, is that the period for retention of records is made 12 months for all records as opposed to 6 months for some records (e.g. complaints, lost property) and 12 months for others (e.g. driver and vehicle records).

Proposal

We propose to harmonise the retention period for records under the Operator Regulations to be 12 months where it is currently 6.

Question 16

Do you agree with our proposal? If you don't agree, please say why.

13. Limit on the number of business names attached to each Operator's licence

While we acknowledge that operators may use different trading names to identify different parts of their business, there are concerns regarding the large number of trading names that some operators are using. We receive applications from operators applying to use the same trading names as existing operators in their Borough causing confusion amongst the public as to who they are making a booking with. There are also examples of operators applying for names containing geographic areas they do not provide services in, and using personal names of other individuals (not related to the business), causing further confusion.

Multiple business names can mean it is confusing for customers to remember the operator they used for a journey. It is important that a passenger can remember these details in case of complaint or dispute.

Requests to vary an operator's licence can be made under section 18 of the 1998 Act. We propose that only five business names can be associated with each individual operator's licence and the number of fields on an operators licence be amended accordingly. Operators will still be able to make a request for additional business names to be attached under section 18, but we will be minded to refuse these requests unless the operator can demonstrate there are exceptional circumstances to justify the additional name.

Proposal

We propose a limit of five on the number of business names attached to each Operator's licence

Question 17

Do you agree with our proposal? If you don't agree, please say why.

PART 2: PRIVATE HIRE DRIVERS

14. Specific requirement for an English Language test

There is currently no specific language requirement for PHV drivers, except that the topographical test has to be delivered in English. Our March 2015 consultation asked if we should consider introducing a formal requirement for private hire applicants to be able to speak English to a certain standard, and what the criteria should be.

The ability of private hire drivers to demonstrate English language skills was strongly supported by consultees. We believe it is essential PHV drivers are able to communicate with customers and other road users, especially in case of an emergency and from a consumer perspective passengers may also need to communicate with drivers during or after the journey.

Many consultees suggested that TfL set an English Language requirement at an intermediate level. The Home Office requires visa applicants applying for settlement to demonstrate that they meet the English language criteria by taking an “English for Speakers of Other Languages” (ESOL) test which is equivalent to level B1 of the Common European Framework of Reference¹. B1 is an intermediate level at which individuals should be able to demonstrate that they can understand everyday English.

We see no reason why a private hire driver should not also be able to demonstrate a similar level of language skills. In fact other licensing bodies outside London have already implemented similar English language assessment tests.

Proposal

We will make regulations that will require drivers to be able to demonstrate they have sufficient knowledge of English language at an intermediate level. The requirement will be applied to all new driver applicants and renewals. In the interim, as part of our review of the topographical test, we will ensure that the test centres are properly assessing the ability of candidates to communicate in English.

Question 18

Do you agree with our proposal? If you don't agree, please say why.

Question 19

What standard do you think it would be appropriate for applicants to demonstrate?

¹ The Common European Framework of References for languages (CEFR) was developed by the Council of Europe to establish international standards for language learning, teaching and assessment in all modern languages, including English. There are various levels within the framework, representing different levels of language capability. For further information on the Common European Framework of Reference for Languages, please go to http://www.coe.int/t/dg4/linguistic/Cadre1_en.asp (accessed 25 September 2015)

15. Drivers to only work for one operator at a time

A number of consultees suggested that PHV drivers should be restricted to working for only a single licensed operator at one time.

This proposal would reduce the risk of drivers working excessive hours for a number of different operators. It also will assist enforcement and compliance activity because there would be more certainty as to whom a driver is undertaking bookings for at any particular time. There will be no restriction on the number of times that a driver changes the operator they are working for.

Proposal

We proposed to make it a requirement that a PHV driver must be registered to a licensed operator and may only be registered to a single operator at any time.

Question 20

Do you agree with our proposal? If you don't agree, please say why.

16. Driver and Operator licence applicants to provide National Insurance numbers and share with Department for Work and Pensions (DWP)

A number of consultees suggested that applicants for a PHV driver or operators licence should be required to provide their National Insurance number as part of their application. Operators are already required under regulation 13 of the Operator Regulations to record the National Insurance number of any driver carrying out bookings for them.

Whilst a National Insurance number is not proof of identity, it does provide an additional safeguard to other identity checks. Furthermore, the information could be of use to the DWP to assist any relevant investigations.

Proposal

We propose an application requirement to provide a National Insurance number for private hire driver and operator licences (where the operator is an individual).

Question 21

Do you agree with our proposal? If you don't agree, please say why.

17. Vehicle licence to be revoked if driver licence revoked

There is no 'fit and proper' requirement for the owners of PHVs and the 1998 Act suggests that the suspension or revocation of a licence, under that section, can only be for a reason connected to the fitness of the vehicle for use as a PHV. This is causing concern in situations where, for example, a driver is convicted of a sexual offence or touting in a licensed vehicle and may attempt to keep working (while unlicensed) in that vehicle.

A majority of stakeholders supported the proposal that, where a licensed driver has their drivers licence revoked, and that driver is the owner of a licensed vehicle, we should also revoke the vehicle licence. This will ensure the driver is not able to illegally work and/or ply for hire.

A suspension or revocation of a vehicle licence can be with immediate effect where we believe it is in the interest of public safety to do so. Our proposal would be to immediately revoke the vehicle licence when the drivers licence has been revoked. A PHV owner can appeal our decision to suspend or revoke a vehicle licence in the Magistrates' Court.

Proposal

Where a licensed driver has their driver's licence revoked, and that driver is the owner of a licensed vehicle, then we will also revoke the vehicle licence.

Question 22

Do you agree with our proposal? If you don't agree, please say why.

18. Checks on convictions of operator staff

The Operators Regulations require an operator to notify us of any convictions of the operator or anyone named on the application for the licence. This does not however extend to other employees and neither is there a formal requirement to undertake any pre-employment checks.

Concerns have been raised regarding the suitability of individuals working for operators such as controllers and it has been suggested that this requirement be extended to all those working for the operator to prevent unsuitable persons acting as controllers. Controllers often have day-to-day contact with the public and are responsible for ensuring the booking is discharged safely by a licensed driver and vehicle.

Consultees strongly supported more rigorous checks on operator staff. We propose to mandate operators to undertake checks on all employees who come into contact with passengers and booking details. A full Disclosure and Barring Service (DBS) check was the most popular option suggested, however to do this will require the addition of operator staff to the list of DBS occupations for which such checks can be made. As an interim measure we will require operators to ask employees to provide a basic disclosure.

Proposal

We will seek to add operator staff to the DBS list and amend the Regulations accordingly. As an interim measure we will require operators to ask any person working for them to provide a basic disclosure as part of the application process.

Question 23

Do you agree with our proposal? If you don't agree, please say why.

19. TfL stop accepting payment by PO and cheque

Only a small number of payments are made by Postal order or cheque, however we incur significant costs in processing them. Consultees were broadly supportive of our proposal that these will no longer be accepted as payment.

Proposal

From 1 April 2016 we will no longer accept cheques or postal orders as payment.

Question 24

Do you agree with this proposal? If you don't agree, please say why.

PART 3: PRIVATE HIRE INSURANCE

Our consultation asked for views on whether we should check that hire and reward insurance was in place at the time of vehicle licensing. Whilst some consultees said that we should do this check, the overriding feedback from consultees was that there should be further checks and controls to ensure hire and reward insurance was always in place.

Comments are welcomed on the following options which are under consideration.

20. Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence

This was supported by many consultees although, as noted above, most of this support was dependent on additional checks and controls.

Requiring Hire and Reward insurance be in place at all times whilst the vehicle is licensed will remove any ambiguity as to whether insurance was in place at the time of any journey. It will also aid compliance in that a private hire driver must be able to demonstrate the insurance is in place regardless of whether the driver is claiming to be using the vehicle for personal use.

Proposal

We propose to check Hire and Reward insurance at the point of vehicle licensing and insurance will be required to remain in place for the duration of the licence. No licence can be issued without evidence that the appropriate insurance is in place.

Question 25

Do you agree with our proposal? If not, please say why.

21. Drivers to carry or display a copy of insurance details at all times

To support the requirement above, we believe private hire drivers should either carry in the vehicle, whether or not displayed in the vehicle, a copy of their insurance documentation. Licensed taxis must have hire and reward insurance in place at all times the vehicle is licensed and must display a copy of that insurance. We see no reason not to require similar provision for private hire vehicle drivers.

Proposal

We propose to amend the Drivers Regulations to the effect that private hire drivers must carry a copy of their insurance documents at all times

Question 26

Do you agree with our proposal? If you don't agree, please say why.

Question 27

If you agree, should the driver be required to display the insurance in the vehicle? If you don't agree, please say why.

22. Hire and Reward fleet insurance in place by operators

As an alternative to the above proposals, some consultees suggested that operators should be required to have Hire and Reward fleet insurance.

We understand some operators have fleet insurance in place but for those that don't, we recognise that there may be a considerable financial cost. Nevertheless, fleet insurance would ensure customers are protected in case the driver is uninsured or if the insurance is in any way invalidated.

Question 28

Do you agree that Hire and Reward fleet insurance put in place by operators is necessary in addition to, or instead of, individual driver insurance cover? If you don't agree, please say why.

PART 4: PRIVATE HIRE LICENSING

23. Operator licence type

We currently issue two types of private hire operator licence: Small (less than two private hire vehicles available) and Standard (more than two private hire vehicles available). The current costs for these licence types are as follows:

	Small	Standard
Licence application fee (non-refundable)	£838	£838
Grant of licence fee (five-year licence)	£650	£1988
Total	£1488	£2826

A key element in both taxi and private hire licensing is that the licence fees can only be used to cover the costs of the licensing, compliance and enforcement functions, and cannot be used to fund other TfL activities.

It has been previously suggested that we should look to introduce an additional category/categories that better reflect and recover costs of the licensing, compliance and enforcement functions. This could include, for example, a greater licence fee cost for operators that have over 1,000 vehicles available. We could also explore a lower licence fee to incentivise the take up of specialist services, such as the provision of wheelchair accessible vehicles or zero emission vehicles.

Proposal

We will review the current operator licence type and look to introduce additional category/categories.

Question 29

Do you agree with our proposal? If you don't agree, please say why.

24. Controls on ridesharing in licensed vehicles

There was some confusion amongst consultees about what issues we were consulting on², however there was a very clear consensus that unlicensed private hire vehicles (and by extension, drivers) should not be used for any journey where multiple passengers were taken on the same trip for commercial gain. The most common concerns were about passenger safety, but also driver safety given potential for disputes between “strangers” and issues about splitting fares.

² We asked: “How are shared private hire services different to exclusive hires and how should this be reflected in the requirements that apply to them?”

Generally our position is to support developments in technology which comply with relevant laws and provide benefits to passengers. Sharing of private hire services has the potential to provide a range of benefits such as cheaper individual fares, reduced congestion and greater utilisation of vehicles, thus reducing emissions.

However, the regulatory framework must properly address any safety concerns and the safety of passengers and drivers must not be put at risk. We will continue to take action in relation to the use of any vehicle undertaking journeys for commercial reward which circumvents the licensing system.

Proposal

We intend to explore measures to ensure that private hire vehicles cannot be used for ride sharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers.

Question 30

Do you support the above proposal? If not, why not?

25. Amendment of advertising regulation to include “in” vehicle

Proposal

We are proposing a small change to Regulation 8 of the Vehicle Regulations which will clarify that advertising displayed “from” as well as “on” a vehicle is subject to the controls set out in that Regulation.

Question 31

Do you agree with our proposal? If you don't agree, please say why.

PART 5: ADDITIONAL MEASURES

We are also taking forward the following measures:

Topographical skills

We shall introduce a significant enhancement in the content, management and delivery of the PHV Topographical Skills Assessment (TSA or 'the test') and an applicants' general understanding of the rules that govern private hire licensing. We will invigilate the TSA going forward, utilising a core of the existing test centres. The new test would be delivered in three parts:

- A computer package testing map reading skills;
- The ability to navigate to/from key points in London (e.g. mainline stations);
- Clear understanding of private hire licensing regulations.

We will not provide training for the enhanced TSA and instead would encourage candidates to attend accredited operator training centres to adequately prepare for the test

Complaints

We will take a greater role in the oversight and management of private hire complaints.

As an interim step, from autumn 2015, private hire operators will provide reports / information to TfL on a periodic basis (to be defined), providing a full summary of all complaints (so we can understand the volumes) and a full breakdown of complaints related to private hire driver behaviour or problems relating to vehicles. This would include details of the investigation undertaken by the operator and the outcome.

We will then establish a more formal role for private hire complaints, providing a fair and independent complaints process for customers not satisfied with private hire services.

Disability awareness training

This was strongly supported by consultees.

Groups representing disabled passengers have told us of many issues with the availability of PH vehicles and more general attitude to those with disabilities. PH drivers cannot discriminate against disabled passengers and this training will protect both the passenger and the driver.

We will include a requirement that introduces training for private hire drivers, to include disability awareness. This will be developed from autumn 2015 and all new licence applicants will be expected to undertake the training prior to becoming licensed. Renewal applicants will also be required to undertake this training ahead of the renewal of their licence.

Driver training

Most consultees suggested further training for private hire drivers was desirable. Driver training will help raise standards of PHV drivers with clear benefits to customers and other members of the travelling public. We are considering further what elements this should take and how it should be delivered.

HOW TO RESPOND TO THIS CONSULTATION

This consultation document seeks views on issues relating to the licensing of private hire vehicles in London. Respondents are invited to comment on the proposals and are also invited to provide relevant information to support our decisions on this issue.

We are publishing this document online at consultations.tfl.gov.uk/tph/private-hire-proposals and are sending a notice initially to the organisations and individuals listed in Appendix A. Comments from other interested organisations or individuals are also welcome. You are invited to pass this link or document on to anybody else that you think should see it. We welcome suggestions as to other organisations that should be aware of this consultation

Please let us know your views on these proposals by visiting our consultation website at consultations.tfl.gov.uk/tph/private-hire-proposals. Responses must be received by **23 December 2015**.

You can also contact us by emailing consultations@tfl.gov.uk, stating 'Private Hire Proposals' in the subject line. Please state your views on the questions set out above, as well as any other comments you wish to make. If you are responding on behalf of an organisation, please provide background information about your organisation and the people that you represent.

The Freedom of Information Act 2000 requires public authorities to disclose information they hold if it is requested. This includes information contained in responses to public consultations. If you ask for your response to be kept confidential this will only be possible if it is consistent with TfL's obligations under the Freedom of Information Act and if certain grounds for confidentiality under the Act apply.

Further copies of the consultation document can be obtained via the TfL consultation website shown above.

Enquiries about the contents of this consultation document may be made by email to consultations@tfl.gov.uk.

Alternatively, you can contact us by post at:

Private Hire Proposals
FREEPOST TFL CONSULTATIONS

APPENDIX A - INITIAL CONSULTATION LIST

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

TfL TPH email circulation

TfL TPH Twitter feed

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
- British Bangladesh Minicab Drivers Association

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

Individuals and organisations that gave email addresses when responding to the previous private hire regulations consultation

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
- 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)

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Private Hire Regulations review

**Part Two Consultation Report
March 2016**

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Annex 1 – Consultation document and questionnaire

Annex 2 - Analysis of responses by Steer Davies Gleave

1 Executive 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. The review is being carried out through a large consultation exercise that commenced in March 2015 and is scheduled for completion in March 2016.

The review can be broken down into three main phases with supporting ancillary work conducted in between and throughout these phases:

- Part One – Spring 2015 - a wide ranging and comprehensive review of regulations and proposals for change put forward following internal review and engagement with key private hire and taxi trade stakeholders. This review was published as a public consultation between March and June 2015.
- Part Two – Autumn 2015 - Following almost 4,000 responses to Part One of the consultation and further detailed engagement with the key private hire and taxi trade we identified **25** detailed proposals which formed the basis of this part of the consultation exercise. The consultation was published in September 2015 and closed on 23 December 2015, attracting almost 16,000 responses.
- Part Three – Winter 2015/16 - We commissioned an independent consultant, Mott MacDonald, to undertake an Integrated Impact Assessment (IIA) on the 25 proposals. An IIA explores the health, equality, environmental and business, and economic impacts of the regulatory proposals. This IIA was published for consultation in late January 2016, bringing the consultation exercise to a close.

The full public consultation process is intended to seek the views of private hire customers, private hire drivers, vehicle owners and operators and other key stakeholders interested in the trade, including members of the taxi trade and organisations that have an interest in private hire activities.

This document summarises the findings from part two of the consultation process which ran from September to December 2015.

Almost 16,000 individuals and organisations responded, including 68 stakeholders, and there were over 210,000 representations from campaigns

The following proposals gained strong support without any significant objections:

- Proposal 1: Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking

- Proposal 4: Improved security for app based booking platforms
- Proposal 9: Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis
- Proposal 12: Harmonise the retention period for records
- Proposal 14: Specific requirement for an English Language test.
- Proposal 16: Driver and Operator licence applicants to provide National Insurance numbers which would be shared with the Department of Work and Pensions (DWP)
- Proposal 18: Checks on convictions of operator staff
- Proposal 19: No longer accept cheques or postal orders as payment from 1 April 2016
- Proposal 21: Drivers to carry or display a copy of insurance details at all times
- Proposal 23: Review of operator licence types
- Proposal 25: Amendment of advertising regulation to include “in” vehicle

There was strong opposition to the following proposals, particularly from customers:

- Proposal 2: Operators must provide booking confirmation details at least five minutes prior to journey commencing
- Proposal 5: Operators must offer a facility to pre-book up to seven days in advance
- Proposal 8: Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app
- Proposal 15: Drivers to only work for one operator at a time

Issues were raised by some respondents about possible effects of the following proposals on private hire trade activities or some customer groups:

- Proposal 6: TfL proposes to no longer issue licenses for in-venue operators or temporary events
- Proposal 11: Operators must record the main destination for each journey which must be specified at the time the booking is made
- Proposal 13: Limit of five on the number of business names attached to each Operator’s licence
- Proposal 20: Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence
- Proposal 22: Hire and Reward fleet insurance in place by operators

There was some support for the aims of the following proposals, but they were seen as being too prescriptive or needing clarification:

- Proposal 3: Operators will be required to seek TfL approval before changing their operating model

Proposal 7: Operator must have a fixed landline telephone which must be available for passenger use at all times

Proposal 10: Operators must specify the fare prior to the booking being accepted

Proposal 17: Vehicle licence to be considered for revocation if PHV driver licence revoked

Proposal 24: Controls on ride sharing in licensed vehicles

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. In respect of the private hire industry, we license and regulate around 3,000 private hire operators, 76,000 private hire vehicles and 98,000 private hire drivers¹ making us the largest licensing authority with responsibility for licensing over a third of all taxi and private hire vehicles (PHVs) in England and Wales.

London has a large and vibrant private hire sector, which has existed since the 1960s to cater for a wide range of journeys.

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

Private hire operators, drivers and vehicles licensed by TfL provide a range of vital services as part of London's transport system which include minicab, chauffeur/ executive and specialist accessible vehicle services.

In recent years, new technology has emerged and app-based platforms now offer near instantaneous private hire bookings at the touch of a button. This has triggered a rapid growth in the sector and the number of licensed drivers has grown from 59,000 in 2009/10 to the volumes seen today.

Given the scale of change and fact that regulations have not been comprehensively updated in almost two decades, we are seeking to bring the regulations up to date and are undertaking an extensive review. Part Two of this review conducted in Autumn 2015 concerns the detailed 25 proposals set out for consultation between September and December 2015, following responses to Part One of the consultation exercise which was conducted in Spring 2015.

¹ TfL Licensing figures

In September 2015 we also announced some policy measures that were to be taken forward outside of the consultation process, to enhance the standards across the private hire industry and improve the customer experience when engaging these services. These measures are:

- The introduction of an enhanced topographical skills test, to include map reading and navigation skills and a clear understanding of the rules governing private hire licensing
- An assessment of the English language skills of all PHV driver applicants through the verbal and written communication with TfL staff (as part of the topographical test)
- Enhanced driver training, including disability equality training

3 The consultation – Part Two

We designed Part Two of the consultation to enable us to understand views in relation to the regulations governing the private hire industry.

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 an 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 30 September to 23 December 2015.

Who we consulted

The consultation intended to seek the views of private hire customers, private hire drivers, vehicle owners and operators and other key stakeholders interested in the trade, including members of the taxi trade and organisations that have an interest in private hire activities, such as the Suzy Lamplugh Trust and London TravelWatch.

The initial list of organisations contacted to notify them of the consultation is attached as Appendix C. Individuals and organisations were invited to pass the details on to other parties or 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;
- informed readers of the other steps that we were taking to raise standards and improve enforcement.

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

The consultation was communicated via a range of different means, including sustained media and stakeholder communications and briefings promoting the consultation, the key issues being discussed and a link to the online consultation. In addition, the consultation to licensed private hire and taxi drivers was promoted through the trade press, the issuing of a TPH notice, which was regularly publicised through weekly emails to over 50,000 licensees, tweets to our 8,000 @TfLTPH twitter followers and an article in our print and online versions of OnRoute magazine, which was published in early November 2015 (<http://content.tfl.gov.uk/onroute-issue2.pdf>) .

(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 TfL Consultations email account shown on an email sent to stakeholders, the consultation page and in the downloadable document. A significant number of responses were received by email.

The consultation asked 31 questions about the proposed regulations under 25 headings. Most of these consisted of a closed question 'Do you support the above proposal' followed by an open question 'If you do not agree, please explain why'. The proposals and questions are summarised in Appendix A.

In addition, we asked questions to identify and classify respondents including name; email address; organisation (if any); any role in the taxi or private hire trade; how they heard about the consultation; and questions for equalities classifications. These identification and classification questions were not included in the downloadable document.

There was considerable local, national and international press coverage. Stakeholders also publicised the consultation to encourage responses from customers and others that they felt would support their positions. Some of these responses were received before we launched the consultation and these have been taken into account.

Our representatives conducted briefings on the consultation at a number of events, in order to encourage stakeholder responses. Attendees included:

- London Chamber of Commerce and Industry (LCCI)
- Federation of Small Businesses (FSB)
- Confederation of British Industry (CBI)
- London First
- London TravelWatch
- Transport for all
- Guide Dogs
- Alzheimer's Society

- Royal National Institute of Blind People (RNIB)
- a large number of London Business Improvement Districts (BIDs)
- Student Union representatives

Comments made at these briefings are incorporated in the Stakeholder section below.

Almost 16,000 individuals and organisations responded to the consultation, including 68 stakeholders, and there were over 210,000 representations from campaigns.

4 Overview of part two consultation responses

Individual and organisation responses

We received a total of almost 16,000 individual and organisation responses to the consultation, made up as follows:

Respondent	Online	Email	Post	Total
Stakeholder	22	46		68
Other individual or organisation	15,533	276 ²	8 ³	15,817
Total	15,555	322	8	15,885

We commissioned Steer Davies Gleave (SDG, an independent consultancy firm) to analyse the individual responses apart from those submitted by stakeholders. Section 5 of this report considers these responses in depth and includes a summary of SDG's report. The full SDG report is available as an Annex to this report.

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.

Campaign responses

We also received over 7,300 responses as part of campaigns:

Campaign	Position	Email	Post	Total
Taxi trade template	Support for all proposals	2,893	751	3,644
Uber driver email	Opposition to some proposals	3,597		3,597
Other PH driver petition	Mixed opposition and support for particular proposals	52		52
Uber customer text	General opposition	50	15	65
Other letters	General support		7	7
Total		6,592	773	7,365

² Includes respondents who emailed as well as completing the online survey, and those who submitted campaign email responses with significant additional comments

³ Includes respondents who submitted posted responses as well as completing the online survey, and those who posted campaign responses with significant additional comments

Campaigns also encouraged respondents to complete the online questionnaire:

- Uber, the largest private hire operator in London, emailed customers on two occasions directing them to the consultation web site, following early emails encouraging customers to sign the Uber petition (see below). Uber published a discussion document setting out the company's views on the proposals, but did not provide model answers. Many recipients of these emails completed the questionnaire, shown by the timing of the online responses
- Taxi trade associations also encouraged their contacts to complete the online questionnaire later in the consultation period, and suggested answering the questions using the letter/email template that gave support and comments for each proposal

The resulting online responses are included among the individual responses considered in the next section.

The following campaign responses are provided in Appendix D.

Taxi trade template

Taxi trade associations encouraged their members, associates and customers to email and write to us, and provided a template which indicated support for each of the proposals and discussion to back this up. Almost 2,900 email responses and over 750 posted ones followed this template. The great majority of respondents that used this template made no changes: a few made additions or changes and any that added significant points were included in the individual responses for analysis. Emails included the template in the body of the email or as a Word or PDF attachment; others sent printed copies of the template.

Private hire drivers – Uber campaign

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. Almost 3,600 responses were received as a result of this. These emails expressed opposition to the five minute delay before a journey could start; the requirement for operators to offer advance bookings; the prohibition on showing available cars and the restriction on working for multiple operators.

Private hire drivers – other campaign

Over 50 private hire drivers sent emails following a different template, indicating support for some proposals and opposition to others and suggesting other measures that the drivers felt were essential.

Uber customer petition – direct submissions

Fifty respondents emailed the text from the Uber petition (see below) directly to us, and fifteen sent it as a letter.

Most of the posted copies were sent through a commercial web site providing direct mailing services for marketing and lobbying, which offered a free promotion on this consultation. This web site gave users a choice of a template letter in favour of the proposed changes or one against the changes: the latter was based on the text of the Uber petition. Letters with significant additional remarks were not counted in this section but were analysed as individual responses.

Other letters

Seven respondents sent standard letters making general arguments in support of the restrictions. These letters were generated through the web site discussed above.

Collective responses

We received a large number of responses from intermediaries:

Source	Position	Responses
Uber petition (approximate figure)	General opposition	200,000
Uber survey	Detailed individual views	1,885
Letters delivered by LTDA	Support for all proposals	1,162
AskPOB survey	Support for all proposals	2,979
Total (approximate figure)		206,000

Uber petition

Uber emailed customers at the start of the consultation and at intervals during the consultation, encouraging them to sign an online petition that generated an email to the consultation email address for each signature. Petitioners were asked to complete their name, email address and postcode but only the name was given on the emails we received. Uber also provided a printout showing the names and postcodes of signatories.

The emails to customers expressed concern at the proposals for a delay between booking and the start of the journey, the restriction on showing available cars on the app and limitation on drivers working for multiple operators. The petition web site referred to these and the restrictions on car pooling, but the email sent to us only said that 'these proposals will make it harder for me to get a convenient and affordable ride at the tap of a button' and the only specific proposal discussed was the restriction on drivers working for a single operator.

Well over 200,000 emails were received from Uber as part of this petition, and the Uber web site states that over 206,000 people have signed. However, the web site was open to anyone and, although the email text says 'As one of the millions of Londoners who use Uber...', Uber does not appear to have validated that the respondents were Uber customers nor their geographical location. A number of the names submitted were clearly spurious so it is prudent to quote an approximate figure. It is however reasonable to assume that a number Uber users in London have used this petition to convey support for Uber and its model of operation.

Uber survey

Uber also provided 1,884 paper responses to a survey that they had conducted based on the consultation questions. Some of the questions were changed to direct them at private hire drivers, suggesting this was the target audience.

Analysis of the responses gives the following points of interest:

- Over 60 per cent of these respondents identified themselves as private hire drivers, operators or vehicle owners, or a combination of these
- Only 70 percent of respondents opposed the five minute delay before starting a hire. Over 20 per cent supported this proposal and ten percent thought that the delay should be more than five minutes
- Almost ten per cent of respondents felt that Uber should provide a landline telephone number for customers
- Ten per cent of respondents agreed with the proposal that customers should not be able to see available cars on the app
- There was strong support (over 80 per cent) for an English language qualification for new and existing drivers
- Almost 70 per cent of respondents opposed the restriction on drivers working for multiple operators
- Almost 80 per cent felt that Uber staff should be subject to criminal records checks

Letters delivered by LTDA

In addition to the respondents that emailed or wrote to us directly using the taxi trade template, 1,162 people submitted signed copies of the letter through the Licensed Taxi Drivers' Association (LTDA, one of the principal taxi drivers' bodies).

AskPOB survey

AskPOB is a consultancy set up by a London taxi driver, with a pool of subscribed taxi drivers and other contacts within the taxi trade. The organisation surveyed subscribers and conducted a parallel survey of taxi drivers, taxi customers and the general public using social media. These surveys asked for support for the LTDA recommendations in favour of all the proposals. In total, 2,979 respondents indicated support. AskPOB did not indicate whether any respondents expressed opposition to any of the proposals.

5 Individual and organisation responses

Profile of respondents

(Analysis by SDG)

Connection with the Private Hire or Taxi Trade

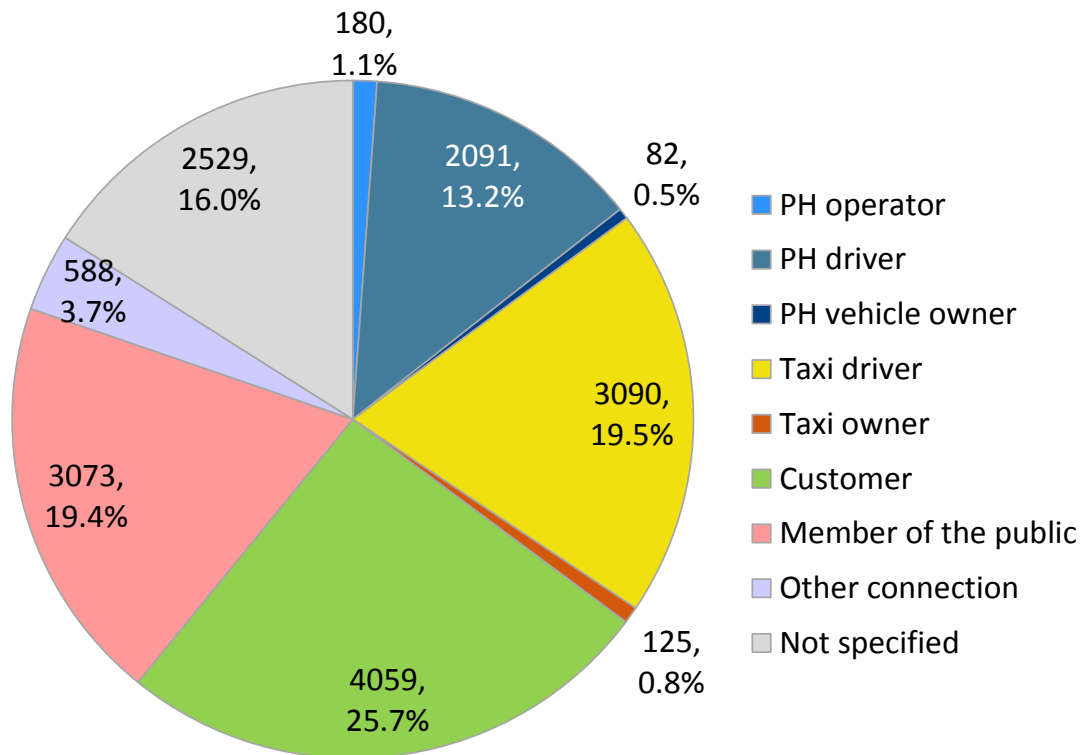
This section describes the profile of the respondents to the consultation. We asked respondents how they were connected to the private hire or taxi trade, with the following options:

- Private hire operator
- Private hire driver
- Private hire vehicle owner
- Taxi driver
- Taxi owner
- Customer
- Member of the public
- Other connection with the taxi or private hire trade⁴

This question was not compulsory and respondents were able to pick more than one option. SDG therefore used information provided in the accompanying open text box to allocate respondents to one of the eight types listed above. This process is described in more detail in an Appendix to the SDG report. Figure 5.1 shows the proportion of respondents by type. Private hire and taxi customers made up the highest proportion of respondents (26%). The second largest group of respondents were taxi drivers (20% of respondents), closely followed by members of the public (19% of respondents). It was not possible to identify the respondent type of 16% of respondents.

⁴ This category primarily included individuals with a close personal connection to someone who works in the taxi trade or private hire industry, for example the spouse of a taxi driver

Figure 5.1: Respondent type



Sample size: 15,817

Table 5.1 below sets out the number of respondents in each respondent type.

Table 5.1: Respondents answering consultation questions

Respondent Type	Number of respondents	Share of respondents
Private hire operator	180	1.1%
Private hire driver	2,091	13.2%
Private hire vehicle owner	82	0.5%
Taxi driver	3,090	19.5%
Taxi owner	125	0.8%
Customer	4,059	25.7%
Member of the public	3,073	19.4%
Other connection	588	3.7%
Not specified	2,529	16.0%
Total	15,817	100.0%

Demographic and Other Information

Gender

A breakdown of respondents' gender is shown in Table 5.2. The majority of respondents who replied to this question (over 65%) were male.

Table 5.2: Respondents' gender

Gender	Total	Proportion
Male	10,582	66.9%
Female	2,599	16.4%
Transgender Man	28	0.2%
Gender Neutral	19	0.1%
Transgender Woman	11	0.1%
Prefer not to say	467	3.0%
Not Answered	2,111	13.3%
Total	15,817	100.0%

Ethnicity

A breakdown of respondents' ethnicity is shown in Table 5.3. More than half of respondents (59%) were white.

Table 5.3: Respondents' ethnicity

Ethnic Group	Total	Proportion
White	9,376	59.3%
Asian/Asian British	1,075	6.8%
Black/African/Caribbean	424	2.7%
Mixed/Multiple Ethnic Group	237	1.5%
Other Ethnic Group	171	1.1%
Prefer not to say	1,020	6.4%
Not Answered	3,514	22.2%
Total	15,817	100.0%

Disability

A breakdown of whether respondents' considered themselves to have a disability is shown in Table 5.4. The majority of respondents (75%) did not consider themselves to have a disability, with one in seven respondents not answering the question.

Table 5.4: Whether respondents considered themselves to have a disability

Disability	Total	Proportion
Yes	390	2.5%
No	11,904	75.3%
Prefer not to say	1,167	7.4%
Not Answered	2,356	14.9%
Total	15,817	100.0%

Faith

A breakdown of respondents' faith is shown in Table 5.5. The largest proportion of respondents (29%) stated they were of no religion.

Table 5.5: Respondents' faith

Faith	Total	Proportion
No religion	4,514	28.5%
Christian	4,231	26.7%
Muslim	1,285	8.1%
Jewish	231	1.5%
Hindu	137	0.9%
Buddhist	88	0.6%
Sikh	58	0.4%
Other	235	1.5%
Prefer not to say	2,340	14.8%
Not Answered	2,698	17.1%
Total	15,817	100.0%

Sexual Orientation

A breakdown of respondents' sexual orientation is shown in Table 5.6. The majority of respondents (59%) were heterosexual.

Table 5.6: Respondents' sexual orientation

Sexual Orientation	Total	Proportion
Heterosexual	9,382	59.3%
Gay	552	3.5%
Bisexual	162	1.0%
Other	143	0.9%
Lesbian	42	0.3%
Prefer not to say	2,854	18.0%
Not Answered	2,682	17.0%
Total	15,817	100.0%

Executive Summary of SDG Analysis Report

Overview

Transport for London (TfL) is the licensing authority and regulatory body for London's taxi and private hire industries. It is the largest licensing authority in the country, being responsible for licensing approximately one third of all taxis and private hire vehicles in England.

Due to a number of developments within the private hire industry, including advances in technology and changes to how people engage and share private hire services, TfL are reviewing the current regulations that govern the licensing of private hire operators, drivers and vehicles.

An initial consultation, conducted in March 2015, aimed to get a better picture of views about these proposals, and to invite other suggestions. Following that consultation, TfL developed detailed proposals for changes to regulations and published these for a further consultation in September 2015.

Topics covered in the September consultation included, but were not limited to: advanced booking confirmations; security for app based booking platforms; in-venue operators; ridesharing; language requirements; vehicle licence revocations; and insurance.

Overall consultation findings

In total, there were 15,817 responses to the consultation, including 68 stakeholder responses that have been analysed by TfL in a separate report. This report therefore includes 15,817 responses, as detailed below:

- 15,533 responses received via the online survey portal
- 276 responses received via email from other parties⁵
- 8 responses received via the post⁶

Of the respondents who specified their connection with private hire a quarter of respondents were customers, 20% were connected with the taxi trade (taxi drivers and taxi owners) and 15% were connected with the private hire industry (private hire operators, drivers and vehicle owners). A further 20% of responses were from the general public.

A summary of responses to the consultation's 25 proposals, detailing the proportion of respondents agreeing or disagreeing with each proposal, is shown in Table 5.7.

⁵ Includes respondents who emailed as well as completing the online survey and those who submitted campaign email responses with significant additional comments.

⁶ Includes respondents who submitted postal responses as well as completing the online survey, and those who posted campaign responses with significant additional comments.

Amongst those who answered the closed questions, more than 50% of respondents were in favour of 22 out of the 25 proposals. For seven of the proposals, 75% of respondents or more were in favour of the suggested changes.

Agreement was strongest in relation to the proposal that operators are required to provide a booking confirmation prior to the booking being discharged (82% agree) and the proposal to introduce a requirement for private hire driver applicants to be able to speak English at an intermediate level (80% agree).

The proposals which had least support included that operators must provide booking confirmation to the passenger at least five minutes prior to the journey commencing (46% agree, 49% disagree) and the proposal that operators must not show vehicles being available for immediate hire, either visibly or on an app (47% agree, 46% disagree).

Overall, respondents who were connected with the taxi trade were more likely to agree with the proposals whilst customers and those connected with the private hire industry were more likely to disagree with the proposals.

Table 5.7: Summary of closed question responses to proposals⁷

Prop	Q	Question	Yes	No	Not Sure	No Op/ Not Ans
1	1	Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking. Do you agree with this proposal?	83%	9%	3%	6%
2	2	Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing. Do you agree with our proposal for a time delay between journey booking and commencement?	46%	49%	1%	4%
2	3	Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing. Do you think that a different time interval to five minutes is appropriate?	36%	46%	5%	14%
3	4	Operators will be required to seek TfL approval before changing their operating model. Do you agree with this proposal?	56%	24%	9%	11%

⁷ Proposal 4 - Improved security for app based booking platforms – is not included in this table as no closed question was asked. Respondents were asked only for views rather than affirm or deny support.

Prop	Q	Question	Yes	No	Not Sure	No Op/ Not Ans
5	7	Operators must offer a facility to pre-book up to seven days in advance. Do you agree with this proposal?	52%	35%	5%	8%
5	8	In relation to the above proposal, do you consider a period other than seven days to be appropriate?	23%	43%	9%	25%
6	9	TfL proposes to no longer issue licenses for in-venue operators or temporary events. Do you agree with this proposal?	58%	11%	8%	23%
7	11	Operators must have a fixed landline telephone which must be available for passenger use at all times. Do you agree with this proposal?	59%	29%	4%	7%
8	12	Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app. Do you agree with this proposal?	47%	46%	2%	5%
9	13	Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis. Do you agree with this proposal?	74%	10%	6%	10%
10	14	Operators must specify the fare prior to the booking being accepted. Do you agree with this proposal?	58%	30%	6%	6%
11	15	Operators must record the main destination for each journey which must be specified at the time the booking is made. Do you agree with this proposal?	67%	18%	6%	9%
12	16	Harmonise the retention period for records to be 12 months where it is currently 6. Do you agree with this proposal?	71%	6%	5%	18%
13	17	Limit the number of business names attached to each Operator's licence to five. Do you agree with this proposal?	63%	10%	8%	19%
14	18	Specific requirement for drivers to be able to demonstrate they have sufficient knowledge of English language at an intermediate level. Do you agree with this proposal?	80%	9%	4%	7%

Prop	Q	Question	Yes	No	Not Sure	No Op/ Not Ans
15	20	A PHV driver must be registered to a licensed operator and may only be registered to a single operator at any time. Do you agree with this proposal?	51%	35%	6%	9%
16	21 ⁸	Driver and Operator licence applicants to provide National Insurance numbers and share with Department for Work and Pensions (DWP). Do you agree with this proposal?	75%	6%	4%	15%
17	22	Where a licensed driver has their driver's licence revoked, and that driver is the owner of a licensed vehicle, we propose to also revoke the vehicle licence. Do you agree with this proposal?	76%	9%	6%	9%
18	23	We will seek to add operator staff to the DBS list and amend the regulations accordingly. Do you agree with this proposal?	79%	6%	6%	10%
19	24	From 1 April 2016 TfL will no longer accept cheques or postal orders as payment. Do you agree with this proposal?	73%	6%	4%	16%
20	25	Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence. Do you agree with this proposal?	76%	7%	5%	12%
21	26	Drivers regulations to be amended to the effect that private hire drivers must carry a copy of their insurance documents at all times. Do you agree with this proposal?	79%	8%	4%	10%
21	27	If you agree with the proposal above, should the driver be required to display the insurance in the vehicle?	57%	16%	6%	21%
22	28	Do you agree that Hire and Reward fleet insurance put in place by operators is necessary in addition to, or instead of, individual driver insurance cover?	52%	17%	13%	18%

⁸ Please note that option boxes were initially omitted from this question, and were added after the first 1,750 responses were submitted. Analysis of the open comments for the 1,750 early responses were used, where possible, to identify respondents' views and these are included in the figures.

Prop	Q	Question	Yes	No	Not Sure	No Op/ Not Ans
23	29	TfL will review the current operator licence type and look to introduce additional category/categories. Do you agree with this proposal?	57%	9%	12%	23%
24	30	We intend to explore measures to ensure that private hire vehicles cannot be used for ridesharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers. Do you agree with this proposal?	55%	25%	10%	10%
25	31	We are proposing a small change to Regulation 8 of the Vehicle regulations which will clarify that advertising displayed “from” as well as “on” a vehicle is subject to the controls set out in that regulation. Do you agree with this proposal?	57%	6%	11%	26%

Respondents were also invited to leave comments to 31 open questions. In most cases the open question was an invitation to explain disagreement with a proposal. The most frequently discussed themes included:

Regulation

Comments included in this theme often discuss the scope, validity and/or appropriateness of the regulation(s) or regulatory framework specific to the question. Common sentiments across a number of questions included that the proposals are bureaucratic, that regulations should be applied equally to Taxis and PHVs and that current regulations are sufficient.

Market/Competition

Respondents were particularly concerned about the potential for the proposals to adversely affect private hire operators/drivers, prevent fair competition within the private hire and taxi industry and stifle creativity and innovation.

Passenger

This theme focused primarily on the potential passenger benefits and disbenefits presented by the proposals, including impacts on convenience, choice and customer service.

Technology

The detail of the comments relating to technology were often specific to the proposal at hand and included remarks on fingerprint/facial recognition (proposal 4), methods for ensuring safe and adequate transport options for those attending events (proposal 6) and the use of real time information (proposal 8). This theme also captured a general sentiment that legislation should not hold back recent technological advances.

Enforcement

Strict enforcement of existing rules and regulations, including penalties for breaches, was the most popular comment under the enforcement theme.

Comments on the proposals

The questions took the form 'Do you agree with this proposal? If you do not agree, please say why'. Most of the discussion that follows is therefore based on the arguments put forward by those opposed to each proposal.

Private hire operators

Proposal 1 (Question 1): Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking

There was relatively little opposition to this from any group with over 80% of respondents supporting this proposal. Of those that disagreed, the most common comments were that current regulations were sufficient; that this proposal would be a cost to small operators that would distort competition and be passed on to customers.

Proposal 2 (Questions 2 and 3): Operators must provide booking confirmation details at least five minutes prior to journey commencing

This proposal had the highest number of people opposed. Nearly half of all respondents were against the proposal, which included almost three quarters of customers. Of those that were against the proposal, respondents highlighted the inconvenience to customers (particularly those who want a journey urgently), the perception from some that this was penalising private hire customers to protect taxis, and the environmental impact of making cars wait before picking up customers.

Respondents were asked if a different interval to five minutes would be more appropriate. Over four fifths of all respondents said that no interval was necessary.

Proposal 3 (Question 4): Operators will be required to seek TfL approval before changing their operating model

Customers were divided on this proposal, with other groups supporting it to different degrees. The most common argument put forward by those that opposed this proposal was that it could inhibit innovation and stifle competition.

*Proposal 4 (Questions 5/6): Security for app based booking platforms
(No proposal)*

The most popular comment was that security measures would help to ensure the safety of passengers and prevent fraud. Some felt that existing security levels were adequate and that too stringent requirements would add unnecessarily to costs.

Almost a third of respondents thought that appropriate technology was available to make apps more secure, with biometric technology the most common suggestion.

Proposal 5 (Questions 7 and 8): Operators must offer a facility to pre-book up to seven days in advance

Whilst a majority of all respondents supported this proposal, there was less support amongst customer groups where over half opposed the proposal. Of those that were against the proposal, the most commonly expressed reasons were that the market, rather than regulations, should drive service standards; customers can choose an operator based on the service needed; there is no evidence of a lack of operators offering advance bookings so this regulation would be unnecessary and anti-competitive.

Respondents were asked if a period other than seven days would be appropriate. The most common response was that advance booking should not be a requirement with some support for a requirement of a day in advance, and small numbers suggesting a period longer than seven days.

Proposal 6 (Questions 9 and 10): TfL proposes to no longer issue licenses for in-venue operators or temporary events

There was little opposition to this proposal. Of those that commented when asked to say why they did not agree, some felt that the restriction would be inconvenient for customers and there were concerns about what alternatives would be offered to get people home safely after events.

About a third of those who commented suggested that more taxi ranks should be provided to ensure safe and adequate transport from venues and events, with about one in seven suggesting designated waiting or pick up points for PHVs.

Proposal 7 (Question 11): Operator must have a fixed landline telephone which must be available for passenger use at all times

Customers and those identifying as members of the public had mixed views on this proposal. Of those that were against the proposal, some respondents said that the landline requirement was archaic and unnecessarily specific, and that it should be for the operator to determine the method of interaction with customers. A number of respondents opposing the proposal did nevertheless acknowledge the importance of customers being able to contact an operator in real time during a journey.

Proposal 8 (Question 12): Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app

This was strongly opposed by customers and those identifying as members of the public and opposed by most private hire trade members. Of those against it, respondents said it would withhold valued information and would be detrimental to customers and saw this as anti-innovation and protectionist. Some drew comparison with the availability of real time information about other transport modes.

Proposal 9 (Question 13): Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis

This was supported by a majority of respondents across all groups with 75% in favour. Less than a quarter of respondents in any single category disagreed. Of these, some felt that existing regulations were adequate and this proposal would add unnecessary bureaucracy and costs, which would be passed to customers.

Proposal 10 (Question 14): Operators must specify the fare prior to the booking being accepted

Customers and members of the public were evenly divided on this proposal. Those opposing, primarily customers and PH drivers, felt that a requirement to provide an estimate would be enough; that pre-set fares could not take account of traffic and other costs so would lead to higher fares overall; and this was discrimination and distortion of the market.

Proposal 11 (Question 15): Operators must record the main destination for each journey which must be specified at the time the booking is made

This was generally supported, although some said it would limit journey flexibility and passenger options.

Proposal 12 (Question 16): Harmonise the retention period for records

There was very little opposition to this proposal. Some felt that twelve months was longer than necessary and six months would be more appropriate.

Proposal 13 (Question 17): Limit of five on the number of business names attached to each Operator's licence

The most common comment was that only one business name should be allowed on each licence.

Private hire drivers

Proposal 14 (Questions 18 and 19): Specific requirement for an English Language test.

This proposal was widely supported with 80% supporting it including majority backing from all those in the private hire trade identifying as belonging to ethnic groups in the online questionnaire. Some felt that no specific requirements were needed, often because technology now can provide routes; that the proposal would discriminate against immigrants; or that it would be discriminatory to set this requirement for PHV drivers without a comparable standard for taxi drivers.

Respondents were asked what standard of English would be appropriate. The most common response was equivalent to the Common European Framework of Reference B1, with support for fluency in conversational English.

Proposal 15 (Question 20): Drivers to only work for one operator at a time

Private hire drivers strongly opposed this proposal and customers also opposed it. Of those against the proposal, respondents said it would restrict drivers' freedom and flexibility, present challenges for small or new operators, and be anti-competitive.

Proposal 16 (Question 21): Driver and Operator licence applicants to provide National Insurance numbers which would be shared with DWP

This was widely supported with three quarters of all respondents in favour of the proposal. Less than a fifth of any one respondent group opposed the proposal, arguing that it was unnecessary or that DWP may not use the data.

Proposal 17 (Question 22): Vehicle licence to be considered for revocation if driver licence revoked

This was strongly supported across all respondent groups. Of those against the proposal, the most significant opposition came from the private hire trade with just under a third of PH drivers opposed. These respondents argued that the proposal would reduce the value of the vehicle and could cause complications if use of the vehicle is shared.

Proposal 18 (Question 23): Checks on convictions of operator staff

There was little opposition to this proposal. However a small number of respondents that were against it, mainly in the private hire trade, argued that there was no real public safety concern and that this would be over-regulation.

Proposal 19 (Question 24): No longer accept cheques or postal orders as payment from 1 April 2016

There was very little opposition to this proposal with 73% supporting it. Of those against it, small numbers, mostly in the private hire trade, opposed removing this payment option for our licensees, arguing that some people do not have access to other payment methods and that removal of the cheque payment option may have legal implications.

Private hire insurance

Proposal 20 (Question 25): Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence

This was strongly supported across all respondent groups with 76% in support. Of those against it, the most significant opposition came from within the private hire trade, particularly PH drivers where just over a quarter opposed. Those opposing suggested that it was only important that insurance is in place on the days that drivers are engaged in private hire work, that this proposal would remove some flexibility for drivers, and that it would form a barrier to entry into the trade.

Proposal 21 (Questions 26 and 27): Drivers to carry or display a copy of insurance details at all times

This proposal had widespread support with 79% in favour. Of those opposed, they felt this was unnecessary because of electronic means of checking, and that this requirement would be irrelevant to passengers.

Fifty seven per cent of respondents were in favour of a copy of the insurance certificate being displayed within the vehicle although more private hire trade members were against this than in support.

Proposal 22 (Question 28): Hire and Reward fleet insurance in place by operators

Private hire trade members were evenly divided on this proposal, and customers gave limited support (only 35% supported whilst over 40% were not sure or had no opinion). Those opposing it suggested the proposal would weaken the drivers' responsibility for proper insurance and impose a financial burden on fleet operators.

Private hire licensing

Proposal 23 (Question 29): Operator licence type

There was general support for this proposal with 57% in favour of it. This included the private hire trade although a nearly half of this respondent group did not offer a view or were unsure. Few made comments, the most common comment of those that opposed it being that licence costs are already too expensive and that any increase in costs would be passed to customers.

Proposal 24 (Question 30): Controls on ride sharing in licensed vehicles (No proposal)

Fifty five per cent of respondents supported the proposal to explore measures to ensure that private hire vehicles cannot be used for ridesharing unless there are very clear controls in place to protect the safety of passengers and drivers. Of those that commented, around one in five suggested that ride sharing should be encouraged to reduce costs to customers and provide congestion and environmental benefits, but about one in eight said that sharing could never be safe and should be banned.

Proposal 25 (Question 31): Amendment of advertising regulation to include “in” vehicle

This proposal was supported by a majority across nearly respondent groups with 57% in favour of the proposal. Some respondents that were opposed to the proposal felt that it was unclear or had not been fully explained.

More details about responses to the open questions can be found in the full SDG report.

6 Responses from statutory bodies and other stakeholders

Sixty eight stakeholders responded, as follows:

Organisation type	Email/ document	Online	Total
Statutory body	4		4
London local authority etc	2	3	5
Elected representatives	5	2	7
User group/campaign group	6	5	11
Business group/major business	4	3	7
Private hire trade body	4		4
Major or specialised PH operator/ PH supplier	8	1	9
Taxi trade body	4	3	7
Taxi business	5	4	9
Other	4	1	5
Total	46	22	68

The following discussion summarises the role of each of these stakeholders and key general points. The stakeholder responses on each proposal are then considered proposal by proposal.

Statutory bodies

Greater London Assembly Transport Committee

The Committee response built on the investigations they carried out for Future Proof, the Committee's report into the London Taxi and Private Hire Trades published in December 2014. On most issues the Committee reached a consensus, but on some proposals the Conservative group expressed a minority opinion.

London TravelWatch

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

LTW would want us to rigorously apply the regulations in a fair manner across the industry, but also believe that technological change that benefits passengers should be embraced.

In the discussion following the briefing session with London TravelWatch, the organisation expressed concern about the practicalities of enforcing some of the proposals, the safety implications of forcing customers to wait, and the possibility that the proposals would make services worse particularly in areas without good access to taxis. LTW argued strongly that we should address concerns about the availability of accessible PHVs.

LTW's response pointed out the importance of PHV services and suggested that more could be done to provide economical transport in accessible PHVs for disabled travellers. LTW suggested that a mix of quotas and incentives would be appropriate to increase the number of accessible vehicles in London's fleet, with a quota for large operators and incentives for smaller ones.

Competition & Markets Authority

The Competition & Markets Authority (CMA) is an independent non-ministerial government department that works to promote competition for the benefit of consumers, with the aim of making markets work well for consumers, businesses and the economy. The CMA response argued that, in general, competition should only be compromised or restricted by regulatory rules to the extent that doing so is absolutely necessary for consumer protection, while taking account of cross-economy consumer protection legislation. Regulators should also take account of the enforceability of proposed regulations and the impact of regulation on innovation.

The CMA argued that:

- Competition among PHVs and competition between taxis and PHVs are both ultimately beneficial for the consumer
- Innovative services (which include app-based booking systems) may drive efficiencies through which it is possible to offer benefits such as lower prices and greater responsiveness to demand
- The introduction of new services also has an inherent benefit in the form of greater choice for consumers

The CMA argued that we should take care to avoid creating or extending regulatory divergence between taxis and PHVs, and between various types of PHV business model, as this is liable to distort competition. The CMA argued that 'there would be value in a broader review of whether maintaining two different tiers – including a higher level of regulation on taxis – continues to serve consumers.

Disabled Persons Transport Advisory Committee

The Disabled Persons Transport Advisory Committee is a statutory consultee, established by the Transport Act 1985, for issues relating to transport for disabled people.

The Committee emphasised the importance of taxi and private hire services for disabled people and called for discussion of the issues across both taxi and private hire trades. The committee saw a disjointed approach to our regulation of the taxi and private hire trades as part of the problem, and expressed concern that our approach appeared to be adding further regulation rather than focussing on the goal of passenger safety.

The committee stated that the major problem to be addressed is the limited number of accessible vehicles and suitably trained drivers.

London Boroughs

London Councils

London Councils is the cross-party organisation that represents London's 32 borough councils and the City of London.

The response supported our proposals to further strengthen the regulations concerning London's private hire industry, and noted our and the Mayor's efforts to seek legislative powers to restrict the number of licences that can be issued for private hire vehicles. The organisation would like more information about the number of trips taken and the potential impact a restriction on vehicle licences might have. London Councils based its response to this consultation by focusing on the best interests of passengers.

The response highlighted borough views that we should do more to raise awareness amongst the public of the difference between a taxi and private hire vehicle and the different ways they should be approached for transport; and that we should undertake far greater enforcement.

Westminster City Council responded emphasising the significant levels of private hire and taxi activity, particularly in the West End. The Council called for higher training and licensing standards for private hire, to address issues of street knowledge, health and safety and kerbside restrictions and enforcement. The response sought clearer signage on PHVs and asked us to put a mechanism in place to manage the numbers of PHVs in central London. The Council urged us to review the regulatory framework for taxis to ensure that unnecessary restrictions do not make taxis less competitive than they could be in the combined taxi/PHV market. Three other London boroughs responded, either as a response from the authority as a whole (*London Borough of Enfield*) or from an officer with a relevant role in the authority (*London Boroughs of Barking & Dagenham and Hillingdon*). There were no responses from authorities outside London.

Elected representatives

One Member of the European Parliament responded, stating that 'The direction that these proposals go is deeply anti consumer, anti innovation and runs counter to the global brand that London seeks to promote for itself... as a forward thinking, technologically advanced city'. He argued that our response to the challenge that 'ride sharing apps' have presented to the traditional black cab should be to encourage the taxi trade to take up these technological advances that consumers demand, not to try to deny them to consumers.

Similar points were made by an MP from outside London, who expressed concern that the proposals seemed to have been in response to the concerns of black cab drivers. A joint response from four MPs argued for deregulation of London taxi drivers as a way of achieving a more level playing field, and strongly favoured a cap on the numbers of private hire licences. A sixth MP with an inner London constituency also responded.

We received responses from the Conservative and Liberal Democrat groups in the Greater London Assembly, and from a Councillor in the Royal Borough of Kingston-upon-Thames.

User, accessibility and campaign groups

In the discussions following briefings, accessibility groups raised concerns including:

- The need for face-to-face Disability Equality training
- The failure of the proposals to address the low numbers of accessible PHVs
- Barriers that might be created for some people by a dependence on technology instead of other options (for example operators who work out of night clubs)

Transport for all

Transport for all (Tfa) is an organisation of disabled and older people that campaigns for accessible transport in London.

Tfa took part in the briefing and subsequent discussions with LTW, where they stressed concerns about the number of wheelchair accessible PHVs. The organisation's written response focussed on three priorities: the availability of accessible PHVs, disability equality training for drivers (and for taxi drivers), and a greater role for us in dealing with complaints about private hire and reporting on complaints. Tfa expressed concern about the accessibility of PHVs both because black cabs can be considerably more expensive and because of fear that competition from app-based PHV services will lead to a reduction in the number of taxis, significantly reducing the availability of accessible vehicles. The call for increased numbers of wheelchair-accessible minicabs was echoed by the *London Region of the National Pensioners' Convention*, who suggested a quota system for large operators.

The *Alzheimer's Society, Enhance the UK* (a charity specialising in disability awareness training, advice and support), *Guide Dogs*, and *Havering Dementia Action Alliance* also called for effective disability awareness training for private hire drivers. Some suggested this should be extended to all drivers and taxi drivers also; the Alzheimer's Society suggested branding to identify taxis and private hire vehicles whose drivers had received appropriate training. Guide Dogs said the training should cover the obligations to carry assistance dogs.

Trailblazers at Muscular Dystrophy (a group campaigning on the social issues affecting young disabled people) and *DABD (UK)* (a charity working with and supporting socially excluded people across London and the UK) indicated support for all the proposals.

Which?

Which?, the largest consumer organisation in the UK, expressed concern that a number of the proposals would be likely to damage competition, consumer choice and innovation in the market, and would prevent new business-model PHV operators from delivering aspects of a service that consumers currently use and value, without providing clear, alternative benefits. The response argued that, for major regulatory interventions to be justified, there should be:

1. Evidence of material harm unless the proposed changes were introduced
2. Careful consideration of the extent to which such harm could be addressed in ways that were less prescriptive
3. Assessment of the extent to which such restrictions might give rise to other unwanted, harmful effects (such as deterring further innovation that would benefit consumers)

Which? was not satisfied that a sufficiently robust impact assessment had been undertaken. The response outlined the consumer benefits from the growth of smartphone PHV apps and argued that we had not adequately explained the rationale or evidence for our proposals. Which? reviewed the possible justifications for our regulatory approaches and concluded that, while the organisation supported efforts to improve the quality, safety, accessibility and overall standard of PHV provision in London, it had serious concerns relating to some of the proposals.

We also received responses from the *London Forum of Amenity and Civic Societies* and the *Suzy Lamplugh Trust*, a charity working to reduce risks of violence and aggression that has been closely involved in the development of private hire licensing in London.

None of the student unions made a formal response. In the discussions that followed briefings, student union representatives raised:

- safety concerns about using private hire
- lack of convenience with the five minute rule
- technology should make things easier not worse

Business groups and major business

Business stakeholders at the briefings expressed criticism of proposals they felt would dis-benefit customers.

- They were keen to understand the data underpinning some of the assumptions in the consultation, including increase in numbers of PHVs; evidence of increase in congestion; evidence of increase in emissions; PHV complaint data
- Some stakeholders noted that the suggestions in the consultation would benefit taxis and this could be at the detriment of consumer choice
- They did not accept that proposals for a five minute delay or to prevent showing car availability on an app would address consumer protection issues, and pointed out that many customers choose an operator based on speed especially in times of urgency
- The Federation of Small Businesses suggested that perhaps provisions such as the five minute wait time could be optional
- The majority of the business representatives highlighted they felt enforcement of these provisions would cause a huge issue if they were put in place
- We were also queried on the impact assessment and how these changes could affect small businesses/operators, particularly regarding:
 - Raising barriers to entry by adding regulations
 - Requiring information flows needing technical and complex IT infrastructure
- Business representatives suggested we should do some work to make drivers aware of engine idling and emissions

Confederation of British Industry

The Confederation of British Industry (CBI) is the UK's leading business organisation, made up of some 190,000 businesses that together employ around a third of the private sector workforce.

In the briefing discussion, the CBI asked if we would be making any efforts to alleviate the burden of regulation, consistent with the Government agenda to reduce red tape. The CBI response made three key points:

- Business and consumers benefit from future proofed regulatory systems that enable firms to compete on a fair basis
- Digital technologies are enablers of growth in the private hire industry, overly prescriptive regulation will restrain innovation and job creation
- Enforceability and the cost impact of these proposals must be robustly tested

Institute of Directors

The Institute of Directors (IoD) is an independent, non-party political organisation of approximately 35,000 individual members.

The Institute argued that *'it is clear that the overarching spirit of the proposals is one which is unfriendly to entrepreneurialism, innovation and fair competition'* and said that many of the proposed do not meet our stated aims. The Institute proposed further discussion about the regulations applied to taxis, and said that *'The answer to disruptive technology is competition and technological innovation by established players, not a regulatory strait-jacket.'*

London Chamber of Commerce and Industry

The London Chamber of Commerce and Industry (LCCI) is a representative business advocacy organisation with over 3,000 member companies.

LCCI addressed the consultation questions by asking *'Would the regulatory proposal:*

- *deliver a consistent quality of service across the London Private Hire Sector?*
- *have potential to increase or decrease fares for customers?*
- *optimise or inhibit the use of current and future technology by the London Private Hire Sector?*
- *help or hinder current and future competition within the London Private Hire Sector?*

London First

London First is an independent business membership organisation whose mission is to make London the best city in the world in which to do business.

The organisation set out the criteria that they would suggest for minicab services and argued that the consultation proposals do not achieve those criteria. The responses offered 'key practical questions' that should be asked:

- *'Whether the sharp, recent rise in minicab licences and drivers is problematic and, if so, to what extent;*
- *What can be done about the slow pace of innovation in the black cab market;*
- *The high regulatory impositions and privileges faced by black cabs and whether these are fit for purpose;*
- *How London's regulation of black cabs and minicabs can work with the grain of change and greater competition and choice – so long as this is not to the detriment of the criteria we outline above (safety etc.)'*

The response said that one problem is the partial lack of relevant data and discussed the evidence available for assessing the impact of private hire services on London's traffic before addressing the consultation questions.

We also received responses from the *Heart of London Business Alliance*, *Victoria Business Improvement District* and *Heathrow Airport*.

Private hire trade bodies

Licensed Private Hire Car Association

The Licensed Private Hire Car Association (LPHCA) is one of the principal bodies representing private hire operators in London and elsewhere. The Association consulted members and others in the London private hire trade to inform their responses, as well as holding meetings with us and with others. The response included the views of the Chauffeur & Executive Association which represents this specialised sector of the private hire trade and is affiliated to the LPHCA. The LPHCA argued that some of the proposals would compromise safety, increase costs and reduce the availability of PHVs, and called for impact assessments to be made available before any changes to regulations are made.

PH Board

The Private Hire Board (PHB) is another organisation of private hire operators that have also engaged with us throughout the review of regulations.

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 predominantly includes private hire drivers as well as taxi drivers and members of other driving and support professions.

The branch argued that responses from those directly engaged in private hire should be given priority over taxi trade responses in coming to decisions. In addition to comments on the proposals, the response suggested additional licensing requirements for operators and operating centre premises, driver training, caps on numbers of drivers or vehicles, minimum fares, car sharing (with cars not covered by PHV licensing), and other areas.

Driver-Guides Association

The Driver-Guides Association (DGA) is the national professional association for qualified Blue Badge tourist guides who undertake tours in their own vehicles. The Association pointed out that the business of Blue Badge driver-guiding is completely different from mini-cabbing, and highlighted the danger of over-regulating. In addition to the consultation proposals, the Association expressed concern about possible restrictions on cross-border hirings and who can drive licensed PHVs, which would adversely affect Association members.

Major or specialised private hire operators and trade suppliers

Uber

Uber started operations in London in 2012 and is now the largest private hire operator in the capital. The customer makes a booking with a smartphone app. Automated systems use GPS tracking to inform the customer of the car's progress before pick-up and the customer pays through the app using a pre-registered bank card.

Uber suggested that we should consider new regulations in the context of the Government's Better Regulation Framework, EU competition law and wider UK government policy guidance and competition law, and argued that our proposals do not appear to take account of this context. The response argued that, as a result, the proposals are likely to result in *'burdensome regulation that will reduce consumer choice, undermine competition, and harm both passenger and driver safety'* and highlighted four areas of concern:

- *'TfL has not clearly set out what policy objectives it is seeking to achieve and why additional regulation is needed.'*
- *TfL has not set out how the proposals in question would address its stated policy objective (or even an unstated one).'*
- *TfL has not published any assessment of whether the benefits of these proposals outweigh the costs.'*
- *TfL's approach is overly prescriptive and will restrict further innovation in the sector. The regulator should seek to define and enforce safety and quality standards for the market, not mandate how services are delivered.'*

In its response to individual proposals, the company provided data and evidence based on its own experience of the London market.

In an Annexe, the company expressed concern about the consultation process and the development of the proposals.

In addition to a company response, Uber organised campaign activity discussed in Chapter 4.

Addison Lee

Addison Lee is a long-established private hire operator, with almost 5,000 cars. Addison Lee referred to the company's response to the first consultation on these regulations, which argued for proportionate regulation and effective enforcement and said that the primary purpose of regulation is to protect public safety. The earlier response also 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 we had 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. The company made six central assertions:

- The number one priority should be public safety, and we should err on the side of caution where there is any doubt
- We should rigorously require operators, particularly the 'corporate personality' rather than the directors of a company, to meet the 'Fit and Proper Person' test at licence issue, renewal and during the currency of a licence

- Regulations must be properly enforced and any derogations must be made public
- Operators' contribution to tackling London's emissions and congestion should be recognised and should be part of the 'Fit and Proper Person' assessment
- We need to take a more even handed 'best practice' approach to enforcement of regulations and have the confidence to take a stronger line where public safety is at risk
- We should apply rigid regulatory standards consistently and not allow exemptions because of the scale of particular operators

The response expressed support for the consultation and engagement process around the proposed regulations.

Tristar Worldwide Chauffeur Services

Tristar is an operator of chauffeur and executive services. Although based in London and therefore subject to London private hire licensing, the company does significant work outside London and is expanding these services. The response supported the main views put forward in the LPHCA response, which Tristar had contributed to. The company expressed concern about the proposals announced with the consultation for more stringent tests of topographical knowledge of London, which they pointed out is not relevant to a driver based elsewhere. Tristar called for us to recognise the diversity of London's private hire businesses as some of the proposals would result in significant additional costs for a firm like Tristar without any benefit for customers.

1st Class Executive Travel

This is another chauffeur/executive operator, offering high specification vehicles and additional services such as close protection security or support for events and corporate roadshows. The response expressed concern at the practicalities of retrospective tests for drivers, particularly if they may have long (multi-day) bookings typical of the chauffeur sector, and the proposed complaints procedures. The company emphasised that some of the proposals would present particular difficulties for the chauffeur sector and called for this to be taken into account before decisions are made.

Ride 2

Ride 2 is an in-venue operator working at around a dozen London venues including Old Billingsgate Market, The Tower of London, and the Roundhouse. On the basis of discussions with many venues and venue owners, the company said that some of the proposals would have significant adverse impacts on safe travel options for the late night market.

Driver Periodic Training and DriverView

These are accredited Topographical Assessment Centres for London private hire drivers, and provide other training services for the private hire trade. In addition to commenting on the proposals, both firms expressed support for the plans for enhancements to the topographical skills assessment and other aspects of driver training, particularly regarding disability awareness and London private hire law and regulations.

Mashin Limited and PCO Rentals

These firms maintain fleets of licensed private hire vehicles that they lease to drivers and operators. Their main concerns related to the proposals for insurance.

Taxi trade bodies

Licensed Taxi Drivers' Association

The Licensed Taxi Drivers' Association (LTDA) is the largest association of London taxi drivers, with over 10,000 drivers. The LTDA called on us to maintain the distinction between taxi and PHVs and to clearly define 'plying for hire', which they argued includes showing where a vehicle is on a map. The response called for us to have powers to cap the numbers of PHVs in London, to address pollution and congestion concerns.

The LTDA had initiated the taxi trade template responses discussed in Chapter 4, although other taxi trade bodies also disseminated this template. The Association revised its position on proposition 2 in its own submission.

Unite the Union

Unite is the largest trade union in the UK, with a taxi trade branch. Unite also called for capping of private hire numbers, and proposed additional training requirements for PHV drivers and more stringent licensing requirements for operators and drivers.

Unite called for London regulations to be changed so that licensed PHVs could only be driven by licensed drivers, even when not engaged in private hire work. This was also supported by the *Rail, Maritime & Transport Union London Taxi Drivers Branch* (RMT), a branch of the national trade union.

We also received responses from the *London Cab Drivers' Club (LCDC)* and the *United Cabbies Group*, which are both associations of taxi drivers, and the *London Motor Cab Proprietors' Association* which represents taxi fleet owners.

AskPOB

AskPOB, a consultancy set up by a London taxi driver, responded with details of the survey the consultancy had conducted among taxi drivers and others, discussed in Section 4.

Taxi businesses and other taxi trade bodies

Gett and Hailo

Gett and Hailo are among technology firms offering taxi hailing and booking and fare payment via smartphone apps. Both organisations were established in 2010/11 and between them have around 15,000 licensed taxi drivers signed up to their services.

Mountview House Group

Mountview House Group (MHG) is the holding company of Radio Taxis, a traditional radio circuit offering taxi booking services, as well as a taxi company called Xeta and an online transport management platform and consultancy, One Transport.

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.

South West London Taxi Ranks

This is an organisation run by taxi drivers promoting taxis and organising taxi bookings in south west inner London.

London Taxi Company

The London Taxi Company (LTC), a wholly owned subsidiary of Zhejiang Geely Holding Group, is the manufacturer of the majority of taxis in London. LTC has committed to substantial investment to build the next generation of zero emissions capable taxis for London, and the response said that this investment is based on a regulatory regime, and enforcement, that maintains the distinction between private hire minicabs and taxis. LTC suggested that erosion of this distinction could lead to black cabs disappearing from London. LTC supported calls for a cap on minicab numbers in London.

We also received responses from *Cabvision Network*, a company providing services such as card payment equipment, taxi and meter rental and advertising sales to the taxi trade; the *London Cab Company*, which organises taxi hirings for tours, filming and other activities; and the *London Taxidriver's Fund for Underprivileged Children*, a taxi trade charity. The response from the last two bodies followed the taxi trade template.

Others

Circuit Clubbing, the company that owns Fire Nightclub in Vauxhall, which has a private hire operator in the venue in order to fulfil the Dispersal Management conditions of the venue licence, expressed concern about the safety impact of the proposed restriction on in-venue operator licences.

Lyft is a mobile-based ridesharing platform operating in 150 cities across the USA, including checking driver backgrounds and vehicle standards but largely ‘peer-to-peer’ without professional drivers. The company suggests that their technology could improve utilisation of road space in London and reduce congestion and emissions.

Yoti is a biometric digital identity company offering smartphone apps that let people prove who they are online and offline. The company suggested that this technology could support the proposals relating to sharing of identity information and reducing fraud.

The *Institute of Economic Affairs*, a ‘free-market think tank’, argued that many of our proposals would appear to:

- *‘Raise barriers to competition in the sector;*
- *Undermine the welfare of PHV users without any apparent impact on passenger safety; and*
- *Make beneficial innovation of the sort that the sector has recently experienced less likely in the future’*

The Institute suggested that *‘innovation is increasingly rendering the legal separation between taxis and minicabs...obsolete’* and said that *‘maintaining such privileges through heavier regulation of PHVs is likely to go against the interests of passengers.’* The response pointed out that *‘while, from a supply-side perspective, the London market for ... minicabs and taxis... is a two-tier market due to existing regulation, such a distinction is much less apparent from the viewpoint of passengers. PHVs and taxis are not substitutes in all circumstances, mainly because the former are legally prevented from responding to immediate demand (“hailing”) by passengers. However, they are substitutes in many circumstances, in the same way that public transport and private hire may be substitutes in certain situations.’* On many proposals, the Institute argues that we have not provided sufficient evidence to justify regulatory intervention.

The Institute concluded that technological trends point towards *‘the growing obsolescence of regulations of taxis and private hire vehicles’* and called on us to *‘review the overall regulatory framework to ensure it is up-to-date with recent innovations and guided by the aim to promote passenger welfare.’*

We also received a response from the *Alliance of British Drivers*, a motorists’ lobbying organisation.

Stakeholder responses to proposals

Private hire operators

Proposal 1 (Question 1): Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking

The great majority of stakeholders supported this proposal. Those that did not thought that this proposal would add unnecessary costs to operators and passengers, that there could be safety implications for drivers, or questioned the practicality in some circumstances.

Proposal 2 (Questions 2 and 3): Operators must provide booking confirmation details at least five minutes prior to journey commencing

Most stakeholders opposed this proposal, particularly the statutory bodies, the business community and the private hire trade. The proposal was felt to be detrimental to customers, over-regulatory and anti-competitive, and was seen as an attempt to protect the taxi trade by inappropriate regulatory restrictions on private hire. Safety implications for customers waiting for vehicles were also raised.

There was some support from accessibility campaigns and from the taxi trade, although the LTDA and Unite, while supporting the principle behind the proposal, argued that on balance it would be detrimental to public safety. They called instead for us to clarify the definition of 'plying for hire'. Some other taxi trade bodies called for a longer delay.

Proposal 3 (Question 4): Operators will be required to seek TfL approval before changing their operating model

Most stakeholders supported this, although some felt the proposal lacked clarity and that the uncertainty and additional bureaucracy would discourage innovation and prevent a better service for Londoners. Some that supported the proposal said that it would depend on our resourcing to ensure that we would respond promptly to submissions.

*Proposal 4 (Questions 5/6): Security for app based booking platforms
(No proposal)*

Many stakeholders supported our intention and believed some measures were appropriate; some felt that current practices among some operators (supplying driver ID and Vehicle Registration Number) were sufficient. Some pointed out that the issue of unlicensed drivers was better controlled with apps than for private hire firms that use radio communications or for taxis. Few stakeholders were opposed: those that were expressed concern about the costs (for instance, of biometric technology) or opposed further regulation on principle.

Proposal 5 (Questions 7 and 8): Operators must offer a facility to pre-book up to seven days in advance

The majority of stakeholders agreed with this proposal, with strong support from the taxi trade. Opposition came from the business community, who felt that the market provided adequate options for customers who want to book in advance and there is no need to require all operators to provide this option; adding this requirement would tend to distort competition and raise prices. There was also opposition from some of the private hire trade and a mixed response from consumer groups.

Proposal 6 (Questions 9 and 10): TfL proposes to no longer issue licenses for in-venue operators or temporary events

More stakeholders supported this proposal than opposed it. Westminster City Council, the area with the greatest concentration of venues, supported the proposal saying that “satellite/ temporary PHV Operating Centres at key West End, Hyde Park etc. attractions essentially means ‘honey pot’ parking, waiting and idling of PHVs”.

Opposition was expressed by some local authorities where a small number of venues exist and night time travel options are limited. The LPHCA, and operators and venues involved in the late night market were against the proposal. They argued that removal of the option for in-venue operators would lead to more touting by unlicensed drivers, with greater risks to safety. Venues pointed out that venue licensing often required them to have arrangements in place for safe dispersal of customers when the venue closes. It was also suggested that this would be an anti-competitive move designed only for the benefit of the taxi trade.

Some of those that suggested alternatives concentrated on temporary events rather than the regular night-time market. The most popular suggestions were designated pick up/drop off points for PHVs, use of marshals or other pre-booking arrangements, and provision of taxi ranks at venues and events.

Proposal 7 (Question 11): Operator must have a fixed landline telephone which must be available for passenger use at all times

Most stakeholders supported this although some felt that the requirement should be that operators provide means to make direct contact with a person through a number of channels rather than referencing one specific (and out-dated) technology.

Proposal 8 (Question 12): Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app

This proposal was supported by taxi trade stakeholders but opposed by many others, who argued that it would limit choice and remove a feature that was highly valued by consumers. Many thought it was simply a protectionist/anti-competitive measure with no obvious benefit for consumers.

Proposal 9 (Question 13): Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis

Almost all stakeholders that expressed a view supported this proposal. It was opposed by specialist private hire operators for whom it would present some difficulties. These operators called for us to bear in mind the diversity of the London private hire trade and ensure that regulations to address issues with minicab services do not adversely impact on other sectors.

Proposal 10 (Question 14): Operators must specify the fare prior to the booking being accepted

Most stakeholders supported this proposal. Those opposed argued that this would restrict the scope for more flexible and competitive pricing options, and that provision of an estimate before the journey would be sufficient.

Proposal 11 (Question 15): Operators must record the main destination for each journey which must be specified at the time the booking is made

Few stakeholders opposed this with most expressing support. There was concern that this would present difficulties for the chauffeur sector where a great deal of work is booked to travel 'as directed'.

Proposal 12 (Question 16): Harmonise the retention period for records

Almost all the stakeholders that expressed a view supported this proposal. Those that did not agree felt that it was unnecessary to make these changes and some felt it was overly bureaucratic to keep these records for longer periods. Uber argued that we should be guided by the principles published by the Information Commissioner. (In a response to the previous consultation, 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.)

Proposal 13 (Question 17): Limit of five on the number of business names attached to each Operator's licence

Most stakeholders supported this, and a few called for a lower limit. Some said this this would be a bureaucratic restriction and would not address the problems of inappropriate names: the Driver Guides Association pointed out that, although they use many trading names, these are necessary because of the nature of their operation.

Private hire drivers

Proposal 14 (Questions 18 and 19): Specific requirement for an English Language test.

No stakeholders expressed outright opposition to this, although some were not sure. Most felt that an appropriate standard would be conversational/everyday English or ESOL standard. Some suggested that computer testing for the topographical skills assessments could be replaced by face-to face interviews which could also assess speaking and comprehension.

Proposal 15 (Question 20): Drivers to only work for one operator at a time

Few stakeholders supported this apart from those connected to the taxi trade. Some argued that it would impinge on the drivers' rights and that more appropriate means should be found to address the issue of drivers working excessive hours. A chauffeur/executive operator said that this proposal would cause particular problems for chauffeur drivers as there are significant fluctuations in the workload of any one operator.

Proposal 16 (Question 21): Driver and Operator licence applicants to provide National Insurance numbers which would be shared with DWP

Most stakeholders supported this proposal and none expressed significant opposition, although some questioned whether and how the data would be used.

Proposal 17 (Question 22): Vehicle licence to be considered for revocation if driver licence revoked

Few stakeholders opposed this proposal. Some felt that this contravened the separation of the licensing strands established by the primary legislation. Others supported the principle for revocations after an offence, but felt it would be unduly harsh to penalise a driver that is revoked on medical grounds by limiting opportunities to sell or lease the vehicle.

Proposal 18 (Question 23): Checks on convictions of operator staff

There was little opposition to this proposal, although there were concerns about the scope and practicalities. Those who did not agree felt that the evidence offered was not sufficient to justify the cost and red tape involved.

Proposal 19 (Question 24): No longer accept cheques or postal orders as payment from 1 April 2016

Many stakeholders outside the private hire and taxi trades did not comment on this, and there was little opposition.

Private hire insurance

Proposal 20 (Question 25): Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence

Most stakeholders supported this proposal. However opposition was expressed by the Private Hire Board, Uber and by vehicle leasing companies, who emphasised the extra costs and limited benefit this would involve in some circumstances, particularly for leasing companies and owner-drivers starting their career. Uber discussed its policy of spot checks and called for our support in the company's efforts to work with insurance companies to find ways of electronically checking the validity of documents in real time.

Proposal 21 (Questions 26 and 27): Drivers to carry or display a copy of insurance details at all times

This proposal was supported by most stakeholders, with few expressing opposition. Some suggested that electronic means of checking insurance would be more effective than traditional display, and others felt that the proposal was unnecessary for passengers and over bureaucratic.

Uber and the taxi trade called for parity with taxis, which have to display a proof of insurance. Most other respondents felt it would be sufficient to carry (rather than display) insurance documentation.

Proposal 22 (Question 28): Hire and Reward fleet insurance in place by operators

Some stakeholders felt that it might be appropriate for some operators (such as fleet owners) but not for ones that used owner-drivers. Others felt that the existing obligation on operators to ensure drivers are covered by valid insurance is adequate. Uber argued that, in addition to the acknowledged costs, this requirement could form a significant barrier to entry and would therefore inhibit competition and innovation. Some stakeholders preferred the measures set out in proposals 20 and 21 but would support this proposal if the alternatives were not taken forward.

Private hire licensing

Proposal 23 (Question 29): Operator licence type

Many stakeholders supported the suggestion that we should review the operator licence structure, although there were divergent views as to what the review should aim to achieve. Some argued that this would help assign costs more accurately to different types of operator although some feared it could distribute costs inappropriately in order to penalise particular operators.

*Proposal 24 (Question 30): Controls on ride sharing in licensed vehicles
(No proposal)*

Many stakeholders suggested principles that regulations should adopt. There was some uncertainty about the proposal for strict controls on ride sharing in licensed vehicles compared to less-regulated peer-to-peer sharing without private hire licensing, which may carry greater risks. Lyft offered a ride-sharing app platform that applies some controls and could apparently accommodate the licensing regime, and claim this service is making a significant contribution to environmental and congestion improvements in the USA. Some stakeholders, including many taxi and private hire trade members, called for a complete ban on ride sharing, suggesting that it would never be safe for passengers.

Proposal 25 (Question 31): Amendment of advertising regulation to include “in” vehicle

Most stakeholders supported this proposal and some called for similar restrictions for taxis. Respondents not supporting this proposal either felt it was over-regulatory, or they did not believe there was enough detail to offer a view.

7 Conclusions

This section considers all responses, from stakeholders and others.

Private hire operators

Proposal 1 (Question 1): Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking

This was supported by the great majority of individuals and organisations as well as stakeholders.

Proposal 2 (Questions 2 and 3): Operators must provide booking confirmation details at least five minutes prior to journey commencing

This proposal was strongly opposed by customers and stakeholders. The proposal was felt to be detrimental to customers, over-regulatory and anti-competitive, and was seen as an attempt to protect the taxi trade by inappropriate regulatory restrictions on private hire.

Proposal 3 (Question 4): Operators will be required to seek TfL approval before changing their operating model

Most respondent groups and stakeholders supported this, although customers were divided. The most common concern was that this would discourage innovation and stifle competition.

Proposal 4 (Questions 5/6): Security for app based booking platforms (No proposal)

This was generally supported, and most felt that current technology offers opportunities to limit fraud opportunities. Some stakeholders were against more regulation in general and some concerns were raised about the possible cost.

Proposal 5 (Questions 7 and 8): Operators must offer a facility to pre-book up to seven days in advance

Customers and the business community opposed this proposal, saying that the market provided adequate options for customers who want to book in advance and there is no need to require all operators to provide this option.

Proposal 6 (Questions 9 and 10): TfL proposes to no longer issue licenses for in-venue operators or temporary events

This proposal was generally supported, particularly by Westminster City Council where a large number of these venues are located. The LPHCA, and operators and venues involved in the late night market expressed concerns that it would lead to more touting by unlicensed drivers, with greater risks to safety.

Proposal 7 (Question 11): Operator must have a fixed landline telephone which must be available for passenger use at all times

The requirement for a landline was seen as unnecessarily restrictive, although there was support for improved means of contacting operators' representatives.

Proposal 8 (Question 12): Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app

This proposal was strongly opposed by most groups as a removal of information that is highly valued by customers. Respondents outside the taxi trade saw the proposal as anti-innovation and protectionist.

Proposal 9 (Question 13): Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis
This was generally supported.

Proposal 10 (Question 14): Operators must specify the fare prior to the booking being accepted

Most stakeholders supported this proposal, although customers and members of the public were evenly divided.

Proposal 11 (Question 15): Operators must record the main destination for each journey which must be specified at the time the booking is made

This was generally supported, although some said it would limit journey flexibility and passenger options. There was concern that this would present difficulties for the chauffeur sector where a great deal of work is booked to travel 'as directed'.

Proposal 12 (Question 16): Harmonise the retention period for records

There was little opposition to this proposal. (In a response to the previous consultation, 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.)

Proposal 13 (Question 17): Limit of five on the number of business names attached to each Operator's licence

Most supported this proposal and some called for a lower limit. The Driver Guides Association pointed out that, although they use many trading names, these are necessary because of the nature of their operation.

Private hire drivers

Proposal 14 (Questions 18 and 19): Specific requirement for an English Language test.

This proposal had widespread support.

Proposal 15 (Question 20): Drivers to only work for one operator at a time
Customers, private hire drivers and stakeholders outside the taxi trade opposed this proposal. It would cause particular problems for chauffeur drivers as there are significant fluctuations in the workload of any one operator.

Proposal 16 (Question 21): Driver and Operator licence applicants to provide National Insurance numbers which would be shared with DWP
This was widely supported.

Proposal 17 (Question 22): Vehicle licence to be considered for revocation if driver licence revoked
There was limited opposition to this proposal. Some felt that it would be unduly harsh to penalise a driver that is revoked on medical grounds.

Proposal 18 (Question 23): Checks on convictions of operator staff
There was little opposition to this proposal.

Proposal 19 (Question 24): No longer accept cheques or postal orders as payment from 1 April 2016
There was little opposition to this proposal.

Private hire insurance

Proposal 20 (Question 25): Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence
This was generally supported, although some private hire trade stakeholders expressed opposition.

Proposal 21 (Questions 26 and 27): Drivers to carry or display a copy of insurance details at all times
There was widespread support for this proposal.

Proposal 22 (Question 28): Hire and Reward fleet insurance in place by operators
Opinion was more divided on this than the other insurance proposals. Some stakeholders preferred the measures set out in proposals 20 and 21 but would support this proposal if the alternatives were not taken forward.

Private hire licensing

Proposal 23 (Question 29): Operator licence type
There was general support for a review of the operator licence structure.

Proposal 24 (Question 30): Controls on ride sharing in licensed vehicles (No proposal)
There was some support for ride sharing as a way to reduce costs to customers and provide congestion and environmental benefits, but some felt that sharing could never be safe and should be banned.

Proposal 25 (Question 31): Amendment of advertising regulation to include “in” vehicle

This proposal was generally supported, although some consultees did not think that the intention of the proposal had been fully demonstrated.

Appendix A – TfL responses to issues raised in the consultation

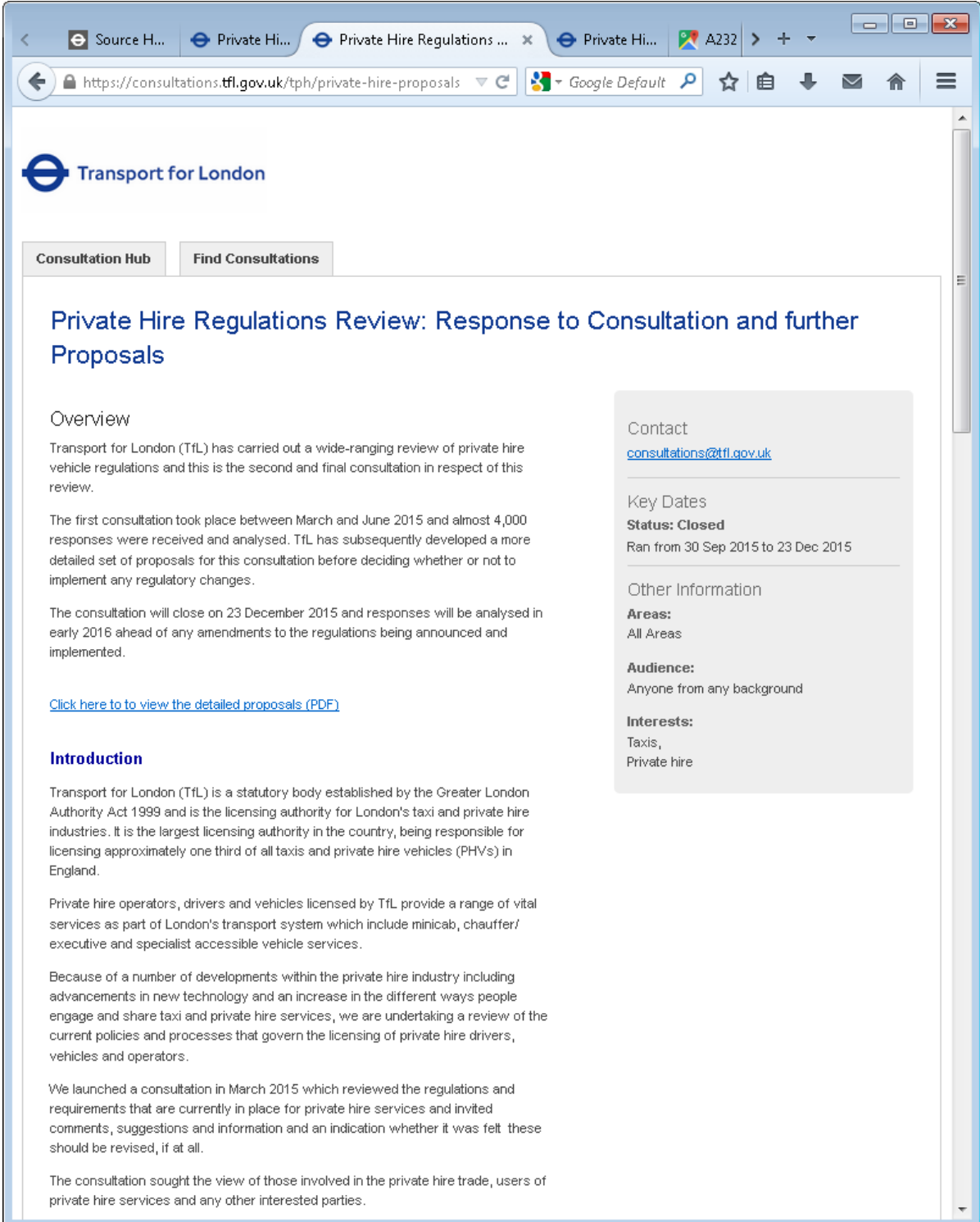
We will now consider all responses to the consultation and will make our recommendations to the TfL Board in due course.

Subject to the agreement of the Board, we will publish details of the proposals we are taking forward, those we are proposing to take forward in a different form (or subject to further consideration) and those we are not going to take forward.

We will work closely with the private hire industry to ensure that any proposals are implemented in a timely and appropriate manner.

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 screenshot shows a web browser window with the URL <https://consultations.tfl.gov.uk/tph/private-hire-proposals>. The page is titled "Private Hire Regulations Review: Response to Consultation and further Proposals" and is part of the "Consultation Hub" on the Transport for London website. The page includes an overview, introduction, and contact information.

Transport for London

Consultation Hub | **Find Consultations**

Private Hire Regulations Review: Response to Consultation and further Proposals

Overview

Transport for London (TfL) has carried out a wide-ranging review of private hire vehicle regulations and this is the second and final consultation in respect of this review.

The first consultation took place between March and June 2015 and almost 4,000 responses were received and analysed. TfL has subsequently developed a more detailed set of proposals for this consultation before deciding whether or not to implement any regulatory changes.

The consultation will close on 23 December 2015 and responses will be analysed in early 2016 ahead of any amendments to the regulations being announced and implemented.

[Click here to view the detailed proposals \(PDF\)](#)

Introduction

Transport for London (TfL) is a statutory body established by the Greater London Authority Act 1999 and is the licensing authority for London's taxi and private hire industries. It is the largest licensing authority in the country, being responsible for licensing approximately one third of all taxis and private hire vehicles (PHVs) in England.

Private hire operators, drivers and vehicles licensed by TfL provide a range of vital services as part of London's transport system which include minicab, chauffeur/ executive and specialist accessible vehicle services.

Because of a number of developments within the private hire industry including advancements in new technology and an increase in the different ways people engage and share taxi and private hire services, we are undertaking a review of the current policies and processes that govern the licensing of private hire drivers, vehicles and operators.

We launched a consultation in March 2015 which reviewed the regulations and requirements that are currently in place for private hire services and invited comments, suggestions and information and an indication whether it was felt these should be revised, if at all.

The consultation sought the view of those involved in the private hire trade, users of private hire services and any other interested parties.

Contact
consultations@tfl.gov.uk

Key Dates
Status: Closed
Ran from 30 Sep 2015 to 23 Dec 2015

Other Information
Areas:
All Areas

Audience:
Anyone from any background

Interests:
Taxis,
Private hire

The background information and the questions were also made available as a PDF document for download. This document is available as Annex 1.

We published a press notice on 30 September, as follows:



PN-286

TfL launches new consultation to modernise private hire regulations

- **Initial consultation, earlier this year, received almost four thousand responses from trades, customers and stakeholders**
- **Secondary consultation contains proposals for discussion in relation to an English language requirement for drivers, stricter controls on insurance and tighter controls on private hire bookings**
- **New taxi and private hire strategy also published, outlining TfL's vision for the wider industry as a whole**

Transport for London (TfL) will tomorrow launch a secondary public consultation on potential changes to the regulations that govern the Capital's private hire trade. This follows an initial consultation which ended in June and received almost 4,000 responses from customers, stakeholders and the trades.

Following a detailed analysis of the responses to the initial consultation and meetings with trade representatives, a number of detailed suggestions have been drafted for consideration with the aim of helping TfL to better regulate the 21st century private hire trade.

These include proposals to improve driver skills, including English language capabilities and stricter requirements for insurance, as well as proposals around the way private hire operators can accept bookings and changes to how bookings are recorded. In addition a tough topographic exam to test driver navigational skills will also be introduced.

Garrett Emmerson, TfL's Chief Operating Officer for Surface Transport, said: "We are launching a public consultation in order to inform and improve the regulations that govern the Capital's private hire trade. In recent years the private hire industry has grown exponentially and technology has also developed rapidly. The consultation sets out a number of ways that standards across the industry could be raised, ensuring Londoners can continue to benefit from the service provided by licensed private hire vehicles. No final decisions have been made and we're keen to hear a range of views from the trade and from Londoners too."

Alongside the consultation, TfL has also published a vision for the future of the taxi and private hire trade as a whole, setting the proposed changes to private hire regulations in the wider context of developments in the entire industry.

The consultation will run for 12 weeks and close on 23 December 2015.

Ends

The Taxi and Private Hire Department sent an email to the TPH email lists, enclosing a TPH Notice that outlined the consultation and directed recipients to the consultation page:.

Notice 09/15

Transport for London
London Taxi and Private Hire



Private Hire Proposals – have your say

In summer 2015 we carried out a wide-ranging consultation asking for views to help us to shape the future of the private hire industry in London.

We have now analysed the 4,000 responses and the report of this consultation is available on our website here: consultations.tfl.gov.uk/tph/private-hire-regulations-review.

After careful consideration of the responses, we have developed a set of more detailed proposals to clarify the issues and address the concerns raised in the previous consultation. We would like to hear your views on these proposals.

These include proposals to improve driver skills, including English language capabilities and stricter requirements for insurance, as well as proposals around the way private hire operators can accept bookings and changes to how bookings are recorded. In addition a tough topographic exam to test driver navigational skills will also be introduced.

The consultation opens today and will run for 12 weeks until 23 December 2015.

Alongside the consultation, TfL has also published a vision for the future of the taxi and private hire trade as a whole, setting the proposed changes to private hire regulations in the wider context of developments in the entire industry.

You can find the consultation on our website here: consultations.tfl.gov.uk/tph/private-hire-proposals, where you will also find details of how to respond.

The Taxi and Private Hire Strategy can also be found on our website [here](http://tfl.gov.uk/tph).

A handwritten signature in black ink, appearing to read 'H Chapman'.

Helen Chapman
General Manager,
London Taxi and Private Hire

30 September 2015
For previous Notices visit tfl.gov.uk/tph

MAYOR OF LONDON

The following email was sent to stakeholders in early October 2015

Dear Stakeholder,

At the end of September we published a further consultation on potential changes to the regulations that govern London's private hire vehicle (PHV) sector. It follows an initial consultation which received nearly 4,000 responses and a number of detailed suggestions.

The private hire market has changed in recent years:

- The rise in digital technology and new app-based business models, which can offer significant customer benefits but change the way the market operates
- A significant increase in the number of private hire drivers operating in London - the growth of PHV drivers in the last 18 months is approximately 32 per cent, from 65,000 in 2013 to 88,000 at the latest count
- The need to improve London's air quality by cleaning up all vehicles including black cabs and PHVs

We have also seen an increase in provision in central London – in September 2012 around 500 PHVs were observed each day in central London, in August 2015 this figure was over 13,000 – more than a 25-fold increase.

In response to these changes, it is timely to review the regulations that govern the private hire trade.

We are consulting on a range of different options, some of which have been proposed by the taxi and private hire industry. We believe it is important to have an inclusive discussion so all ideas can be tested through the consultation. This is an open consultation and we are keen to hear as many views and ideas as possible.

We want to make sure that in London we continue to regulate in a way that is safe and supports a modern thriving taxi and private hire sector for the benefit of our customers.

The consultation ends on 23 December 2015. Details on how to respond are on our [consultation hub](#)

Yours sincerely,

A handwritten signature in black ink that reads "Peter Bradley". The signature is written in a cursive, flowing style.

Peter Bradley
Head of Consultation
Transport for London

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

- Heathrow Airport Ltd
- Inclusion London
- Joint Committee on Mobility for Disabled People
- Living Streets
- London Accessible Transport Alliance
- London Assembly Members
- London Business Improvement Districts (BIDs)
- 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.

Appendix D – Campaign and petition responses

Taxi trade template

PART 1: PRIVATE HIRE OPERATORS

- 1. Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking.**

I support this proposal. It will improve passenger safety by ensuring that passengers do not get into the wrong vehicle.

- 2. Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing.**

I support this proposal. Currently minicab drivers are accepting immediate hirings without having checked the pick up point and are often seen performing U turns or other dangerous manoeuvres whilst trying to work a Sat Nav and contact the passenger at the same time on the phone. Similarly passengers, particularly late at night, are often seen running into the road, whilst looking at a mobile phone, trying to stop what they think is their car. The delay would be enough to enable the untrained minicab driver to accurately determine the pick up point, look at the destination, plan a basic route or programme a Sat Nav and then pick the passenger safely.

- 3. Operators will be required to seek TfL approval before changing their operating model.**

I support this proposal. This will ensure that with technological changes, new and existing entrants to the market will be subject to TfL regulations – thus avoiding the problem caused when booking apps were first introduced. This will affect the whole industry, and will help ensure a consistent regulatory approach going forward.

- 4. Security for app-based booking platforms**

I support this proposal. It will help ensure the safety of passengers, preventing an unlicensed and uninsured driver from taking their fare.

- 5. Operator must offer a facility to pre-book up to seven days in advance**

I support this proposal. All PH Operators with the exception of Uber currently offer a pre booking service – again highlighting the difference between Uber’s model and that of normal minicab companies. By only allowing people to book an Uber at the time they wish to take one, Uber is effectively encouraging its drivers to illegally ‘ply for hire’, by driving around certain locations, instead of waiting in a location until they are booked.

We feel this directly impacts on passenger safety. If a passenger, especially one that may rely on a cab for their journey – such as someone with a lot of luggage or who is disabled – knows the time they will need to travel on a particular day – i.e. (a) to make a journey to a train station or (b) leave a party – they should be able to book in advance and not worry that they will (a) miss the train (b) have to wait around on the street for a lift home.

6. TfL proposes to no longer issue licenses for in-venue operators or temporary events.

I support this proposal.

Major sporting or social events will have been arranged a long time in advance, which will give the organisers enough time to arrange with TfL, (a) whether their event is suitable for temporary taxi ranks and parking areas, and (b) how this can be set up.

7. Operators must have a fixed landline telephone which must be available for passenger use at all times.

I support this proposal.

This will improve passenger safety and experience. Passengers will be able to call a central operator in real time, rather than through less reactive electronic communication, if they need to, for example (a) make a complaint, (b) make a change to their booking, and (c) trace lost property in real time rather than wait for an email to be answered some time later.

8. Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app.

I support this proposal.

Showing where a vehicle is on a map is clearly “plying for hire” – which is solely reserved for black taxis under the 1998 Private Hire Vehicles (London) Act. This is an essential component of the two-tier taxi system, which must be properly enforced.

9. Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis.

I support this proposal.

This will give TfL an up-to-date database of drivers, allowing them to respond quickly to infringements of the law and act accordingly. It will also help improve passenger safety, with emergency services being able to discover information on a driver straight away by contacting TfL.

The time period for this information has not yet been decided, but given the rate of new PHV drivers, operators should provide up-to-date information to TfL on a weekly basis. This information will also help TfL be better informed on the current state of the taxi and PH market.

10. Operators must specify the fare prior to the booking being accepted.

I support this proposal.

PH Operators only take advanced pre bookings and have the advantage of being able to plan a route, taking into account the time of day, roadwork's and other traffic problems and can accurately calculate in advance, distance and likely journey times. With this information they can quote an exact fare and advise the customer at the time of booking-again this is custom and practice for the majority of PH Operators.

11. Operators must record the main destination for each journey which must be specified at the time the booking is made.

I support this proposal.

In the interest of public safety, a precise account of where each journey went would be beneficial. It would ensure that should something go wrong, a detailed log can be consulted to better assist TfL and/or emergency services. Until recently TfL required all PH Operators to record both the pick up and the destination addresses. The details recorded should be a full postal address not just a postcode or GPS coordinates.

12. Harmonise retention periods for records.

I support this proposal.

This will make it easier for PHV operators to comply with regulations, ensuring more effective compliance.

13. Limit on the number of business names attached to each Operator's licence.

I support this proposal.

This will help TfL keep better track of each operators' activities.

PART 2: PRIVATE HIRE DRIVERS

14. Specific requirement for an English Language test.

I support this proposal.

It is imperative that drivers understand everyday English, so they are able to communicate with passengers and other road users and ensure the safety and experience of passengers and others on the road.

15. Drivers to only work for one operator at a time.

I support this proposal.

It is common sense to support anything that helps TfL effectively enforce PHV regulations and ensure that drivers are not tired when on the road. I have seen numerous press reports of PH drivers being involved in accidents after falling asleep; being able to work for multiple operators makes it impossible for operators to monitor the hours worked by their drivers.

16. Driver and Operator licence applicants to provide National Insurance numbers and share with Department for Work and Pensions (DWP).

I support this proposal.

17. Vehicle licence to be revoked if driver licence revoked.

I support this proposal.

This will help ensure the safety of the public, by preventing unlicensed drivers from picking up fares illegally.

18. Checks on convictions of operator staff.

I support this proposal.

It is crucial for the safety of passengers that employees who deal with passengers directly and handle their details have undergone sufficient background checks. In an era where cyber-attacks/hacking is becoming more commonplace, this will be especially vital for web-based employees.

19. TfL stop accepting payment by PO and cheque.

I support this proposal.

PART 3: PRIVATE HIRE INSURANCE

20. Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence

I support this proposal.

Any licensed PH vehicle should be insured for Hire and Reward purposes at all times in parity with the taxi trade.

21. Drivers to carry or display a copy of insurance details at all times

I support this proposal.

Licensed taxis must have Hire and Reward insurance in place at all times and have a copy of that insurance displayed in their taxi. PHV drivers should also abide by the same regulations if they are to carry out a similar function.

22. Hire and Reward fleet insurance in place by operators not driver

I support this proposal.

One of the biggest areas of concern over the safety of minicabs in London is uninsured vehicles. Currently there is no fail safe method of ensuring that a PH vehicle is insured to carry passengers for Hire and Reward. ANPR and roadside checks will only reveal if the vehicle has normal Social Domestic and Pleasure cover. Even insisting a PH vehicle is insured at the point of licensing (Q20) will not resolve the current problem of drivers insuring a vehicle for H&R and then cancelling the policy after a short period in favour of a cheaper non H&R policy. If the responsibility for insurance is transferred to the Operator the potential for uninsured PH vehicles would be almost totally eliminated and the process of checking a few thousand Operators policies would be much easier than checking tens of thousands of individual policies.

PART 4: PRIVATE HIRE LICENSING

23. Operator licence type – TfL will review the current operator licence type and look to introduce additional category/categories.

I support this proposal.

There current system is outdated. Given there are 88,000 PHVs in London, more categories need to be introduced. I believe that there should be a three category system: Small (those with less than 5 vehicles) Medium (those with between 5 and 1000 vehicles) and Large (those with over 1000 vehicles).

In addition, sub-categories for vehicles with wider benefits, such as those PHVs that are wheelchair accessible or zero emission vehicles, should also be encouraged.

24. Controls on ridesharing in licensed vehicles.

I support this proposal.

The safety of passengers and drivers is paramount. PH drivers do not possess the Knowledge of London and planning multiple pick ups and drop offs using map books or Satellite Navigation would necessitate frequent stops to input changed data, with drivers possibly being pressurised to do it whilst driving.

25. Amendment of advertising regulation to include “in” vehicle

I support this proposal.

PART 5: ADDITIONAL MEASURES

Topographical skills – the Knowledge will be reconsidered.

I support this proposal.

Having basic understanding of London’s Geography is crucial. Although I acknowledge that the ‘Knowledge’ – which covers 320 routes, over 25,000 streets and over 20,000 landmarks and popular destinations – should not be required for PH drivers, they should have a basic understanding of where they’re going. The number of cases of PH drivers blindly following their Sat Nav’s up one way streets/cul-de-sacs etc. is testament to this.

26. Complaints – TfL will take a greater role in the oversight and management of private hire complaints.

I support this proposal.

27. Disability awareness training.

I support this proposal.

28. Driver training must be reviewed.

I support this proposal. I think that in parity with taxi drivers, PH drivers should have to complete an enhanced Driving Standards Agency driving test before being licensed.

Uber driver campaign

Dear Transport for London,

Please accept this email as a formal response to the Private Hire Regulations Review. As a licensed private hire driver in London, I feel strongly about some of these proposals and would like to ensure my voice is heard.

New technology, mobile phones and apps have made my life better. They've made it easier for me to get work and make more money. And I know that my customers feel safer too.

With regard to the proposals in the Private Hire Regulations Review:

2. Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing

I do not agree with this proposal. Making people wait five-minutes for their car even when it might be round the corner would make it harder for me to make a decent living. I also worry that my customers less safe as they may have to needlessly wait around on the street late at night.

5. Operators must offer a facility to pre-book up to seven days in advance

I do not agree with this proposal. Drivers and customers should be able to choose how they want to book a car. There are plenty of other operators where I can choose to work with journeys booked seven days in advance. But it would mean that I do fewer journeys, make less money and can't choose my own hours.

8. Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app

I do not agree with this proposal. Customers frequently say that they love the ability to see cars live in their smartphone - knowing when their car will arrive in real-time and meeting drivers at the right time. Having this information means I spend less time looking for passengers and more time making a living.

15. Drivers to work for one operator at a time

I do not agree with this proposal. It is important to me, and drivers, that we have the freedom to work for who we want when we want and can switch easily between operators. This makes sure that operators have to compete with each other to give us - as well as customers - the best deal.

Regards,

Other private hire driver campaign

Hi

I am a TfL licensed private hire drivers and here are my answers to the questions asked in the ongoing consultation on private hire regulations.

Question 1

Do you agree with the above proposal? If you don't agree, please explain why.

Answer:

No I do not agree to this. I already wear a TfL picture ID which is sufficient and already a much higher standard than the taxi trade. I am not convinced that my personal details will not be misused or leaked on to the internet

Question 2

Do you agree with our proposal for a time delay between journey booking and commencement? If you don't agree, please explain why.

No I do not agree. An imposed waiting time will only lead to more congestion and income loss for drivers and pose a safety threat for passengers.

Question 3

Do you think that a different time interval to five minutes is appropriate? If you do, please say what you consider an appropriate time interval to be, and why.

There should be no time delay imposed.

Question 4

Do you agree with our proposal? If you don't agree, please explain why.

Yes, I agree with this proposal.

Question 5

What are your views on ensuring that app based platforms are secure and do not allow passenger or driver fraud?

I don't have a view on how operators manage passenger fraud. I believe drivers wearing a picture ID at all times provides sufficient security. I don't believe the problem is app specific. For example a taxi driver can easily pass his badge and cab to an unlicensed driver.

Question 6

Do you believe that there is sufficient technology available to achieve this and if so what technology do you believe we should consider?

I don't believe the technology exists to properly secure driver details. At the moment driver details are being cut and pasted from the app to social media channels. The best security is not to collect data that is not needed.

Question 7

Do you agree with our proposal? If you don't agree, please say why.

Yes.

Question 8

Do you consider a period other than seven days to be appropriate? If you do, please say why.

The same advance booking period as airlines allow.

Question 9

Do you agree with our proposal? If you don't agree, please say why.

No. Large trade events and concerts cannot be serviced adequately and safely without on site service. If TfL bans this it will only encourage touting.

Question 10

How would you propose that venues and temporary events ensure safe and adequate transportation options for those attending such events?

On site operator could be asked to register and submit driver and phv details in advance.

Question 11

Do you agree with our proposal? If you don't agree, please say why.

Yes but there must also be a manned support line for operators to support drivers 24x7.

Question 12

Do you agree with our proposal? If you don't agree, please say why.

Yes I agree.

Question 13

Do you agree with our proposal? If you don't agree, please say why not.

No I don't agree. I have no objection with the operator supplying my details to TfL but I do object to your monitoring of 'behavioural indiscretions'. TfL must stick to writing and enforcing regulations only. I would like TfL to get professional, independent advice on equalities.

Question 14

Do you agree with our proposal? If you don't agree, please say why.

I do not agree. It's impossible to fix a time and distance fare in advance. To mandate this will result in either the passenger being overcharged or the driver being underpaid.

Question 15

Do you agree with our proposal? If you don't agree, please say why.

Yes I agree. I also believe I must be told of the destination at the time of booking confirmation so that I can prepare for the journey and also have the option to decline or discuss with the operator if I feel I am unable to complete the journey.

Question 16

Do you agree with our proposal? If you don't agree, please say why.

Yes, I agree to this proposal.

Question 17

Do you agree with our proposal? If you don't agree, please say why.

No I don't agree. I don't see why an operator cannot organise and market their business anyway they chose.

Question 18

Do you agree with our proposal? If you don't agree, please say why.

I don't agree.

Question 19

What standard do you think it would be appropriate for applicants to demonstrate?

I suggest TfL gets professional, external equalities advice on this question.

Question 20

Do you agree with our proposal? If you don't agree, please say why.

I completely disagree with this proposal. It would directly reduce and harm my employment prospects. I should be allowed to work for as many operators as I chose. Not all operators can offer me enough work to provide a full time income.

Question 21

Do you agree with our proposal? If you don't agree, please say why.

I completely disagree with this proposal and I resent the implication that I or my colleagues are benefit cheats. TfL should stick to regulating the taxi and private hire trade where it already has more than enough to do.

Question 22

Do you agree with our proposal? If you don't agree, please say why.

Yes I agree.

Question 23

Do you agree with our proposal? If you don't agree, please say why.

Yes I agree.

Question 24

Do you agree with this proposal? If you don't agree, please say why.

I disagree.

Question 25

Do you agree with our proposal? If not, please say why.

Yes I agree

Question 26

Do you agree with our proposal? If you don't agree, please say why.

Yes, I agree to this proposal.

Question 27

If you agree, should the driver be required to display the insurance in the vehicle?
If you don't agree, please say why.

Yes but only via a windscreen sticker but not inside the car.

Question 28

Do you agree that Hire and Reward fleet insurance put in place by operators is necessary in addition to, or instead of, individual driver insurance cover? If you don't agree, please say why.

Yes I agree that operators should carry fleet insurance in addition to but not instead of driver HR insurance.

Question 29

Do you agree with our proposal? If you don't agree, please say why.

Yes but TfL should bring detailed proposals back for further consultation.

Question 30

Do you support the above proposal? If not, why not?

Yes I support the proposal. Ride sharing should not be allowed. Based on my experience I believe it is unsafe for me as a driver and for the passenger.

Question 31

Do you agree with our proposal? If you don't agree, please say why.

No I do not agree. I see no reason for any further restrictions.

Additional measures:

I agree with the additional you propose and in addition I think the following are essential also:

- Safety and security training for drivers to be provided by operators.
- TfL should provide whistle blower protection and an anonymous complaints lines for drivers and operators to report concerns to TfL.
- Driver deposits need to be protected by a TfL approved scheme to stop operator abuse.
- TfL should carry out credit checks on operators to ensure they are fit for business.
- TfL should ensure that operators provide suitable rest, kitchen and toilet facilities 24x7.
- TfL must provide suitable rest areas throughout London.
- All operators must provide a 24 hour, live, manned support line for driver operations

Regards

Uber petition

Dear Transport for London,

I've recently heard of the proposed regulations that TfL is looking at for private hire in London.

I am concerned that some of these proposals will make it harder for me to get a convenient and affordable ride at the tap of a button, something that I - like millions of Londoners - have come to rely on. Technology that makes it safer and easier to travel around the city should be encouraged not restricted.

Moreover, the proposed regulations restrict the flexibility of drivers to drive for more than one company. I have concerns about the effect this will have on a service that tens of thousands of drivers rely on to help earn a decent living. Uber is attracting a lot of drivers, because it offers a service that no one else does.

As one of the millions of Londoners who use Uber, I want to have my voice heard.

Regards,

[sender's name]

Annex 1 - Consultation document and questionnaire

Annex 2 - Analysis of responses by Steer Davies Gleave

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Private Hire Regulations
Review – Response to
Consultation and
Further Proposals:
Consultation Analysis

Transport for London

Report
February 2016

Our ref: 22903501
Client ref:

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Executive Summary

Overview

Transport for London (TfL) is the licensing authority and regulatory body for London's taxi and private hire industries. It is the largest licensing authority in the country, being responsible for licensing approximately one third of all taxis and private hire vehicles in England.

Due to a number of developments within the private hire industry, including advances in technology and changes to how people engage and share private hire services, TfL are reviewing the current regulations that govern the licensing of private hire operators, drivers and vehicles.

An initial consultation, conducted in March 2015, aimed to get a better picture of views about these proposals, and to invite other suggestions. Following that consultation, TfL developed detailed proposals for changes to regulations and published these for a further consultation in September 2015.

Topics covered in the September consultation included, but were not limited to: advanced booking confirmations; security for app based booking platforms; in-venue operators; ridesharing; language requirements; vehicle licence revocations; and insurance.

Overall consultation findings

In total, there were 15,817 responses to the consultation, including 68 stakeholder responses that have been analysed by TfL in a separate report. This report therefore includes 15,817 responses, as detailed below:

- 15,533 responses received via the online survey portal;
- 276 responses received via email from other parties¹; and
- 8 responses received via the post².

Of the respondents who specified their connection with private hire a quarter of respondents were customers, a 20% were connected with the taxi trade (taxi drivers and taxi owners) and 15% were connected with the private hire industry (private hire operators, drivers and vehicle owners). A further 20% of responses were from the general public.

A summary of responses to the consultation's 25 proposals, detailing the proportion of respondents agreeing or disagreeing with each proposal, is shown in Table 1.1.

Amongst those who answered the closed questions, more than 50% of respondents were in favour of 22 out of the 25 proposals. For seven of the proposals, 75% of respondents or more were in favour of the suggested changes.

Agreement was strongest in relation to the proposal that operators are required to provide a booking confirmation prior to the booking being discharged (82% agree) and the proposal to

¹ Includes respondents who emailed as well as completing the online survey, and those who submitted campaign email responses with significant additional comments.

² Includes respondents who submitted postal responses as well as completing the online survey, and those who posted campaign responses with significant additional comments.

introduce a requirement for private hire driver applicants to be able to speak English at an intermediate level (80% agree).

The proposals which had least support included that operators must provide booking confirmation to the passenger at least five minutes prior to the journey commencing (46% agree, 49% disagree) and the proposal that operators must not show vehicles being available for immediate hire, either visibly or on an app (47% agree, 46% disagree).

Overall, respondents who were connected with the taxi trade were more likely to agree with the proposals whilst customers and those connected with the private hire industry were more likely to disagree with the proposals.

Table 1.1: Summary of closed question responses to proposals

Proposal Number	Question Number	Question	Yes	No	Not Sure	No Opinion / Not Answered
1	1	Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking. Do you agree with this proposal?	83%	9%	3%	6%
2	2	Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing. Do you agree with our proposal for a time delay between journey booking and commencement?	46%	49%	1%	4%
2	3	Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing. Do you think that a different time interval to five minutes is appropriate?	36%	46%	5%	14%
3	4	Operators will be required to seek TfL approval before changing their operating model. Do you agree with this proposal?	56%	24%	9%	11%
5	7	Operator must offer a facility to pre-book up to seven days in advance. Do you agree with this proposal?	52%	35%	5%	8%
5	8	In relation to the above proposal, do you consider a period other than seven days to be appropriate?	23%	43%	9%	25%
6	9	TfL proposes to no longer issue licenses for in-venue operators or temporary events. Do you agree with this proposal?	58%	11%	8%	23%
7	11	Operator must have a fixed landline telephone which must be available for passenger use at all times. Do you agree with this proposal?	59%	29%	4%	7%
8	12	Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app. Do you agree with this proposal?	47%	46%	2%	5%
9	13	Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis. Do you agree with this proposal?	74%	10%	6%	10%
10	14	Operators must specify the fare prior to the booking being accepted. Do you agree with this proposal?	58%	30%	6%	6%

Proposal Number	Question Number	Question	Yes	No	Not Sure	No Opinion / Not Answered
11	15	Operators must record the main destination for each journey which must be specified at the time the booking is made. Do you agree with this proposal?	67%	18%	6%	9%
12	16	Harmonise the retention period for records to be 12 months where it is currently 6. Do you agree with this proposal?	71%	6%	5%	18%
13	17	Limit the number of business names attached to each Operator's licence to five. Do you agree with this proposal?	63%	10%	8%	19%
14	18	Specific requirement for drivers to be able to demonstrate they have sufficient knowledge of English language at an intermediate level. Do you agree with this proposal?	80%	9%	4%	7%
15	20	A PHV driver must be registered to a licensed operator and may only be registered to a single operator at any time. Do you agree with this proposal?	51%	35%	6%	9%
16	21 ³	Driver and Operator licence applicants to provide National Insurance numbers and share with Department for Work and Pensions (DWP). Do you agree with this proposal?	75%	6%	4%	15%
17	22	Where a licensed driver has their driver's licence revoked, and that driver is the owner of a licensed vehicle, we propose to also revoke the vehicle licence. Do you agree with this proposal?	76%	9%	6%	9%
18	23	We will seek to add operator staff to the DBS list and amend the Regulations accordingly. Do you agree with this proposal?	79%	6%	6%	10%
19	24	From 1 April 2016 TfL will no longer accept cheques or postal orders as payment. Do you agree with this proposal?	73%	6%	4%	16%
20	25	Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence. Do you agree with this proposal?	76%	7%	5%	12%
21	26	Drivers Regulations to be amended to the effect that private hire drivers must carry a copy of their insurance documents at all times. Do you agree with this proposal?	79%	8%	4%	10%
21	27	If you agree with the proposal above, should the driver be required to display the insurance in the vehicle?	57%	16%	6%	21%
22	28	Do you agree that Hire and Reward fleet insurance put in place by operators is necessary in addition to, or instead of, individual driver insurance cover?	52%	17%	13%	18%

³ Please note that option boxes were initially omitted from this question, and were added after the first 1,750 responses were submitted. Analysis of the open comments for the 1,750 early responses were used, where possible, to identify respondents' views and these are included in the figures.

Proposal Number	Question Number	Question	Yes	No	Not Sure	No Opinion / Not Answered
23	29	TfL will review the current operator licence type and look to introduce additional category/categories. Do you agree with this proposal?	57%	9%	12%	23%
24	30	We intend to explore measures to ensure that private hire vehicles cannot be used for ridesharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers. Do you agree with this proposal?	55%	25%	10%	10%
25	31	We are proposing a small change to Regulation 8 of the Vehicle Regulations which will clarify that advertising displayed “from” as well as “on” a vehicle is subject to the controls set out in that Regulation. Do you agree with this proposal?	57%	6%	11%	26%

Respondents were also invited to leave comments to 31 open questions. In most cases the open question was an invitation to explain disagreement with a proposal. The most frequently discussed themes include:

- *Regulation*

Comments included in this theme often discuss the scope, validity and/or appropriateness of the regulation(s) or regulatory framework specific to the question. Common sentiments across a number of questions included that the proposals are bureaucratic, that regulations should be applied equally to Taxis and PHVs and that current regulations are sufficient.

- *Market/Competition*

Respondents were particularly concerned about the potential for the proposals to adversely affect private hire operators/drivers, prevent fair competition within the private hire and taxi industry and stifle creativity and innovation.

- *Passenger*

This theme focused primarily on the potential passenger benefits and disbenefits presented by the proposals, including impacts on convenience, choice and customer service.

- *Technology*

The detail of the comments relating to technology were often specific to the proposal at hand and included remarks on fingerprint/facial recognition (proposal 4), methods for ensuring safe and adequate transport options for those attending events (proposal 6) and the use of real time information (proposal 8). This theme also captured a general sentiment that legislation should not hold back recent technological advances.

- *Enforcement*

Strict enforcement of existing rules and regulations, including penalties for breaches, was the most popular comment under the enforcement theme.

More details about responses to the open questions can be found in **Chapter 4**, with full codeframes included in **Appendix B**.

1 Introduction

Background

- 1.1 Transport for London (TfL) is a statutory body established by the Greater London Authority Act 1999 and is the licensing authority and regulatory body for London’s taxi and private hire industries. It is the largest licensing authority in the country, being responsible for licensing approximately one third of all taxis and private hire vehicles (PHVs) in England. As of January 2016, TfL licensed and regulated over 2,900 private hire operators, 75,000 private hire vehicles and 95,000 private hire drivers.
- 1.2 The Private Hire Vehicles (London) Act 1998 (1998 Act), the primary legislation governing private hire services in London, provided for the introduction of 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.
- 1.3 TfL is 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.
- 1.4 TfL has identified a number of proposals for changes to these regulations through internal review and engagement with stakeholders. An initial consultation, conducted in March 2015, aimed to get a better picture of views about these proposals, and to invite other suggestions.
- 1.5 Following that consultation, TfL developed detailed proposals for changes to regulations and published these for a further consultation in September 2015. TfL also announced some measures that it had introduced to improve enforcement and raise standards in the private hire trade.
- 1.6 TfL commissioned Steer Davis Gleave to analyse and report on the responses to the September 2015 consultation⁴ and the findings are detailed in this report.

⁴ Excluding responses from stakeholders and other campaign activity, which are covered in TfL’s main consultation report.

2 Methodology

The Consultation

2.1 The consultation ran from 30 September to 23 December 2015. It was designed to enable TfL 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 TfL 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.

2.2 The objectives of the consultation were:

- To give stakeholders and the public the background to the regulations in question;
- To help TfL 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.

Who was consulted

2.3 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.

2.4 The initial list of organisations is attached as an Appendix to TfL’s full Consultation Report. Individuals and organisations were invited to pass the details on to other organisations.

Consultation material, distribution and publicity

2.5 TfL 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; and
- Informed readers of the other steps that TfL are taking to raise standards and improve enforcement.

This was published on the TfL consultation [website](#) in the form of a structured questionnaire. It was also available as a downloadable file in PDF format.

- 2.6 An email was sent to stakeholders informing them of the consultation, highlighting key issues being discussed, and including a link to the consultation web site. This information was also promoted on the TfL Taxi and Private Hire (TPH) Twitter feed (@TfLTPH), an email distribution list, and circulated to trade press contacts.
- 2.7 TfL invited people to respond by completing the questionnaire online through their 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.
- 2.8 The consultation asked 31 questions about the proposed regulations under 25 headings. Most of these consisted of a closed question ‘Do you support the above proposal’ followed by an open question ‘If you do not agree, please explain why’.
- 2.9 In addition, questions were asked in order to identify and classify respondents including name; email address; organisation (if any); any role in the taxi or private hire trade; how they heard about the consultation; and questions for equalities classifications. These identification and classification questions were not included in the downloadable document.
- 2.10 TfL representatives conducted briefings on the consultation at a number of events in order to encourage stakeholder responses. Attendees included:
- London Chamber of Commerce and Industry
 - Federation of Small Businesses (FSB)
 - Confederation of British Industry (CBI)
 - London First
 - London TravelWatch
 - Transport for all
 - Guide Dogs
 - Alzheimer’s Society
 - Royal National Institute of Blind People (RNIB)
 - Many London Business Improvement Districts (BIDs)
 - Student Union representatives
- 2.11 These events were principally to raise awareness and encourage participation in the consultation, although any substantive comments made at these briefings are incorporated in the Stakeholder section of TfL’s main consultation report.
- 2.12 There was considerable press coverage, particularly with the publication of a court verdict relating to the legality of some aspects of private hire operations, early in the consultation period. Stakeholders also publicised the consultation to encourage responses from customers and others that they felt would support their positions.

Analysis of Consultation Responses

Introduction

- 2.13 Almost 16,000 individuals and organisations responded, including 68 stakeholders, and there were over 210,000 representations from campaigns.
- 2.14 TfL commissioned Steer Davies Gleave to analyse and report on the 15,817 individual responses, excluding stakeholders. This analysis is presented in this report.

Analysis of responses

- 2.15 The responses from respondents who have answered the consultation questions, either through the online portal, by email or by post, have been analysed in this report. This includes 15,533 respondents through the online portal, 276 email respondents and 8 respondents who replied by post.
- 2.16 Table 2.1 sets out the number of responses received to the consultation by channel, excluding specified stakeholder responses.

Table 2.1: Responses received by respondent type and channel

	Online portal	Email	Post	Total
Number of responses	15,533	276	8	15,817
Share of responses	98.2%	1.7%	0.1%	100.0%

- 2.17 Chapter 3 of this report includes analysis of the profile of all respondents detailed in Table 2.1, a total of 15,817 respondents.
- 2.18 Chapter 4 of this report includes analysis of the responses to open and closed questions received through the online portal, by email and post, from a total of 15,817 respondents.
- 2.19 Code frames, which categorise and quantify responses to the open questions, have been developed. The open questions invited respondents to comment if they did not agree with a particular proposal. A separate codeframe, with themes and individual codes, was developed for each of the open questions, for example for Q1: Regulation - Current regulation is sufficient.
- 2.20 Following review of the code frames with TfL, it was agreed that all open responses which were unsupportive of the proposals, or where respondents were unsure of the proposals, would be coded. During the coding process it was necessary to add additional codes to the code frames as appropriate. Individual comments were coded to one or many of the codes within the code frame as relevant.
- 2.21 To ensure consistency between individuals' coding responses, the first 50 responses coded by each analyst were checked by the project manager. A random check of coding on 5% of the responses was also undertaken.
- 2.22 Copies of the code frames are available in [Appendix B](#).

Analysis of stakeholder responses

- 2.23 Responses from stakeholders were received via TfL's online consultation tool, by email and by letter. Stakeholder's responses were flagged and analysed separately by TfL and are not included in this report.

3 Profile of Respondents

Connection with the Private Hire or Taxi Trade

3.1 This chapter describes the profile of the respondents to the consultation. TfL asked respondents how they were connected to the private hire or taxi trade, with the following options:

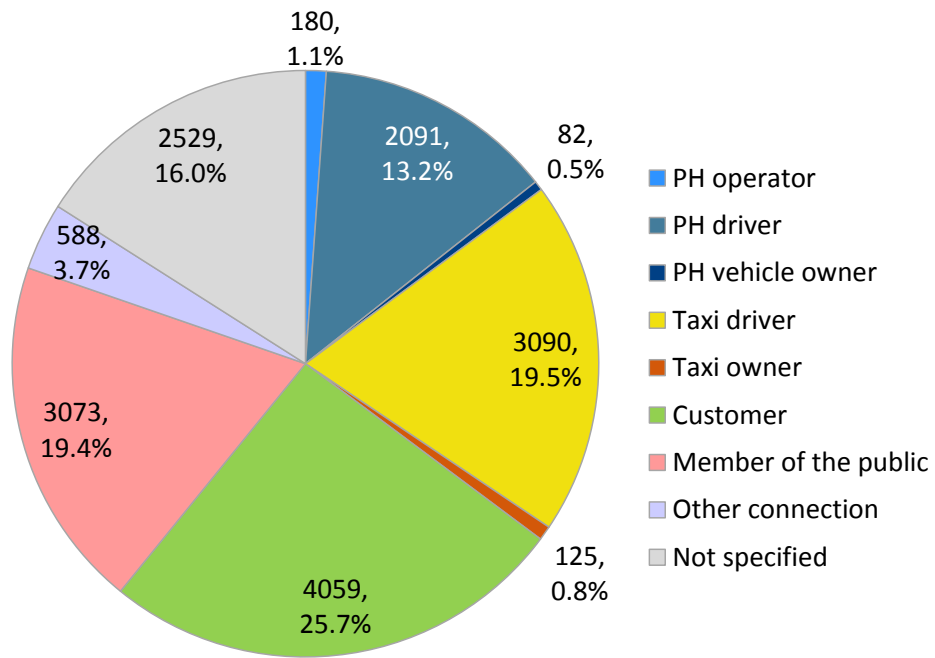
- Private hire operator;
- Private hire driver;
- Private hire vehicle owner;
- Taxi driver;
- Taxi owner;
- Customer;
- Member of the public; and
- Other connection with the taxi or private hire trade⁵.

3.2 Although this question allowed respondents to specify whether they were connected to the private hire or taxi trade, it was not compulsory and respondents were able to pick more than one option. We therefore used information provided in an accompanying open text box to allocate respondents to one of the eight types listed above. This process is described in more detail in [Appendix A](#).

3.3 Figure 3.1 shows the proportion of respondents by type. Private hire and taxi customers made up the highest proportion of respondents (26%). The second largest group of respondents were taxi drivers (20% of respondents), closely followed by members of the public (19% of respondents). It was not possible to identify the respondent type of 16% of respondents.

⁵ This category primarily included individuals with a close personal connection to someone who works in the taxi trade or private hire industry, for example the spouse of a taxi driver.

Figure 3.1: Respondent type



Sample size: 15,817

3.4 Figure 3.1 below sets out the number of respondents in each respondent type.

Table 3.1: Respondents answering consultation questions

Respondent Type	Number of respondents	Share of respondents
Private hire operator	180	1.1%
Private hire driver	2,091	13.2%
Private hire vehicle owner	82	0.5%
Taxi driver	3,090	19.5%
Taxi owner	125	0.8%
Customer	4,059	25.7%
Member of the public	3,073	19.4%
Other connection	588	3.7%
Not specified	2,529	16.0%
Total	15,817	100.0%

Demographic and Other Information

Gender

- 3.5 A breakdown of respondents' gender is shown in Table 3.2. The majority of respondents who replied to this question (over 65%) were male.

Table 3.2: Respondents' gender

Gender	Total	Proportion
Male	10,582	66.9%
Female	2,599	16.4%
Transgender Man	28	0.2%
Gender Neutral	19	0.1%
Transgender Woman	11	0.1%
Prefer not to say	467	3.0%
Not Answered	2,111	13.3%
Total	15,817	100.0%

Ethnicity

- 3.6 A breakdown of respondents' ethnicity is shown in Table 3.3. More than half of respondents (59%) were white.

Table 3.3: Respondents' ethnicity

Ethnic Group	Total	Proportion
White	9,376	59.3%
Asian/Asian British	1,075	6.8%
Black/African/Caribbean	424	2.7%
Mixed/Multiple Ethnic Group	237	1.5%
Other Ethnic Group	171	1.1%
Prefer not to say	1,020	6.4%
Not Answered	3,514	22.2%
Total	15,817	100.0%

Disability

- 3.7 A breakdown of whether respondents' considered themselves to have a disability is shown in Table 3.4. The majority of respondents (75%) did not consider themselves to have a disability, with one in seven respondents not answering the question.

Table 3.4: Whether respondents considered themselves to have a disability

Disability	Total	Proportion
Yes	390	2.5%
No	11,904	75.3%
Prefer not to say	1,167	7.4%
Not Answered	2,356	14.9%
Total	15,817	100.0%

Faith

- 3.8 A breakdown of respondents' faith is shown in Table 3.5. The largest proportion of respondents (29%) stated they were of no religion.

Table 3.5: Respondents' faith

Faith	Total	Proportion
No religion	4,514	28.5%
Christian	4,231	26.7%
Muslim	1,285	8.1%
Jewish	231	1.5%
Hindu	137	0.9%
Buddhist	88	0.6%
Sikh	58	0.4%
Other	235	1.5%
Prefer not to say	2,340	14.8%
Not Answered	2,698	17.1%
Total	15,817	100.0%

Sexual Orientation

- 3.9 A breakdown of respondents' sexual orientation is shown in Table 3.6. The majority of respondents (59%) were heterosexual, with 17% not answering the question.

Table 3.6: Respondents' sexual orientation

Sexual Orientation	Total	Proportion
Heterosexual	9,382	59.3%
Gay	552	3.5%
Bisexual	162	1.0%
Lesbian	42	0.3%
Other	143	0.9%
Prefer not to say	2,854	18.0%
Not Answered	2,682	17.0%
Total	15,817	100.0%

How Respondents Heard About the Consultation

- 3.10 Respondents were asked in a closed question how they heard about the consultation. Table 3.7 shows the coding of these responses. Over a third of respondents heard about the consultation through social media, four times as many as for the March consultation. Official TfL channels informed one in four respondents while traditional media (e.g. newspapers) informed one in six respondents about the consultation.

Table 3.7: How respondents heard about the consultation

Theme	Number of respondents	% of responses
Social media	5,549	35.1%
Read about in the press	2,572	16.3%
Received an email from TfL	2,151	13.6%
Saw it on the TfL website	949	6.0%
Received a letter from TfL	155	1.0%
Other	2,351	14.9%
Not answered	2,090	13.2%
Total	15,817	100.0%

4 Proposals

4.1 This chapter provides detail and analysis of the responses of 15,817 individual respondents who answered questions asked in the consultation (through Transport for London’s online consultation portal or via email). It excludes 68 stakeholder responses, which have been reported separately by TfL.

4.2 The questions asked in the online questionnaire were:

- Q1. Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking. Do you agree with this proposal?
- Q2. Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing. Do you agree with our proposal for a time delay between journey booking and commencement?
- Q3. Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing. Do you think that a different time interval to five minutes is appropriate?
- Q4. Operators will be required to seek TfL approval before changing their operating model. Do you agree with this proposal?
- Q7. Operator must offer a facility to pre-book up to seven days in advance. Do you agree with this proposal?
- Q8. In relation to the above proposal, do you consider a period other than seven days to be appropriate?
- Q9. TfL proposes to no longer issue licenses for in-venue operators or temporary events. Do you agree with this proposal?
- Q11. Operator must have a fixed landline telephone which must be available for passenger use at all times. Do you agree with this proposal?
- Q12. Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app. Do you agree with this proposal?
- Q13. Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis. Do you agree with this proposal?
- Q14. Operators must specify the fare prior to the booking being accepted. Do you agree with this proposal?
- Q15. Operators must record the main destination for each journey which must be specified at the time the booking is made. Do you agree with this proposal?
- Q16. Harmonise the retention period for records to be 12 months where it is currently 6. Do you agree with this proposal?
- Q17. Limit the number of business names attached to each Operator’s licence to five. Do you agree with this proposal?

- Q18. Specific requirement for drivers to be able to demonstrate they have sufficient knowledge of English language at an intermediate level. Do you agree with this proposal?
- Q20. A PHV driver must be registered to a licensed operator and may only be registered to a single operator at any time. Do you agree with this proposal?
- Q21. Driver and Operator licence applicants to provide National Insurance numbers and share with Department for Work and Pensions (DWP). Do you agree with this proposal?
- Q22. Where a licensed driver has their driver’s licence revoked, and that driver is the owner of a licensed vehicle, we propose to also revoke the vehicle licence. Do you agree with this proposal?
- Q23. We will seek to add operator staff to the DBS list and amend the Regulations accordingly. Do you agree with this proposal?
- Q24. From 1 April 2016 TfL will no longer accept cheques or postal orders as payment. Do you agree with this proposal?
- Q25. Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence. Do you agree with this proposal?
- Q26. Drivers Regulations to be amended to the effect that private hire drivers must carry a copy of their insurance documents at all times. Do you agree with this proposal?
- Q27. If you agree with the proposal above, should the driver be required to display the insurance in the vehicle?
- Q28. Do you agree that Hire and Reward fleet insurance put in place by operators is necessary in addition to, or instead of, individual driver insurance cover?
- Q29. TfL will review the current operator licence type and look to introduce additional category/categories. Do you agree with this proposal?
- Q30. We intend to explore measures to ensure that private hire vehicles cannot be used for ridesharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers. Do you agree with this proposal?
- Q31. We are proposing a small change to Regulation 8 of the Vehicle Regulations which will clarify that advertising displayed “from” as well as “on” a vehicle is subject to the controls set out in that Regulation. Do you agree with this proposal?

4.3 In the sections which follow we detail the responses to each of the closed questions⁶, split by respondent type, followed by analysis of the related open question/s.

4.4 In each of the tables that detail the open responses, major themes are shown in the first column and key codes within each theme (those with a high number of responses) are shown in the next column. For each theme and key code the number of respondents and share of respondents who provided these comments is detailed. If a respondent made more than one comment they are counted multiple times.

4.5 A complete list of the themes, and more detailed codes for each question, can be found in **Appendix B**.

⁶ In the closed question graphs, percentages may not total 100% due to rounding.

Part I: Private Hire Operators

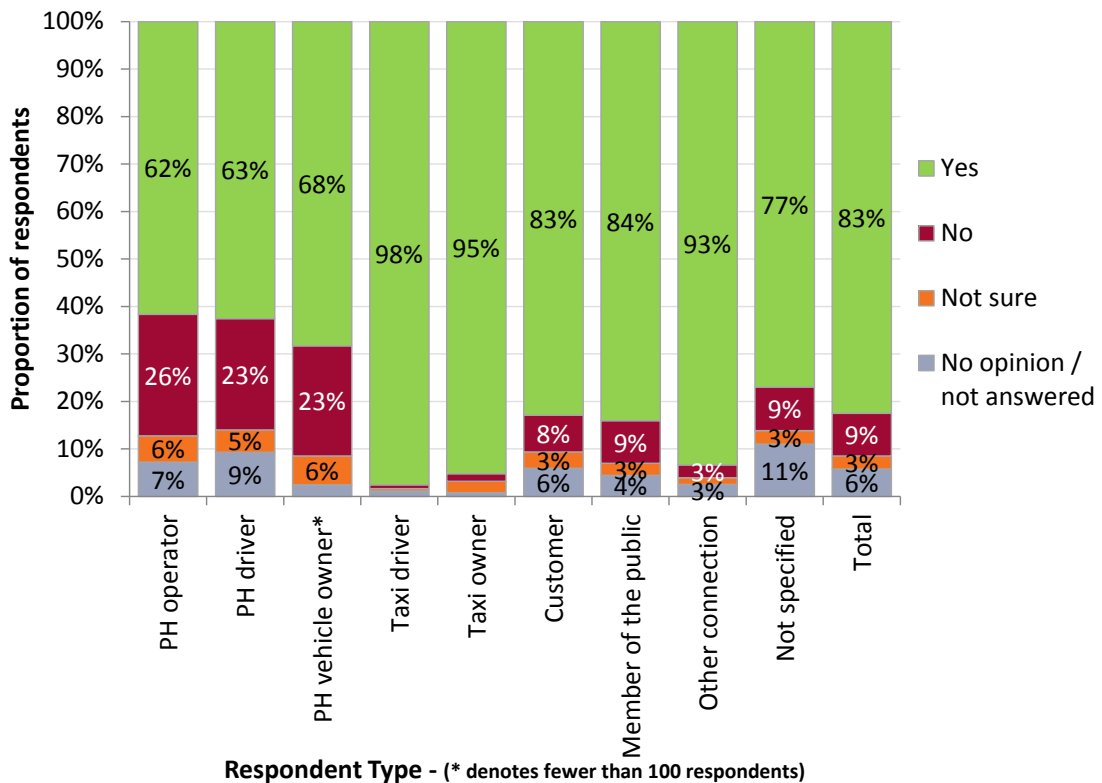
Q1. Booking Confirmation – Driver and Vehicle Details

4.6 The March 2015 consultation asked if passengers should be provided with driver and vehicle details prior to the commencement of a journey. The proposal was strongly supported by consultees. In this consultation, respondents were asked whether they agreed with the following proposal:

We propose amendments to the PHV Regulations to the effect that operators must provide driver and vehicle identification in advance of the journey commencing. Photographic evidence for the driver must be provided if the customer has provided a means by which such information can be transmitted.

4.7 Overall, 83% of respondents agreed with the proposal, as shown in Figure 4.1. Whilst taxi drivers and taxi owners were most likely to agree with the proposal and private hire operators/drivers were most likely to disagree with the proposal, the majority of respondents within all groups agreed with the proposal.

Figure 4.1: Do you agree with the proposal that operators must provide driver and vehicle identification in advance of the journey commencing?



4.8 Table 4.1 shows a summary of the open responses received to this question from respondents who disagreed with, or were not sure about, the proposal.

Table 4.1: Open responses from respondents who disagreed with, or were not sure about, the proposal that operators must provide driver and vehicle identification in advance of the journey commencing

Theme	Key Codes	Number of respondents	% of respondents
Regulation		361	29.6%
	<i>Current regulation is sufficient</i>	173	14.2%
Market/Competition		344	28.2%
	<i>Prevents fair competition</i>	133	10.9%
	<i>Higher costs/time for consumer/company</i>	117	9.6%
Unnecessary		222	18.2%
	<i>Information already provided by operators</i>	135	11.1%
Safety		168	13.8%
	<i>Risk for drivers e.g. discrimination, misuse, privacy</i>	111	9.1%
Detail		149	12.2%
	<i>No photo – other information is more useful e.g. make and model of car, driver's phone number, customer reviews</i>	129	10.6%
<i>Not answered</i>		252	20.6%
Total number of respondents (who disagreed with, or were not sure about the proposals)		1,221	

Regulation

4.9 Respondents' most common sentiment was that current regulations were sufficient, as mentioned by 14% of respondents.

Market/Competition

4.10 More than a quarter of respondents mentioned that the proposal would have an adverse effect on the private hire and taxi market. In particular, respondents were concerned that the proposal prevented fair competition by placing a burden on private hire drivers and operators. Ten percent of respondents also mentioned the financial and administrative costs of the proposal, with some concerned that these costs would be passed on to passengers.

Unnecessary

4.11 Eleven percent of respondents considered the proposal to be unnecessary as the information discussed in the proposal is already provided by some operators.

Safety

4.12 Approximately one in ten respondents were concerned that providing a driver's details, particularly their photograph, to customers could result in racial stereotyping or misuse of personal/identifiable information.

Detail

4.13 A number of respondents commented on the specific detail of the proposal and in particular, one in ten disagreed with the requirement for a photo to be provided, stating that other

information is more useful to customers including the make and model of the car they will be travelling in, the driver’s phone number and other customers’ reviews.

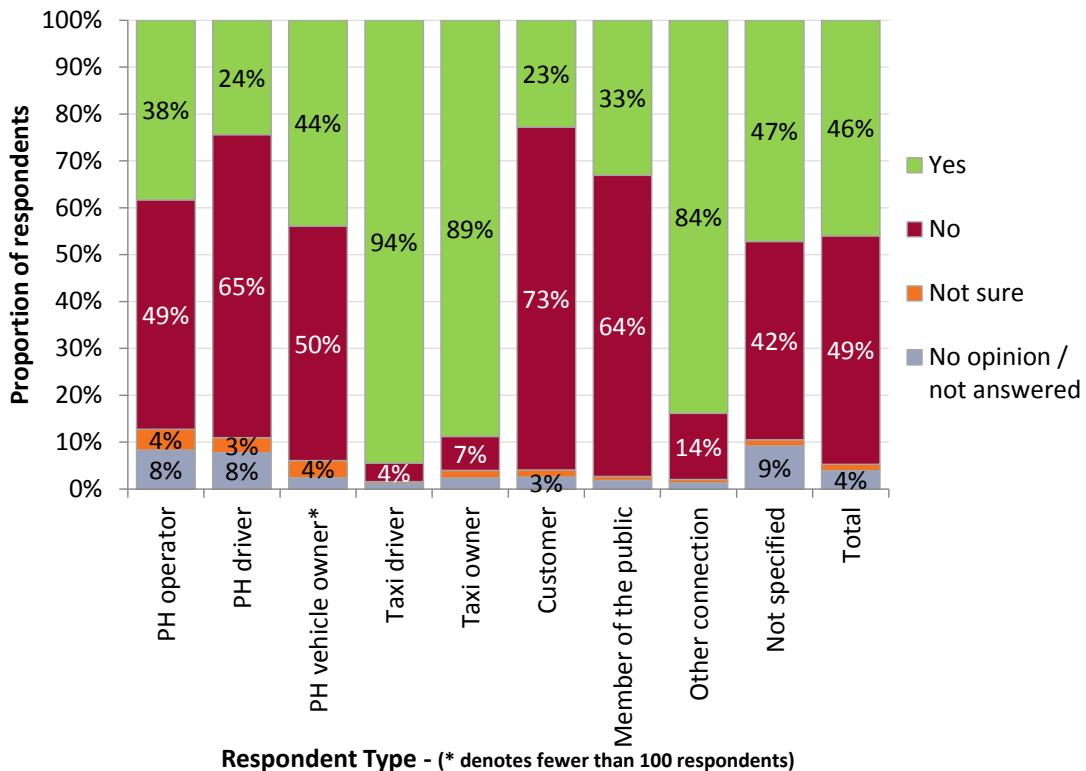
Q2. Booking Confirmation – Five Minute Interval

4.14 In the previous consultation, a number of consultees suggested that booking confirmation details (including the vehicle and driver information set out above) should be provided to the passenger a minimum set period prior to commencement of the journey. In this consultation, respondents were asked whether they agreed with the following proposal:

We propose changes to the PHV Regulations that will require operators to ensure that there is a time interval between a booking being accepted and the commencement of that journey to allow the driver and vehicle information to be communicated to passengers. It is proposed that the specified time interval is **five minutes**.

4.15 Figure 4.2 shows that the proportion of respondents disagreeing with a time delay between journey booking and commencement (49%) was marginally greater than those agreeing with the proposal (46%). Taxi and private hire customers were most likely to disagree with the proposal whilst nine in ten taxi drivers and taxi owners agreed with the proposal.

Figure 4.2: Do you agree with the proposal for a time delay between journey booking and commencement?



4.16 Table 4.2 shows a summary of the open responses received to this question from respondents who disagreed with, or were not sure about, the proposal.

Table 4.2: Open responses from respondents who disagreed with, or were not sure about, the proposal for a time delay between journey booking and commencement

Theme	Key Codes	Number of respondents	% of respondents
Passenger		2,883	42.9%
	<i>Inconvenient/less choice/wasted time for passengers/delayed journey</i>	1,838	27.3%
	<i>Desire for PHV on demand/instantly/emergency</i>	1,271	18.9%
Market/Competition		2,113	31.4%
	<i>Penalises app-based/PHV companies/anti-competitive/protects Taxis</i>	1,178	17.5%
	<i>Inconvenient/wasted time/financial loss to PHV businesses/inefficient</i>	511	7.6%
	<i>Shouldn't hold back progress/technology/backward step</i>	424	6.3%
	<i>Passenger to confirm driver/vehicle is who/what it's supposed to be</i>	135	2.0%
Unnecessary		1,418	21.1%
	<i>Disagreement/Unnecessary intervention/No benefit</i>	1,329	19.8%
Detail		1,267	18.8%
	<i>Details should/can be sent ahead of journey commencing (as per Q1)</i>	991	14.7%
	<i>Wait time should be greater than 5 mins</i>	137	2.0%
	<i>Wait time should be less than 5 mins</i>	117	1.7%
Regulation		1,206	17.9%
	<i>Over regulation/anti-competitive/problem that doesn't exist/nanny state</i>	486	7.2%
	<i>Flawed/no justification/logic for implementation/lack of evidence</i>	401	6.0%
Environment		260	3.9%
	<i>Taxis shouldn't be treated differently</i>	260	3.9%
		363	5.4%
Environment	<i>Increased idling/congestion/pollution/delays because of additional waiting</i>	360	5.4%
		126	1.9%
Not answered		126	1.9%
Total number of respondents (who disagreed with, or were not sure about the proposals)		6,726	

Passenger

- 4.17 The most common sentiment was around the general inconvenience for passengers with 27% of respondents raising this as an issue. Almost one in five respondents noted that there is a desire to be able to access services on-demand, such as in the event of an emergency.

Market/Competition

- 4.18 Almost a third of respondents mentioned that the proposal would have an impact on the private hire and taxi market. In particular, respondents felt this particular proposal would unfairly penalise the private hire market with around one in thirteen suggesting that it would result in financial loss to drivers and a similar proportion concerned that technological progress would be held back unnecessarily.

Unnecessary

4.19 One fifth of respondents felt that that this intervention was unnecessary and had no benefits.

Detail

4.20 One in seven respondents referenced the prior questions suggesting that, if sufficient details are sent prior to the journey started, the proposal is unnecessary. A smaller proportion of respondents suggested alternative periods of time.

Regulation

4.21 Approximately 7% of those who responded felt that this proposal was trying to account for a problem that didn't exist, creating an anti-competitive environment. A further 6% felt that the logic behind the implementation of the five minute rule was flawed and sighted a lack of evidence for their disagreement. A minority of respondents stated that there needed to be a general increase in regulation and associated enforcement.

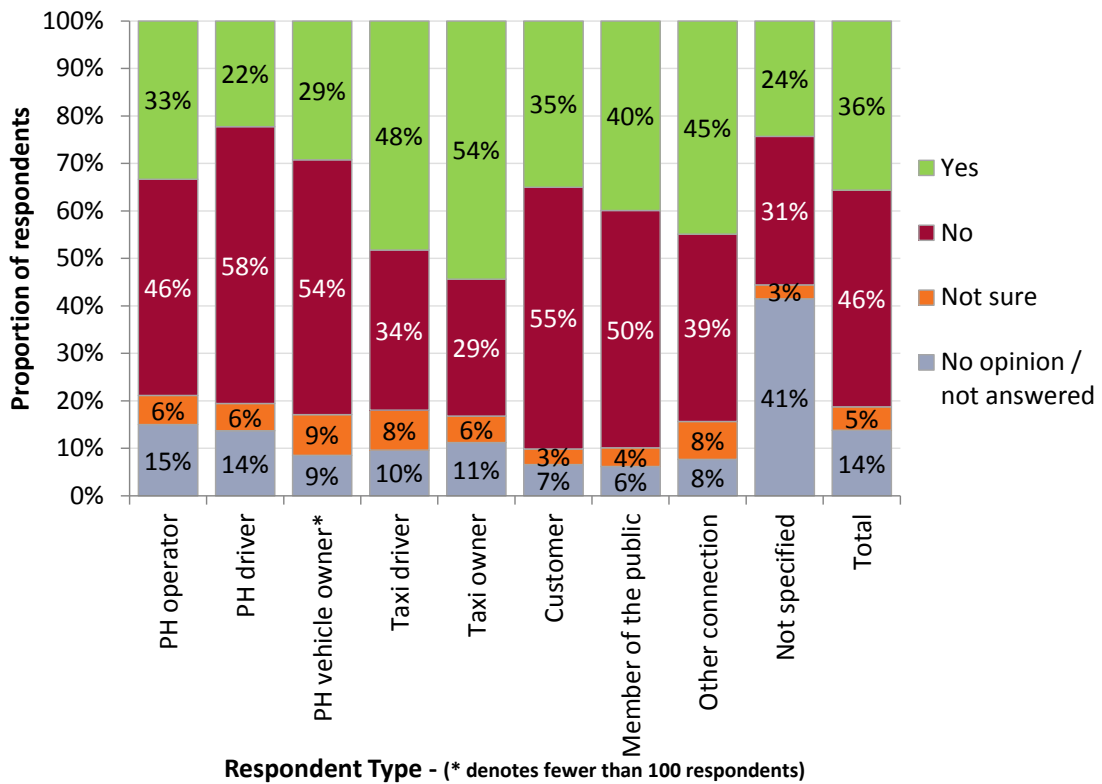
Environment

4.22 One in twenty respondents suggested that there would be an increase in pollution levels as the implementation of this particular policy would result in more vehicle idling.

Q3. Booking Confirmation – Alternative Interval

4.23 Respondents were asked if they thought that an alternative interval to five minutes was appropriate. Figure 4.3 shows that 36% of respondents agreed that a different interval to five minutes was appropriate: taxi owners were the most likely to think so whilst private hire drivers were least likely.

Figure 4.3: Do you think that a different time interval to five minutes is appropriate?



4.24 Table 4.3 shows a summary of the open responses received to this question from respondents who disagreed with, or were not sure about, the proposal.

Table 4.3: Open responses from respondents who agreed that a different time interval to five minutes is appropriate, including reasons why and suggestions for alternative time intervals

Theme	Key Codes	Number of respondents	% of respondents
Time period/interval		4,396	88.4%
	<i>No interval</i>	3,631	73.0%
	<i>Less than 5 minutes</i>	583	11.7%
	<i>More than 5 minutes</i>	157	3.2%
Detail		728	14.6%
	<i>Journey should be allowed once information exchange is complete/car is available/correct car identified</i>	688	13.8%
Safety		292	5.9%
	<i>Longer passenger dwell times do not pose risk to passenger safety</i>	120	2.4%
Market/Competition		259	5.2%
	<i>Attempt to stifle competition/bias toward Taxis</i>	184	3.7%
Technology	<i>Legislation should not hold back recent advances in technology which have made the pre-booking process faster/more efficient</i>	156	3.1%
Other		101	2.0%
Not answered		106	3.1%
Total number of respondents (who disagreed with, or were not sure about the proposals)		4,972	

Time period/interval

4.25 Nearly three quarters of respondents felt that there should be no time interval at all, with one in ten suggesting that it should be less than 5 minutes, and less than one in thirty suggesting a wait of longer than 5 minutes.

Detail

4.26 Approximately 14% of respondents felt that a journey should commence as soon as the information exchange has been completed.

Safety

4.27 One in fifty consultees suggested that a longer passenger dwell time wouldn't pose a particular risk to passenger safety whilst a number of people suggested that a longer time wouldn't reduce the risk of a passenger getting into the incorrect vehicle.

Market/Competition

4.28 A small proportion of respondents (4%) saw proposals as an attempt to stifle competition within the industry with some people suggesting that there needs to be more distinction between private hire vehicles and taxis.

Technology

- 4.29 Approximately 3% of people who responded said that legislation shouldn't hold back recent technological advancements, which have made the pre-booking process more efficient.

Other

- 4.30 A wide variety of sentiment was captured with small numbers of people suggesting that this proposal would allow for genuine pre-booking of private hire, others concerned that the waits would cause confusion and some suggesting that delays are damaging to the economy.

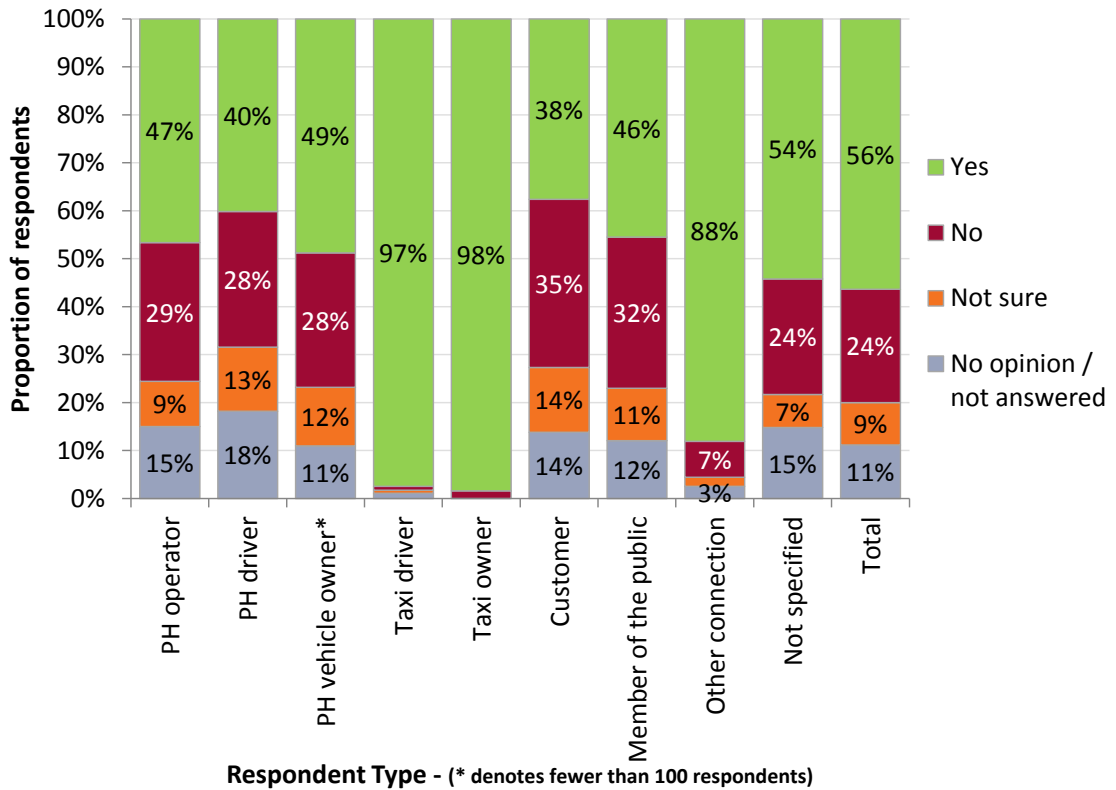
Q4. Seeking TfL Approval Before Changing Operating Model

- 4.31 In the consultation, TfL propose to place a specific obligation on operators to inform them of changes to specified aspects of their operating model prior to implementing those changes. By requiring operators to provide them with information of these operating model changes prior to them being implemented, TfL would be able to determine whether the new operating model is compliant with private hire legislation and in the interests of passenger safety. In this consultation, respondents were therefore asked whether they agreed with the following proposal:

We propose to amend the PHV Regulations to require operators to inform TfL prior to implementing specified changes to their operating model.

- 4.32 Figure 4.4 shows that that more respondents (56%) agreed with the requirement to inform TfL prior to implementing changes to operating models, than disagreed. Taxi drivers and taxi owners were most likely to agree with the proposal whilst customers were most likely to disagree.

Figure 4.4: Do you agree with the proposal requiring operators to inform TfL prior to implementing specific changes to their operating model?



4.33 Table 4.4 shows a summary of the open responses received to this question from respondents who disagreed with, or were not sure about, the proposal.

Table 4.4: Open responses from respondents who disagreed with, or were not sure about, the proposal requiring operators to inform TfL prior to implementing specific changes to their operating model

Theme	Key Codes	Number of respondents	% of respondents
Market/Competition		1,605	48.1%
	<i>Discourages innovation/progress/ stagnation in innovation/restrictive/depends how much this will hamper innovation</i>	734	22.0%
	<i>Private Hire operators should be free to make business decisions without added regulation</i>	384	11.5%
	<i>Allow market forces to win out/customers can make their own choices</i>	296	8.9%
	<i>Stifles competition/anti-competitive</i>	276	8.3%
	<i>Taxi protection/protectionism</i>	199	6.0%
	<i>Prevents better service for London/limits options for users</i>	156	4.7%
Regulation		1,024	30.7%
	<i>Needless bureaucracy/Over-regulation/Interventionist</i>	612	18.3%
	<i>TfL shouldn't have a say/shouldn't get involved/ TfL have an invested interest</i>	219	6.6%

Theme	Key Codes	Number of respondents	% of respondents
Alternative/Suggestion		320	9.6%
	<i>Only required if they are in breach of requirements</i>	215	6.4%
Detail		296	8.9%
	<i>TfL must turn applications around promptly and fairly/in a specified timeframe</i>	104	3.1%
Unnecessary		289	8.7%
	<i>Unnecessary/pointless</i>	166	5.0%
	<i>The current licence process is sufficient/works well at the moment</i>	112	3.4%
Technology		224	6.7%
	<i>They should be allowed to keep up with recent technology</i>	204	6.1%
Impact	<i>Will cause unnecessary delays/ waste of time/ over complicates the system</i>	206	6.2%
Cost		160	4.8%
Passenger	<i>No benefits for the consumer/ loss of customer service/experience</i>	156	4.7%
Question misleading/unclear		144	4.3%
	<i>Proposal/question is too vague</i>	142	4.3%
Not answered		183	5.5%
Total number of respondents (who disagreed with, or were not sure about the proposals)		3,337	

Market/Competition

- 4.34 Respondents were particularly concerned with the impacts of this proposal on the industry with over a fifth suggesting that this will discourage innovation and one in ten suggesting that private hire operators should be free to make decisions without additional regulation. Approximately 9% of respondents felt that the market should be left to determine which operating models succeed whilst a number of respondents thought that the proposal threatened to stifle competition and was an effort to protect the taxi trade.

Regulation

- 4.35 Almost a fifth of respondents felt that this proposal was needlessly bureaucratic with one in fifteen suggesting that TfL shouldn't be involved in the process as they have a vested interest. A small proportion of people suggested that it was government policy to reduce regulations whilst others said they felt that the current regulations were outdated.

Alternative/Suggestion

- 4.36 Approximately 6% of respondents felt that an operator should only need to notify TfL of a change if there is a breach of requirements with others suggesting that this should occur if there is a breach of requirements. Some suggested that it was reasonable to allow operators to begin working to the new model whilst the approval process occurs.

Detail

- 4.37 Around one in thirty respondents said that TfL should ensure that any applications should be turned around within agreed timescales and a similar proportion suggested that a consistent set of requirements should be identified.

Unnecessary

- 4.38 One in twenty respondents felt that this proposal was either unnecessary or pointless, with a smaller proportion suggesting that the current process is sufficient.

Technology

- 4.39 Approximately 6% of those who responded said that operators should be allowed to keep up with changes in technology.

Impact

- 4.40 One in sixteen people felt that this would over complicate the system and inevitably waste time and cause unnecessary delays.

Cost

- 4.41 For those who referenced cost, sentiment was around unnecessary expense for operators, with concern that these would be passed onto the customer.

Passenger

- 4.42 One in twenty respondents suggest that the passenger would see no benefit to the change and it would result in poorer service overall.

Q5. Security of App Based Booking Platforms

- 4.43 To prevent unauthorised use of app based booking systems, in the consultation TfL propose to make it a requirement that app based platforms have, and can demonstrate during pre-licensing checks and compliance inspections, appropriate security measures to prevent the app being used by a person other than the licensed driver they are allocating bookings to.
- 4.44 Rather than asking respondents to state their agreement with a specific proposal, respondents were instead asked for their views on the security of app based platforms (Q5) and whether there is sufficient technology available to achieve this (Q6).
- 4.45 Table 4.5 shows popular responses to Question 5.

Table 4.5: What are your views on ensuring that app based platforms are secure and do not allow passenger or driver fraud?

Theme	Key Codes	Number of respondents	% of respondents
Agreement		6,928	55.0%
	<i>Agreement, no further comment</i>	3,825	30.4%
	<i>It will help ensure safety of passengers (and drivers)</i>	2,373	18.8%
	<i>To prevent fraud/data protection/driver fraud</i>	2,134	16.9%

Theme	Key Codes	Number of respondents	% of respondents
Disagreement		1,325	10.5%
	<i>Adequate security already /Proposals from Q1 (photo/registration given to passenger) are adequate</i>	1,091	8.7%
	<i>Not effective/can never be 100% secure</i>	146	1.2%
	<i>Not feasible to implement/too much money</i>	108	0.9%
Query/Concern		854	6.8%
	<i>Will be difficult to implement/will be inefficient/add cost/stifle innovation/mustn't happen while driver is driving/vaguely worded</i>	521	4.1%
	<i>Is fraud/security really an issue/evidence?</i>	167	1.3%
	<i>Why is this only directed at app based platforms?</i>	153	1.2%
Regulation		778	6.2%
	<i>Taxis/PHV should have the same rules</i>	608	4.8%
	<i>Not within jurisdiction of TfL/Not TfL place to implement</i>	132	1.0%
Alternative/Suggestion		659	5.2%
	<i>Licence, traffic offences checks/only licensed drivers/background checks/One driver to one car</i>	285	2.3%
	<i>Different security check suggestion/ third party regulation/reporting irregularities to TfL</i>	183	1.5%
	<i>CRB Checks/police checks for all drivers/spot checks</i>	167	1.3%
	<i>Login with password/PIN is sufficient</i>	114	0.9%
Technology		659	5.2%
	<i>Periodical facial recognition/finger-print/periodical re-logging/occasional checks</i>	433	3.4%
	<i>Apps are equally/more secure than non-app systems</i>	227	1.8%
Enforcement		397	3.2%
	<i>Penalties for not abiding by conditions of use</i>	298	2.4%
Market/Competition		261	2.1%
	<i>Apps will be effectively self-regulated by users and/or app companies/ customer reviews/down to the operator to regulate</i>	245	1.9%
Unnecessary	<i>Unnecessary bureaucracy</i>	236	1.9%
Detail		230	1.8%
	<i>Fingerprint/facial recognition is excessive/not mature enough yet/difficult to implement/too expensive</i>	164	1.3%
Data security/privacy	<i>App based platforms not safe</i>	167	1.3%
Other		124	1.0%
<i>Not Answered</i>		1,177	9.3%
Total number of respondents (who disagreed with, or were not sure about the proposals)		12,601	

Agreement

- 4.46 Almost a third of respondents agreed with the proposal but offered no further comment whilst around a fifth of respondents agreed that this proposal would help ensure the safety of both passengers and drivers. A similar proportion was in favour of the proposal and its potential to tackle fraudulent activity.

Disagreement

- 4.47 One in ten respondents disagreed with this particular proposal with 9% stating that there is already adequate security and this would be enhanced with the introduction of the proposal in Question 1. A small proportion of respondents argued that you can never guarantee total security.

Query/Concern

- 4.48 Approximately 4% of respondents felt that this proposal would be difficult to implement, add cost and stifle innovation. A similar proportion queried why this particular proposal was only being directed at app based platforms.

Regulation

- 4.49 Just over 6% of respondents commented on the regulations with most of the comments in this category suggesting that the same rules should apply to both taxis and private hire and others suggesting that it isn't TfL's place to implement such a proposal.

Alternative/Suggestion

- 4.50 One in twenty respondents suggested an alternative approach which included traffic offence checks, CRB checks and spot checks by the police. Others felt that this should be regulated by a third party and not TfL.

Technology

- 4.51 Around one in thirty respondents suggested that there should be some degree of biometric authentication, such as facial recognition or fingerprints, and this should be refreshed periodically. Just under 2% of respondents felt that app-based platforms are inherently more secure than non-app systems.

Enforcement

- 4.52 Approximately 2% of those who responded suggested that there should be penalties for operators who are not abiding by the conditions of use, with others highlighting the need for tighter regulation.

Market/Competition

- 4.53 Sentiment in this theme was mostly around letting the markets decide the most appropriate methods to combat driver fraud. Roughly 2% of respondents felt that apps would be largely self-regulated by users and their reviews.

Unnecessary

- 4.54 One in fifty respondents felt that such an intervention would be unnecessarily bureaucratic.

Detail

- 4.55 Of respondents commenting on the detail of the question, 1% felt that current biometric technologies were not yet mature enough and would therefore be expensive and problematic to implement. A small proportion of respondents said that whatever is implemented shouldn't slow down the system unnecessarily.

Data security/privacy

- 4.56 Just over 1% of people who responded suggested that app-based platforms are not safe with some sighting personal experience account hacking or hearing about different drivers sharing the same account.

Q6. Technology for Securing App Based Booking Platforms

- 4.57 Table 4.6 shows popular responses to Question 6.

Table 4.6: Do you believe that there is sufficient technology available to achieve this and if so what technology do you believe we should consider?

Theme	Key Codes	Number of respondents	% of respondents
Technological capability		4,354	42.3%
	<i>Technology sufficient</i>	3,265	31.7%
	<i>Technology insufficient/unreliable/evolves quickly</i>	998	9.7%
	<i>Biometrics/technology can be bypassed/fooled</i>	123	1.2%
Biometrics		2,349	22.8%
	<i>Biometric technology such as fingerprint</i>	2,113	20.5%
	<i>Biometric technology such as facial recognition</i>	613	6.0%
	<i>Biometric technology such as eye scan</i>	115	1.1%
	<i>Biometric general/other</i>	102	1.0%
Regulation		939	9.1%
	<i>Not for TfL to regulate</i>	169	1.6%
	<i>Should be equally applied to both Taxis and PHV</i>	142	1.4%
	<i>App/technology responsibility of operator/app developer</i>	123	1.2%
	<i>For TfL to regulate/consider/approve</i>	122	1.2%
	<i>Other industry-standard checks</i>	122	1.2%
	<i>Better/tighter regulation/fines for non-compliance</i>	109	1.1%
	<i>Independent verification</i>	107	1.0%
Other		820	8.0%
	<i>All/any/latest technologies to be considered</i>	269	2.6%
	<i>TfL or other authority to hold database of drivers/journeys/other metrics</i>	101	1.0%
Cost	<i>Concerns about costs for operators/costs passed on to consumers</i>	301	2.9%
Unnecessary	<i>Not required/unnecessary</i>	235	2.3%
Data security/privacy		169	1.6%
	<i>Authentication/encryption/data security considerations</i>	159	1.5%

Theme	Key Codes	Number of respondents	% of respondents
Enforcement	Law enforcement/checks e.g. police, TfL, company	117	1.1%
Not answered		1,578	15.3%
Total number of respondents (who disagreed with, or were not sure about the proposals)		10,293	

Technological capability

- 4.58 Almost a third of respondents (32%) stated that they thought there was sufficient technology available to ensure that app-based platforms are secure and do not allow passenger or driver fraud, in comparison with 10% of respondents who did not.

Biometrics

- 4.59 One in five respondents mentioned some form of biometric technology as a method of ensuring security and limiting fraud. The most commonly noted forms were fingerprint scans (21%), facial recognition (6%) and eye/iris scans (1%).

Regulation

- 4.60 The most common response under the Regulation theme was that TfL should not be seeking to regulate this aspect of the industry (2%). Nonetheless, 1% of respondents did think that TfL should regulate this technology and 1% felt there should be tighter regulation and/or fines for non-compliance.

Other

- 4.61 Approximately 3% of respondents stated that all available technologies should be considered by TfL when looking to secure app-based platforms.

Cost

- 4.62 Some respondents (3%) expressed concern about the potential costs of requiring operators to have specific technology in place in relation to this proposal.

Data security/privacy

- 4.63 Roughly one in fifty respondents discussed data security/privacy, particularly in relation to the encryption of personal information used for authentication.

Enforcement

- 4.64 Approximately 1% of respondents commented that security and fraud can be monitored by law enforcement agencies, TfL and other parties in addition to, or instead of, the proposed technologies.

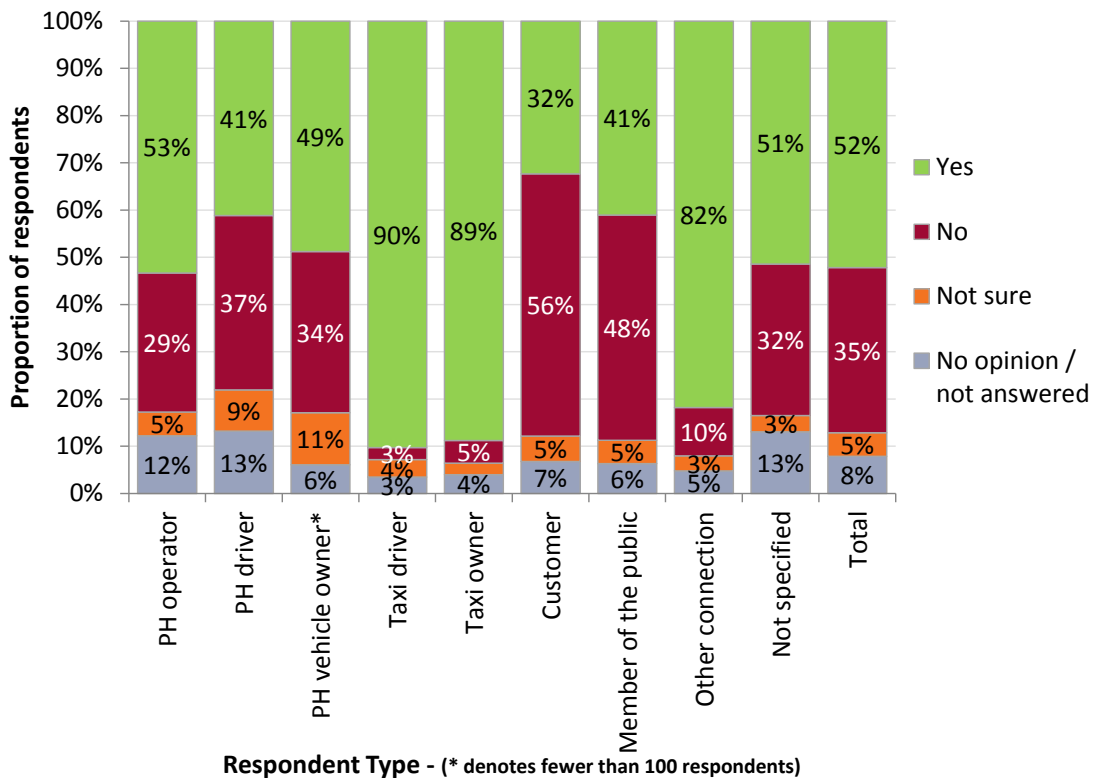
Q7. Pre-Booking Facility up to 7 Days in Advance

4.65 In the previous consultation, a number of consultees suggested that an essential part of a private hire operator’s role is to offer the facility to accept advance bookings. Whilst there is currently no requirement for operators to offer an advance booking facility for a specified period, Tfl’s view is that it is reasonable to expect a private hire operator to offer such a facility. In this consultation, respondents were therefore asked whether they agreed with the following proposal:

We propose to amend the PHV Regulations to require licensed operators to offer the facility for customers to book a journey up to seven days in advance of that journey.

4.66 The chart in Figure 4.5 shows that overall just over half of respondents agreed with the proposal requiring operators to offer customers the option to book a journey up to seven days in advance. Taxi drivers and taxi owners were most likely to agree with the proposal whilst customers were most likely to disagree, with more than half of customers (56%) disagreeing with the proposal.

Figure 4.5: Do you agree with the proposal requiring operators to offer customers the option to book a journey up to seven days in advance?



4.67 Table 4.7 shows a summary of the open responses received to this question from respondents who disagreed with, or were not sure about, the proposal.

Table 4.7: Open responses from respondents who disagreed with, or were not sure about, the proposal requiring operators to offer customers the option to book a journey up to seven days in advance

Theme	Key Codes	Number of respondents	% of respondents
Unnecessary		2,554	50.2%
	<i>This proposal is pointless/unnecessary</i>	1,531	30.2%
	<i>A number of operators already offer this service in London</i>	857	16.9%
	<i>It is not necessary/shouldn't be mandatory for all operators to offer advance bookings</i>	500	9.9%
	<i>Taxis and PHVs are widely available so pre-booking is unnecessary</i>	235	4.6%
	<i>Customers very rarely need to book a taxi seven days in advance</i>	120	2.4%
	Market/Competition		2,497
<i>Let the market drive change - if there is demand for this service then operators will naturally offer it</i>		865	17.1%
<i>Consumers can choose a company based on the services they offer</i>		673	13.3%
<i>This proposal unfairly targets real time transport operators such as Uber</i>		396	7.8%
<i>Operators have different business models catering to different audiences</i>		372	7.3%
<i>This proposal is anti-competitive</i>		353	7.0%
<i>This proposal punishes certain business models</i>		171	3.4%
<i>There is no evidence that there is an underserved customer need for advance bookings</i>		127	2.5%
<i>Taxis don't have to offer this so PHVs shouldn't either</i>		125	2.5%
<i>Forcing this upon operators will discourage innovation and efficient services</i>		117	2.3%
<i>Many other industries do not take advance bookings, taxi companies shouldn't have to either</i>		114	2.3%
Regulation			2,378
	<i>Operators should be free to choose their own business model - pre-booking should be optional not be mandatory</i>	2,265	44.7%
Passenger		549	10.8%
	<i>Reduces passenger choice and flexibility - people want on-demand services</i>	393	7.8%
	<i>This offers no/little benefit to consumers</i>	157	3.1%
Impact		381	7.5%
	<i>Adds further burden to operators (admin, IT, staffing, costs, fuel consumption, waiting times, longer driver journeys)</i>	207	4.1%
Time period/interval		145	2.9%
Driver/Operator	Restricts the flexible working patterns of PHV drivers	133	2.6%
Cost	Consumers would have to pay increased prices overall to cover the fixed costs of taking advance bookings	118	2.3%

Theme	Key Codes	Number of respondents	% of respondents
<i>Not answered</i>		70	1.4%
Total number of respondents (who disagreed with, or were not sure about the proposals)		5,063	

Unnecessary

- 4.68 Half of those who responded suggested that the proposal was generally unnecessary, with other comments highlighting that a number of operators already provide this option in London, that it shouldn't be mandatory for all operators to offer a pre-booking facility and some suggesting that very few people have the need to book seven days in advance.

Market/Competition

- 4.69 Almost half of respondents (49%) mentioned markets and competition with people suggesting that the market should be the driver of change (17%) and that it is down to customers to choose which service they would like to use (13%). Others suggested that the proposal was anti-competitive (7%), penalised certain business models (3%) and that imposing such a proposal would discourage innovation and efficient services (2%).

Regulation

- 4.70 Over two fifths of respondents were of the opinion that operators should be free to choose their own business model, with pre-booking optional rather than mandatory. A small proportion of respondents felt that this proposal does not have safety implications and therefore there is no requirement for it to be mandated by law.

Passenger

- 4.71 Roughly 8% of respondents felt that implementing the proposal would reduce both passenger choice and flexibility (particularly with respect to on-demand services), with a further 3% suggesting that it would offer little, or no benefit to passengers.

Impact

- 4.72 Of respondents commenting on the potential impacts of the implementation, 4% suggested that it would add further burden to operators from administrative, IT and cost perspectives. Roughly 2% of respondents thought that there would be an increase in cancellations, which would then cause wider serviced delays and 1% felt that this proposal would have a disproportionate impact on smaller operators with a limited number vehicles.

Time period/interval

- 4.73 Approximately 3% of respondents commented specifically on the time period proposed with some suggesting that seven days was too long, others proposing alternatives and a smaller proportion saying it should be seven days or greater.

Driver/Operator

- 4.74 Some respondents (3%) thought that this proposal would place restrictions on the flexible working patterns of private hire drivers with some noting that this flexibility was a reason for the decision to become a driver in the first place.

Cost

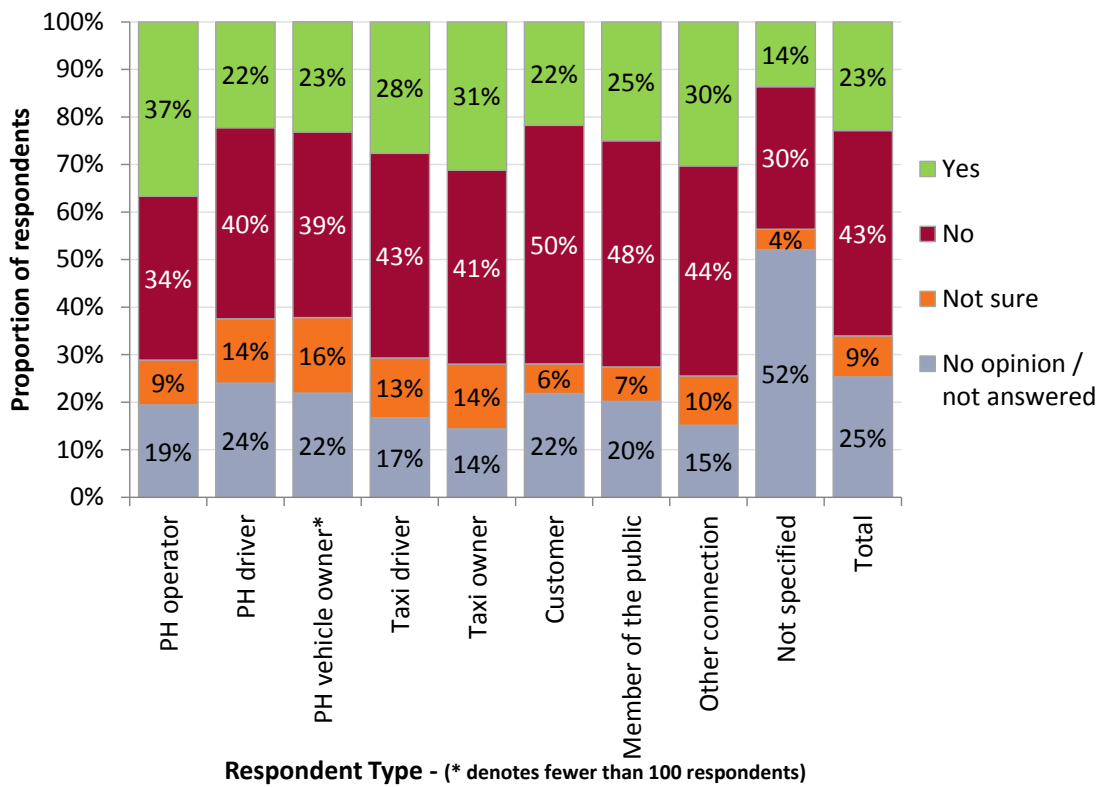
4.75 Just over 2% of those who responded believed that customers would end up paying more money for their journeys to cover the costs of operators having to offer advanced bookings. Some suggested that if it was introduced, there should be a premium for pre-booked journeys rather than costs being spread across all trips.

Q8. Pre-Booking Facility – Alternative Time Period

4.76 Further to Question 7, respondents were asked whether they thought that a period other than seven days was an appropriate interval for pre-booking. Figure 4.6 shows respondents’ answers to the closed question element of this question, whilst Table 4.8 shows the alternatives suggested and reasons given by those who agreed that a period other than seven days was appropriate.

4.77 Figure 4.6 shows that approximately one in four respondents considered a time period other than seven days to be appropriate. By respondent group, the proportion of respondents agreeing varied from 22% (customers and private hire drivers) to 37% (private hire operators). A quarter of respondents did not answer this question, or had no opinion on the subject.

Figure 4.6: Do you consider a period other than seven days to be appropriate for pre-booking?



4.78 Table 4.8 shows a summary of the open responses received to this question from respondents who agreed with the proposal.

Table 4.8: Open responses from respondents who agreed that a period other than seven days was appropriate for pre-booking

Theme	Key Codes	Number of respondents	% of respondents
Regulation		1,015	41.1%
	<i>This service should not be a requirement</i>	944	38.2%
Time period/interval		734	29.7%
	<i>Zero time/booking should be made on demand</i>	397	16.1%
	<i>Up to 24 hours/same day booking</i>	150	6.1%
	<i>7 days or more</i>	99	4.0%
Market/Competition		687	27.8%
	<i>Choice of each individual operator</i>	376	15.2%
	<i>Let the market and demand drive this service</i>	270	10.9%
	<i>Operators have different business models catering to different audiences</i>	101	4.1%
Unnecessary		109	4.4%
Not answered		87	3.5%
Total number of respondents (who disagreed with, or were not sure about the proposals)		2,470	

Regulation

- 4.79 The most common response related to regulation with almost two fifths of respondents suggesting that pre-booking shouldn't be a requirement and a small proportion stating that it isn't for TfL to regulate.

Time period/interval

- 4.80 Almost a third of people commented specifically on the time period that they considered appropriate for pre-booking, with the majority suggesting that there shouldn't be a minimum time and that bookings should be available on demand. Approximately 6% of respondents suggested that this should be up to 24 hours in advance, with 4% believing that it should be at least seven days.

Market/Competition

- 4.81 Over a quarter of respondents felt that such a decision was down to either the operator or the market to decide with 4% stating that different business models exist to cater for different audiences.

Unnecessary

- 4.82 Amongst the 4% of respondents who thought that the pre-booking proposal was unnecessary, comments included that there are already enough taxi and private hire businesses offering pre-booking, or there are plenty of alternative transport options available.

Q9. Licencing of In-Venue Operators and Temporary Events

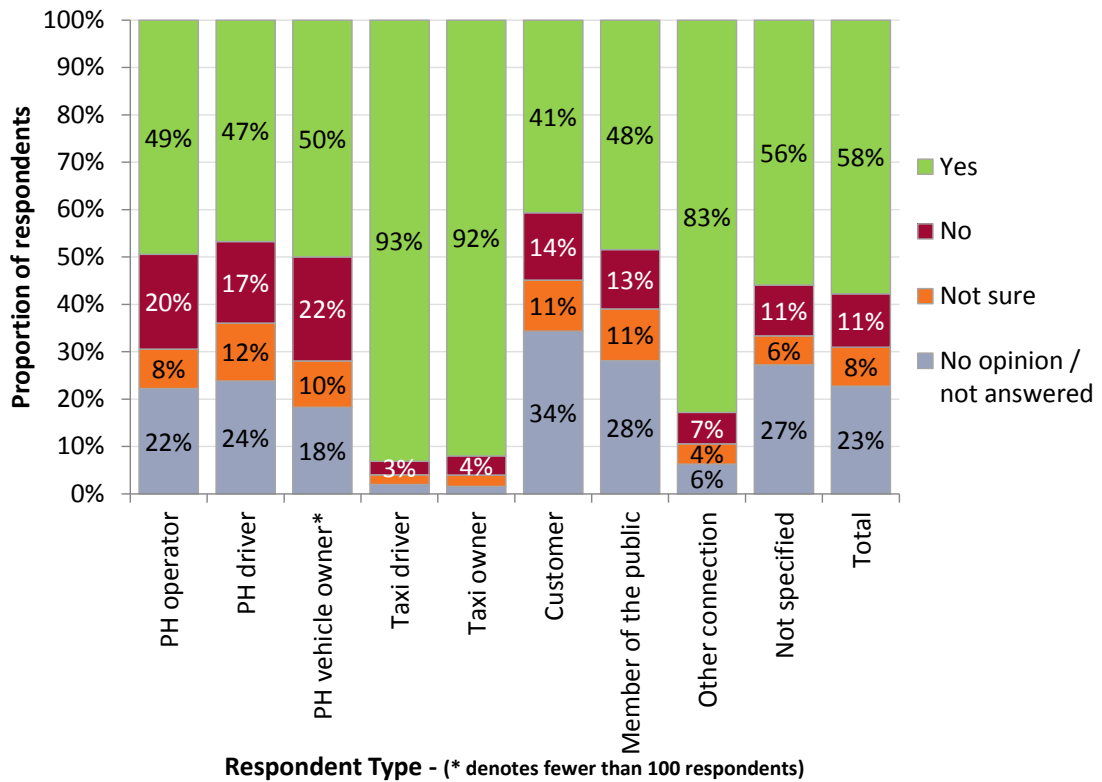
- 4.83 In the previous consultation, a significant number of consultees felt that TfL should no longer issue licences for in-venue operators (sometimes called "satellite offices") and temporary events. Issues were cited with operator staff accepting bookings outside venues and touting, particularly late at night; and with private hire vehicles parking and waiting in the vicinity of

operating centres. In this consultation, respondents were therefore asked whether they agreed with the following proposal:

TfL proposes to no longer issue operating licences in respect of in-venue operations and for temporary events. We will continue to assist with arrangements for temporary taxi ranks and parking areas for pre-booked PHVs when requested for major sports and social events.

4.84 Figure 4.7 shows that the majority of respondents (58%) agreed with the proposal to no longer issue operating licences for in-venue operators and temporary events. Taxi drivers and taxi owners were most likely to agree with the proposal whilst private hire vehicle owners and private hire operators were most likely to disagree with the proposal.

Figure 4.7: Do you agree with the proposal to no longer issue operating licences for in-venue operators and temporary events?



4.85 Table 4.9 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.9: Open responses from respondents who disagreed with, or were not sure about, the proposal to no longer issue operating licences for in-venue operators and temporary events

Theme	Key Codes	Number of respondents	% of respondents
Passenger		376	27.7%
	<i>Inconvenient for users</i>	296	21.8%
Market/Competition		271	20.0%
	<i>Protectionist (in favour of Taxis)/anti-competitive</i>	212	15.6%

Theme	Key Codes	Number of respondents	% of respondents
Regulation		163	12.0%
Query/Concern		146	10.8%
	<i>Concern about transport availability after major events</i>	104	7.7%
Safety	There needs to be a way to get people home safely after events	117	8.6%
	<i>Not answered</i>	92	6.8%
Total number of respondents (who disagreed with, or were not sure about the proposals)		1,356	

Passenger

- 4.86 Just over a quarter (28%) of respondents commented on issues relating to passengers, with 22% suggesting that this proposal would inconvenience users and smaller proportion saying that it would restrict user choice.

Market/Competition

- 4.87 Exactly a fifth of respondents commented on the impact this proposal could have on the market/competition, with 16% feeling that it was anti-competitive and favoured taxi drivers. There was some sentiment around letting customers and the market decide the outcome, with a small proportion suggesting that there are enough taxis to cope with the demand.

Regulation

- 4.88 There was a broad mix of sentiment in this category, with some suggesting that the proposal was overly bureaucratic and others saying that TfL should be trying to enhance customer choice, not restrict it.

Query/Concern

- 4.89 Roughly 8% of respondents had concerns about the availability of taxis and private hire vehicles after events with 2% fearing that the removal of licensing would increase the number of unlicensed operators at venues. Some queried whether the changes would mean that operators would no longer have a desk at large temporary venues/events.

Safety

- 4.90 One in eleven people felt that there should be a way to get people home safely after events with particular reference to those that finish later at night. There was some suggestion that coordination between organisers and private hire operators would allow for the efficient dispersal of crowds at the end of the night.

Q10. Licencing of In-Venue Operators and Temporary Events – Suggestions for Ensuring Safe and Adequate Transport Options

- 4.91 Respondents were asked how they would propose that venues and temporary events ensure safe and adequate transport options for those attending such events.
- 4.92 Table 4.10 shows the themes mentioned by respondents who answered this open question.

Table 4.10: Open responses from respondents describing how venues and temporary events could ensure safe and adequate transportation options for those attending

Theme	Key Codes	Number of respondents	% of respondents
Enforcement		3,564	43.5%
	<i>More/temporary (London licensed) taxi ranks</i>	2,700	32.9%
	<i>Marshalls</i>	1,157	14.1%
	<i>Clearly identify those permitted to operate in the area, punish illegal touting (i.e. licensed only) and enforce</i>	282	3.4%
Alternative/Suggestion		3,521	42.9%
	<i>Designated pick up/drop off & waiting areas for PHVs</i>	1,207	14.7%
	<i>Use of Taxis</i>	878	10.7%
	<i>Pre-book PHV/Taxi</i>	481	5.9%
	<i>Public transport</i>	312	3.8%
	<i>Use of PHV companies</i>	299	3.6%
	<i>Security/ID checks on drivers/only reputable/licensed PH companies</i>	285	3.5%
	<i>Verify/track/record drivers/journeys</i>	156	1.9%
	<i>Pre-booked cars can only enter area with confirmation of booking</i>	152	1.9%
	<i>Temporary booking facility near/at event</i>	102	1.2%
	<i>Park & Ride schemes/shuttle buses to public transport</i>	101	1.2%
Communication/Planning		2,532	30.9%
	<i>There is enough time prior to an event to organise suitable taxi provisions (ranks, bays) with TfL in advance</i>	1,141	13.9%
	<i>Prior notice to suppliers (Taxi drivers/PHV drivers/local Taxi operators/radio circuits) of an event (time, location, demand)</i>	504	6.1%
	<i>Arrangements with event organiser and PHV companies (often 'local' mini cabs companies)</i>	334	4.1%
	<i>Taxi/PH telephone numbers/app names/QR codes for customers to contact (both in advance and at event)</i>	206	2.5%
	<i>Announcement/information at/before event giving contact info, location info for taxis/PHVs/education on licensed/unlicensed operators</i>	200	2.4%
	<i>Event organisers should have planned sufficiently with appropriate licensing (in line with guidelines)</i>	146	1.8%
	<i>Event organisers to liaise with TfL</i>	146	1.8%
	<i>Signage/info for all transport available</i>	111	1.4%
Unnecessary		534	6.5%
	<i>Not necessary for events/venues to organise transport options/be subject to regulations</i>	375	4.6%
	<i>Current provisions are enough/no regulation required</i>	162	2.0%
Technology		359	4.4%
	<i>Via app</i>	349	4.3%

Theme	Key Codes	Number of respondents	% of respondents
<i>Not answered</i>		658	6.5%
Total number of respondents (who disagreed with, or were not sure about the proposals)		8,198	

Enforcement

- 4.93 Just under half of all respondents to this question (44%) commented specifically on enforcement with the majority suggesting that there should be more licensed temporary taxi ranks at events (33%). Other suggestions included more marshalling and the need to clearly identify those that are permitted to operate at the event, with punishment for those that are illegally touting.

Alternative/Suggestion

- 4.94 Almost 15% of respondents suggested that there should be designated pick-up/drop-off/waiting areas for private hire vehicles. Over 10% suggested that people should make use of Taxis and just under 6% specifically mentioned pre-booked PHVs/Taxis. Just under 4% believed that public transport could be an effective alternative. There was some suggestion of additional checks and regulation of drivers to ensure that they had the right to operate at the venue.

Communication/Planning

- 4.95 Almost a third of respondents discussed communication and planning with 14% believing there is enough time prior to an event taking place for suitable arrangements to be organised, and 6% saying that operators should be given prior notice of events occurring. Roughly 4% of respondents suggested that arrangements could be made with local PHV companies whilst 2% thought that information about phone numbers for operators, and apps to make bookings, could be made available both before and at events.

Unnecessary

- 4.96 Roughly 7% of people who responded felt that this proposal was unnecessary, either because they felt that the market should determine the outcome or they perceived the current regulations to be sufficient.

Technology

- 4.97 Almost one in twenty respondents suggested that customers should be able to make bookings via mobile applications, with a small number of respondents highlighting the need for Wi-Fi to ensure that the apps are accessible in-venue.

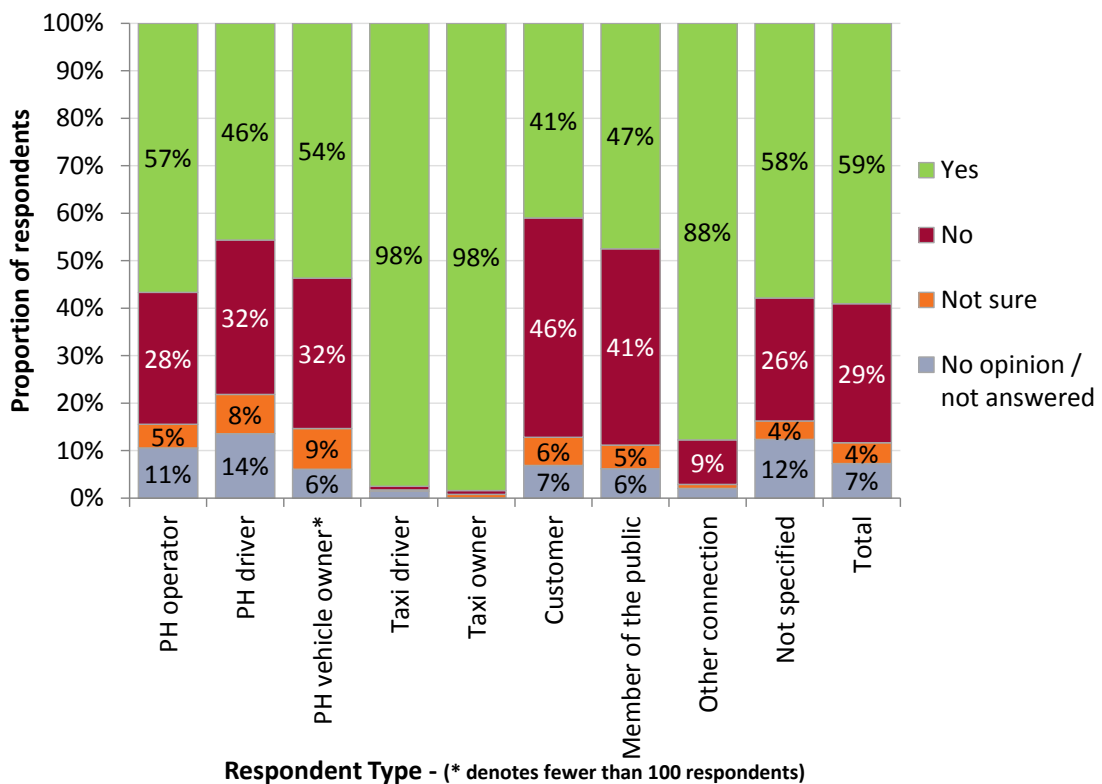
Q11. Fixed Landline

4.98 In the previous consultation, a number of consultees suggested that licensed operators should have a landline number in place at all times. In this consultation, respondents were therefore asked whether they agreed with the following proposal:

We propose to amend the PHV Regulations to require all licensed private hire operators to have a landline number available at all times so passengers can speak to operator staff for the purposes of customer care, complaints and the booking of private hire journeys. The number of staff managing customer telephone enquiries will be required to be commensurate with the size of the operator and the volume of private hire bookings.

4.99 Figure 4.8 shows that more than half of respondents (59%) agreed with the proposal that operators must have a landline number available for use at all times. Taxi drivers and taxi owners were most likely to agree with the proposal whilst customers were most likely to disagree with the proposal. Amongst those disagreeing, many supported the sentiment of being able to contact to an operator in real-time, but that this should not necessarily be via a landline number.

Figure 4.8: Do you agree with the proposal that operators must have a fixed landline available for use at all times?



4.100 Table 4.11 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.11: Open responses from respondents who disagreed with, or were not sure about, the proposal that operators must have a fixed landline available for use at all times

Theme	Key Codes	Number of respondents	% of respondents
Unnecessary		3,357	78.7%
	<i>Landline requirement is archaic (i.e. people are more likely to use apps and email, not landline)</i>	2,152	50.5%
	<i>Unnecessary process to constrain operators to use landline, should have the flexibility to use mobile phones/other ways in which to communicate (e.g. apps, email)</i>	1,788	41.9%
	<i>Complaints/feedback can be made after journey is completed (can be made online, etc.) /if concerned about safety, app is more discreet</i>	778	18.2%
	<i>Phone contact is unnecessary to use by operators if app based model is applied (i.e. easier/quicker to provide support online)</i>	259	6.1%
Market/Competition		1,074	25.2%
	<i>Customer is not concerned if the operator doesn't have a landline/customer can choose to use service that is most suitable to their needs</i>	531	12.5%
	<i>Cost operators more money (i.e. need to hire staff to answer the phones) and restrict businesses from email-based customer service</i>	169	4.0%
	<i>Proposal is anti-PHV</i>	155	3.6%
	<i>Operator should be able to choose their business model</i>	142	3.3%
	<i>These regulations are designed to stifle competition (i.e. anti-competition)/regulations are not taking into consideration technological advances</i>	141	3.3%
Alternative/Suggestion		827	19.4%
	<i>Communication shouldn't be via landline but it must be via app based or text/email (standards needed re electronic communication)</i>	618	14.5%
	<i>Customers should be able to speak to operator staff over the phone (a requirement based on call-response times, does not need to be a landline)</i>	218	5.1%
Passenger	A phone line causes queues and slows the process/does not enhance customer service	137	3.2%
Disagreement	It should not be mandatory to have a landline, as long as operator or driver offers some form of communication	108	2.5%
<i>Not answered</i>		69	1.6%
Total number of respondents (who disagreed with, or were not sure about the proposals)		4,265	

Unnecessary

- 4.101 Over three quarters of respondents felt this requirement to be unnecessary with over 50% suggesting that it was 'archaic' as users are more likely to use apps or email. Over two fifths thought there should be the flexibility to offer a mobile phone number instead whilst roughly a fifth thought that a landline was not required in order to make complaints or provide

feedback. Indeed, there was some suggestion that providing this information through an app is more discreet and therefore potentially safer.

Market/Competition

- 4.102 A quarter of those responding mentioned markets/competition with one in eight believing that customers won't be concerned if an operator doesn't have a landline as they have the choice to use a service that most closely meets their needs. One in twenty five thought this proposal would increase operational costs whilst a similar proportion felt the proposal was anti-private hire.

Alternative/Suggestion

- 4.103 One in seven respondents suggested that all communications should be via mobile apps, email or text, whereas one in twenty thought that customers should be able to speak to an operator on the telephone, but this didn't necessarily have to be a landline.

Passenger

- 4.104 Roughly 3% of people thought that having a phone line would result in queues and poorer customer service, sighting alternatives like email as more efficient.

Disagreement

- 4.105 Just under 3% of respondents disagreed with the proposal as long as there was a suitable alternative contact method.

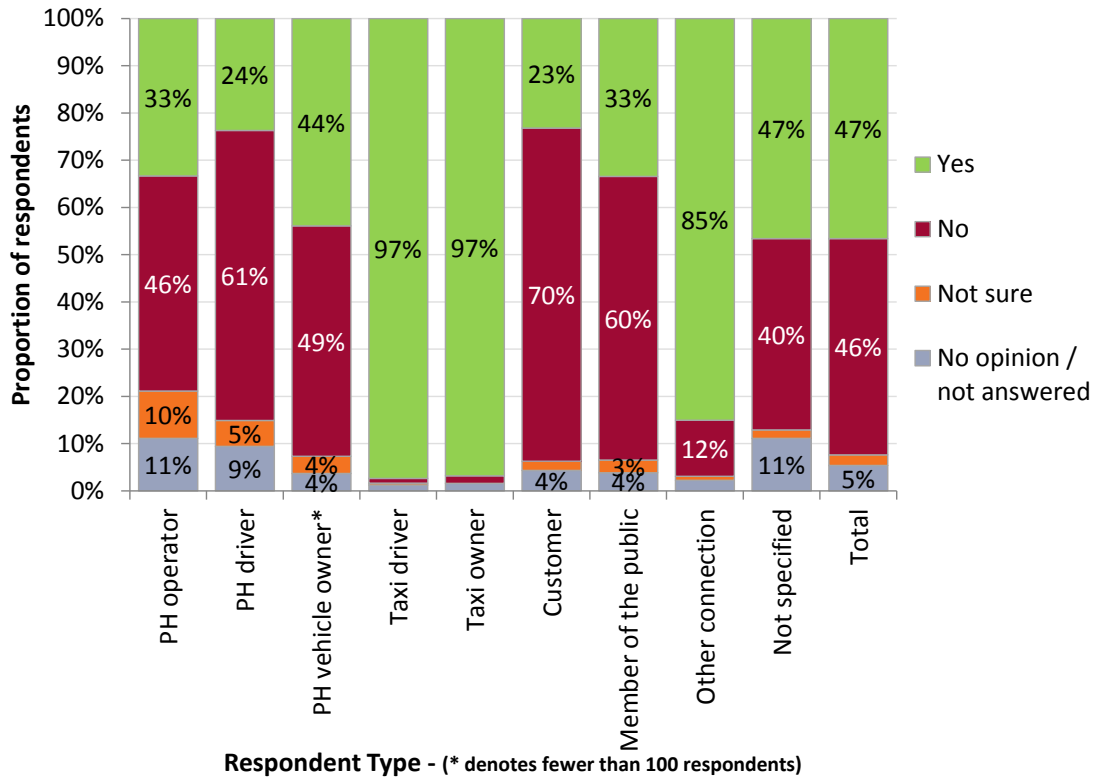
Q12. Vehicles Being Available for Immediate Hire, Either Visibly or Virtually

- 4.106 In the previous consultation, a number of consultees suggested that, whether through an app or through physical street ranking, some operators are creating the impression of vehicles being available for immediate hire. In this consultation, respondents were therefore asked whether they agreed with the following proposal:

We propose to amend the PHV Regulations to require operators to ensure that private hire vehicles are not visibly shown to be available for immediate hire, whether physically (e.g. signage or otherwise on the street) or via an app, or other means.

- 4.107 Figure 4.9 shows that the proportion of all respondents agreeing with the proposal (47%) was very similar to those disagreeing (46%). Taxi drivers and taxi owners were most likely to agree with the proposal whilst a significant majority of customers disagreed with the proposal.

Figure 4.9: Do you agree with the proposal that operators must ensure that private hire vehicles are not visibly shown to be available for immediate hire?



4.108 Table 4.12 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.12: Open responses from respondents who disagreed with, or were not sure about, the proposal that operators must ensure that private hire vehicles are not visibly shown to be available for immediate hire

Theme	Key Codes	Number of respondents	% of respondents
Passenger		3,593	56.9%
	<i>This would be detrimental to customer experience/does not benefit passengers</i>	2,479	39.2%
	<i>Limits free choice/withholds information (availability & waiting time), less transparency</i>	2,103	33.3%
Market/Competition		2,922	46.3%
	<i>Anti-consumer demand/choice</i>	1,483	23.5%
	<i>Anti-technological progress/innovation</i>	840	13.3%
	<i>Anti-competitive/protectionist</i>	740	11.7%
	<i>Initiative against smartphone/PHV booking services</i>	530	8.4%
	<i>Market/people will regulate, not TfL's role to regulate</i>	166	2.6%
Enforcement		980	15.5%
	<i>Authorisation/enforcement (by booking through app) should prevent touting</i>	644	10.2%
	<i>Need to punish fraudulent use (e.g. phantom use) another way, as long as it's accurate</i>	359	5.7%
Question misleading/unclear	No valid (safety/touting) reasons for proposal	963	15.2%
Technology	Real time information (yellow light, bus/tube times, Hailo, phoning office) exists in/should be extended to, other transport	455	7.2%
		302	4.8%
Regulation	<i>Touting needs other regulation</i>	194	3.1%
		283	4.5%
Detail	<i>Removes uncertainty & risk of touting</i>	214	3.4%
		119	1.9%
Driver/Operator	Against drivers' interests	119	1.9%
Not answered		465	7.4%
Total number of respondents (who disagreed with, or were not sure about the proposals)		6,316	

Passenger

- 4.109 The most common response was that this proposal would be detrimental to customer experience and offer no benefit (39%) closely followed by the comment that it limits free choice and would result in less transparency (33%).

Market/Competition

- 4.110 Almost a quarter of people who responded felt this was anti-consumer choice, with 13% suggesting it was against technological progress and innovation. 12% of respondents felt that the proposals were anti-competitive, while 8% of respondents thought that the proposals were a specific initiative against smartphone apps. Around 3% felt that this wasn't something TfL should be regulating and should instead be left to the free market.

Enforcement

- 4.111 One in ten respondents thought that checks on drivers for the correct authorisation and enforcement of licensing laws would help prevent touting, with one in twenty suggesting that there should be punishment for fraudulent (e.g. phantom) use.

Technology

- 4.112 Approximately 7% of respondents thought that real time information is already well used and should be extended to other modes of transport. Respondents questioned why they shouldn't be able to see the local private hire status in the same way that they can with buses and tubes.

Regulation

- 4.113 Just over 4% of respondents felt that touting should be addressed by other regulation and a small proportion suggested that there should be a distinction made between physical and virtual signs of availability.

Detail

- 4.114 One in thirty respondents felt that the ability to see the location of vehicles removed uncertainty and therefore reduced the risk of touting, with a smaller proportion suggesting that a general indication of availability, rather than actual locations, would be acceptable.

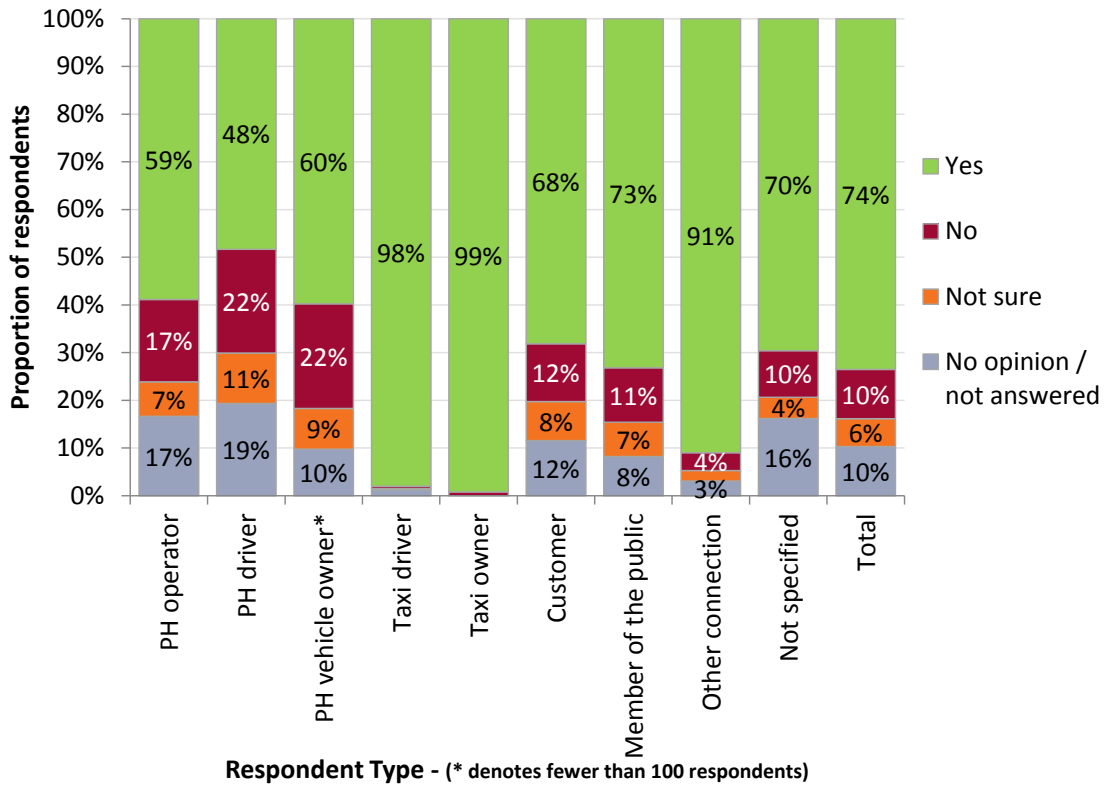
Q13. Providing Driver and Vehicle Details to TfL on a Regular Basis

- 4.115 In the previous consultation, consultees were mostly supportive of a requirement that operators provide TfL with details of their drivers and vehicles on a regular basis. At present, TfL do not know for certain which driver is working for which operator. This change would mean that they can quickly trace back the driver to the operator where illegal activity is suspected and/or a complaint is made about a vehicle or driver. Although operators are obliged to keep a record of drivers and vehicles, which are inspected as part of any routine (or other) compliance inspection, having a nearer “real-time” record would enable TfL to react quickly where they have to follow up an enforcement issue and/or identify a pattern of poor operator behaviour. Respondents to this consultation were therefore asked whether they agreed with the following proposal:

We propose to require operators to provide TfL with information in such form, content and at such intervals as TfL specifies including details of drivers and vehicles.

- 4.116 Figure 4.10 shows that the majority of respondents agreed with the proposal (74%). Taxi drivers and taxi owners were most likely to agree with the proposal whilst private hire drivers and private hire vehicle owners were less likely to agree with the proposal.

Figure 4.10: Do you agree with the proposal that operators must provide TfL with information in such form, content and at such intervals as TfL specifies including details of drivers and vehicles?



4.117 Table 4.13 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.13: Open responses from respondents who disagreed with, or were not sure about, the proposal that operators must provide TfL with information in such form, content and at such intervals as TfL specifies including details of drivers and vehicles

Theme	Key Codes	Number of respondents	% of respondents
Unnecessary		315	21.8%
	<i>The current system is adequate</i>	163	11.3%
	<i>It is not necessary to provide this information to TfL</i>	133	9.2%
Market/Competition		191	13.2%
Regulation		163	11.3%
	<i>Micro-management/bureaucracy</i>	149	10.3%
Question misleading/unclear		156	10.8%
	<i>Detail of proposal is vague/too broad</i>	117	8.1%
Cost		149	10.3%
	<i>This will be very costly for operators to manage/costs passed on to consumers</i>	119	8.2%
Agreement		135	9.3%
Not answered		129	8.9%
Total number of respondents (who disagreed with, or were not sure about the proposals)		1,444	

Unnecessary

- 4.118 One in five respondents considered the proposal to be unnecessary with approximately one in ten stating that the current system is adequate.

Market/Competition

- 4.119 Within this theme, respondents commented on the anti-competitive/protectionist nature of the proposal, that drivers should be free to work for as many operators as they choose and that the proposal requirement should be applied equally to private hire operators and the taxi industry.

Regulation

- 4.120 One in ten respondents thought that the proposal was bureaucratic or an attempt by TfL to micro-manage private businesses.

Question misleading/unclear

- 4.121 One in ten respondents commented on the content of the question/proposal with the primary comment being that the wording was vague or too broad. Respondents took particular issue with the phrasing “in such form, content and at such intervals as TfL requires”.

Cost

- 4.122 One in ten respondents noted that the proposal may result in additional costs for the operators and that these could be passed on to the consumer. Other comments under this theme related to the cost to TfL to manage and implement the proposal.

Agreement

- 4.123 Just under one in ten respondents agreed with the proposal, despite disagreeing with the closed question, but with caveats. Respondents were most likely to agree with the proposal providing the requirements were not too onerous for operators and didn’t prevent new entrants to the market (7%).

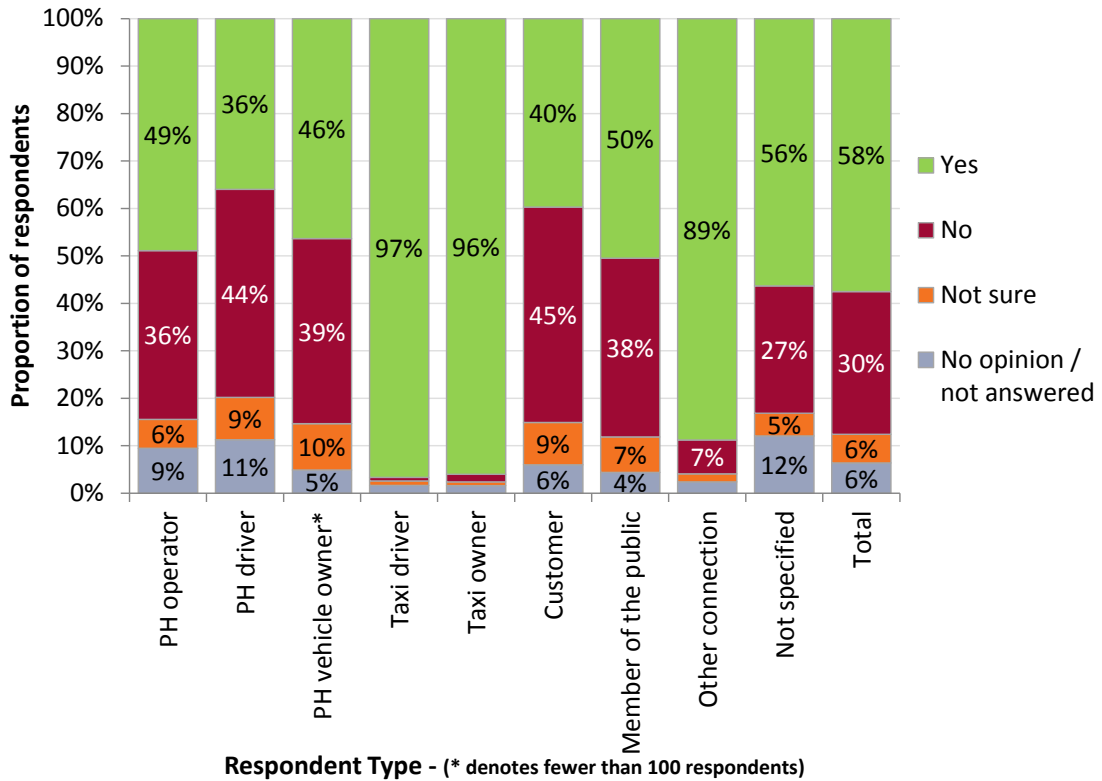
Q14. Fares to be Specified Prior to a Booking Being Accepted

- 4.124 In the previous consultation, a number of consultees suggested that private hire operators must specify the fare for each journey prior to commencement of that journey. The proposed amendment could help provide certainty to customers and minimise the risk of customers being overcharged and/or additional charges/tariffs being applied after the journey has commenced. Respondents to this consultation were therefore asked whether they agreed with the following proposal:

We propose to require operators to provide a specified fare prior to a booking being accepted.

- 4.125 As shown in Figure 4.11, more than half of respondents (58%) were in favour of the proposal. Taxi drivers and taxi owners were most likely to agree with the proposal whilst customers and private hire drivers were more likely to disagree with the proposal.

Figure 4.11: Do you agree with the proposal that operators must provide a specified fare prior to a booking being accepted?



4.126 Table 4.14 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.14: Open responses from respondents who disagreed with, or were not sure about, the proposal that operators must provide a specified fare prior to a booking being accepted

Theme	Key Codes	Number of respondents	% of respondents
Calculation		2633	57.9%
	<i>Estimation is enough (minimum to maximum could be included)</i>	1,188	18.2%
	<i>Does not take into account traffic (or other similar factors e.g. parking charges)</i>	1,158	17.8%
	<i>Rounding up of fares mean customers lose out with higher prices/fare increase</i>	478	7.3%
	<i>As long as what is being charged is clear/route is agreed, and can be contested there is no need</i>	324	5.0%
Market/Competition		1,319	29.0%
	<i>Taxis don't do this/why discriminate</i>	827	12.7%
	<i>Free market should decide</i>	311	4.8%
	<i>Protectionist/anti-competitive</i>	213	3.3%
	<i>Should be operator's choice</i>	105	1.6%
Passenger		877	19.3%
	<i>No flexibility for passenger</i>	763	11.7%
	<i>No benefit to customers</i>	107	1.6%

Theme	Key Codes	Number of respondents	% of respondents
Regulation		243	5.3%
	<i>Current system works</i>	232	3.6%
Alternative/Suggestion		156	3.4%
	<i>Should not be mandatory, only if customer requests</i>	110	1.7%
Unnecessary		117	1.8%
Technology	<i>Apps are good at measuring fares fairly</i>	108	1.7%
<i>Not answered</i>		95	1.5%
Total number of respondents (who disagreed with, or were not sure about the proposals)		4,551	

Calculation

- 4.127 Over half of respondents commented specifically on the calculation of fares with 18% believing that an estimate, with minimums and maximums, would be sufficient, and 18% noting that fixed fares do not take into account traffic conditions or other costs such as parking charges. There was some concern amongst respondents that the rounding up of fares would result in higher fares overall.

Market/Competition

- 4.128 One in eight respondents felt that this proposal discriminates against private hire drivers with 6% commenting that the market should be left to determine fares. A smaller proportion noted that the proposal was protectionist/anti-competitive (3%) with 1% stating that fare-setting should be up to the operator.

Passenger

- 4.129 Respondents thought that this proposal offered no benefits to customers (2%) and removed a degree of flexibility, such as being able to amend a destination once a journey has started (12%).

Regulation

- 4.130 Roughly 5% of respondents thought that the current system works as it is, with a lower proportion thinking that such an intervention would be bureaucratic.

Alternative/Suggestion

- 4.131 Almost 2% of those who responded thought that this proposal shouldn't be mandatory and it's up to the customer to ask for a specified fare. There were some suggestions about regulation fares and the setting up of a zonal structure.

Technology

- 4.132 A small proportion of respondents (2%) felt that mobile applications are already very good at measuring fares fairly with some suggesting that they make it easy to settle disputes as all journey information is recorded.

Q15. Recording the Main Destination for Each Journey

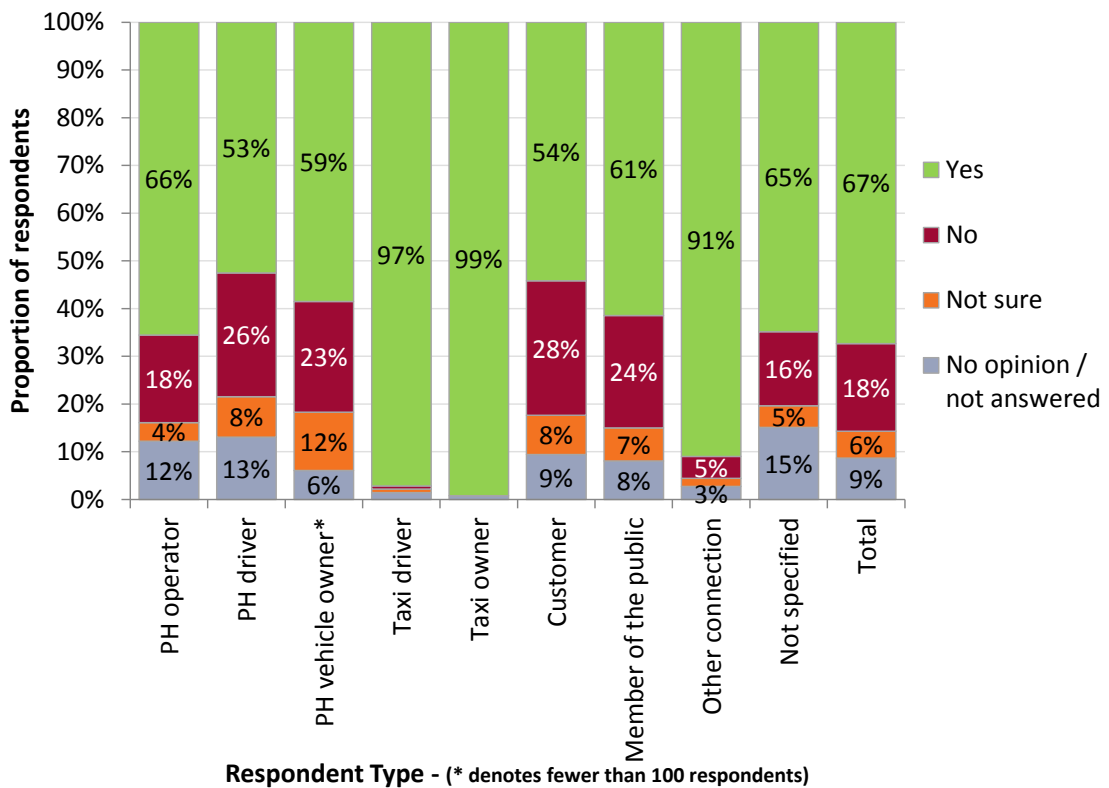
- 4.133 In the previous consultation, most consultees supported the idea that operators should record the main destination for each journey, which must be specified at the time the booking is

made. Therefore, in this consultation, respondents were asked whether they agreed with the following proposal:

We propose to amend the Operators Regulations to require the operator to record the main destination of private hire journeys, which must be specified at the time the booking is made.

4.134 Figure 4.12 shows that the majority of respondents (67%) agreed with the proposal. Taxi drivers and taxi owners were most likely to agree with the proposal whilst customers and private hire drivers were less like to agree.

Figure 4.12: Do you agree with the proposal to amend the Operators Regulations to require the operator to record the main destination of private hire journeys at the time the booking is made?



4.135 Table 4.15 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.15: Open responses from respondents who disagreed with, or were not sure about, the proposal to amend the Operators Regulations to require the operator to record the main destination of private hire journeys at the time the booking is made

Theme	Key Codes	Number of respondents	% of respondents
Passenger	Will limit journey flexibility/passenger options	1,575	60.2%
Unnecessary	This isn't necessary/already happens	519	19.8%
Market/Competition		228	8.7%
	<i>Undermines app-based services/deliberately restricts competition</i>	189	7.2%

Theme	Key Codes	Number of respondents	% of respondents
Data security/privacy	<i>Invasion of privacy</i>	179	6.8%
Impact	Will add delays/cause confusion	165	6.3%
Safety	<i>Does not support passenger safety</i>	144	5.5%
<i>Not answered</i>		130	5.0%
Total number of respondents (who disagreed with, or were not sure about the proposals)		2,617	

Passenger

- 4.136 More than half of respondents stated that requiring the operator to record their main destination at the time of booking would limit the journey flexibility or passenger options.

Unnecessary

- 4.137 One in five respondents felt that the proposal was unnecessary, or that operators already recorded the passenger's main destination at the time of booking.

Market/competition

- 4.138 Almost one in ten respondents commented with regard to the proposals intervening in the market with 7% noting that the proposal specifically undermines app based services.

Data security/privacy

- 4.139 Roughly 6% of respondents were concerned that the proposals were an invasion of privacy.

Impact

- 4.140 6% of respondents also commented that the proposals would add delays or cause confusion.

Safety

- 4.141 5% of respondents commented that the proposals did not support passenger safety.

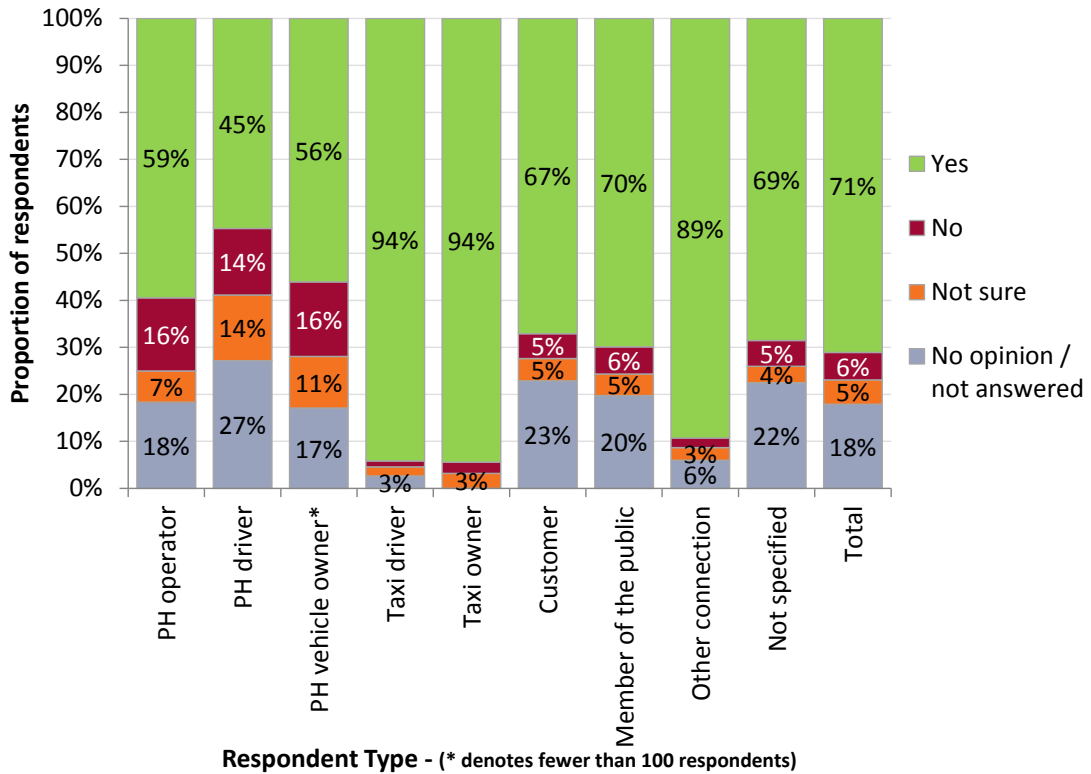
Q16. Harmonise the Retention Period for Records

- 4.142 In the previous consultation, TfL's suggestion, which was largely supported by consultees, was that the period for retention of records should be made 12 months for *all* records as opposed to 6 months for some records (e.g. complaints, lost property) and 12 months for others (e.g. driver and vehicle records). In this consultation, respondents were therefore asked whether they agreed with the following proposal:

We propose to harmonise the retention period for records under the Operator Regulations to be twelve months where it is currently six.

- 4.143 Figure 4.13 shows that the majority of respondents (71%) agreed with the proposal. Taxi drivers and taxi owners were most likely to agree with the proposal whilst a higher proportion of private hire operators and private hire vehicle owners and private hire drivers disagreed with the proposal.

Figure 4.13: Do you agree with the proposal to harmonise the retention period for records under the Operator Regulations to twelve months where it is currently six?



4.144 Table 4.16 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.16: Open responses from respondents who disagreed with, or were not sure about, the proposal to harmonise the retention period for records under the Operator Regulations to be twelve months where it is currently six

Theme	Key Codes	Number of respondents	% of respondents
Time period/interval		286	49.0%
	<i>Harmonise to six months</i>	178	30.5%
Unnecessary	<i>Unnecessary/no change required</i>	128	21.9%
Regulation		97	16.6%
Cost		38	6.5%
<i>Not answered</i>		23	3.9%
Total number of respondents (who disagreed with, or were not sure about the proposals)		584	

Time period/interval

4.145 The most common comment was that the time period for harmonisation of records should be six months, rather than the proposed twelve month, as noted by just under a third of respondents.

Unnecessary

4.146 A fifth of respondents commented that they didn't think that a change of regulations was required.

Regulation

4.147 Approximately one in six respondents mentioned regulations in their comments with the majority commenting that the proposal was excessive/bureaucratic.

Cost

4.148 Just over 6% of respondents highlighted that there would be cost implications for operators which could end up being passed on to consumers.

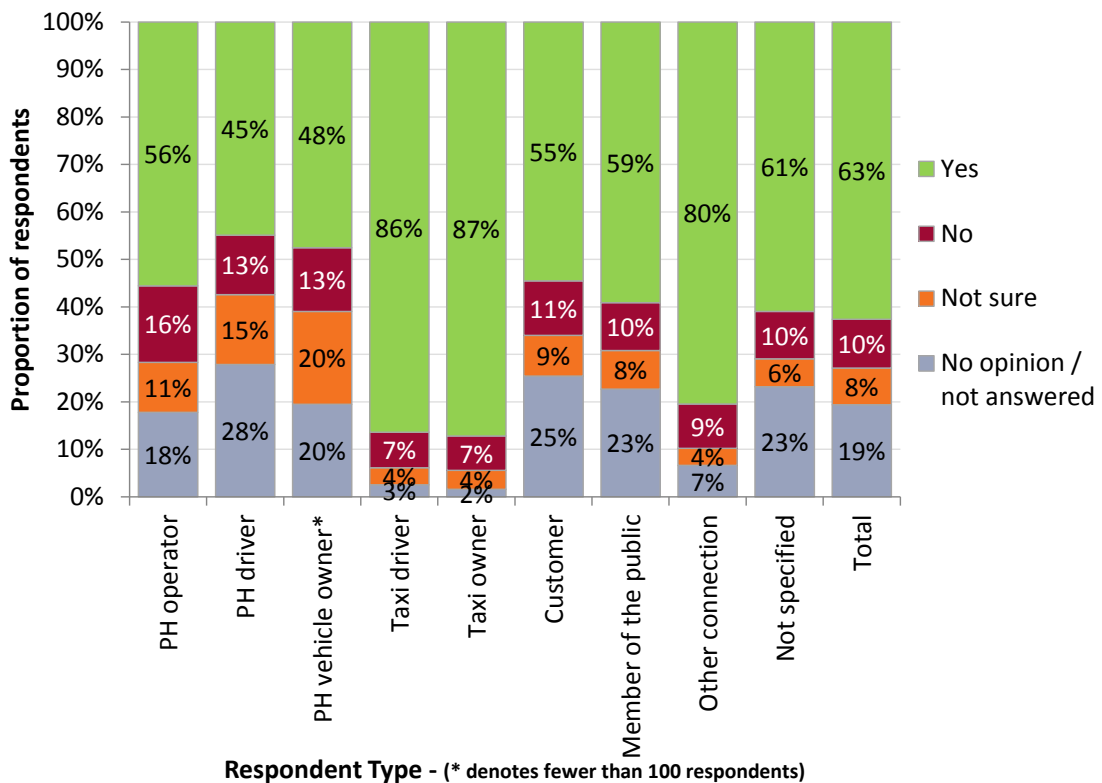
Q17. Business Names Attached to an Operator’s Licence

4.149 Whilst it is acknowledged that operators may use different trading names to identify different parts of their business, there are concerns regarding the large number of trading names that some operators are using. Multiple business names can cause confusion for customers and make it difficult to remember the operator they used for a journey. It is important that a passenger can remember these details in case of complaint or dispute. As a result, TfL propose to limit the number of business names that can be associated with each individual operator’s licence. Respondents were therefore asked whether they agreed with the following proposal:

We propose a limit of five on the number of business names attached to each operator’s licence

4.150 As shown in Figure 4.14, the majority of respondents (63%) agreed with the proposal. Taxi drivers and taxi owners were most likely to agree with the proposal whilst private hire operators were most likely to disagree.

Figure 4.14: Do you agree with the proposal to limit the number of business names attached to each operator’s licence to five?



- 4.151 Table 4.17 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.17: Open responses from respondents who disagreed with, or were not sure about, the proposal to limit the number of business names attached to each operator's licence to five

Theme	Key Codes	Number of respondents	% of respondents
Alternative/Suggestion		524	41.5%
	<i>Should only have one business name (one licence per name)</i>	378	29.9%
Regulation		200	15.8%
Market/Competition		190	15.0%
Unnecessary		175	13.9%
	<i>Not necessary, no further comment</i>	130	10.3%
<i>Not answered</i>		150	11.9%
Total number of respondents (who disagreed with, or were not sure about the proposals)		1,263	

Alternative/Suggestion

- 4.152 Just over 40% of respondents had an alternative or suggestion with regard to the proposals to limit businesses names to five per operator licence. Almost a third suggested that the number of business names should be limited to one per licence.

Regulation

- 4.153 One in six respondents commented more specifically about the proposed changes, these comments included that the proposal will not help to solve the current issues, that better regulation is required or that somebody other than TfL should deal with this regulation.

Market/Competition

- 4.154 The most common comments regarding the market or competition were that these proposals would restrict trade or they would undermine current business models.

Unnecessary

- 4.155 Just over one in ten respondents thought that the proposal was unnecessary.

Part II: Private Hire Drivers

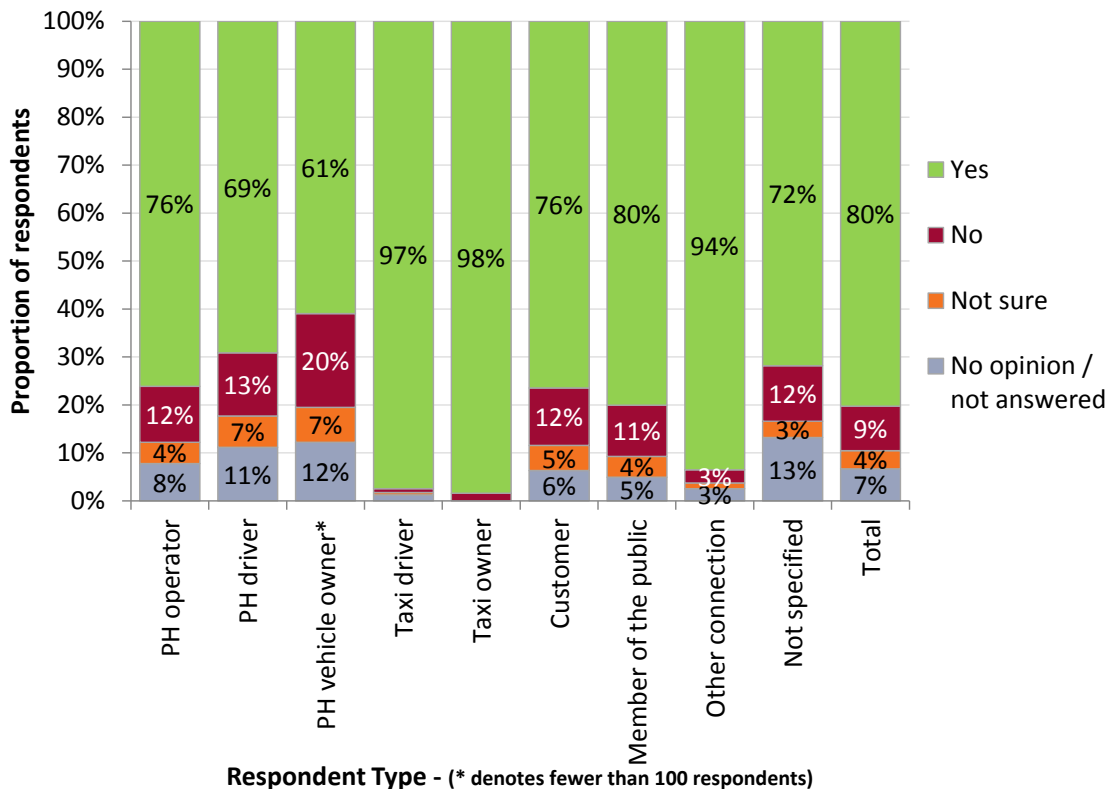
Q18. Requirement for an English Language Test

- 4.156 There is currently no specific language requirement for private hire drivers, except that the topographical test has to be delivered in English. The March 2015 consultation asked if TfL should consider introducing a formal requirement for private hire applicants to be able to speak English to a certain standard, and what the criteria should be.
- 4.157 The ability of private hire drivers to demonstrate English language skills was strongly supported by consultees and many suggested that TfL set an English Language requirement at an intermediate level. In this consultation, respondents were therefore asked whether they agreed with the following proposal:

We will make regulations that will require drivers to be able to demonstrate they have sufficient knowledge of English language at an intermediate level. The requirement will be applied to all new driver applicants and renewals. In the interim, as part of our review of the topographical test, we will ensure that the test centres are properly assessing the ability of candidates to communicate in English.

- 4.158 As shown in Figure 4.15, the majority of respondents (80%) agreed with the proposal. Private hire vehicle owners were most likely to disagree with the proposal, although support didn't fall below 61% amongst any respondent type.

Figure 4.15: Do you agree with the proposal to require drivers to demonstrate they have sufficient knowledge of English language at an intermediate level?



4.159 Table 4.18 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.18: Open responses from respondents who disagreed with, or were not sure about, the proposal to require drivers to demonstrate they have sufficient knowledge of English language at an intermediate level

Theme	Key Codes	Number of respondents	% of respondents
Disagreement	<i>No specific requirements needed</i>	544	41.8%
Discrimination		407	31.3%
	<i>Discriminatory to immigrants/workers with low English proficiency</i>	269	20.7%
	<i>Discriminatory to PHV drivers/ London PHV drivers</i>	129	9.9%
Technology	<i>English not necessary as technology should provide routes</i>	191	14.7%
Standard		166	12.8%
Other		157	12.1%
Market/Competition		147	11.3%
	<i>Not a TfL issue to sort - market based solution needed</i>	146	11.2%
Cost		106	8.1%
<i>Not answered</i>		20	1.5%
Total number of respondents (who disagreed with, or were not sure about the proposals)		1,301	

Disagreement

4.160 Four out of ten respondents noted overall disagreement with the need for drivers to demonstrate that they have a sufficient knowledge of English.

Discrimination

4.161 A third of respondents noted concern about discrimination. In particular, discrimination against immigrants and drivers with a low level of English proficiency was noted by one in five respondents. One in ten respondents thought that the proposals discriminated against private hire drivers in general.

Technology

4.162 One in seven respondents felt that English language proficiency was less important due to new technology used by private hire drivers.

Standard

4.163 A number of respondents commented on the standard of English they considered it reasonable for drivers to be able to demonstrate, ranging from a basic level i.e. sufficient to do their job, through to conversational fluency.

Other

4.164 Roughly 12% of respondents mentioned other requirements that they considered to be important, including driving ability and geographic knowledge.

Market/Competition

- 4.165 Just over one in ten respondents felt that this was not an issue for TfL to regulate and that a market-based solution was needed instead.

Cost

- 4.166 Respondents commented on the potential for this proposal to introduce costs for drivers and consumers alike.

Q19. Requirement for an English Language Test – Specific Standard

- 4.167 The next question asked respondents what standard of English they thought it would be appropriate for private hire driver applicants to demonstrate. Table 4.19 shows a categorised summary of the responses received to this question.

Table 4.19: Open responses on the standard of English that respondents thought it would be appropriate for private hire driver applicants to demonstrate

Theme	Key Codes	Number of respondents	% of respondents
Standard		6,509	64.0%
	<i>Common European Framework of Reference (CEFR) for Languages B1, equivalent to Entry Level 3 (Key Stage 3) on Qualifications and Credit Framework (QCF)</i>	2,554	25.1%
	<i>Fluency/Conversational English</i>	1,810	17.8%
	<i>Basic English sufficient</i>	1,062	10.4%
	<i>Common European Framework of Reference (CEFR) for Languages B2 or C1, equivalent to Level 1 (GCSE grades D-G) or Level 2 (GCSE grades A-C) on QCF</i>	569	5.6%
	<i>Unspecified "high" standard of English</i>	343	3.4%
Other communication/understanding		3,315	32.6%
	<i>Ability to communicate in English (especially with regard to safety)</i>	2,439	24.0%
	<i>Ability to understand place names directions and general instruction</i>	620	6.1%
	<i>Ability to read a map/satellite navigation/road signs</i>	348	3.4%
	<i>Should demonstrate good levels of English in speaking, reading and writing</i>	122	1.2%
	<i>Knowledge of Highway Code</i>	116	1.1%
Other		408	4.0%
	<i>Knowledge of London/appropriate area</i>	209	2.1%
Testing/Training		373	3.7%
	<i>Should be tested for language skills</i>	120	1.2%
Disagreement	<i>None required</i>	265	2.6%
<i>Not answered</i>		312	3.1%
Total number of respondents (who disagreed with, or were not sure about the proposals)		10,166	

Standard

- 4.168 A high proportion of respondents (64%) specified the type of English language qualification⁷ which they thought would be appropriate. A quarter of respondents felt that drivers should be able to demonstrate an intermediate level of English, classified in the proposal description as level B1 of the Common European Framework of Reference. Almost a fifth of respondents did not identify a specific standard but stated that drivers should be fluent in English. One in ten respondents stated that basic proficiency in English was sufficient.

Other communication/understanding

- 4.169 Respondents also commented about the need for drivers to understand English and be able to communicate (a third of respondents). The more common comments were the need to communicate in English (24% of respondents), the ability to understand place names and directions (6%) and the ability to read maps/road signs (3%).

Other

- 4.170 A range of other comments were made, including the need to have knowledge of London geography.

Testing/Training

- 4.171 Almost 4% of respondents commented on the need for drivers to be trained and tested for a range of skills, including language ability and topographical knowledge.

Disagreement

- 4.172 Just under 3% of respondents stated general disagreement with the proposal and suggested that no language requirement was needed.

Q20. Limiting the Number of Operators that a Driver Can Work For

- 4.173 In the previous consultation, a number of consultees suggested that private hire drivers should be restricted to working for only a single licensed operator at one time. This would reduce the risk of drivers working excessive hours for a number of different operators. Respondent were therefore asked in this consultation whether they agreed with the following proposal:

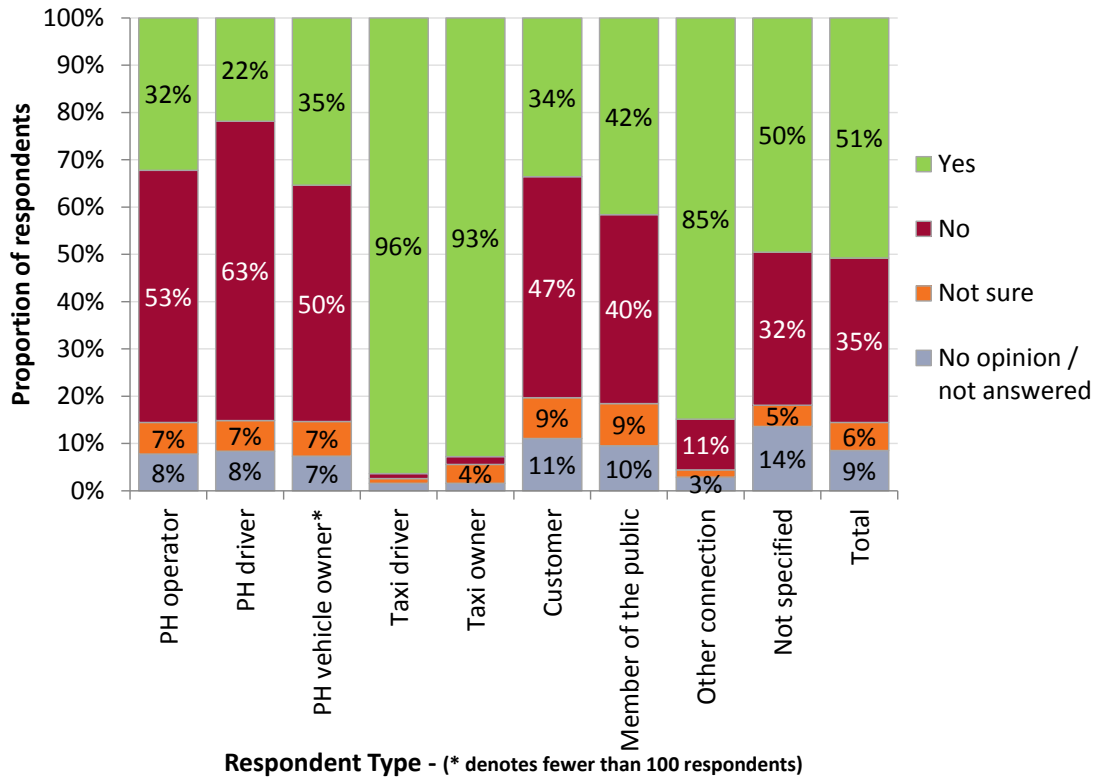
We propose to make it a requirement that a PHV driver must be registered to a licensed operator and may only be registered to a single operator at any time.

- 4.174 As shown in Figure 4.16, just over half of respondents (51%) agreed with the proposal. Taxi drivers and taxi owners were most likely to agree with the proposal whilst the majority of

⁷ Further information about the Common European Framework of Reference (CEFR) and Qualifications and Credit Framework (QCF) can be found online at http://www.coe.int/t/dg4/linguistic/cadre1_en.asp and <http://www.accreditedqualifications.org.uk/qualifications-and-credit-framework-qcf.html> respectively.

private hire drivers (63%) disagreed with the proposal. There was also a majority of private hire operators who disagreed with this proposal.

Figure 4.16: Do you agree with the proposal to require that private hire drivers are registered to a licensed operator and to only one operator at any time?



4.175 Table 4.20 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.20: Open responses from respondents who disagreed with, or were not sure about, the proposal to require that private hire drivers are registered to a licensed operator and to only one operator at any time

Theme	Key Codes	Number of respondents	% of respondents
Market/Competition		2,547	54.2%
	<i>Restriction of trade - drivers are self-employed/freedom of choice</i>	1,210	25.8%
	<i>Drivers should have the flexibility to work multiple jobs/working hours</i>	908	19.3%
	<i>A single operator may not have a sufficient quantity/variety of work</i>	359	12.7%
	<i>Anti-competitive</i>	256	5.2%
	<i>Provides difficulty for small/new operators in the market</i>	112	3.8%
Driver/Operator		1,753	37.3%
	<i>Restricts driver income/livelihood</i>	894	19.0%
	<i>Discriminates against PH drivers/operators</i>	596	12.7%
	<i>No benefit to drivers</i>	244	5.2%
	<i>Operators could exploit working conditions</i>	177	3.8%

Theme	Key Codes	Number of respondents	% of respondents
Regulation		1,321	28.1%
	<i>Unjustified/unnecessary new regulation</i>	779	16.6%
	<i>Not a decision for TfL to make</i>	332	7.1%
	<i>Record which operator drivers work for</i>	200	4.3%
Alternative/Suggestion		437	9.3%
	<i>Alternatively monitor/track/log excessive working hours for safety</i>	425	9.1%
Detail		412	8.8%
	<i>No correlation between excessive working hours and working for multiple operators</i>	348	7.4%
Passenger	<i>No benefit to the consumer</i>	403	8.6%
<i>Not answered</i>		26	0.6%
Total number of respondents (who disagreed with, or were not sure about the proposals)		4,695	

Market/Competition

- 4.176 There was a strong feeling from more than half of all respondents that this proposal was limiting the competitiveness of the private hire market. In particular, a quarter of drivers commented that the proposals restricted their trade as self-employed drivers. Drivers were also concerned about flexibility of their working arrangements (20% of respondents), that a single operator may not have sufficient work (13%) and that the proposals are generally anti-competitive (6%).

Driver/Operator

- 4.177 Considering drivers in particular, almost one in five respondents noted that the proposals would restrict their income, with more than one in ten stating that the proposal discriminated against private hire drivers or operators.

Regulation

- 4.178 One in six respondents thought that the proposal to limit the number of operators a driver could work for was unjustified, with 7% indicating that this was not an area of the industry that TfL should be regulating.

Alternative/Suggestion

- 4.179 The most popular suggestion, from just under one in ten respondents was that there should be an alternative way for excessive working hours to be monitored or tracked.

Detail

- 4.180 Further detail was provided by a number of respondents who stated that there was not a specific link between excessive driver working hours and working for more than one operator.

Passenger

- 4.181 Just under one in ten respondents stated that the proposals have no benefits for passengers.

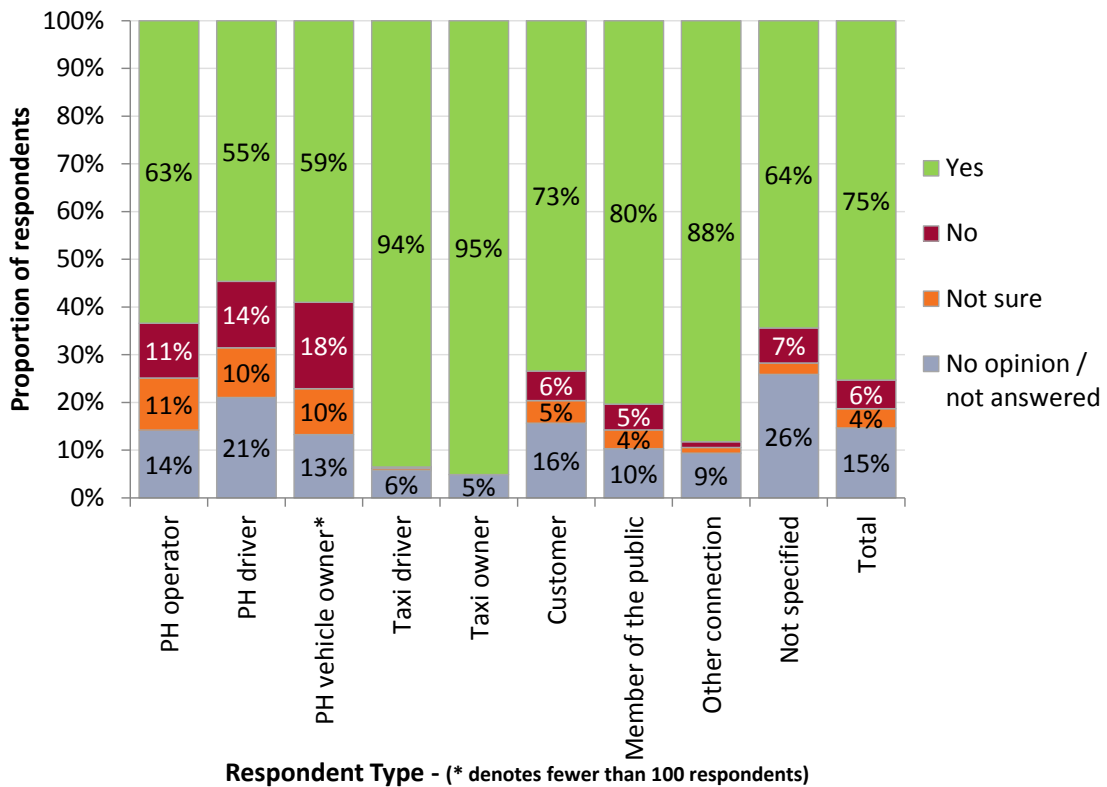
Q21. National Insurance Numbers

4.182 In the previous consultation, a number of consultees suggested that applicants for a private hire driver or private hire operator’s licence should be required to provide their National Insurance number as part of their application. Whilst a National Insurance number is not proof of identity, TfL are of the view that it does provide an additional safeguard to other identity checks. Respondents to this consultation were therefore asked whether they agreed with the following proposal:

We propose an application requirement to provide a National Insurance number for private hire driver and operator licences (where the operator is an individual).

4.183 As shown in Figure 4.17, the majority of respondents (75%) agreed with the proposal. Taxi drivers and taxi owners were most likely to agree with the proposal whilst private hire vehicle owners were most likely to disagree (18% of respondents).

Figure 4.17: Do you agree with the proposal to require that applicants for private hire driver and operator licences provide a National Insurance number?



4.184 Table 4.21 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.21: Open responses from respondents who disagreed with, or were not sure about, the proposal to require that applicants for private hire driver and operator licences provide a National Insurance number

Theme	Key Codes	Number of respondents	% of respondents
Regulation		382	54.0%
Unnecessary		202	28.6%
<i>Not answered</i>		61	8.6%
Total number of respondents (who disagreed with, or were not sure about the proposals)		707	

Regulation

- 4.185 More than half of respondents (54%) commented on aspects of existing and proposed regulations. The most common comment (with 14% of responses) was that current regulation is sufficient. Other comments were that the requirements should be equal to any other employee in the UK and that TfL should not need to deal with this type of information.

Unnecessary

- 4.186 Just over a quarter of respondents (29%) thought that this proposal was unnecessary with 13% stating that operators already have this information.

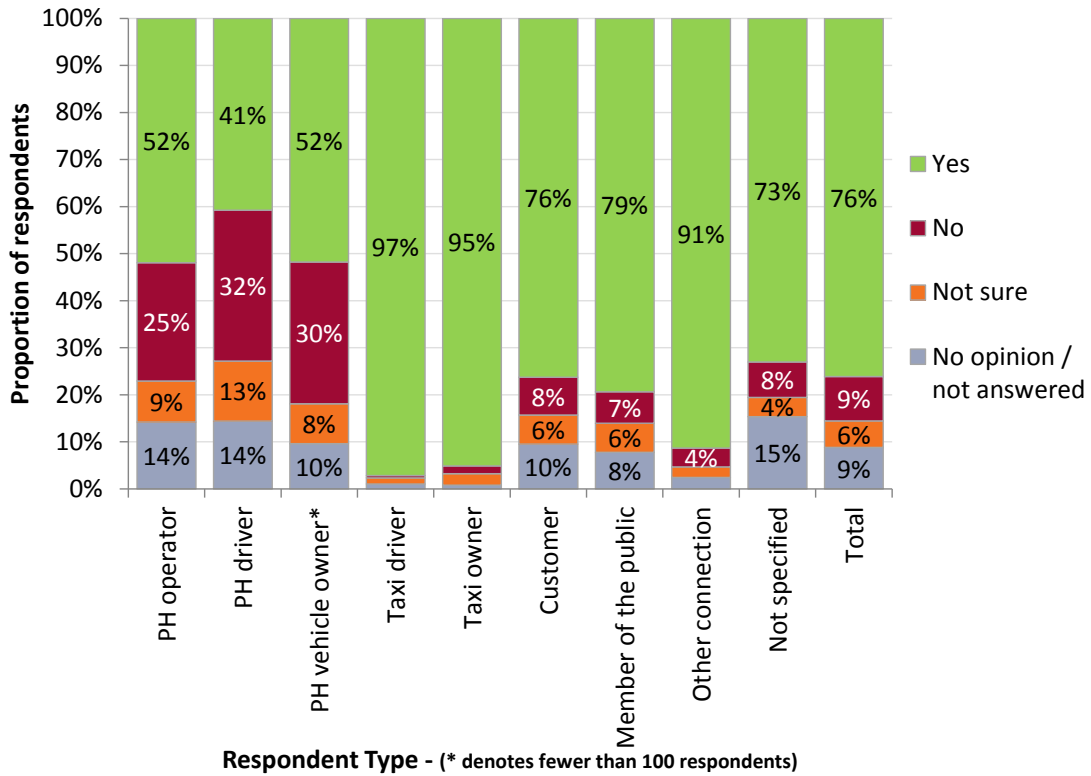
Q22. Revoking Vehicle Licences

- 4.187 There is no ‘fit and proper’ requirement for the owners of private hire vehicles and the 1998 Act suggests that the suspension or revocation of a licence, under that section, can only be for a reason connected to the fitness of the vehicle for use as a private hire vehicle. This is causing concern in situations where, for example, a driver is convicted of a sexual offence or touting in a licensed vehicle and may attempt to keep working (while unlicensed) in that vehicle. In the March consultation, a majority of stakeholders supported the proposal that, where a licensed driver has their driver’s licence revoked, and that driver is the owner of a licensed vehicle, TfL should also revoke the vehicle licence. This will ensure the driver is not able to illegally work and/or ply for hire. Respondents to this consultation were therefore asked whether they agreed with the following proposal:

Where a licensed driver has their driver’s licence revoked, and that driver is the owner of a licensed vehicle, then we will also revoke the vehicle licence.

- 4.188 The graph in Figure 4.18 shows that the majority of respondents (76%) agreed with this proposal. Private hire drivers and private hire vehicle owners were, however, most likely to disagree with the proposal, with almost one in three answering ‘no’ to the question.

Figure 4.18: Do you agree with the proposal that where a licensed driver has their driver’s licence revoked, and that driver is the owner of a licensed vehicle, then the vehicle licence should also be revoked?



4.189 Table 4.22 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.22: Open responses from respondents who disagreed with, or were not sure about, the proposal that where a licensed driver has their driver’s licence revoked, and that driver is the owner of a licensed vehicle, then the vehicle licence should also be revoked

Theme	Key Codes	Number of respondents	% of respondents
Impact		406	34.8%
	<i>Vehicle cannot be sold or rented to someone else</i>	314	26.9%
Query/Concern	<i>What if the vehicle is shared?</i>	394	33.7%
Regulation		217	18.6%
	<i>Driver’s licence and vehicle licence are separate things</i>	139	11.9%
<i>Not answered</i>		46	3.9%
Total number of respondents (who disagreed with, or were not sure about the proposals)		1,168	

Impact

4.190 Just over a third of respondents commented on the impacts of the proposal. The most common concern was that if the vehicle licence was revoked that the vehicle could not then be used by another driver, or sold (more than a quarter of respondents).

Query

- 4.191 Similarly, a third of respondents queried whether this proposal was practical, if the private hire vehicle was shared.

Regulation

- 4.192 With regard to the proposed changes to regulations, just over one in ten respondents commented that the driver's licence and vehicle licence should be dealt with separately.

Q23. Convictions of Operator Staff

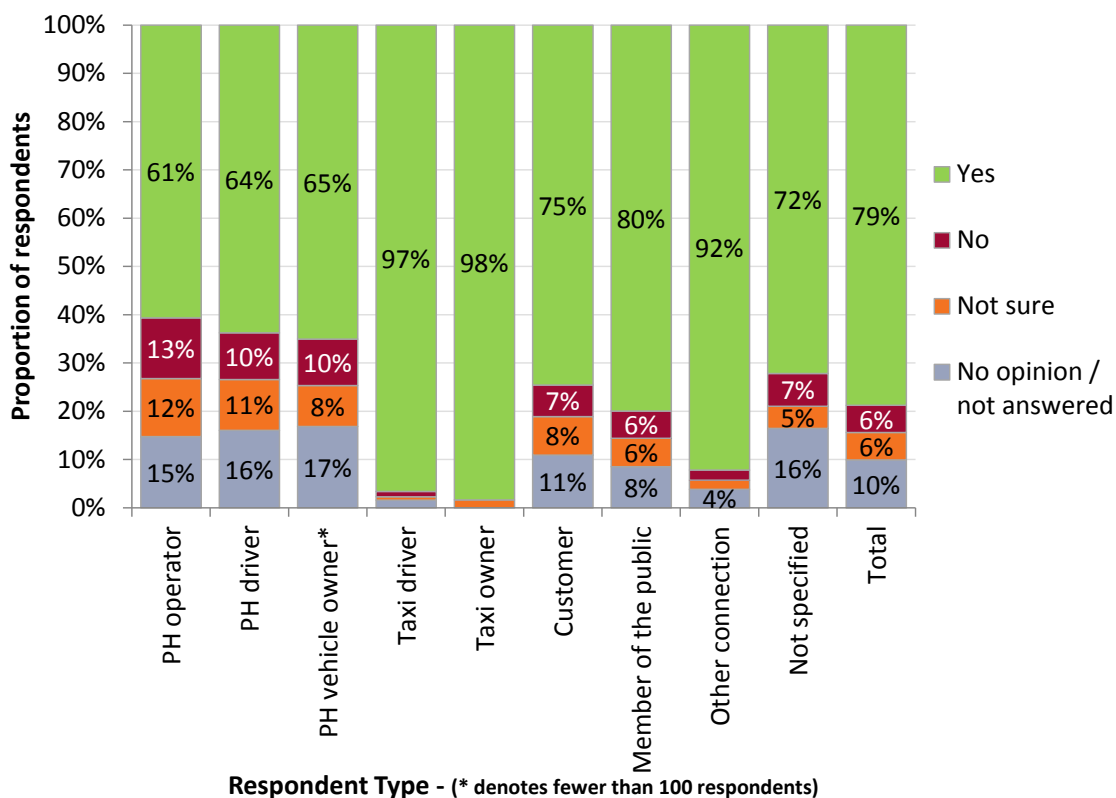
- 4.193 The Operators' Regulations require an operator to notify TfL of any convictions of the operator or anyone named on the application for the licence. This does not, however, extend to other employees and neither is there a formal requirement to undertake any pre-employment checks. In the previous consultation, consultees strongly supported more rigorous checks on operator staff and a full Disclosure and Barring Service (DBS)⁸ check was the most popular option suggested. Respondents to this consultation were therefore asked whether they agreed with the following proposal:

TfL will seek to add operator staff to the DBS list and amend the Regulations accordingly. As an interim measure we will require operators to ask any person working for them to provide a basic disclosure as part of the application process.

- 4.194 The graph in Figure 4.19 shows that the majority of respondents (79%) agreed with this proposal. Private hire operators were most likely to disagree with the proposal, but support did not drop below 61% amongst any respondent type.

⁸ Disclosure and Barring Service (DBS) – previously Criminal Records Bureau (CRB).

Figure 4.19: Do you agree with the proposal that operator staff will be required to be DBS checked as part of the application process?



4.195 Table 4.23 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.23: Open responses from respondents who disagreed with, or were not sure about, the proposal that operator staff will be required to be DBS checked as part of the application process

Theme	Key Codes	Number of respondents	% of respondents
Unnecessary		264	33.7%
	<i>No public safety concern as operators have no unmediated contact with vulnerable people</i>	152	19.4%
Regulation		198	25.3%
Discrimination		158	20.2%
	<i>Second chance to re-integrate into society and reduce stigma</i>	100	12.8%
Detail		141	18.0%
Other		109	13.9%
<i>Not answered</i>		49	6.3%
Total number of respondents (who disagreed with, or were not sure about the proposals)		784	

Unnecessary

4.196 A third of respondents thought that these proposals were unnecessary, with one in five noting that there was no public safety concern with operator staff, as they do not have individual contact with customers in the same way as drivers.

Regulation

- 4.197 A number of issues were raised by respondents including that the proposal was an increase in red tape, and not the role of TfL to regulate in this area.

Discrimination

- 4.198 More than one in ten respondents thought that this proposal was discriminatory against people who were in the process of re-integrating into work, for example following a previous conviction.

Detail

- 4.199 Just under one in five respondents commented on the specific detail of the proposal including that the checks should only be made on drivers.

Other

- 4.200 Of those who made other comments about the proposal, the most common was that the checks should be commensurate with those undertaken in other sectors i.e. not as onerous as that being suggested.

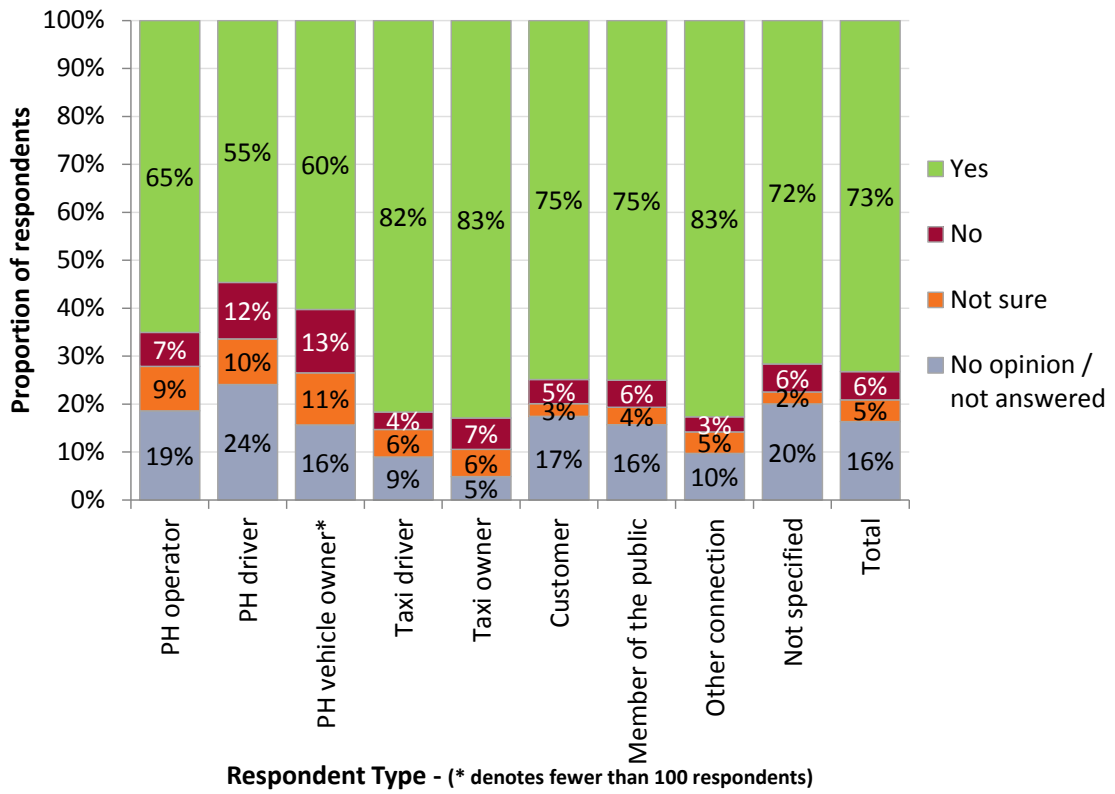
Q24. Payment by Postal Order and Cheque

- 4.201 Only a small number of payments are made by postal order or cheque, however TfL incur significant costs in processing them. In the March consultation, consultees were broadly supportive of the proposal that these will no longer be accepted as payment. Respondents to this consultation were therefore asked whether they agreed with the following proposal:

From 1 April 2016 TfL will no longer accept cheques or postal orders as payment.

- 4.202 The majority of respondents (73%) agreed with this proposal as shown in Figure 4.20. Private hire vehicle owners and private hire drivers were most likely to disagree with the proposal, although one in four private hire drivers either had no opinion about this proposal or did not respond to the question.

Figure 4.20: Do you agree with the proposal that TfL will no longer accept cheques or postal orders as payment?



4.203 Table 4.24 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.24: Open responses from respondents who disagreed with, or were not sure about, the proposal that TfL will no longer accept cheques or postal orders as payment

Theme	Key Codes	Number of respondents	% of respondents
Disagreement		205	32.7%
	<i>Having options is good for customers</i>	204	32.5%
Discrimination		179	28.5%
	<i>Some people don't have access to cards/online banking</i>	103	16.4%
Regulation		147	23.4%
	<i>Should have option, law requires to accept all legal forms of payment</i>	141	22.5%
Not answered		77	12.3%
Total number of respondents (who disagreed with, or were not sure about the proposals)		627	

Disagreement

4.204 The most common reason for the third of respondents who disagreed with the proposals was that having options for customer was good (this may be a misunderstanding of the proposals).

Discrimination

- 4.205 The next most common theme was discrimination, mentioned by just under a third of respondents. Again, it appears that respondents thought that the proposal were to change the ways in which the public can pay for private hire services.

Regulation

- 4.206 For the respondents who commented under this theme, the most common response was that having the option to pay by postal order and cheque is required by law (one in five respondents).

Part III: Private Hire Insurance

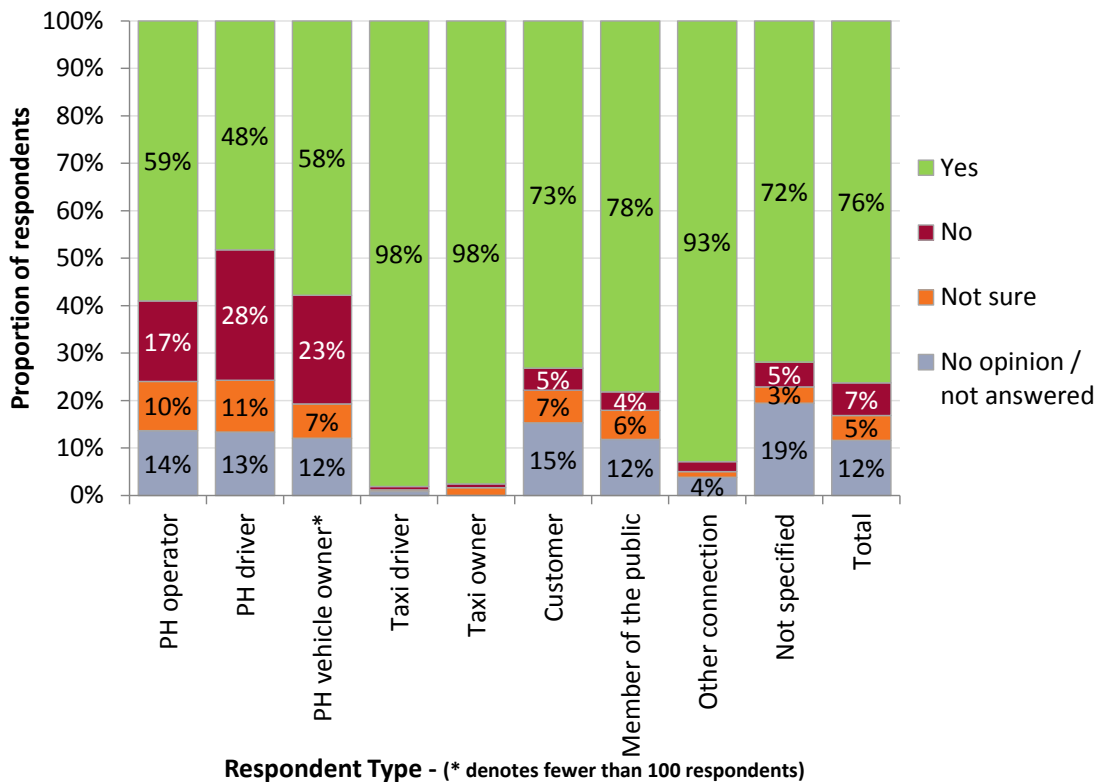
Q25. Hire and Reward Insurance – Checks and Duration

4.207 In the previous consultation, consultees were supportive of a requirement for Hire and Reward insurance to be checked at the point of licensing and for additional checks and controls to ensure that the insurance remains in place for the duration of the vehicle licence. In this consultation, respondents were therefore asked whether they agreed with the following proposal:

We propose to check Hire and Reward insurance at the point of vehicle licensing and insurance will be required to remain in place for the duration of the licence. No licence can be issued without evidence that the appropriate insurance is in place.

4.208 As shown in Figure 4.21, the majority of respondents (76%) agreed with this proposal. Taxi drivers and taxi owners were most likely to agree with the proposal whilst private hire drivers were most likely to disagree with the proposal (with almost a third disagreeing).

Figure 4.21: Do you agree with the proposal to check Hire and Reward insurance at the point of vehicle licensing and for insurance to be required to remain in place for the duration of the licence?



4.209 Table 4.25 overleaf shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.25: Open responses from respondents who disagreed with, or were not sure about, the proposal to check Hire and Reward insurance at the point of vehicle licensing and for insurance to be required to remain in place for the duration of the licence

Theme	Key Codes	Number of respondents	% of respondents
Detail		243	29.5%
	<i>Only important for days that drivers are driving</i>	108	13.1%
Impact	Removes flexibility for drivers	215	26.1%
Market/Competition		159	19.3%
	<i>Drivers might not be able to pay, barrier to entry</i>	130	15.8%
Driver/Operator		103	12.5%
<i>Not answered</i>		95	11.5%
Total number of respondents (who disagreed with, or were not sure about the proposals)		823	

Detail

- 4.210 Almost a third of respondents commented about the detail of the proposals. The most common comment was that Hire and Reward insurance was only necessary for days on which drivers are working.

Impact

- 4.211 More than one in four respondents commented that the proposal would impact drivers, removing an element of flexibility.

Market/Competition

- 4.212 Of the one in five respondents who noted a concern regarding the market or competition the most common response was regarding the proposals being a financial barrier to entry for new drivers.

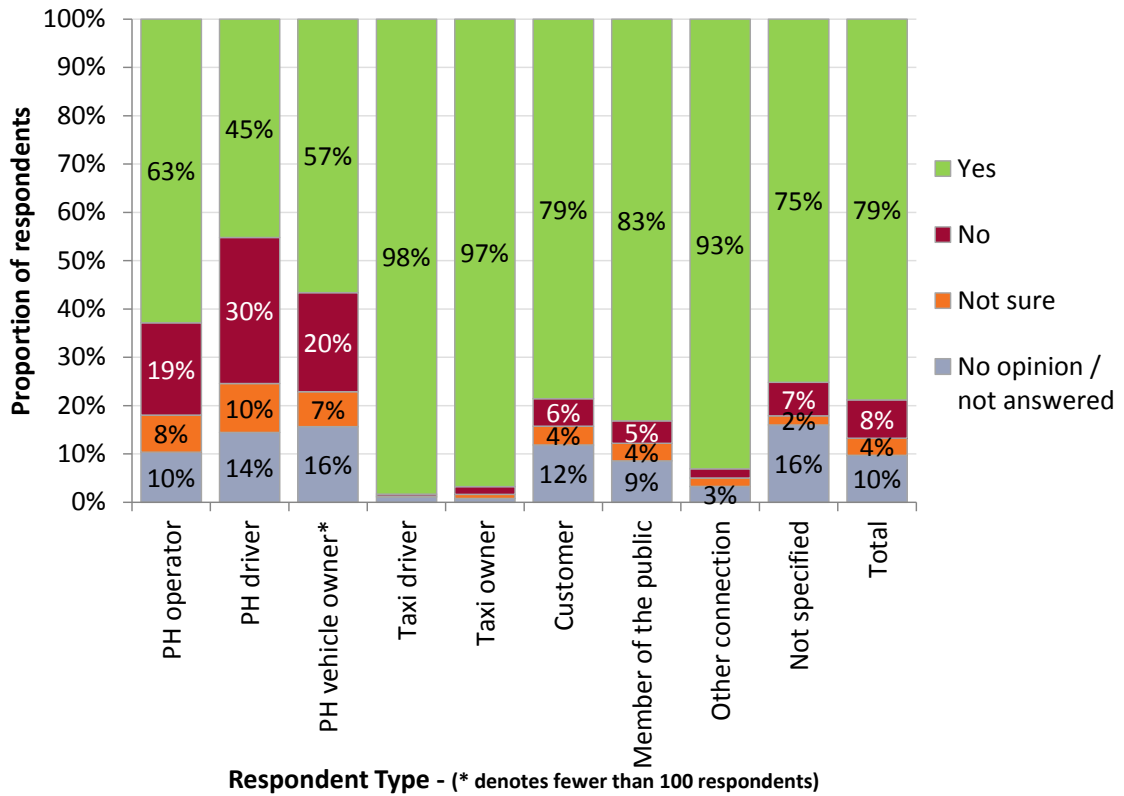
Q26. Carrying a Copy of Insurance Documentation

- 4.213 To support the requirement above, TfL believe that private hire drivers should carry in the vehicle, whether or not displayed in the vehicle, a copy of their insurance documentation. Licensed taxis must have hire and reward insurance in place at all times the vehicle is licensed and must display a copy of that insurance. TfL see no reason not to require similar provision for private hire vehicle drivers. Respondents were therefore asked whether they agreed with the following proposal:

We propose to amend the Drivers' Regulations to the effect that private hire drivers must carry a copy of their insurance documents at all times.

- 4.214 As shown in Figure 4.22, the majority of respondents (79%) agreed with this proposal. Taxi drivers and taxi owners were most likely to agree with the proposal whilst private hire drivers were most likely to disagree with the proposal (with 30% disagreeing with the proposal).

Figure 4.22: Do you agree with the proposal to require private hire drivers to carry a copy of their insurance documents at all times?



4.215 Table 4.26 overleaf shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.26: Open responses from respondents who disagreed with, or were not sure about, the proposal to require private hire drivers to carry a copy of their insurance documents at all times

Theme	Key Codes	Number of respondents	% of respondents
Unnecessary		613	65.6%
	<i>Records can be checked electronically/centrally e.g. ANPR</i>	360	38.5%
	<i>Unnecessary/irrelevant to passengers</i>	229	24.5%
Regulation		94	10.1%
Alternative/Suggestion		63	6.7%
Not answered		66	7.1%
Total number of respondents (who disagreed with, or were not sure about the proposals)		935	

Unnecessary

4.216 Two thirds of respondents stated that the proposal was unnecessary. Key reasons included that records can be checked electronically and that the information was irrelevant to passengers.

Regulation

4.217 Approximately one in ten respondents mentioned regulation in their comments with the majority commenting that the proposal was excessive/bureaucratic.

Alternative/Suggestion

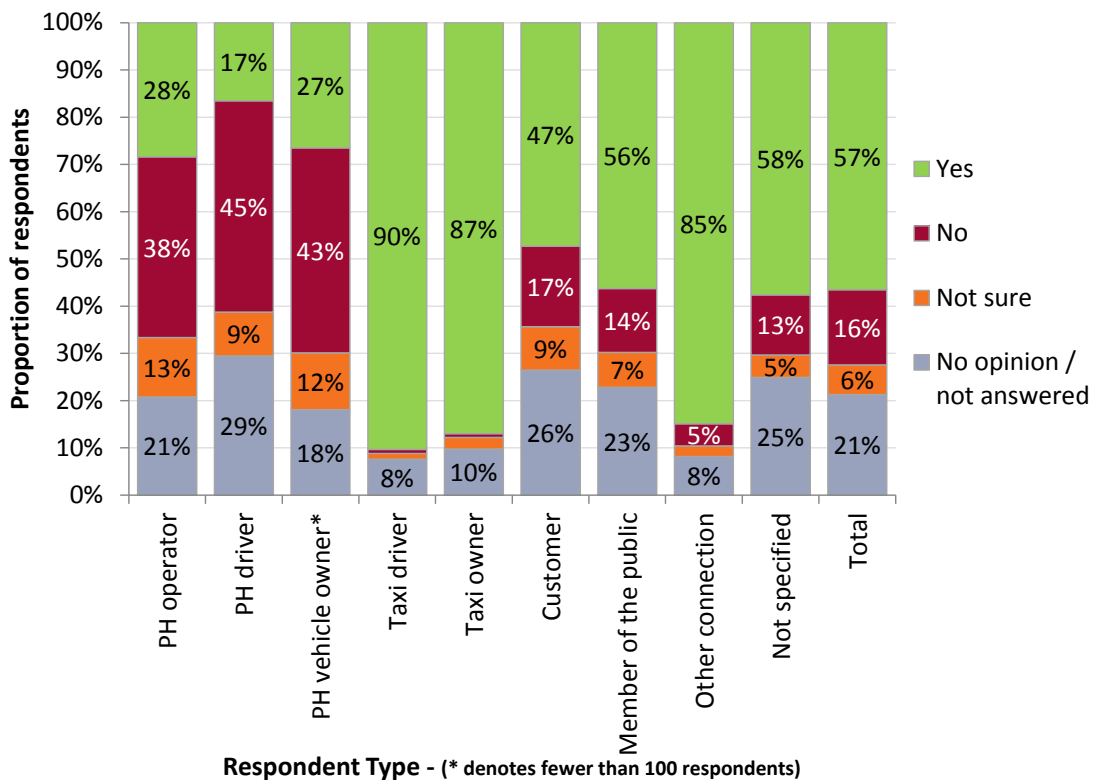
4.218 The majority of responses in this category were from respondents pre-empting the next question and stating that drivers should only need to carry a copy of their insurance, not display it.

Q27. Displaying a Copy of Insurance Documentation

4.219 Question 27 featured a closed question asking respondents who agreed with the previous proposal whether a driver should be required to *display* their insurance in their vehicle.

4.220 As shown in Figure 4.23, over half of all respondents (57%) agreed with this proposal. Taxi drivers and taxi owners were most likely to agree with the proposal whilst overall private hire drivers disagreed with the proposal (45% of respondents).

Figure 4.23: If you agree with the proposal to require private hire drivers to carry a copy of their insurance documents at all times, should the driver be required to display the insurance in the vehicle?



4.221 Table 4.27 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.27: Open responses from respondents who disagreed with, or were not sure about, the proposal to require private hire drivers to display their insurance in their vehicle

Theme	Key Codes	Number of respondents	% of respondents
Alternative/Suggestion		572	36.2%
	<i>Should be carried - available on request</i>	515	32.6%
Unnecessary		473	30.0%
	<i>Unnecessary</i>	257	16.3%
	<i>Enough checks in place already</i>	170	10.8%
Query/Concern		233	14.8%
	<i>Concerns about forgery/fraud/data protection</i>	105	6.6%
	<i>Concerns over display of personal info</i>	101	6.4%
Operation		204	12.9%
	<i>Unnecessary clutter in the vehicle/obstruction/impractical</i>	196	12.4%
Disagreement	<i>Shouldn't need to display it</i>	156	9.9%
		111	7.0%
Passenger	<i>Passenger isn't interested/shouldn't be the ones to check</i>	110	7.0%
Regulation		103	6.5%
	<i>Not answered</i>	97	6.1%
Total number of respondents (who disagreed with, or were not sure about the proposals)		1,579	

Alternative/Suggestion

- 4.222 The main suggestion, made by almost a third of respondents was that insurance details should be carried and made available on request.

Unnecessary

- 4.223 A third of respondents thought that the proposal was unnecessary with one in ten commenting that there are enough checks in place already.

Query/Concern

- 4.224 The most common concerns highlighted were regarding potential issues with forgery, fraud or data protection. There were also concerns about the display of personal information.

Operation

- 4.225 More than one in ten respondents noted concern about increased clutter in the vehicle, or that the display of insurance details would cause an obstruction or be impractical.

Disagreement

- 4.226 One in ten respondents simply commented that displaying insurance details should not be required.

Passenger

- 4.227 Just under one in ten respondents noted that passengers were not interested in this information, or shouldn't be the people to check whether insurance is in place.

Regulation

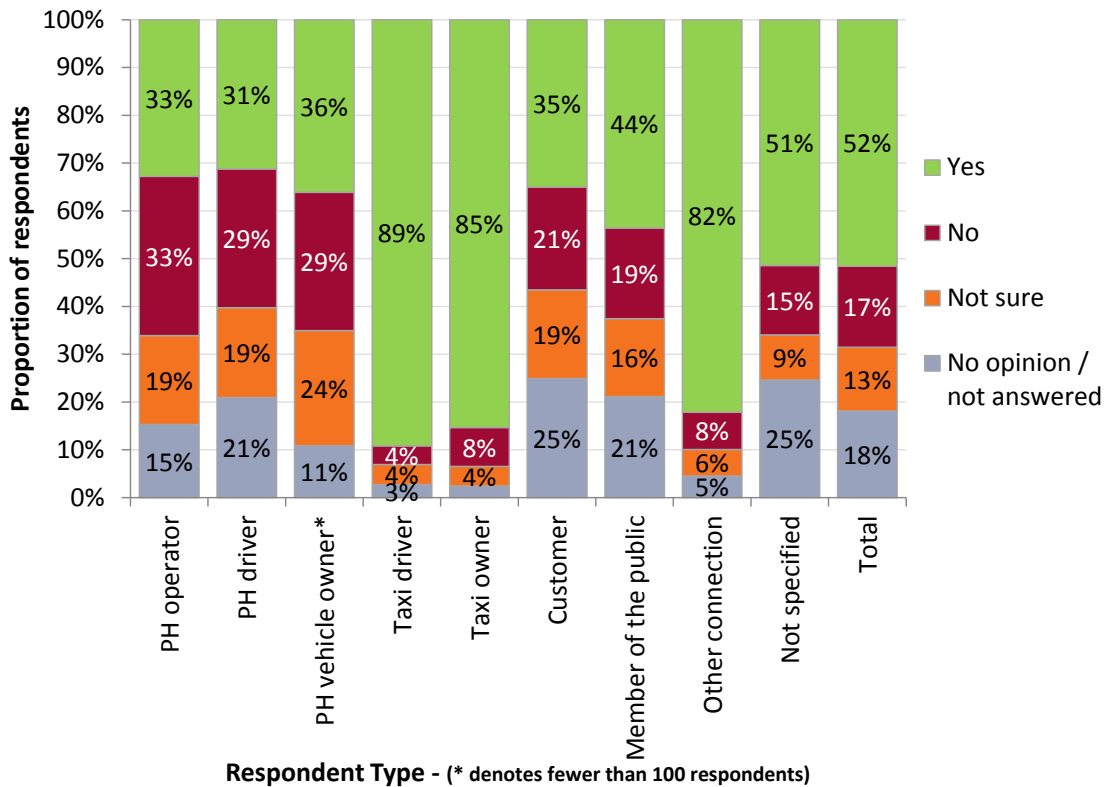
4.228 Of the 7% of respondents who mentioned regulatory issues, over half commented that the proposal was unnecessarily bureaucratic/archaic.

Q28. Hire and Reward Fleet Insurance

4.229 Some consultees suggested in the previous consultation that, as an alternative to the above proposals, operators should be required to have Hire and Reward fleet insurance. TfL understand that some operators have fleet insurance in place but for those that don't, they recognise that there may be a considerable financial cost. Rather than presenting a proposal, TfL instead asked respondents to this consultation whether they agreed that Hire and Reward fleet insurance put in place by operators is necessary in addition to, or instead of, individual driver insurance cover.

4.230 As shown in Figure 4.24, just over half of all respondents (52%) agreed that Hire and Reward fleet insurance put in place by operators is necessary in addition to, or instead of, individual driver insurance cover. Taxi drivers and taxi owners were most likely to agree whilst private hire operators, private hire drivers and private hire vehicle owners were most likely to disagree.

Figure 4.24: Do you agree that Hire and Reward fleet insurance put in place by operators is necessary in addition to, or instead of, individual driver insurance cover?



4.231 Table 4.28 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.28: Open responses from respondents who disagreed, or were not sure whether, Hire and Reward fleet insurance put in place by operators is necessary in addition to, or instead of, individual driver insurance cover

Theme	Key Codes	Number of respondents	% of respondents
Driver/Operator		1,063	48.7%
	<i>Driver should be responsible for car being insured</i>	794	36.4%
	<i>Operator should make sure there is appropriate insurance in place for their fleet</i>	212	9.7%
Cost		562	25.7%
	<i>Financial burden on fleet operators and drivers / costs will be passed on to consumers</i>	447	20.5%
	<i>Duplicates insurance and increases costs</i>	133	6.1%
Market/Competition		266	12.2%
	<i>Harms competition/reduces customer choice/makes it difficult to enter the market</i>	182	8.3%
Regulation		252	11.5%
	<i>Strict controls on vehicle insurance should be sufficient</i>	133	6.1%
Detail		174	8.0%
	<i>Should be in addition to, not instead of</i>	110	5.0%
Other		159	7.3%
Unnecessary		152	7.0%
	<i>Proposal is not practical</i>	118	5.4%
<i>Not answered</i>		30	1.4%
Total number of respondents (who disagreed with, or were not sure about the proposals)		2,183	

Driver/Operator

- 4.232 The most common comment (from more than a third of respondents) was that drivers should be responsible for insuring the vehicle they drive. Almost one in ten respondents stated that the operator should ensure that the vehicles on their fleet are suitably insured.

Cost

- 4.233 Respondents were concerned that the proposals would be a financial burden on operators and drivers (20% of respondents) and that the proposals could result in duplicate insurance increasing costs (6% of respondents).

Market/Competition

- 4.234 Allied to comments regarding costs, almost one in ten respondents stated that the proposals would harm competition, reduce customer choice or make it more difficult for new companies to enter the market.

Regulation

- 4.235 Just over one in twenty respondents noted that strict controls on existing vehicle insurance should be sufficient, rather than the proposals put forward.

Detail

- 4.236 Referring specifically to the proposal, one in twenty respondents emphasised that Hire and Reward insurance should be in addition to, not instead of, individual driver insurance.

Other

- 4.237 Of the 7% of respondents who commented on other issues, the largest proportion stated that insurance certificates should be shown in drivers' vehicles.

Unnecessary

- 4.238 Of those who thought that the proposal was unnecessary, the largest proportion stated that this was because it was impractical whilst others commented that existing conditions are sufficient.

Part IV: Private Hire Licensing

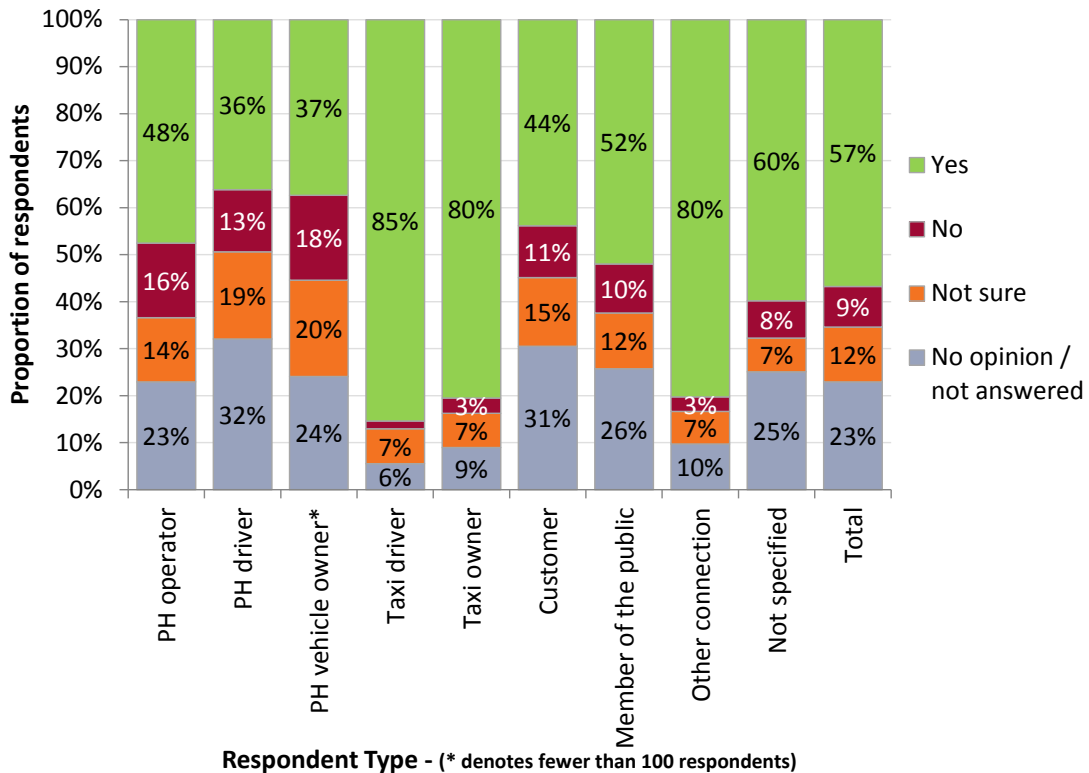
Q29. Operator Licence Type

4.239 TfL currently issue two types of private hire operator licence: Small (less than two private hire vehicles available) and Standard (more than two private hire vehicles available). A key element in both taxi and private hire licensing is that the licence fees can only be used to cover the costs of the licensing, compliance and enforcement functions, and cannot be used to fund other TfL activities. TfL has proposed a review of whether additional licence categories might be needed to better reflect and recover costs of the licensing, compliance and enforcement functions. Respondents were therefore asked whether they agreed with the following proposal:

We will review the current operator licence types and look to introduce additional category/categories.

4.240 As shown in Figure 4.25, over half of respondents (57%) agreed with this proposal. Taxi drivers were most likely to agree with the proposal whilst private hire vehicle owners and private hire operators were most likely to disagree with the proposal, although there was some degree of uncertainty amongst these respondents.

Figure 4.25: Do you agree with the proposal to review the current operator licence types and look to introduce additional category/categories?



4.241 Table 4.29 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.29: Open responses from respondents who disagreed with, or were not sure about, the proposal to review the current operator licence types and look to introduce additional category/categories

Theme	Key Codes	Number of respondents	% of respondents
Detail		202	18.9%
	<i>Licence costs should be reduced/already too expensive</i>	123	11.5%
Cost		199	18.6%
	<i>Ultimately will result in increased costs for passengers</i>	122	11.4%
Market/Competition		197	18.4%
	<i>Anti-competitive/stifles PHV market/discourages growth</i>	171	16.0%
Other		165	15.4%
Question misleading/unclear		123	11.5%
Regulation		113	10.6%
<i>Not answered</i>		68	6.3%
Total number of respondents (who disagreed with, or were not sure about the proposals)		1,071	

Detail

- 4.242 One in five respondents noted points of detail about the proposal. In particular it was felt by more than one in ten respondents that licence costs are already too expensive or should be reduced.

Cost

- 4.243 Almost one in five respondents commented about the proposals with regard to costs more widely, in particular that the proposals would result in higher fares for passengers.

Market/Competition

- 4.244 The most common comment relating to the market was that the proposals were uncompetitive, or not in the interest of the private hire industry, which was mentioned by 16% of respondents.

Other

- 4.245 Other comments were mainly focused on the perceived high level of licence fees received by TfL from the private hire industry.

Question misleading/unclear

- 4.246 Just over one in ten respondents commented that the proposal lacked detail and little justification had been provided for its inclusion.

Regulation

- 4.247 Comments around regulation focused on the perceived bureaucracy of the proposal.

Q30. Ridesharing

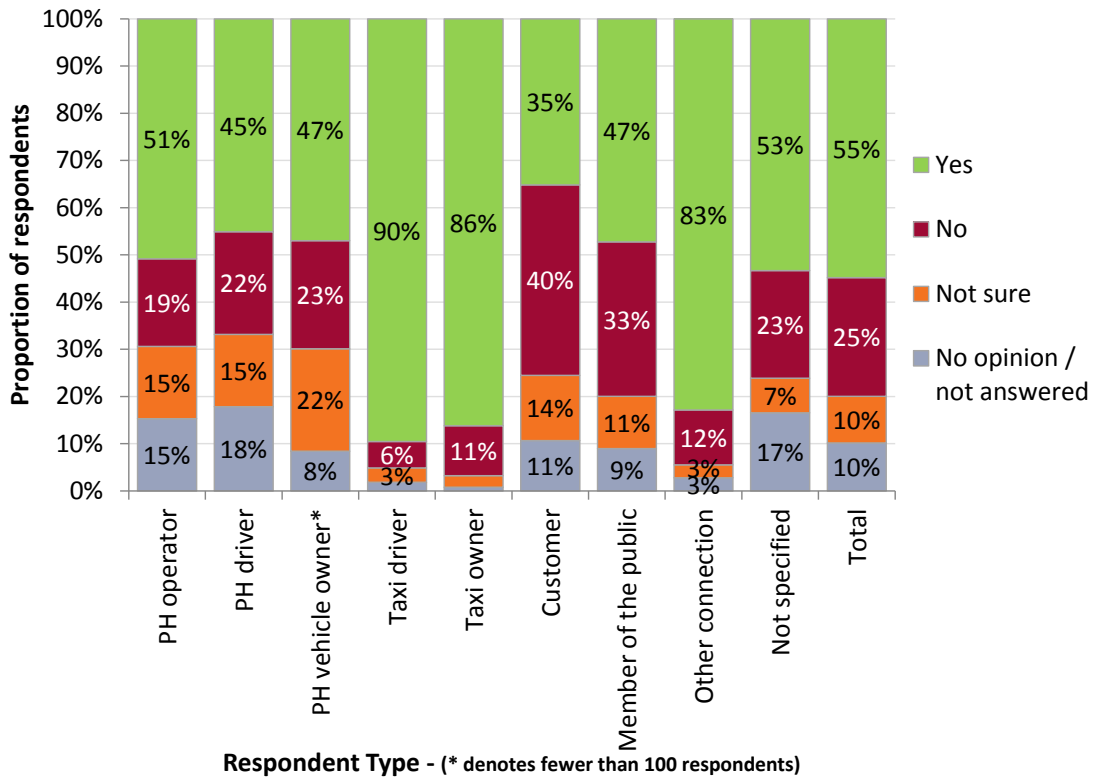
- 4.248 There was some confusion amongst consultees in the March consultation about what issues TfL were consulting on in relation to ridesharing⁹, however there was a very clear consensus that unlicensed private hire vehicles (and by extension, drivers) should not be used for any journey where multiple passengers were taken on the same trip for commercial gain. The most common concerns were about passenger safety, but also driver safety given potential for disputes between “strangers” and issues about splitting fares. Generally TfL’s position is to support developments in technology which comply with relevant laws and provide benefits to passengers. However, TfL recognise that the regulatory framework must properly address any safety concerns and the safety of passengers and drivers must not be put at risk. Respondents to this consultation were therefore asked whether they supported the following proposal:

TfL intend to explore measures to ensure that private hire vehicles cannot be used for ridesharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers.

- 4.249 As shown in Figure 4.26, just over half of respondents (55%) supported this proposal. Taxi drivers and taxi owners were most likely to support the proposal whilst customers and other members of the public were most likely to disagree with the proposal. Amongst private hire operators, private hire drivers and private hire vehicle owners there was some degree of uncertainty about this proposal.

⁹ The question asked in the March consultation was: “How are shared private hire services different to exclusive hires and how should this be reflected in the requirements that apply to them?”

Figure 4.26: Do you support the proposal to explore measures to ensure that private hire vehicles cannot be used for ridesharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers?



4.250 Table 4.30 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.30: Open responses from respondents who disagreed with, or were not sure about, the proposal to explore measures to ensure that private hire vehicles cannot be used for ridesharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers

Theme	Key Codes	Number of respondents	% of respondents
Market/Competition		1,526	43.2%
	<i>Ridesharing should be encouraged for providing cheap option to consumers</i>	699	19.8%
	<i>Passengers' decision if they want to share</i>	545	15.4%
	<i>Leave it to the market</i>	428	12.1%
Environment		842	23.8%
	<i>Ridesharing should be encouraged for environmental/decongestion benefits</i>	834	23.6%
Safety		650	18.4%
	<i>Focus on making it safe and successful rather than banning</i>	299	8.5%
	<i>Respondent questions safety concerns</i>	237	6.7%
Regulation		553	15.7%
	<i>Ridesharing will never be safe/should be banned</i>	469	13.3%

Theme	Key Codes	Number of respondents	% of respondents
Other	<i>Ridesharing works in other countries</i>	499	14.1
	<i>Consumers already share other modes of transport e.g. buses, trains</i>	123	3.5%
	<i>Ridesharing acceptable as destinations/price split agreed before start of journey or by app</i>	114	3.2%
		114	3.2%
Question misleading/unclear	<i>Proposal not currently detailed enough</i>	328	9.3%
	<i>Lack of clarity over differences between sharing with friends and strangers</i>	190	5.4%
		133	3.8%
<i>Not answered</i>		244	4.8%
Total number of respondents (who disagreed with, or were not sure about the proposals)		3,531	

Market/Competition

- 4.251 Almost one in five respondents thought that ridesharing should be encouraged, with 15% of respondents noting that it should be the passenger's decision if they want to share. Just over 10% of respondents thought that TfL should leave ridesharing to the market and not intervene.

Environment

- 4.252 Almost a quarter of respondents stated that ridesharing should be encouraged for environmental reasons.

Safety

- 4.253 One in five respondents noted concerns regarding the safety of ridesharing, with almost one in ten respondents suggesting that there should be a focus on making ridesharing safe, rather than banning services.

Regulation

- 4.254 The majority of respondents mentioning regulation were against ridesharing with 13% stating that it would never be safe and should be banned.

Other

- 4.255 Other comments were focused on stating that ridesharing is safe in other countries (4% of respondents) and that passengers already share other forms of transport, such as buses (3% of respondents).

Question misleading/unclear

- 4.256 Just under one in ten respondents made a comment to the effect that the question was misleading or unclear. The most common comment was that the proposal was not detailed enough in its current form whilst 4% of respondents noted the lack of clarity over how differences in ridesharing between friends and strangers would be treated.

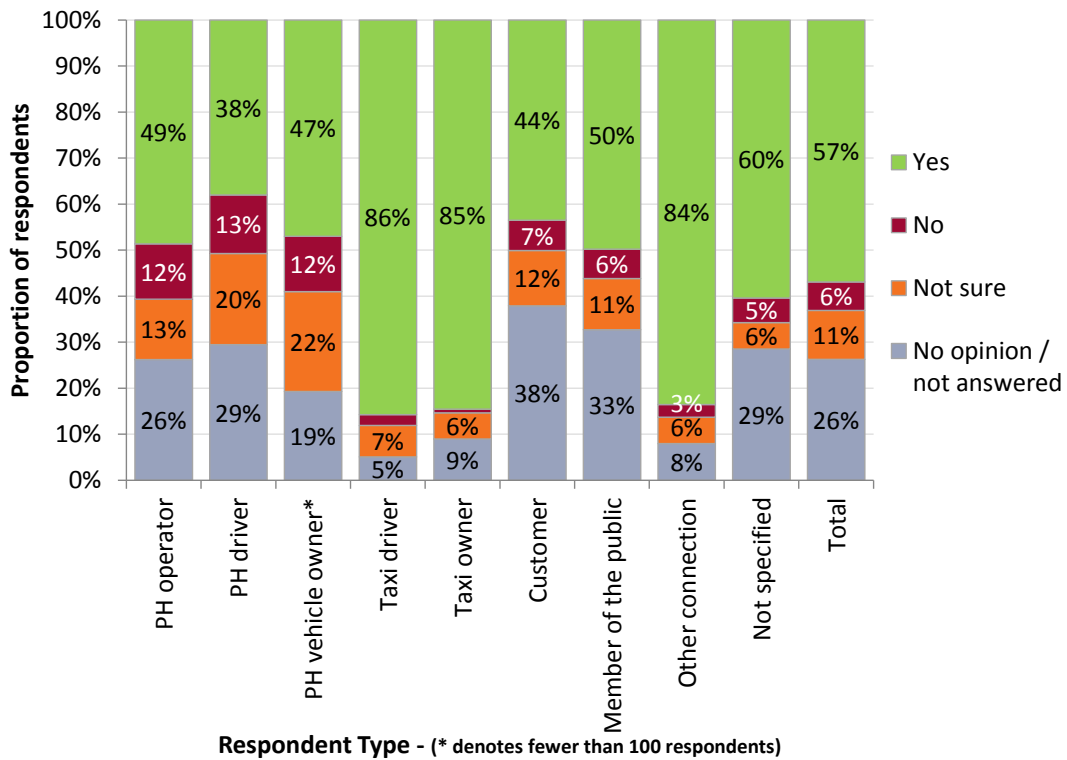
Q31. In-Vehicle Advertising

- 4.257 For the final question, respondents were asked whether they agreed with the following proposal:

We are proposing a small change to Regulation 8 of the Vehicle Regulations which will clarify that advertising displayed “from” as well as “on” a vehicle is subject to the controls set out in that Regulation.

4.258 As shown in Figure 4.27, over half of respondents (57%) agreed with this proposal. Taxi drivers were most likely to agree with the proposal whilst private hire drivers were most likely to disagree with the proposal. Between one in fifteen and one in five respondents across all respondent types stated that they were not sure about this proposal. It is possible that respondents were unsure of the details of Regulation 8 and therefore felt unable to comment.

Figure 4.27: Do you agree with the proposal to change Regulation 8 of the Vehicle Regulations to clarify that advertising displayed “from” as well as “on” a vehicle is subject to the controls set out in that Regulation?



4.259 Table 4.31 shows the themes that were mentioned by respondents who disagreed with, or were not sure about, the proposal.

Table 4.31: Open responses from respondents who disagreed with, or were not sure about, the proposal to change Regulation 8 of the Vehicle Regulations to clarify that advertising displayed “from” as well as “on” a vehicle is subject to the controls set out in that Regulation

Theme	Key Codes	Number of respondents	% of respondents
Question misleading/unclear	<i>Don't understand proposal/lacks detail on what Regulation 8 is/confusing use of in and on/no explanation</i>	203	32.3%
Regulation		131	20.8%
Detail		90	14.3%
Unnecessary		89	14.2%
<i>Not answered</i>		44	7.0%
Total number of respondents (who disagreed with, or were not sure about the proposals)		631	

Question misleading/unclear

4.260 Approximately one in three respondents did not understand the proposal or were unclear on the content of Regulation 8 of the Vehicle Regulations.

Regulation

4.261 Under the Regulation theme, respondents were most likely to comment that the proposal amounted to over-regulation (9%).

Detail

4.262 Of the respondents who commented on the specific detail of the proposal, roughly half stated that it should be up to the vehicle owners/operators to decide if/how they advertise from their vehicles. A smaller proportion thought that advertising should be permitted both from and on the vehicle.



A Respondent Type Analysis

A.1 Although Question 36 of the consultation allowed respondents to specify whether they were related to the private hire or taxi trade, this question was not compulsory and respondents were able to pick more than one option. We have therefore used information provided in the ‘Other response’ open text box to allocate respondents to a respondent type. This appendix details this process and the assumptions used.

A.2 We have used the following questions, in the order shown, to allocate respondents to groups:

- Q36: How are you connected to the Private Hire or Taxi Trade? (closed question); and
- Q36: How are you connected to the Private Hire or Taxi Trade? – other responses (open text box).

Q36: How are you connected to the Private Hire or Taxi Trade? (closed question).

A.3 Using this closed question it was possible to allocate 12,880 of the 15,817 responses, as detailed in Table A.1.

Table A.1: Respondent types determined using Q36 (closed question)

Category	Responses	Proportion
Customer	3,416	21.6%
Member of the public	3,025	19.1%
Taxi driver	2,880	18.6%
PH driver	2,069	13.1%
Other connection	1,097	6.9%
PH operator	183	1.2%
Taxi owner	126	0.8%
PH vehicle owner	84	0.5%
<i>Not specified</i>	<i>2,937</i>	<i>18.6%</i>
Total	15,817	100.0%

Q36: How are you connected to the Private Hire or Taxi Trade? –other responses (open text box)

- A.4 Using this open question it was possible to allocate a further 408 of the 15,817 responses, as detailed in Table A.2. At this stage, approximately 100 respondents were manually re-allocated due to discrepancies between their responses to the closed and open elements of Q36. In addition, almost half of the respondents who selected the ‘Other connection’ option in the closed part of the question could be allocated to a specific respondent type using the open text box information.

Table A.2: Respondent types determined using a combination of the closed and open elements of Q36

Category	Responses	Proportion
Customer	4,059	25.7%
Taxi driver	3,090	19.5%
Member of the public	3,073	19.4%
Private hire driver	2,091	13.2%
Other connection	588	3.7%
Private hire operator	180	1.1%
Taxi owner	125	0.8%
Private hire vehicle owner	82	0.5%
<i>Not specified</i>	2,529	16.0%
Total	15,817	100.0%

B Codeframes

Table 32: Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking. If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	General agreement	8	0.7%	8	0.7%
Alternative/Suggestion	Should be made available as an option	36	2.9%	36	2.9%
Detail	No photo, other information more useful (e.g. make and model of car, driver phone number, customer reviews)	129	10.6%	149	12.2%
	Should work both ways (photo of driver and passenger)	13	1.1%		
	Needs more information (colour and make of car)	3	0.2%		
	Not essential for Minicab companies	3	0.2%		
	Should not be too prescriptive (i.e. email format)	1	0.1%		
	Photo should be clearly displayed in car	1	0.1%		
Disagreement	General disagreement	4	0.3%	4	0.3%
Discrimination	Discriminates against consumer (e.g. blind, elderly people, tourists, no smartphone)	42	3.4%	42	3.4%
Impact	Impact on driver's livelihood	22	1.8%	22	1.8%
Market/Competition	Prevents fair competition	133	10.9%	344	28.2%
	Higher costs/time (consumer/company)	117	9.6%		

	Customers have choice to use platforms that offer this	67	5.5%		
	Doesn't need market regulation by TfL	58	4.8%		
	Against innovation / confluence of mobile technology and automobile industry	54	4.4%		
	Initiative against Private Hire/Uber	50	4.1%		
	Appeasing/protecting taxi drivers	31	2.5%		
Operation	Less flexibility/accessibility (e.g. covering/changing shifts)	58	4.8%	58	4.8%
Other	Will take too long to implement	2	0.2%	2	0.2%
Passenger	Passenger's responsibility	27	2.2%	29	2.4%
Passenger	Good for passenger confidence	2	0.2%		
Query/Concern	Changing physical features, counterfeit documents	14	1.1%	14	1.1%
Question misleading/unclear	Proposal too vague	4	0.3%	4	0.3%
Regulation	Current regulation sufficient	173	14.2%	361	29.6%
	Should apply to taxis also	76	6.2%		
	Needless bureaucracy	74	6.1%		
	Responsibility of licensing authority/ licensing process	67	5.5%		
	Needs other regulation/licensing regulation	15	1.2%		
Safety	Risk for drivers (e.g. discrimination, misuse, privacy)	111	9.1%	168	13.8%
	No extra safety/ Less safety	64	5.2%		
Technology	For app based operators only	3	0.2%	6	0.5%
	Technological issues e.g. how to receive photo if not using smartphone	3	0.2%		
Unnecessary	Information already provided by operators	135	11.1%	222	18.2%
	Not feasible/practical	50	4.1%		
	No need for information in advance	49	4.0%		
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	252	20.6%	252	20.6%
Total		1,951			

	Count of respondents	1,221			
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Table 33: Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing. If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Alternative/Suggestion	Better dispute resolution framework required	1	0.0%	2	0.0%
	Uber should be banned from the UK	1	0.0%		
Detail	Details should/can be sent ahead of journey commencing (as per Q1)	991	14.7%	1,267	18.8%
	Wait time should be greater than 5 mins	137	2.0%		
	Wait time should be less than 5 mins	117	1.7%		
	Allow more time for planning an efficient route	14	0.2%		
	Wait time shouldn't always be necessary	9	0.1%		
	Optional 5 minute wait	5	0.1%		
	Shouldn't apply to app-based services	4	0.1%		
	Should exclude bookings from a taxi office	3	0.0%		
	Should only apply to offline booking	2	0.0%		
	Mandate private hires can only pick up in approved locations	2	0.0%		
	Should only apply to app-based services	1	0.0%		
	Each booking is different - depends on location of vehicle in relation to pick-up	1	0.0%		
	Allows time for drivers to make better decisions e.g. where to stop	1	0.0%		
	Mandatory pick up period	1	0.0%		
Environment	Increased idling/congestion/pollution/delays because of additional waiting	360	5.4%	363	5.4%
	More should be done to discourage private hire drivers from Central London (congestion)	1	0.0%		
	PRIVATE HIREs already causing congestion	1	0.0%		
Market/Competition	Penalises app-based/PRIVATE HIRE companies/anti-competitive/protects taxis	1,178	17.5%	2,113	31.4%
	Inconvenient/wasted time/financial loss to private hire businesses/inefficient	511	7.6%		
	Shouldn't hold back progress/technology/backward step	424	6.3%		

Market/Competition	Passenger to confirm driver/vehicle is who/what it's supposed to be	135	2.0%			
	Driver and/or passenger should ensure safety	81	1.2%			
	Issues with queuing at private hire offices - impatient passengers	4	0.1%			
	Unaffordable for small businesses	4	0.1%			
	Will lead to more cancellations of journeys	3	0.0%			
	All companies/drivers to have same rates/minimum fare	1	0.0%			
Other	Can see both sides of the argument	4	0.1%	4	0.1%	
Passenger	Inconvenient/less choice/wasted time for passengers/delayed journey	1,838	27.3%	2,883	42.9%	
	Desire for private hire on demand/instantly/emergency	1,271	18.9%			
	Longer wait times in suburban areas	6	0.1%			
Question misleading/unclear	Question isn't clear	2	0.0%	2	0.0%	
Regulation	Over regulation/anti-competitive/problem that doesn't exist/nanny state	486	7.2%	1,206	17.9%	
	Flawed/no justification/logic for implementation/lack of evidence	401	6.0%			
	Taxis shouldn't be treated differently	260	3.9%			
	Unenforceable/Difficult to enforce/expensive	36	0.5%			
	Increase unlicensed driver activity	25	0.4%			
	Better regulation/enforcement	21	0.3%			
	Cancellation/change mind without penalty	15	0.2%			
	Less regulation on taxis	10	0.1%			
	Better education	10	0.1%			
	Taxis/PRIVATE HIRE need to be more distinctive	8	0.1%			
	Fails to address real issues with private hires	5	0.1%			
	Max time for communication of details	4	0.1%			
	Ban idling without a booking	4	0.1%			
	Regulation	Better identification in-vehicle	3	0.0%		
		Won't greatly inconvenience passengers	1	0.0%		

Safety	Safety implications of mandatory wait	939	14.0%	1076	16.0%
	Safety issues/issues about availability raised have more to do with taxis	115	1.7%		
	Might make people more inclined to use unlicensed vehicles to avoid having to wait	34	0.5%		
	Increased risk of people getting in the wrong car	21	0.3%		
	Using Health & Safety as a justification for change is wrong	15	0.2%		
	Implications for those whose mobile battery dies	2	0.0%		
	Will prevent poor driving by private hire drivers	1	0.0%		
	Will improve passenger safety	1	0.0%		
Unnecessary	Disagreement/Unnecessary intervention/No benefit	1,329	19.8%	1,418	21.1%
	Status quo/Keep things as they are/nothing to fix/Happy with current way private hire work	94	1.4%		
Not Answered	Not Answered/Not Relevant/Not Providing Answer to Question	126	1.9%	126	1.9%
	Total	11,080			
	Count of respondents	6,726			

Table 34: Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing. Do you think that a different time interval to five minutes is appropriate? If you do, please say what you consider an appropriate time interval to be, and why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Alternative/Suggestion	Allow period for penalty free cancellation	11	0.2%	36	0.7%
	Allow customers to choose if they want 5 min delay	10	0.2%		
	Should be a maximum time limit for confirmation to be sent	8	0.2%		
	Varied minimum wait by inner/outer London/location	2	0.0%		
	Operators should have to opt in	3	0.1%		
	Confirmation should be emailed as well as provided through app	3	0.1%		
Cost	Wait times will increase costs to both passengers and drivers	29	0.6%	30	0.6%
	Wait time would create an administrative/enforcement fee	1	0.0%		
Detail	Journey should be allowed once information exchange is complete/car is available/correct car identified	688	13.8%	728	14.6%
	Time required for booking information to be conveyed to passengers/drivers and checked/forwarded	34	0.7%		
	Shorter period open to abuse	2	0.0%		
	Allows more time for driver and passenger to meet/identify correct vehicle	3	0.1%		
Disagreement	Oppose the proposal for a 5 minute wait	62	1.2%	62	1.2%
Driver/Operator	Time delay is inefficient for driver	62	1.2%	62	1.2%
Enforcement	Easier to enforce	2	0.0%	2	0.0%
Environment	Wait times would increase congestion	34	0.7%		
	Wait time would increase air pollution	18	0.4%		
	Wait times would reduce congestion	4	0.1%		
	Wait times are damaging to the environment/carbon emissions	13	0.3%		
	Reduction in private hire touting will help improve air quality	1	0.0%		

Impact	Wait times will exacerbate parking shortage as minicabs will be filling all the spaces during the wait	10	0.2%	22	0.4%
	Lack of safe and legal places for private hire to stop and wait for 5 mins/risk of fines	9	0.2%		
	Would be difficult for drivers to manage wait times, could require stopping/parking	5	0.1%		
Market/Competition	Attempt to stifle competition/bias toward taxis	184	3.7%	259	5.2%
	To discourage private hire 'ranking/plying' in hot spots	14	0.3%		
	Allows for better distinction between private hire (pre-booked) and taxis (instant)	14	0.3%		
	If interval imposed it should also be imposed on taxis who need to also perform same planning tasks/passengers check ID	31	0.6%		
	Consumer interests over taxi interests	20	0.4%		
	Efforts should be made to help taxis adapt to the times	16	0.3%		
	Allow smaller companies to compete	1	0.0%		
Time period/interval	No interval	3,631	73.0%	4,396	88.4%
	Less than 5 minutes	583	11.7%		
	5 minutes	18	0.4%		
	More than 5 minutes	157	3.2%		
Other	Does not require 5 minutes to read information and identify the correct private hire	76	1.5%	101	2.0%
	Allows for genuine pre-booking	6	0.1%		
	Delay is damaging to the economy	9	0.2%		
	Use the Uber app to monitor and enforce loitering	3	0.1%		
	People should know when they want to go home and book accordingly	1	0.0%		
	Enforce rest breaks similar to HGV drivers	2	0.0%		
	Waits could cause confusion	1	0.0%		
	All booking details should be open to trade body scrutiny	1	0.0%		
	Do not allow phones to be used as meters	1	0.0%		
	Other	Taximeters should record earnings so that correct tax can be paid	1	0.0%	

Passenger	Delay would cause inconvenience to customers	176	3.5%	291	5.9%	
	Proposals have nothing to do with benefitting customers	69	1.4%			
	Customer shouldn't be made to wait/waste of time	41	0.8%			
	Objective should be to minimise time from request to pickup/improve customer service	15	0.3%			
Question misleading/unclear	Question is biased/leading	23	0.5%	23	0.5%	
Regulation	Should be no arbitrary wait time imposed	22	0.4%	24	0.5%	
	Two tiered system dependant on overall anticipated wait time	2	0.0%			
Safety	Longer passenger dwell times do not pose risk to passenger safety	120	2.4%	292	5.9%	
	Longer waits won't help people get in the correct cab/can't identify car until it arrives	57	1.1%			
	Wait time won't stop passengers 'running out into traffic', drivers responsibility to stop in safe place	36	0.7%			
	Safety better guaranteed by efficient communication (confirmations), safe pick-up locations and screened drivers	35	0.7%			
	Time for driver to reach pick-up destination safely	25	0.5%			
	Allow sufficient time for route planning	21	0.4%			
	Time to stop in appropriate and safe location	17	0.3%			
	Web based taxi apps provide better safety, security, cost, service over taxis	15	0.3%			
	Changes could increase unlawful private hire use (Hailing private hire)	13	0.3%			
	Safe passenger dwell time	4	0.1%			
	Public awareness campaigns to bring about safety improvements	3	0.1%			
	Improper pick-up locations/poor route planning cause Road Traffic Accidents	2	0.0%			
	Route pre-planning will increase safety	1	0.0%			
	Safety	Allows drivers to have a break between fares	1	0.0%		
	Technology	Legislation should not hold back recent advances in technology which have made the pre-booking process faster/more efficient	156	3.1%	156	3.1%

Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	106	2.1%	106	2.1%
Total		6,744			
	Count of respondents	4,972			

Table 35: Operators will be required to seek TfL approval before changing their operating model. If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	Operators to seek approval/potentially a good idea	4	0.1%	7	0.2%
	Agree, providing no consent obligation or ability to block	3	0.1%		
Alternative/Suggestion	Only required if they are in breach of requirements	215	6.4%	320	9.6%
	TfL to do periodical reviews	14	0.4%		
	Only if new operating model results in unsafe operations	13	0.4%		
	Inform rather than seek approval	71	2.1%		
	Begin a new operating model whilst initiating the approval process	10	0.3%		
	Independent company to regulate	5	0.1%		
	Allow operators to vary models based on demand	1	0.0%		
	Audit some operators each year to understand their business models	1	0.0%		
	Allow operators trial periods to test out any proposed changes to their operating models	2	0.1%		
	Consultation with operators only	1	0.0%		
Cost	Unnecessarily expensive/burdensome for the company	91	2.7%	160	4.8%
	Added expense will be passed onto consumers/ tax payers	80	2.4%		
	Will cost TfL unnecessary amounts	18	0.5%		
Data security/privacy	Breach of privacy of company/Company shouldn't have to disclose information	6	0.2%	6	0.2%
Detail	TfL must turn applications around promptly and fairly/in a specified timeframe	104	3.1%	296	8.9%
	A consistent set of requirements of operators must be set out by TfL/clearly defined	92	2.8%		
	Dependent on turn around/Only if delays are minimal	32	1.0%		
	Approval for major changes/no intervention for minor changes	30	0.9%		
	Must not hinder benefits to drivers/passengers/customer comes first	22	0.7%		
	Only for informative purposes/safety/licensing purposes/purposes that benefit the customer	21	0.6%		

Detail	Limited to most important issues only, set out in guidelines	9	0.3%		
	Issue of incremental change and updates/Depends what they change/Incremental change restrictive	8	0.2%		
	As long as it is not detrimental to the consumer/ slows progress	3	0.1%		
	As long as it is not onerous to app company	3	0.1%		
	As long as there are sufficient resources	1	0.0%		
Enforcement	If in breach of law the company can be prosecuted after the fact/ fined/As long as they do not break the law	144	4.3%	169	5.1%
	TfL should be able to enforce regulations without a pre-approval process	25	0.7%		
Impact	Will cause unnecessary delays/ waste of time/ over complicates the system	206	6.2%	206	6.2%
Market/Competition	Discourages innovation/progress/ stagnation in innovation/ restrictive/depends how much this will hamper innovation	734	22.0%	1,605	48.1%
	Private Hire operators should be free to make business decisions without added regulation	384	11.5%		
	Allow market forces to win out/customers can make their own choices	296	8.9%		
	Stifle competition/ anti-competition	276	8.3%		
	Taxi protection/protectionism	199	6.0%		
	Prevents better service for London/limits options for users	156	4.7%		
	Seems anti-business	17	0.5%		
	TfL must encourage innovation/must not restrict business flexibility	13	0.4%		
	TfL protects suppliers above consumers	5	0.1%		
Other	Wasteful use of TfL resources/TfL lacks resources already	41	1.2%	69	2.1%
	Changes should be communicated to clients not to TfL	18	0.5%		
	TfL will process too slowly/not process quickly enough	11	0.3%		
Passenger	No benefits for the consumer/ loss of customer service/experience	156	4.7%	156	4.7%
Query/Concern	Depends on what changes are being made	30	0.9%	52	1.6%

	What are the benefits	22	0.7%		
Question misleading/unclear	Proposal/question is too vague	142	4.3%	144	4.3%
	Unclear how in advance operators have to inform TfL of changes	2	0.1%		
Regulation	Needless bureaucracy/Over-regulation/Interventionist	612	18.3%	1,024	30.7%
	TfL shouldn't have a say/shouldn't get involved/ TfL have an invested interest	219	6.6%		
	Regulation needs update/too outdated	67	2.0%		
	TfL should only enforce the rules/ safety regulate/ audit/exception of safety	56	1.7%		
	Gives TfL too much power/TfL already has too much power	49	1.5%		
	TfL doesn't have the right knowledge to make judgement/ won't be a fair judgement/ TfL shouldn't influence	27	0.8%		
	Regulation changes should be explained to customers	20	0.6%		
	TfL should deal with complaints as required/regulate where necessary	20	0.6%		
	Government policy is to reduce regulations	11	0.3%		
	Enough regulation at present	4	0.1%		
	TfL to have some control	3	0.1%		
	Shouldn't apply retrospectively	1	0.0%		
Safety	Changes should be allowed as long as safety standards are maintained/ no issues found	45	1.3%	51	1.5%
	Not in the interest of safety	6	0.2%		
Technology	They should be allowed to keep up with recent technology	204	6.1%	224	6.7%
	TfL cannot keep up with technological changes/ too slow	23	0.7%		
Unnecessary	Unnecessary/pointless	166	5.0%	289	8.7%
	The current licence process is sufficient/ works well at the moment	112	3.4%		
Unnecessary	Law already covers this	9	0.3%		
	Customers don't care about this	7	0.2%		
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	183	5.5%	183	5.5%

	Total	5,581			
	Count of respondents	3,337			

Table 36: What are your views on ensuring that app based platforms are secure and do not allow passenger or driver fraud?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	Agree (No further comment)	3,825	30.4%	6,928	55.0%
	It will help ensure safety of passengers (and drivers)	2,373	18.8%		
	To prevent fraud/data protection/driver fraud	2,134	16.9%		
Alternative/Suggestion	Licence, traffic offences checks/only licensed drivers/background checks/One driver to one car	285	2.3%	659	5.2%
	Different security check suggestion/ third party regulation/reporting irregularities to TfL	183	1.5%		
	CRB Checks/police checks for all drivers/spot checks	167	1.3%		
	Login with password/PIN is sufficient	114	0.9%		
Data security/privacy	App based platforms not safe	167	1.3%	167	1.3%
Detail	Fingerprint/facial recognition is excessive/not mature enough yet/difficult to implement/too expensive	164	1.3%	230	1.8%
	Must be done in a short time frame/not slow down the system	67	0.5%		
Disagreement	Adequate security already /Proposals from Q1 (photo/registration given to passenger) are adequate	1,091	8.7%	1,325	10.5%
	Not effective/can never be 100% secure	146	1.2%		
	Not feasible to implement/too much money	108	0.9%		
Enforcement	Penalties for not abiding by conditions of use	298	2.4%	397	3.2%
	Fines/revocation of licence is a sufficient deterrent/ strict regulation	92	0.7%		
	Compensation/fines for app companies	20	0.2%		
Market/Competition	Apps will be effectively self-regulated by users and/or app companies/ customer reviews/down to the operator to regulate	245	1.9%	261	2.1%
	Let the market decide	19	0.2%		
Other	Drivers must have badge/permit/display insurance/ visible licence discs	97	0.8%	124	1.0%
	Responsibility of the account owner	29	0.2%		

Query/Concern	Will be difficult to implement/will be inefficient/add cost/stifle innovation/mustn't happen while driver is driving/vaguely worded	521	4.1%	854	6.8%
	Is fraud/security really an issue/evidence?	167	1.3%		
	Why is this only directed at app based platforms?	153	1.2%		
	How do you police it?	34	0.3%		
Regulation	Taxis/private hire should have the same rules	608	4.8%	778	6.2%
	Not within jurisdiction of TfL/Not TfL place to implement	132	1.0%		
	TfL make a general set of requirements/amend current requirements/ tighter regulations/ TfL's responsibility	46	0.4%		
Technology	Periodical facial recognition/finger-print/periodical re-logging/occasional checks	433	3.4%	659	5.2%
	Apps are equally/more secure than non-app systems	227	1.8%		
Unnecessary	Unnecessary bureaucracy	236	1.9%	236	1.9%
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	1,177	9.3%	1,177	9.3%
	Total	15,358			
	Count of respondents	12,601			

Table 37: What are your views on ensuring that app based platforms are secure and do not allow passenger or driver fraud? Do you believe that there is sufficient technology available to achieve this and if so what technology do you believe we should consider?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Alternative/Suggestion	Authentication through applications e.g. use Uber, Hailo, gett, Addison Lee or similar apps	726	7.1%	2,141	20.8%
	Existing identification technology e.g. Chip and PIN, ID/password, security questions	488	4.7%		
	Identification details e.g. photo, licence plate, name, presented within app	305	3.0%		
	Smartphone-based technology	251	2.4%		
	Require log-ins e.g. log-in per shift, log-in per job	246	2.4%		
	Offline registration e.g. photo ID, license	146	1.4%		
	GPS location/vehicle tracking	69	0.7%		
	"Confirm the driver" screen/button or other method for passenger to confirm correct driver	43	0.4%		
	Periodic photos - time stamped and/or geotagged	24	0.2%		
	Unique driver ID/user ID/unique device	16	0.2%		
	Dashboard camera/cctv	15	0.1%		
	Fixed terminal in car	9	0.1%		
	Screen or other method to display driver/journey details	9	0.1%		
	Secondary method for non-smartphones	7	0.1%		
	Implement in future	6	0.1%		
	Submit photo/official document when signing up with app	5	0.0%		
	Scan an ID	5	0.0%		
	Driver-passenger pay system requiring confirmation from both sides	4	0.0%		
	Human required to enable technology	3	0.0%		
	Ability to pre-book	3	0.0%		
Only TfL licensed app based drivers to be allowed to pick up in TfL area	3	0.0%			

Alternative/Suggestion	Money held by third party to complete transaction	2	0.0%		
	App bookings to operator who then distributes bookings	2	0.0%		
	Payment into UK bank account	2	0.0%		
	Show drivers in area/driver location	2	0.0%		
	Taxi drivers to register details on passenger device upon pickup	1	0.0%		
Biometrics	Biometric technology such as fingerprint	2,113	20.5%	2,349	22.8%
	Biometric technology such as facial recognition	613	6.0%		
	Biometric technology such as eye scan	115	1.1%		
	Biometric general/other	102	1.0%		
	Biometric technology such as voice recognition	67	0.7%		
	Biometrics are over the top	37	0.4%		
	Biometrics should not be compulsory	6	0.1%		
Cost	Concerns about costs for operators/costs passed on to consumers	301	2.9%	301	2.9%
Data security/privacy	Authentication/encryption/data security considerations	159	1.5%	169	1.6%
	Concerns about data protections	10	0.1%		
	Invasion of driver privacy	2	0.0%		
Driver/Operator	Operator to check drivers/Operators to keep details of drivers/Operators to check original docs	48	0.5%	56	0.5%
	Operator/driver liable/responsible for issues	10	0.1%		
Enforcement	Law enforcement/checks e.g. police, TfL, company	117	1.1%	117	1.1%
Market/Competition	Concerns about barriers to entry/competition/innovation	64	0.6%	71	0.7%
	Let customers decide	8	0.1%		
Other	All/latest technologies to be considered	269	2.6%	820	8.0%
	TfL or other authority to hold database of drivers/journeys/other metrics	101	1.0%		
Other	Technologies in banking apps/online shopping	99	1.0%		
	Mechanism for reporting issues/reviews and ratings, phone number	72	0.7%		

	Operator to have physical location/landline	47	0.5%		
	Alternative options should be considered - not specific	30	0.3%		
	Ban app-based operators/stop licencing private hire/pre-book only	24	0.2%		
	Transition period	22	0.2%		
	Unsafe to use phone while driving	21	0.2%		
	Need to work together to determine best options	18	0.2%		
	Keep simple/convenient	17	0.2%		
	Requires new/specific hardware/software	16	0.2%		
	New tech to be subsidised by TfL or operator or bought by TfL or operator	15	0.1%		
	Insufficient resource for monitoring	12	0.1%		
	Audit trail	12	0.1%		
	Passenger also needs to be verified	11	0.1%		
	Hindrance to drivers/users/operators	10	0.1%		
	Use platform that is common to all phones/open technology	10	0.1%		
	Restriction on logged hours/enforced rest periods	7	0.1%		
	Only operator allowed to update driver photo	6	0.1%		
	This should already be in place/is already in place	6	0.1%		
	App/Tech to be tested	5	0.0%		
	Fixed prices/TfL should set rates that private hires can charge, in order to prevent surge pricing	4	0.0%		
	Share passenger location/destination	3	0.0%		
	List of compliant devices	3	0.0%		
	Insufficient mobile signal	3	0.0%		
Other	App feature to show journey has ended	2	0.0%		
	Cap operator/driver numbers	1	0.0%		
Passenger	Passengers should be responsible for verifying they're getting in the correct vehicle	1	0.0%	1	0.0%

Regulation	Not for TfL to regulate	169	1.6%	939	9.1%
	Should be equally applied to both taxis and private hire	142	1.4%		
	App/Technology responsibility of operator/app developer	123	1.2%		
	For TfL to regulate/consider/approve	122	1.2%		
	Other industry-standard checks	122	1.2%		
	Better/tighter regulation/fines for non-compliance	109	1.1%		
	Independent verification	107	1.0%		
	Ban apps/licence not granted until technology is proven to be adequate/available	46	0.4%		
	Operator to decide tech and TfL to regulate/set standards/approve	30	0.3%		
	Difficult to implement	10	0.1%		
	Different groups of users access different types of data e.g. drivers cannot access passenger bank account details	1	0.0%		
	Regular checks on operator	1	0.0%		
	Not be overly prescriptive in the exact method of control	1	0.0%		
Safety	Safety consideration	83	0.8%	83	0.8%
Technological Capability	Technology sufficient	3,264	31.7%	4,354	42.3%
	Technology insufficient/unreliable/evolves quickly	998	9.7%		
	Biometrics/Tech can be bypassed/fooled	123	1.2%		
Unnecessary	Not required/unnecessary	235	2.3%	235	2.3%
Not Answered	Don't know/Not sure/No or Not enough knowledge	790	7.7%	1578	15.3%
	Not Answered/Answer Not Relevant/Question Misunderstood	788	7.7%		
	Total	14,275			
	Count of respondents	10,293			

Table 38: Operator must offer a facility to pre-book up to seven days in advance. If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	General agreement, no further comment	18	0.4%	23	0.5%
	Agree, but should not be for specific driver or vehicle	2	0.0%		
	Agree, providing prices don't rise	2	0.0%		
	Agree, but should be possible to assign a driver at, or shortly before, the booking time	1	0.0%		
	Yes, with non-refundable deposit	1	0.0%		
Alternative/Suggestion	There should only be on demand services, no pre-booking	19	0.4%	63	1.2%
	TfL should run a fleet of cars to cater for those who have different needs to the majority of taxi users	7	0.1%		
	All private hires should have disabled access, therefore removing the need for advance booking	7	0.1%		
	Advanced booking should be charged at a higher rate	6	0.1%		
	Work towards changing the taxi model rather than Uber model	5	0.1%		
	Set proportion of private hire fleet available for pre-booking	4	0.1%		
	Needs a re-confirmation mechanism shortly before journey to avoid cancellations	3	0.1%		
	Cap on number of advance bookings	2	0.0%		
	Allow two-tier booking, as long as there's no extra costs	2	0.0%		
	For certain areas with less private hire/Uber coverage	2	0.0%		
	All operators should have to have an app	2	0.0%		
	Make more vehicles wheelchair-friendly	2	0.0%		
	Should have two different license types	1	0.0%		
	Advance bookings should be charged at the same rate as instant bookings	1	0.0%		
	Pre-booking should only be for account holders, not cash bookings	1	0.0%		

Cost	Consumers would have to pay increased prices overall to cover the fixed costs of taking advance bookings	118	2.3%	118	2.3%
Data security/privacy	Does not want personal data to be stored on computers - safety issues	1	0.0%	1	0.0%
Detail	Advanced booking is useful, but not essential	16	0.3%	37	0.7%
	Enforcing this will create many new rules e.g. how payments are taken, cancellation policies etc., refunds	10	0.2%		
	Cancellation charges will/ should apply to passengers	7	0.1%		
	Only if customers pay up front when making the booking	3	0.1%		
	Not all operators have wheelchair accessible cars in their fleet	1	0.0%		
	Should be balanced based on cost of implementation and demand	1	0.0%		
Disabled passengers/services	Other methods should be used to cater for passengers with disabilities	30	0.6%	97	1.9%
	Advance bookings should be available for disabled passengers/accessible vehicles	24	0.5%		
	Uber already runs a reliable booking service for disabled customers	13	0.3%		
	Large private hire companies should have to provide accessible vehicles as a certain percentage of their fleet	10	0.2%		
	Not good for disabled customers who currently gain a lot of benefit from app based operators	7	0.1%		
	Operators should specify if they offer services for disabled people	5	0.1%		
	Disabled passengers should receive the exact service that is available to other passengers	3	0.1%		
	Firms offering disabled access vehicles are likely already well known to those who need the service	2	0.0%		
	Make taxis take advanced bookings as they are all wheelchair accessible	2	0.0%		
	Private hire cannot provide services that disabled passengers require	1	0.0%		
Should be enforced for fully accessible private hire	Should be enforced for fully accessible private hire	1	0.0%		
	Could reduce disabled access car supply	1	0.0%		
	Two days is suitable booking time for disabled passengers	1	0.0%		
Driver/Operator	Restricts the flexible working patterns of private hire drivers	133	2.6%	133	2.6%

Environment	Will increase congestion/pollution on London's roads	13	0.3%	13	0.3%
Impact	Adds further burden to operators (admin, IT, staffing, costs, fuel consumption, waiting times, longer driver journeys)	207	4.1%	381	7.5%
	This will lead to increased passenger cancellations causing delays in service	81	1.6%		
	Allowing advance bookings will reduce the availability of cars for immediate hire	72	1.4%		
	This will impact disproportionately on the smallest firms with limited cars	54	1.1%		
	Will mean less journeys being made and therefore affect economy	1	0.0%		
Market/Competition	Let the market drive change - if there is demand for this service then operators will naturally offer it	865	17.1%	2497	49.3%
	Consumers can choose a company based on the services they offer	673	13.3%		
	This proposal unfairly targets real time transport operators such as Uber	396	7.8%		
	Operators have different business models catering to different audiences	372	7.3%		
	This proposal is anti-competitive	353	7.0%		
	This proposal punishes certain business models	171	3.4%		
	There is no evidence that there is an underserved customer need for advance bookings	127	2.5%		
	Taxis don't have to offer this so PHVs shouldn't either	125	2.5%		
	Forcing this upon operators will discourage innovation and efficient services	117	2.3%		
	Many other industries do not take advance bookings, taxi companies shouldn't have to either	114	2.3%		
	This proposal is to protect Taxis	79	1.6%		
	This is a restraint of trade/ barrier to entry	50	1.0%		
	Forcing a company to offer a service they don't want to or are unprepared to offer will worsen the service	47	0.9%		
Market/Competition	Companies/Taxis who already offer this service will lose business to those operators forced to offer this	24	0.5%		
	Could put some operators out of business	24	0.5%		
	This will bring issues to the trade such as job feeding to friends	5	0.1%		

	Should be a balance of services that offer pre-booking	4	0.1%		
	Depends if there are enough alternatives offering advance booking	1	0.0%		
Other	With advanced bookings drivers are only assigned a short time before the pick-up time therefore they're no more reliable	49	1.0%	82	1.6%
	Many conditions could affect a driver honouring an advance booking on time - illness, congestion etc.	13	0.3%		
	Real time operators are much more reliable than those offering advance bookings	10	0.2%		
	TfL should incentivise operators to offer advance bookings, not force them	7	0.1%		
	As long as it doesn't affect real-time bookings	3	0.1%		
	Pre-booking isn't reliable either	1	0.0%		
	Yes for licensed minicabs, no for Uber	1	0.0%		
	Depends whether it would impact the service standard	1	0.0%		
Passenger	Reduces passenger choice and flexibility - people want on demand services	393	7.8%	549	10.8%
	This offers no/little benefit to consumers	157	3.1%		
	This will lead to customer dissatisfaction when operators fail to honour advance bookings	17	0.3%		
Query/Concern	Does this apply to taxi drivers?	36	0.7%	74	1.5%
	How will this be enforced/policed? Some companies could increase prices for advance bookings as a discouraging factor	26	0.5%		
	How will this affect the way that private operators can adjust their pricing based on demand?	9	0.2%		
	Danger of everything becoming on demand	1	0.0%		
Query/Concern	What would the specific requirements of the regulation be?	1	0.0%		
	Could be open to fraudulent bookings by unscrupulous drivers	1	0.0%		
	This will force people to use unlicensed minicab drivers	1	0.0%		
Regulation	Operators should be free to choose their own business model - pre-booking should be optional not be mandatory	2,265	44.7%	2,378	47.0%

	This proposal has nothing to do with safety and therefore should not be mandated by law	22	0.4%		
	Unenforceable/ unworkable	16	0.3%		
	Rules should apply to all - private hire and taxis	7	0.1%		
	Create policies to regulate pre-booking systems for those who choose to offer this	6	0.1%		
	TfL should just monitor/review	2	0.0%		
	The law already states that private hire must be pre-booked. Currently breaking the law	2	0.0%		
Safety	Pre-booking will increase touting	1	0.0%	1	0.0%
Technology	Developments in technology are allowing the market to meet changing consumer demands	32	0.6%	37	0.7%
	Modern apps provide a pre-booking service	5	0.1%		
Time period/interval	7 days is too long (alternative not specified)	68	1.3%	145	2.9%
	More than one day but less than 7 days	40	0.8%		
	7 days is an arbitrary number	33	0.7%		
	7 days or more	15	0.3%		
	Up to 24 hours/same day booking	6	0.1%		
Unnecessary	This proposal is pointless/unnecessary	1,531	30.2%	2,554	50.4%
	A number of operators already offer this service in London	857	16.9%		
	It is not necessary/should not be mandatory for all operators to offer advance bookings	500	9.9%		
Unnecessary	Taxis and private hire are widely available so pre-booking is unnecessary	235	4.6%		
	Customers very rarely need to book a taxi seven days in advance	120	2.4%		
	The system works fine at the moment	69	1.4%		
	Implementing this rule would be a waste of tax payers' money	5	0.1%		
Not answered	Not Answered/Answer Not Relevant/Question Misunderstood	70	1.4%	70	1.4%
	Total	11,087			

	Count of respondents	5,063			
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Table 39: Do you consider a period other than seven days to be appropriate? If you do please say why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Alternative/Suggestion	Private hire operators must keep checkable records for advance bookings	3	0.1%	7	0.3%
	Cancellation charges should apply	2	0.1%		
	Journey cost should be fixed at time of pre booking	1	0.0%		
	There should be a system in place to remind drivers of advance bookings	1	0.0%		
	Penalty should apply to driver if late	1	0.0%		
Disabled passengers/services	Pre-booking is of benefit to disabled passengers	4	0.2%	10	0.4%
	One day, only for disabled/vulnerable passengers	4	0.2%		
	Private hire operators should have to provide an instant service for disabled passengers	1	0.0%		
	Pre-book should only apply to disabled bookings	1	0.0%		
Disagreement	This proposal is nonsensical	34	1.4%	34	1.4%
Impact	Advance bookings add complexities for service providers	18	0.7%	28	1.1%
	This will complicate on the spot availability	12	0.5%		
Market/Competition	Choice of each individual operator	376	15.2%	687	27.8%
	Let the market and demand drive this service	270	10.9%		
	Operators have different business models catering to different audiences	101	4.1%		
	This proposal is anti-competitive	29	1.2%		
	This proposal is to protect taxis	23	0.9%		
	This should apply to taxis as well	12	0.5%		
	This is an anti-Uber proposal	12	0.5%		
	Forcing this upon operators will discourage innovation and efficient services	12	0.5%		
Market/Competition	Proposal might damage taxi trade	1	0.0%		
Other	Customers rarely need to book a vehicle 7 days in advance	18	0.7%	45	1.8%

Other	Booking in advance does not guarantee the car will be available/turn up	14	0.6%		
	Customer plans can change or be forgotten in 7 days	12	0.5%		
	This will give customers security that their journeys are booked in	1	0.0%		
	Pre-booking should be mandatory only if there is evidence that this service is needed	1	0.0%		
Passenger	This will reduce choice and flexibility for drivers and customers	44	1.8%	71	2.9%
	This offers no/little benefit to consumers	30	1.2%		
	This is not an issue for consumers	8	0.3%		
	This will increase customer choice and flexibility	1	0.0%		
Query/Concern	Why put a time limit on advance bookings	64	2.6%	65	2.6%
	What will the regulations for taxis be?	1	0.0%		
Question misleading/unclear	This question is misleading/leading	13	0.5%	13	0.5%
Regulation	This service should not be a requirement	944	38.2%	1,015	41.1%
	Not an issue for TfL to regulate	72	2.9%		
Time period/interval	Zero time/booking should be made on demand	397	16.1%	734	29.7%
	Up to 24 hours/same day booking	150	6.1%		
	7 days or more	99	4.0%		
	More than one day but less than 7 days	71	2.9%		
	7 days is too long (alternative not specified)	15	0.6%		
	7 days is an arbitrary number	6	0.2%		
Unnecessary	Pre-booking is not necessary as there are plenty of taxis and other transport options available on demand in London	86	3.5%	109	4.4%
	Sufficient operators already offer this service in London	30	1.2%		
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	87	3.5%	87	3.5%
	Total	3,082			
	Count of respondents	2,470			

Table 40: TfL proposes to no longer issue licences for in-venue operators or temporary events. If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	Current system is OK/In favour of issuing in-venue licensing	53	3.9%	70	5.2%
	General agreement, no further comment	13	1.0%		
	Provided it doesn't unnecessarily restrict customer choice	3	0.2%		
	Provided private hire parking is out of sight	1	0.1%		
Alternative/Suggestion	Licences should be granted on a limited/case by case basis	28	2.1%	87	6.4%
	In favour of temporary parking/ranks for private hire	24	1.8%		
	Only taxis should be allowed/more taxi ranks should be provided closer to the venue	21	1.5%		
	Private hire should be allowed to operate provided they are regulated	5	0.4%		
	Establish partnerships with local private hire firms	4	0.3%		
	Should depend on the demand/disruption caused by a specific event	3	0.2%		
	If they are an approved private hire vehicle, there should be a sticker stating so	2	0.1%		
	TfL should arrange later running tube services	1	0.1%		
Disagreement	General disagreement, no further comment	13	1.0%	14	1.0%
	Providing more space for taxis isn't the answer	1	0.1%		
Discrimination	Concerns over disability discrimination	1	0.1%	1	0.1%
Driver/Operator	Inconvenient for drivers/operators	6	0.4%	6	0.4%
Enforcement	Events/venues need taxi marshalls working with licensed taxi operators	65	4.8%	97	7.2%
	Prosecute law breakers rather than punishing customers	17	1.3%		
	Better regulation/enforcement	10	0.7%		
	Should be dealt with by the police	5	0.4%		
	Reduce congestion	2	0.1%		
Impact	Will cause traffic in residential streets	6	0.4%	9	0.7%

Impact	Events and venues might require additional drivers	3	0.2%		
Market/Competition	Protectionist (in favour of taxis)/anti-competitive	212	15.6%	271	20.0%
	Let the customers decide	31	2.3%		
	Let the market decide/Event organisers to make their own decisions	20	1.5%		
	Market should be evenly distributed between taxis and private hire	6	0.4%		
	Sufficient taxis to cope with demand	5	0.4%		
	Protects local private hire firms	2	0.1%		
Other	Better information is needed in-venue about licensed private hire services	1	0.1%	1	0.1%
Passenger	Inconvenient for users	296	21.8%	376	27.7%
	Restricts user choice	86	6.3%		
Query/Concern	Concern about transport availability after major events	104	7.7%	146	10.8%
	Will result in increase in unlicensed operators (touting) at venues	30	2.2%		
	Withdrawing licenses will make clients more uncertain or confused	6	0.4%		
	Would the changes still allow operator to have a desk at a large temporary event?	3	0.2%		
	Operational costs to blame for issues	2	0.1%		
	Why have new applications been suspended?	2	0.1%		
	People may have a preference for "official" vehicles but it's hard to distinguish	1	0.1%		
Question misleading/unclear	Question/description too vague/more evidence required	39	2.9%	39	2.9%
Regulation	Over regulation/bureaucratic	87	6.4%	163	12.0%
	TfL should be concerned with enhancing, not restricting consumer choice	53	3.9%		
	Resolve problems with current system	13	1.0%		
	If regulated correctly, this could be done to benefit all parties (Taxi, private hire & the public)	4	0.3%		
	Touting needs to be better regulated	3	0.2%		
Regulation	Same rules for all	2	0.1%		
	Marshalls should be able to enforce the rules	1	0.1%		

Safety	There needs to be a way to get people home safely after events	117	8.6%	117	8.6%
Unnecessary	Not needed if all operators move to an app-based model	1	0.1%	1	0.1%
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	92	6.8%	92	6.8%
	Total	1,506			
	Count of respondents	1,356			

Table 41: How would you propose that venues and temporary events ensure safe and adequate transportation options for those attending such events?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Alternative/Suggestion	Designated pick up/drop off & waiting areas for private hire	1,207	14.7%	3,521	42.9%
	Use of taxis	878	10.7%		
	Pre-book private hire/taxi	481	5.9%		
	Public Transport	312	3.8%		
	Use of private hire companies	299	3.6%		
	Security/ID checks on drivers/only reputable/licensed PH companies	285	3.5%		
	Verify/track/record drivers/journeys	156	1.9%		
	Pre-booked cars can only enter area with confirmation of booking	152	1.9%		
	Temporary booking facility near/at event	102	1.2%		
	Park & ride schemes/shuttle buses to public transport	101	1.2%		
	Temporary licensing	93	1.1%		
	Equal opportunity for taxis and private hire	36	0.4%		
	Satellite office	34	0.4%		
	Make road layout more suitable for pick up/drop off	29	0.4%		
	Encourage/enable cab sharing	21	0.3%		
	Increase availability/attractiveness of on-demand services	20	0.2%		
	Increase number of available transport options when necessary	15	0.2%		
	No 5 minute wait	14	0.2%		
	Appropriate parking for cars (not taxis/private hire)	10	0.1%		
	5 (or more) minute wait for pre booked private hire	9	0.1%		
	Recommend other transportation	8	0.1%		
	Reduce licensing	2	0.0%		

Communication/Planning	There is enough time prior to an event to organise suitable taxi provisions (ranks, bays) with TfL in advance	1,141	13.9%	2,532	30.9%
	Prior notice to suppliers (taxi drivers/private hire drivers/local taxi operators/radio circuits) of an event (time, location, demand)	504	6.1%		
	Arrangements with event organiser and private hire companies (often 'local' mini cabs companies)	334	4.1%		
	Taxi/private hire telephone numbers/app names/QR codes for customers to contact (both in advance and at event)	206	2.5%		
	Announcement/information at/before event giving contact info, location info for taxis/private hire/education on licensed/unlicensed operators	200	2.4%		
	Event organisers should have planned sufficiently with appropriate licensing (in line with guidelines)	146	1.8%		
	Event organisers to liaise with TfL	146	1.8%		
	Signage/info for all transport available	111	1.4%		
	Live data feed of event	20	0.2%		
	Private hire advertise at event	17	0.2%		
Cost	Know fare in advance	27	0.3%	35	0.4%
	Fixed fare pricing/no inflated pricing	8	0.1%		
Disabled passenger/service	Disabled access should be a priority	16	0.2%	16	0.2%
Enforcement	More/temporary (London licensed) taxi ranks	2,700	32.9%	3,564	43.5%
	Marshalls	1,157	14.1%		
	Clearly identify those permitted to operate in the area, punish illegal touting (i.e. licensed only) and enforce	282	3.4%		
	Police/Security	77	0.9%		
	Traffic controls/parking enforcement	39	0.5%		
Query/Concern	Private hire touting away from venue/out of sight	11	0.1%	11	0.1%
Regulation	Booking through an operator as required by law	11	0.1%	11	0.1%

Technology	Via app	349	4.3%	359	4.4%
	Free Wifi/ good network coverage to ensure apps are accessible in-venue	12	0.1%		
Unnecessary	Not necessary for events/venues to organise transport options/be subject to regulations	375	4.6%	534	6.5%
	Current provisions are enough/No regulation required	162	2.0%		
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	658	8.0%	658	8.0%
	Total	12,973			
	Count of respondents	8198			

Table 42: Operator must have a fixed landline telephone which must be available for passenger use at all times. If you don't agree, please say why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	Landline required for complaints, emergencies, etc.	72	1.7%	75	1.8%
	Agreement, no further comment	3	0.1%		
Alternative/Suggestion	Communication shouldn't be via landline but it must be via app based or text / email (standards needed re electronic communication)	618	14.5%	827	19.4%
	Customers should be able to speak to operator staff over the phone (a requirement based on call-response times, does not need to be a landline)	218	5.1%		
	For fixed line operators, ensure they provide driver's number to passenger for better service	8	0.2%		
	Provide emergency provisions e.g. panic button when using taxi, private hire and Uber services	5	0.1%		
	App-based communication should be mandatory for private hire operators	2	0.0%		
	Provision for operators to use a shared telephone operator service to answer calls on their behalf	1	0.0%		
Cost	Increase cost of fare, which will be passed down to the customer	99	2.3%	99	2.3%
Disagreement	It should not be mandatory to have a landline, as long as operator or driver offers some form of communication	108	2.5%	108	2.5%
Impact	Not fair to an operator with a small employee base to run the business	57	1.3%	57	1.3%
Market/Competition	Customer is not concerned if the operator doesn't have a landline / customer can choose to use service that is most suitable to their needs	531	12.5%	1,074	25.2%
	Cost operators more money (i.e. need to hire staff to answer the phones) and restrict businesses from email-based customer service	169	4.0%		
	Proposal is anti- private hire	155	3.6%		
	Operator should be able to choose their business model	142	3.3%		

Market/Competition	These regulations are designed to stifle competition (i.e. anti-competition) / regulations are not taking into consideration technological advances	141	3.3%		
	Protectionist / if implemented for private hire should be implemented for taxis	75	1.8%		
	The proposal is deliberately designed to prevent apps and restricts customer choice	31	0.7%		
Passenger	A phone line causes queues and slows the process / does not enhance customer service	137	3.2%	137	3.2%
Query/Concern	Who should a customer call to complain about taxis?	10	0.2%	11	0.3%
	Operators will not adhere to this regulation	1	0.0%		
Question misleading/unclear	Benefits of fixed landline are not clear to users / evidence used in proposal is not clear	59	1.4%	59	1.4%
Regulation	Regulations too prescriptive	53	1.2%	81	1.9%
	Regulate timeframes in which requests should be answered	27	0.6%		
	Customers must be informed if they are going to be charged for using landline to book services	2	0.0%		
Safety	Fixed landline does not enhance passenger safety	13	0.3%	13	0.3%
Unnecessary	Landline requirement is archaic (i.e. people are more likely to use apps and email, not landline)	2,152	50.5%	3,357	78.7%
	Unnecessary process to constrain operators to use landline, should have the flexibility to use mobile phones/other ways in which to communicate (e.g. apps, email)	1,788	41.9%		
	Complaints / feedback can be made after journey is completed (can be made on line, etc.) / if concerned about safety, app is more discreet	778	18.2%		
	Phone contact is unnecessary to use by operators if app based model is applied (i.e. easier/quicker to provide support online)	259	6.1%		
Unnecessary	Current system is adequate	47	1.1%		
	Landline does not enhance customer service	2	0.0%		

Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	69	1.6%	69	1.6%
	Total	7,832			
	Count of respondents	4,265			

Table 43: Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app. If you don't agree, please say why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Detail	Removes uncertainty & risk of touting	214	3.4%	283	4.5%
	Risk of "touting" is slim (compared to benefits)	64	1.0%		
	General indication of availability acceptable (without exact location or time to pick-up)	3	0.0%		
	Agrees that availability should not be communicated virtually	1	0.0%		
	Should not apply outside of the city centre	1	0.0%		
	Ok to show availability via app once booking is accepted	1	0.0%		
	Minicab offices should be able to show vehicles for immediate hire	1	0.0%		
Driver/Operator	Against drivers' interests	119	1.9%	119	1.9%
Enforcement	Authorisation/enforcement (by booking through app) should prevent touting	644	10.2%	980	15.5%
	Need to punish fraudulent use (e.g. phantom use) another way, as long as it's accurate	359	5.7%		
	Proposal will increase congestion, fuel wastage, environmental pollution etc.	55	0.9%		
Market/Competition	Anti-consumer demand/choice	1,483	23.5%	2,922	46.3%
	Anti-technological progress/innovation	840	13.3%		
	Anti-competitive/protectionist	740	11.7%		
	Initiative against smartphone/private hire booking services	530	8.4%		
	Market/people will regulate, not TfL's role to regulate	166	2.6%		
	Integrate taxis into transport strategy/real-time data provides information for transport planning	10	0.2%		
Other	Maps are only illustrations of availability	45	0.7%	55	0.9%
	Different definitions for "immediate"	9	0.1%		
	Will have no effect on passengers	1	0.0%		
Passenger	This would be detrimental to customer experience/does not benefit passengers	2479	39.2%	3593	56.9%

Passenger	Limits free choice/withholds information (availability & waiting time), less transparency	2,103	33.3%		
Question misleading/unclear	No valid (safety/touting) reasons for proposal	963	15.2%	963	15.2%
Regulation	Touting needs other regulation	194	3.1%	302	4.8%
	Physical and virtual signs of availability should be dealt with in separate regulations	74	1.2%		
	Needs a level playing field	27	0.4%		
	Regulation of taxis/drivers more important	22	0.3%		
Safety	Increases illegal cab activity/chances of getting into the wrong car	42	0.7%	42	0.7%
Technology	Real time information (yellow light, bus/tube times, Hailo, phoning office) exists in/should be extended to, other transport	455	7.2%	455	7.2%
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	465	7.4%	465	7.4%
	Total	12,110			
	Count of respondents	6316			

Table 44: Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis. If you don't agree, please say why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	Agree providing not too onerous for operator/doesn't prevent new entrants to market	96	6.6%	135	9.3%
	Agree providing drivers are allowed to work for more than one operator	33	2.3%		
	Helpful for investigative purposes	12	0.8%		
	Providing it helps speed up renewal of PCO licenses	1	0.1%		
Alternative/Suggestion	Create a way for operator databases to feed through information automatically to TfL	20	1.4%	37	2.6%
	There should be an audit/spot checks performed instead	13	0.9%		
	Use licence plates to track vehicles	3	0.2%		
	In-app complaint button which reports to TfL	1	0.1%		
Cost	This will be very costly for operators to manage/costs passed on to consumers	119	8.2%	149	10.3%
	This will be very costly for TfL to manage	43	3.0%		
Data security/privacy	Data protection/privacy	47	3.3%	56	3.9%
	Information can be misused	10	0.7%		
Detail	Businesses should continue to collate this information but should not be required to provide it to TfL regularly	60	4.2%	74	5.1%
	This will be too much information to handle	21	1.5%		
	Information supplied should be limited to details of drivers and vehicles	7	0.5%		
	Data suggested for recording isn't enough to keep an accurate watch on the industry	6	0.4%		
	Two-way deal: TfL should let operators know when licenses are revoked or a driver has received complaints	1	0.1%		
Disagreement	A waste of time and money if TfL do not intend to routinely use the data	22	1.5%	22	1.5%
Driver/Operator	Responsibility for managing/recording drivers should lie with the operators	65	4.5%	87	6.0%

Driver/Operator	If there is a crime or indiscretion with a driver, customers can report this to operator/TfL	16	1.1%		
	Drivers should also have to provide information to TfL about the operators they work for	5	0.3%		
	For private hire operators that run as third-parties between the driver and the customer (e.g. Uber) then driver should be responsible	1	0.1%		
Market/Competition	Anti-competitive/protectionist	88	6.1%	191	13.2%
	Drivers should be free to work for as many operators as they choose	69	4.8%		
	Only supportive if this is applied equally across all services e.g. private hire and taxi	36	2.5%		
Other	Should be dealt with by police/enforcement agencies	36	2.5%	53	3.7%
	Impractical as drivers/vehicles regularly move around	13	0.9%		
	Will provide unreliable snapshot for businesses with variations in workload	2	0.1%		
	Stricter requirements are needed to confirm personal details of drivers e.g. fingerprints	1	0.1%		
	Tax Uber's profits	1	0.1%		
Passenger	More regulation harms consumers' interests	25	1.7%	25	1.7%
Query/Concern	Can't this information be gleaned from the PCO?	6	0.4%	8	0.6%
	What happens when London starts introducing driverless taxis?	1	0.1%		
	Not if it prevents the operator from adding drivers or vehicles in the meantime	1	0.1%		
Question misleading/unclear	Detail of proposal is vague/too broad	117	8.1%	156	10.8%
	No evidence has been provided re: the problems caused from not currently having this data	40	2.8%		
Regulation	Micro-management/bureaucracy	149	10.3%	163	11.3%
	Not TfL's responsibility	15	1.0%		
Technology	Modern technology already provides this information	47	3.3%	47	3.3%
Unnecessary	The current system is adequate	163	11.3%	315	21.8%
	It is not necessary to provide this information to TfL	133	9.2%		

	It is not necessary to provide this information in real time	28	1.9%		
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	129	8.9%	129	8.9%
	Total	1,702			
	Count of respondents	1,444			

Table 45: Operators must specify the fare prior to the booking being accepted. If you don't agree, please say why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	Providing that the passenger be able to discontinue or extend the journey at any time, subject to pro-rata adjustment of the originally quoted fare	1	0.0%	3	0.1%
	Specified fares useful for long journeys	1	0.0%		
	Benefit consumers	1	0.0%		
Alternative/Suggestion	Should not be mandatory, only if customer requests	110	1.7%	156	3.4%
	Metered fare better solution	39	0.6%		
	Fares should be based on usage	3	0.0%		
	Fares should be centrally regulated by TfL or other body	2	0.0%		
	Fares should be zoned	2	0.0%		
	Caveat should be included that if the offered fare is no longer available then the operator may decline the booking and offer a new fare	1	0.0%		
Calculation	Estimation is enough (minimum to maximum could be included)	1,188	18.2%	2,633	57.9%
	Does not take into account traffic (or other similar factors e.g. parking charges)	1,158	17.8%		
	Rounding up of fares mean customers lose out with higher prices/fare increase	478	7.3%		
	As long as what is being charged is clear/route is agreed, and can be contested there is no need	324	5.0%		
	Hard to predict fares in advance	84	1.3%		
	Customers can get a lower fare when not specified	53	0.8%		
	Only specify in high levels of traffic	1	0.0%		
Driver/Operator	Unfair on drivers	78	1.2%	78	1.7%
Enforcement	Need a system for complaints/fines if not compliant	5	0.1%	5	0.1%
Market/Competition	Taxis don't do this/why discriminate	827	12.7%	1,319	29.0%
	Free market should decide	311	4.8%		
	Protectionist/Anti-competitive	213	3.3%		

Market/Competition	Should be operator's choice	105	1.6%		
	Don't need a one size fits all model	24	0.4%		
	Not commercially realistic	3	0.0%		
	Barrier to entering the market	2	0.0%		
	Prohibits innovative pricing models e.g. those that vary with supply/demand	1	0.0%		
Other	Won't work	20	0.3%	21	0.5%
	Only taxis should be metered	1	0.0%		
Passenger	No flexibility for passenger	763	11.7%	877	19.3%
	No benefit to customers	107	1.6%		
	Slow down the process of getting a vehicle	24	0.4%		
	Time consuming when in a rush	4	0.1%		
Query/Concern	System will be open to abuse	2	0.0%	2	0.0%
Question misleading/unclear	Question misleading as private hire operators are only allowed to charge on distance, not journey time	3	0.0%	3	0.1%
Regulation	Current system works	232	3.6%	243	5.3%
	Bureaucratic	8	0.1%		
	If regulated accordingly there is no problem	1	0.0%		
	Overly restrictive	1	0.0%		
	Conflict of interest for TfL to influence private hire pricing	1	0.0%		
Safety	Safety of passengers will be harmed	13	0.2%	13	0.3%
Technology	Apps are good at measuring fares fairly	108	1.7%	108	2.4%
Unnecessary	Unnecessary	117	1.8%	117	2.6%
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	95	1.5%	95	1.5%
	Total	6,515			
	Count of respondents	4,551			

Table 46: Operators must record the main destination for each journey which must be specified at the time the booking is made. If you don't agree, please say why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Alternative/Suggestion	Should include all intermediate destinations also	15	0.6%	22	0.8%
	Required at beginning of journey	3	0.1%		
	Operators should have to log in real time where the vehicle is	2	0.1%		
	Anonymised data gleaned from destination specification could be used for transport planning	1	0.0%		
	When a trip is shared, only the last destination should be specified before the booking	1	0.0%		
	Record both pick-up point and destination	1	0.0%		
Cost	Additional cost burden	30	1.1%	30	1.1%
	Invasion of privacy	166	6.3%	179	6.8%
	App security issues/need security protocols	16	0.6%		
Detail	Start of journey also needs recording	4	0.2%	4	0.2%
Disagreement	Unreasonable	12	0.5%	37	1.4%
	Old and outdated	10	0.4%		
	Not required at time of booking	10	0.4%		
	Destination specification should be optional	5	0.2%		
Driver/Operator	Gives drivers chance to pick and choose longer routes, or turn down routes	80	3.1%	91	3.5%
	Let operator decide	11	0.4%		
Impact	Will add delays/cause confusion	165	6.3%	165	6.3%
Market/Competition	Undermines app-based services/deliberately restricts competition	189	7.2%	228	8.7%
	Should apply equally to taxis	39	1.5%		
Other	Must be easily implemented	2	0.1%	2	0.1%
Passenger	Will limit journey flexibility/passenger options	1,575	60.2%	1,575	60.2%

Query/Concern	Risk that a vehicle would not pick based on where passenger is going	1	0.0%	1	0.0%
Question misleading/unclear	Not enough information/unclear proposal	7	0.3%	7	0.3%
Safety	Does not support passenger safety	135	5.2%	144	5.5%
	Safety threat - can be overheard etc. if booked in advance	10	0.4%		
Unnecessary	This isn't necessary/already happens	519	19.8%	519	19.8%
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	130	5.0%	130	5.0%
Total		3,009			
Count of respondents		2,617			

Table 47: We propose to harmonise the retention period for records under the Operator Regulations to be 12 months where it is currently 6. If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	General agreement	18	3.1%	21	3.6%
	Provided it doesn't create an additional administrative burden	5	0.9%		
	As long as it's stored securely	1	0.2%		
	As long it's not anti-competitive	1	0.2%		
Alternative/Suggestion	Depends on the type of information e.g. lost property vs personal data	25	4.3%	28	4.8%
	There should be no data retention requirement	3	0.5%		
Cost	Cost implications	37	6.3%	38	6.5%
	TfL should be more conscious of costs being passed onto customers	2	0.3%		
Data security/privacy	Customer privacy/data protection	16	2.7%	16	2.7%
Other	Lack of evidence to support the case/reasoning not clear	13	2.2%	27	4.6%
	Unsure about regulatory specifics	7	1.2%		
	Unsure (general comment)	3	0.5%		
	Improved guidance on what record to keep	3	0.5%		
	It should add additional cost	1	0.2%		
Regulation	Bureaucratic/Over regulation/Anti-competitive	69	11.8%	97	16.6%
	Should apply to taxis if it does to private hire	23	3.9%		
	Not a TfL issue	7	1.2%		
Time period/interval	Should be held for as little time as possible	1	0.2%	286	49.0%
	Should be less than 6 months	15	2.6%		
	6 months is fine/harmonise as 6 months	178	30.5%		
	Should be less than 12 months	26	4.5%		
	Should be greater than 12 months	28	4.8%		
Time period/interval	Indefinite storage	6	1.0%		

	Harmonised with accounting records	14	2.4%		
	Harmonised with standard UK data retention	5	0.9%		
	Harmonised with criminal records (3 years)	2	0.3%		
	Harmonised with the taxi data policy	1	0.2%		
	Up to the operator/should be optional	9	1.5%		
	No confusion over current situation	1	0.2%		
Unnecessary	Unnecessary/no change required	128	21.9%	128	21.9%
Not answered	Not Answered/Answer Not Relevant/Question Misunderstood	23	3.9%	23	3.9%
	Total	671			
	Count of respondents	584			

Table 48: Limit of five on the number of business names attached to each Operator’s licence. If you don’t agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	General agreement, no further comment	18	1.4%	31	2.5%
	Restriction on misleading geography is good	13	1.0%		
Alternative/Suggestion	Should only have one business name (one licence per name)	378	29.9%	524	41.5%
	Should be less than 5 names	99	7.8%		
	There should be no restrictions	37	2.9%		
	No restriction on number of 'sub-services' i.e. under an umbrella operator	6	0.5%		
	Should apply to all services	3	0.2%		
	Justification should be required for each name	2	0.2%		
	Name of umbrella operator should be visible on advertising/vehicles	2	0.2%		
Disagreement	No/fewer benefits	63	5.0%	63	5.0%
Enforcement	Not enforceable	5	0.4%	5	0.4%
Market/Competition	Restriction of trade	56	4.4%	190	15.0%
	Undermining business models	51	4.0%		
	Consumer will know who they booked with, up to customer	50	4.0%		
	Adversely affect competition	30	2.4%		
	Businesses are allowed to, so should private hire operators	17	1.3%		
	Less passenger choice	9	0.7%		
Other	Not customer's concern	22	1.7%	68	5.4%
	TfL should have comprehensive directory	19	1.5%		
	Operators need more transparency	12	1.0%		
	Passengers need electronic confirmation	10	0.8%		
	Okay if one app is responsible for many operators	7	0.6%		
Regulation	Will not help solve the current problem, arbitrary number	76	6.0%	200	15.8%

Regulation	Needs better/other regulation (e.g. not have same names)	58	4.6%		
	Should be regulated by someone other than TfL	33	2.6%		
	More bureaucracy and costs	30	2.4%		
	Less regulation necessary	22	1.7%		
Unnecessary	Not necessary, no further comment	130	10.3%	175	13.9%
	Current regulation sufficient	31	2.5%		
	Irrelevant for booking via app	22	1.7%		
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	150	11.9%	150	11.9%
	Total	1,461			
	Count of respondents	1,263			

Table 49: Specific requirement for an English Language test. If you don't agree, please say why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	Agreed benefit of English tests	24	1.8%	35	2.7%
	Providing the test is free and support is given to those who fail	11	0.8%		
	Helpful in emergencies	1	0.1%		
Alternative/Suggestion	Replace topographical test with an English test	1	0.1%	1	0.1%
Cost	No benefit/will increase cost to consumer	71	5.5%	106	8.1%
	No benefit/will increase cost to driver	43	3.3%		
Detail	New drivers only not renewals	17	1.3%	27	2.1%
	Only for non-British drivers	12	0.9%		
Disagreement	No specific requirements needed	544	41.8%	544	41.8%
Discrimination	Discriminatory to immigrants/workers with low English proficiency	269	20.7%	407	31.3%
	Discriminatory to private hire drivers	129	9.9%		
	Not all passengers speak English	50	3.8%		
	Tests should not discriminate against private hire drivers with dyslexia/disability	1	0.1%		
Market/Competition	Not a TfL issue to sort - market based solution needed	146	11.2%	147	11.3%
	Creates difficulty for operators to recruit drivers	1	0.1%		
Other	Safety/driving ability is a greater priority	74	5.7%	157	12.1%
	Certified driving tests are enough	54	4.2%		
	Locational knowledge required	17	1.3%		
	Further clarification needed on requirements of proposed test	13	1.0%		
	Talking to passengers will help to improve English proficiency	5	0.4%		
	Topographical test sufficient	2	0.2%		
Query/Concern	How will TfL decide what the intermediate level of English will entail?	5	0.4%	9	0.7%
	Could encourage illegal activity	2	0.2%		

Query/Concern	Bad for the economy	2	0.2%		
Question misleading/unclear	Justification for this proposal is unclear. English is not required for emergency purposes.	1	0.1%	1	0.1%
Standard	Basic English sufficient	93	7.1%	166	12.8%
	Preferable but not required	35	2.7%		
	Fluency/Conversational English	21	1.6%		
	The test level should not exceed that sufficient to do the job	10	0.8%		
	Standard shouldn't be onerous - those with GCSE/A-Level ability should be able to pass	10	0.8%		
	English test should be set at UK standard, not European level	1	0.1%		
	English pronunciation test	1	0.1%		
	Technology	English not necessary as technology should provide routes	191	14.7%	191
Testing/Training	Testing should be completed by TfL	9	0.7%	28	2.2%
	Testing should be a simple/quick process	5	0.4%		
	Implementation by TfL will be difficult- may not be able to test all private hire drivers/enforce authority over any driver who fails	5	0.4%		
	Intermediate tests	4	0.3%		
	Testing should be for all drivers not just new or renewals	4	0.3%		
	Tests for private hire drivers below an academic standard	1	0.1%		
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	20	1.5%	20	1.5%
	Total	1,905			
	Count of respondents	1,301			

Table 50: What standard (of English) do you think it would be appropriate for applicants to demonstrate?

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Disagreement	None required	265	2.6%	265	2.6%
Other	Knowledge of London/appropriate area	209	2.1%	408	4.0%
	Safe driving record	55	0.5%		
	Clean driving licence is enough	28	0.3%		
	Criminal records test/DBS	28	0.3%		
	Matter for the operators to decide who to hire	25	0.2%		
	Professional approach	18	0.2%		
	Should have been living/driving in the UK for 5 years	13	0.1%		
	UK citizenship	7	0.1%		
	Good hygiene standards of driver and car	6	0.1%		
	Tolerance of London's diversity	6	0.1%		
	Knowledge of first aid	5	0.0%		
	Language ability to be shown in the app	3	0.0%		
	Medical tests	3	0.0%		
	Training to help disabled passengers	3	0.0%		
	Being multi-lingual is a bonus for the job here	3	0.0%		
	Should apply to all, even if UK born	2	0.0%		
	Driven in UK for 2/3 years	2	0.0%		
	Take professional driving test	2	0.0%		
	No extremist religious views	2	0.0%		
	Should have lived in the UK for 3 years and worked in the UK for 2 years	2	0.0%		
	Set maximum driving hours	1	0.0%		
Should be advanced drivers to drive in central London	1	0.0%			

Other	Lived in the UK for 2 years	1	0.0%		
	BTEC Qualification for Private Hire	1	0.0%		
	Apply to those less than 3 years in UK	1	0.0%		
	Should have a driving test for all private hire/taxi drivers	1	0.0%		
	To apply to new applicants only	1	0.0%		
	Live in UK for more than 3 months	1	0.0%		
	PRIVATE HIRE licences should be restricted to UK residents only	1	0.0%		
	Driving licence for 3 years or more	1	0.0%		
	Should have classes on customer service skills	1	0.0%		
	Willingness to work and provide a service	1	0.0%		
	Apps to display B1 certification	1	0.0%		
	Only need to sit a test if they have had complaints about their English skill	1	0.0%		
	Operators to have translation available if English level is poor	1	0.0%		
	Should be agreement between all operators	1	0.0%		
	To not accept new applications	1	0.0%		
Other communication/ understanding	Ability to communicate in English (esp. with regard to safety)	2,439	24.0%	3,315	32.6%
	Ability to understand place names directions and general instruction	620	6.1%		
	Ability to read a map/sat nav/road signs	348	3.4%		
	Should demonstrate good levels of English in speaking, reading and writing	122	1.2%		
	Knowledge of Highway Code	116	1.1%		
	Knowledge of job-specific/transport phrases	76	0.7%		
	Knowledge of key destinations	66	0.6%		
	Understanding of language, customs and culture	23	0.2%		
Other communication/ understanding	Politeness	22	0.2%		

	Ability to understand a variety of accents	13	0.1%		
	Basic numeracy	13	0.1%		
	Be able to recite/read literature	5	0.0%		
	Should have school/college/university certificate	5	0.0%		
	Should be able to use sign language	2	0.0%		
	Take "public contact skills" 4-6 week training course given by TFL	1	0.0%		
	Able to fill in PH application without help	1	0.0%		
	Only be required to pass ESOL test after 6 months residency	1	0.0%		
Regulation	Regulations need to be apply to all including taxi drivers	7	0.1%	7	0.1%
Standard	Common European Framework of Reference (CEFR) for Languages B1, equivalent to Entry Level 3 (Key Stage 3) on QCF	2,554	25.1%	6,509	64.0%
	Fluency/Conversational English	1,810	17.8%		
	Basic English sufficient	1,062	10.4%		
	Common European Framework of Reference (CEFR) for Languages B2 or C1, equivalent to Level 1 (GCSE grades D-G) or Level 2 (GCSE grades A-C) on QCF	569	5.6%		
	Unspecified "high" standard of English	343	3.4%		
	Common European Framework of Reference (CEFR) for Languages A2 Basic User, equivalent to Entry Level 2 (6th form) on QCF	41	0.4%		
	Sufficient to do their job	33	0.3%		
	Level of primary school leaver/Key Stage 2	28	0.3%		
	Common European Framework of Reference (CEFR) for Languages C2 Proficient User, equivalent to Level 3 (A-Level) on QCF	24	0.2%		
	IELTS - level not stated	23	0.2%		
Standard	Common European Framework of Reference (CEFR) for Languages A1 = Basic User, equivalent to less than School / 6th Form on QCF	17	0.2%		
	TEFL - level not stated	11	0.1%		

	Same as other TfL workers	10	0.1%		
	Knowledge equal to taxi driver	8	0.1%		
	Common European Framework of Reference (CEFR) for Languages C2 Proficient User equivalent to Level 5 (University Degree BA, BSc) on QCF	6	0.1%		
	English as first language	4	0.0%		
	Basic ESOL	3	0.0%		
	Level of English-speaking child	3	0.0%		
	Those who grew up here should be exempt from language requirement	3	0.0%		
	Equivalent to ICAO level 6	1	0.0%		
	To know national anthem	1	0.0%		
	Lower level for private hire, higher for chauffeurs	1	0.0%		
	Use recognised standard	1	0.0%		
	The standard required to join the Met police	1	0.0%		
Testing/Training	Should be tested for language skills	120	1.2%	373	3.7%
	Sit a driving test or be a holder of a valid driving license issued by the DVLA	94	0.9%		
	Should require a verbal interview/test	46	0.5%		
	Tests by run TfL	35	0.3%		
	Topographical test in English	23	0.2%		
	Test similar to taxi	23	0.2%		
	Consult experienced teachers of English as second language/professional body for level	13	0.1%		
	Same approach as NHS to assess language skills	12	0.1%		
Testing/Training	Accept any official English language test	10	0.1%		
	Should have to take English classes	5	0.0%		
	Study English for 6 months	1	0.0%		
	Basic geographic test	1	0.0%		

	TfL or operators should cover the exam costs	1	0.0%		
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	312	3.1%	312	3.1%
	Total	11,837			
Count of respondents		10,166			

Table 51: Drivers to only work for one operator at a time. If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	Agree with preventing overworking	49	1.0%	49	1.0%
Alternative/Suggestion	Alternatively monitor/track/log excessive working hours for safety	425	9.1%	437	9.3%
	The number of operators shouldn't be capped but a time duration should be set with specific operators	6	0.1%		
	TfL should consult with private hire drivers	3	0.1%		
	Drivers should be assigned areas to work in	2	0.0%		
	TfL should run their own private hire operator	1	0.0%		
Detail	No correlation between excessive working hours and working for multiple operators	348	7.4%	412	8.8%
	Illegal/breach of human rights	53	1.1%		
	Certified licence is sufficient	13	0.3%		
	Difficult to implement	1	0.0%		
Driver/Operator	Restricts driver income/livelihood	894	19.0%	1753	37.3%
	Discriminates against private hire drivers/operators	596	12.7%		
	No benefit to drivers	244	5.2%		
	Operators could exploit working conditions	177	3.8%		
	Could encourage drivers to partake in illegal activities to avoid regulation	18	0.4%		
	Variety of clients/work type	5	0.1%		
Environment	Environmental problems - congestion/pollution	24	0.5%	24	0.5%
Market/Competition	Restriction of trade - drivers are self-employed/freedom of choice	1,210	25.8%	2,547	54.2%
	Drivers should have the flexibility to work multiple jobs/working hours	908	19.3%		
	A single operator may not have a sufficient quantity/variety of work	359	7.6%		
	Anti-competitive	256	5.5%		

Market/Competition	Provides difficulty for small/new operators in the market	112	2.4%		
	Disadvantages operator - holiday/sick pay etc.	38	0.8%		
	Chauffeur/specialist car trade would be disadvantaged	15	0.3%		
	Taxi drivers should be retrained/re-equipped to compete in current market	2	0.0%		
Other	TfL procedures should be set in place for operator switches/no fines	14	0.3%	21	0.4%
	Conflicts with other consultation proposals	5	0.1%		
	Drivers must be registered to the operator that they are working with/have visible evidence of this	2	0.0%		
Passenger	No benefit to the consumer	403	8.6%	403	8.6%
Question misleading/unclear	More detail regarding implementation of the scheme is needed	14	0.3%	14	0.3%
Regulation	Unjustified/unnecessary new regulation	779	16.6%	1,321	28.1%
	Not a decision for TfL to make	332	7.1%		
	Record which operator drivers work for	200	4.3%		
	PRIVATE HIRE drivers should have a capped maximum of operators	94	2.0%		
	Capped number of drivers allowed to be employed per operator	1	0.0%		
Technology	Technological advances (e.g. tachograph) render this unnecessary	70	1.5%	70	1.5%
Not answered	Not Answered/Answer Not Relevant/Question Misunderstood	26	0.6%	26	0.6%
	Total	7,699			
	Count of respondents	4,695			

Table 52: Driver and Operator licence applicants to provide National Insurance numbers and share with Department for Work and Pensions (DWP). If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	Agreement with elements of proposal	14	2.0%	14	2.0%
Alternative/Suggestion	TfL could require drivers to provide NI numbers within a specified period of receiving a licence	1	0.1%	1	0.1%
Data security/privacy	Loss of privacy for (mostly self-employed) drivers	46	6.5%	46	6.5%
Detail	National Insurance Numbers are not proof of identity	43	6.1%	44	6.2%
	Should be limited to those working more than 15 hours+ per month	1	0.1%		
Disagreement	Disagreement, no further comment	17	2.4%	17	2.4%
Discrimination	Discriminates against those without a National Insurance Number	28	4.0%	28	4.0%
Enforcement	Needs more ID checks (retina, fingerprint, passport etc.)	8	1.1%	12	1.7%
	Should investigate operators rather than drivers	4	0.6%		
Market/Competition	Influence on way drivers work	15	2.1%	21	3.0%
	Attack on Uber	6	0.8%		
Passenger	Not passenger's concern	6	0.8%	6	0.8%
Query/Concern	National Insurance numbers can be bought on black market/forged	6	0.8%	7	1.0%
	Licensing process is protecting special interests	1	0.1%		
Regulation	Current regulation sufficient	99	14.0%	382	54.0%
	Requirements should be equal to any other employee in UK (individual's responsibility)	74	10.5%		
	HMRC's responsibility, not TfL	71	10.0%		
	More paperwork/bureaucracy	69	9.8%		
	Should also apply to taxi drivers	33	4.7%		
	Licensing/employment process should be enough	32	4.5%		
	Too much regulation and stifling enterprise	31	4.4%		

Unnecessary	Operator has those records	92	13.0%	202	28.6%
	No evidence of problem/benefit (e.g. safety)	91	12.9%		
	Sufficient alternative checks available	28	4.0%		
	Not necessary to share NI number with HMRC	4	0.6%		
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	61	8.6%	61	8.6%
	Total	881			
	Count of respondents	707			

Table 53: Where a licensed driver has their driver's licence revoked, and that the driver is the owner of the licensed vehicle, then we will also revoke the vehicle licence. If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Detail	Applicable to all drivers including taxis	25	2.1%	45	3.9%
	Licence should be suspended until the driver re-obtains their driver's licence	10	0.9%		
	Licence should be refunded	3	0.3%		
	Only if the vehicle is privately owned by the driver	2	0.2%		
	Vehicle licence should be revoked whether or not the driver is the owner	1	0.1%		
	Vehicle licences should relate to purpose	1	0.1%		
	Driver's licence revocations should be reported to all operators	1	0.1%		
	Should be allowed to transfer licence to someone else	1	0.1%		
	Proposal should only be agreed if applied to drivers of all vehicles	1	0.1%		
Disagreement	General disagreement	89	7.6%	89	7.6%
Impact	Vehicle cannot be sold or rented to someone else	314	26.9%	406	34.8%
	The owner may not be the driver	44	3.8%		
	Vehicle used for other purposes	26	2.2%		
	Will have a too big a financial impact on the driver	19	1.6%		
	Can affect driver's personal life	7	0.6%		
Market/Competition	Will negatively affect the industry	3	0.3%	5	0.4%
	Allow the market to decide	2	0.2%		
Operation	Vehicle should be seized	3	0.3%	5	0.4%
	Waste of a vehicle	2	0.2%		
	Vehicle should be destroyed	1	0.1%		
Other	There shouldn't be a vehicle licence	4	0.3%	7	0.6%
	Proposal assumes guilt, that every driver that has their licence revoked will work illegally	2	0.2%		

Other	Improve speed of DBS check instead	1	0.1%		
Query/Concern	What if the vehicle is shared?	394	33.7%	394	33.7%
Question misleading/unclear	Not enough evidence to demonstrate how effective this will be or how much it will cost	7	0.6%	7	0.6%
Regulation	Driver’s licence and vehicle licence are separate things	139	11.9%	217	18.6%
	Should be case dependant	56	4.8%		
	A matter for the police, or court, not TfL	26	2.2%		
	Decision should be made by TfL	1	0.1%		
	Operator specific bans	1	0.1%		
Technology	TfL should introduce technology which ensures the correct driver is driving a vehicle	5	0.4%	5	0.4%
Unnecessary	Driving any vehicle is illegal so this is an unnecessary measure	41	3.5%	41	3.5%
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	46	3.9%	46	3.9%
	Total	1,278			
	Count of respondents	1,168			

Table 54: We will seek to add operator/staff to the DBS list and amend the Regulations accordingly. If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	General agreement, no further comment	15	1.9%	15	1.9%
Alternative/Suggestion	Needs a transition phase	2	0.3%	2	0.3%
Cost	Higher costs, waste of time	71	9.1%	71	9.1%
Data security/privacy	Data security/privacy/fraud issue	3	0.4%	3	0.4%
Detail	Only for drivers	43	5.5%	141	18.0%
	All should have full disclosure/DBS check	39	5.0%		
	Including any person who works for an operator is too broad	34	4.3%		
	Basic check should be sufficient	29	3.7%		
Discrimination	Second chance to re-integrate into society and reduce stigma	100	12.8%	158	20.2%
	Limits employment opportunities of convicts	87	11.1%		
	Against civil liberty once sentence is served	36	4.6%		
Market/Competition	Protectionist/Anti-competitive	13	1.7%	33	4.2%
	Negatively affects business and trade	12	1.5%		
	Less relevant with app bookings/in future	7	0.9%		
	Reduces flexibility	2	0.3%		
	May limit number of drivers	1	0.1%		
Other	Should be same as for other employment sectors	69	8.8%	109	13.9%
	Issue of offshore controllers/foreign staff	14	1.8%		
	Not for petty crimes	14	1.8%		
	Not customer's concern	8	1.0%		
	No people on probation, serious crimes etc.	5	0.6%		
	TfL should pay for the extra security checks	2	0.3%		
Question misleading/unclear	Problem doesn't exist, no evidence	26	3.3%	31	4.0%

Question misleading/unclear	Not enough information provided about who absorbs cost	3	0.4%		
	Not enough information provided	2	0.3%		
Regulation	Red tape, take too long and burdensome	92	11.7%	198	25.3%
	Not TfL's place to regulate, some already do this	55	7.0%		
	As long as driver has been checked, its fine (authorisation/licensing)	44	5.6%		
	Needs other regulation	13	1.7%		
	Should also apply to taxis	4	0.5%		
Unnecessary	No public safety concern as operators have no unmediated contact with vulnerable people	152	19.4%	264	33.7%
	Not necessary, current regulations sufficient	92	11.7%		
	No added benefit	37	4.7%		
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	39	5.0%	49	6.3%
	Not sure/not enough knowledge	10	1.3%		
	Total	1,175			
	Count of respondents	784			

Table 55: From 1 April 2016 we will no longer accept cheques or postal orders as payment. If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	General agreement, no further comment	8	1.3%	8	1.3%
Alternative/Suggestion	Small additional charge to cover costs	17	2.7%	44	7.0%
	Payment regulations should be expanded (e.g. cash, over the counter)	14	2.2%		
	Must have an alternative	6	1.0%		
	Keep cheques but stop accepting POs	6	1.0%		
	Allow payments over certain amount	1	0.2%		
Cost	Costs aren't significant (compared to TfL's income from drivers)	38	6.1%	42	6.7%
	TfL should save costs elsewhere	5	0.8%		
Data security/privacy	Cheques leave a paper trail, more security	18	2.9%	18	2.9%
Disagreement	Having options is good for customers	204	32.5%	205	32.7%
	General disagreement, no further comment	1	0.2%		
Discrimination	Some people don't have access to cards/online banking	103	16.4%	179	28.5%
	Some aren't comfortable with technology	98	15.6%		
Market/Competition	Affects competitive ability of small businesses	3	0.5%	3	0.5%
Other	More inconvenience for businesses	21	3.3%	25	4.0%
	Inconsistent message - wanting to stop the progress of technology on one hand yet, here, trying to argue that technology change has made something obsolete	5	0.8%		
Question misleading/unclear	Question unclear	3	0.5%	3	0.5%
Regulation	Should have option, law requires to accept all legal forms of payment	141	22.5%	147	23.4%
	Nothing to do with private hire regulations	7	1.1%		
Unnecessary	Unnecessary	8	1.3%	8	1.3%
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	77	12.3%	77	12.3%

	Total	784			
	Count of respondents	627			

Table 56: Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence. If you don't agree, please explain why

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	General agreement, no further comment	8	1.0%	8	1.0%
Cost	Extra costs	96	11.7%	96	11.7%
Detail	Only important for days drivers are driving	108	13.1%	243	29.5%
	Insurance and licensing: different timespans, not sure if granted, etc.	96	11.7%		
	Should be there once operators start taking bookings	29	3.5%		
	Need other ways to insure and licence (insurance before licence)	29	3.5%		
Disagreement	Doesn't solve problem	16	1.9%	18	2.2%
	Doesn't affect passenger	2	0.2%		
Driver/Operator	Operator's responsibility	74	9.0%	103	12.5%
	TfL can liaise with operators to monitor, needs additional checks	39	4.7%		
Impact	Removes flexibility for drivers	215	26.1%	215	26.1%
Market/Competition	Drivers might not be able to pay, barrier to entry	130	15.8%	159	19.3%
	Anti-competition	22	2.7%		
	Reduces number of drivers	16	1.9%		
Other	Insurance should be displayed in vehicle	13	1.6%	37	4.5%
	Special private hire licence permitting the holder to drive any car for which he/she is insured	7	0.9%		
	Already done by some	7	0.9%		
	Court already prosecutes/police responsible for enforcement	6	0.7%		
	Only insurance companies benefit	4	0.5%		
Query/Concern	Easy to cancel	18	2.2%	18	2.2%
Regulation	Also extended to taxis	7	0.9%	7	0.9%
Technology	Information is stored and can be checked online	13	1.6%	17	2.1%

Technology	Technology will advance to allow on demand insurance/PAY drive	4	0.5%		
Unnecessary	Current regulations sufficient	56	6.8%	95	11.5%
	Too complicated, too many checks	43	5.2%		
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	95	11.5%	95	11.5%
	Total	1,050			
	Count of respondents	823			

Table 57: Drivers to carry or display a copy of insurance details at all times. If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	General agreement, no further comment	5	0.5%	7	0.7%
	Reassuring for passengers	1	0.1%		
	Provided it's not a measure introduced to stifle the private hire market	1	0.1%		
Alternative/Suggestion	Should only need to carry it (available on request)	29	3.1%	63	6.7%
	Should be able to show an electronic copy	26	2.8%		
	Online mechanism provided to check if vehicle is insured	4	0.4%		
	Small disc would be sufficient	2	0.2%		
	Remote monitoring should be sufficient	1	0.1%		
	Valid PCO badge is sufficient	1	0.1%		
Data security/privacy	Concerns about carrying around personal details - lost/stolen	36	3.9%	36	3.9%
Detail	Fleet insurance only	3	0.3%	6	0.6%
	Drivers don't all need the same insurance	1	0.1%		
	Originals only not copies	1	0.1%		
	Licence should take account of holidays	1	0.1%		
Driver/Operator	Operators won't provide a job without insurance	36	3.9%	56	6.0%
	Operators should ensure their drivers are insured	18	1.9%		
	Shouldn't result in increased burden/costs for private hire drivers/operators	2	0.2%		
Enforcement	Unenforceable	3	0.3%	3	0.3%
Market/Competition	Taxi protectionism/stifles competition	24	2.6%	50	5.3%
	Non-Private Hire vehicles don't have to carry	15	1.6%		
	Respect the differences between taxis and private hire	7	0.7%		
	Remove the requirement from licenced taxis	5	0.5%		
	Let the market decide	1	0.1%		

Other	Copy should be presented in certain period of time	7	0.7%	15	1.6%
	Too much to carry around already	5	0.5%		
	Means modifying car to find place to display	1	0.1%		
	Some drivers renew every month - hard for them to remember	1	0.1%		
	Uber should pay for insurance - and it's TfL's job to check it	1	0.1%		
Query/Concern	Open to abuse (forged documentation)	34	3.6%	34	3.6%
Question misleading/unclear	No evidence is provided of how many offences this would prevent or how much it would cost.	14	1.5%	14	1.5%
Regulation	Overly bureaucratic/over regulation	57	6.1%	94	10.1%
	Proposals should include taxis	23	2.5%		
	Display of insurance should be mandatory	7	0.7%		
	Not TfL's business	5	0.5%		
	Should be same requirements for all drivers	5	0.5%		
Safety	Dangerous - will encourage touting	1	0.1%	1	0.1%
Unnecessary	Records can be checked electronically/centrally e.g. ANPR	360	38.5%	613	65.6%
	Unnecessary/irrelevant to passengers	229	24.5%		
	Outdated/flawed implementation	38	4.1%		
	If already evidenced, it's unnecessary	35	3.7%		
	Existing system is fine	10	1.1%		
	Most drivers keep a copy	1	0.1%		
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	66	7.1%	66	7.1%
	Total	1,123			
	Count of respondents	935			

Table 58: Should the driver be required to display the insurance in the vehicle? If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	General agreement, no further comment	6	0.4%	12	0.8%
	Agreement but might not be practical	5	0.3%		
	Provided this is not the only proof of a driver's competency	1	0.1%		
Alternative/Suggestion	Should be carried - available on request	515	32.6%	572	36.2%
	Small sticker or tax disc-like display	32	2.0%		
	Record should be kept on app	11	0.7%		
	Website to check validity of vehicle insurance	8	0.5%		
	Electronic versions of insurance documents e.g. on an app	6	0.4%		
	QR code to scan so passengers can check if they wish to	3	0.2%		
	On a plate outside the vehicle	1	0.1%		
	Should be available as part of booking confirmation	2	0.1%		
	Drivers should have workplace insurance instead	1	0.1%		
	Details of insurance could be linked by text when booking cab	1	0.1%		
	Sticker to say information is available on request	1	0.1%		
Cost	Additional costs	3	0.2%	3	0.2%
Disagreement	Shouldn't need to display it	156	9.9%	156	9.9%
Enforcement	Should be random checks	2	0.1%	8	0.5%
	Hard to enforce	2	0.1%		
Market/Competition	Taxi protectionism/making difficult for private hire	14	0.9%	14	0.9%
Operation	Unnecessary clutter in the vehicle/obstruction/impractical	196	12.4%	204	12.9%
	Basic driver information should be displayed on the back of seat	4	0.3%		
	Impractical if working for more than one operator	2	0.1%		
	Vehicle may be used for more than one purpose	1	0.1%		

Passenger	Passenger isn't interested/shouldn't be the ones to check	110	7.0%	111	7.0%
	Passenger should be able to take a copy if there is accident	1	0.1%		
Query/Concern	Concerns about forgery/fraud/data protection	105	6.6%	233	14.8%
	Concerns over display of personal info	101	6.4%		
	Concerns about documentation damage/theft	25	1.6%		
	Doesn't make sense/why?	12	0.8%		
	Unnecessary when drivers not working	1	0.1%		
	Easy to forget to carry	1	0.1%		
	How will you know if the paper is genuine?	2	0.1%		
	Not if it means that it has to be displayed when the driver is using for personal use	1	0.1%		
	Nowhere to display this information	1	0.1%		
	Will reduce people's trust in PCO	0	0.0%		
	Easy for this to become a way of tying cars to specific employer	1	0.1%		
Question misleading/unclear	Question bias	2	0.1%	3	0.2%
	No evidence is provided of how many offences this would prevent or how much it would cost	0	0.0%		
Regulation	Over regulation/bureaucratic/archaic	53	3.4%	103	6.5%
	Regular drivers don't have such rules, why should private hire drivers	21	1.3%		
	All drivers should be treated the same	16	1.0%		
	Better regulation/checks	2	0.1%		
	Taxis shouldn't have to display it	3	0.2%		
	Existing private hire sticker is enough	2	0.1%		
	Down to the operators to regulate	2	0.1%		
	Not TfL's responsibility	2	0.1%		
Regulation	Providing it isn't designed to stifle Uber	1	0.1%		
	Deregulate the taxi industry	1	0.1%		

	Should be instances where it should be mandate e.g. max number of passengers	1	0.1%		
Unnecessary	Unnecessary	257	16.3%	473	30.0%
	Enough checks in place already	170	10.8%		
	Necessary information is available electronically/centralised database	87	5.5%		
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	97	6.1%	97	6.1%
	Total	2,051			
	Count of respondents	1,579			

Table 59: Do you agree that Hire and Reward fleet insurance put in place by operators is necessary in addition to, or instead of, individual driver insurance cover? If you don't agree, please say why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Alternative/Suggestion	Alternative to proposals in Q25/Q26	2	0.1%	7	0.3%
	Larger firms should have fleet insurance/smaller firms should just have Hire and Reward	5	0.2%		
Cost	Financial burden on fleet operators and drivers / costs will be passed on to consumers	447	20.5%	562	25.7%
	Duplicates insurance and increases costs	133	6.1%		
	Fleet operators will charge more	28	1.3%		
Detail	Should be in addition to, not instead of	110	5.0%	174	8.0%
	Should be instead of, not in addition to	65	3.0%		
Driver/Operator	Driver should be responsible for car being insured	794	36.4%	1,063	48.7%
	Operator should make sure there is appropriate insurance in place for their fleet	212	9.7%		
	If driver has own insurance, operator does not need to provide fleet insurance	42	1.9%		
	Not manageable for the operator or driver	40	1.8%		
	Reduces flexibility and security for drivers	35	1.6%		
	Penalise operator/driver if a driver is not insured at all	35	1.6%		
Market/Competition	Insurance should be made optional / decided between operator and driver	10	0.5%	266	12.2%
	Harms competition/reduces customer choice/makes it difficult to enter the market	182	8.3%		
	Penalises private hire operators	31	1.4%		
	Limits business models/should be determined by operator	24	1.1%		
	Consider that operators have different business models	11	0.5%		
	Bias towards larger firms	9	0.4%		
	Will reduce supply of drivers	7	0.3%		

Market/Competition	Puts financial strain on smaller companies/firms	18	0.8%		
Operation	Not all operators have fleets/vehicles might be rented	26	1.2%	30	1.4%
	Will cause delays when an incident occurs	4	0.2%		
Other	Insurance certificate should be shown	79	3.6%	159	7.3%
	Proposals in Q25/Q26 are sufficient	60	2.7%		
	Drivers will lose their no claims bonus	22	1.0%		
Passenger	Passenger does not mind how the car is insured	33	1.5%	39	1.8%
	Passengers are required to check whether vehicle is insured	2	0.1%		
	Consumers need to have assurance they are getting into an insured vehicle	4	0.2%		
Query/Concern	Will encourage fraud/lack of compliance	22	1.0%	27	1.2%
	How does this sort of insurance work for an app based company?	2	0.1%		
	What constitutes a fleet?	1	0.0%		
	What does the insurance include?	1	0.0%		
	Why should private hire have cheaper insurance than taxis?	1	0.0%		
Question misleading/unclear	Additional information required (i.e. cost implications, etc.)	37	1.7%	47	2.2%
	Question unclear / too broad	12	0.5%		
Regulation	Strict controls on vehicle insurance should be sufficient	133	6.1%	252	11.5%
	Too much regulation	57	2.6%		
	Should also apply to taxis	34	1.6%		
	TfL to be more proactive/regulation insurance costs	33	1.5%		
	This should already be in place/they should already be insured/thought this already occurred under current licence agreement	4	0.2%		
	Difficult to implement	1	0.0%		
Unnecessary	Proposal is not practical	118	5.4%	152	7.0%
Unnecessary	Existing system sufficient	34	1.6%		
Not answered	Not Answered/Answer Not Relevant/Question Misunderstood	30	1.4%	30	1.4%

Total	2,990			
Count of respondents	2,183			

Table 60: TfL will review the current operator licence type and look to introduce additional category/categories. If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Agreement	Provided it's not being used to penalise private hire operators	32	3.0%	58	5.4%
	General agreement	13	1.2%		
	Larger operators should bare a greater proportion of costs	4	0.4%		
	Provided taxis are given incentives for the same things	3	0.3%		
	Agree as long as it only applies to app-based operators	3	0.3%		
	Provided it doesn't penalise larger operators	3	0.3%		
	Provided it doesn't increase costs for passengers	2	0.2%		
	Agree as long as it doesn't increase the cost for existing operators	1	0.1%		
	Private hire should pay a premium as their set-up costs are significantly less than for taxis	1	0.1%		
	Alternative/Suggestion	Sliding scale based on number of vehicles	32		
Scrap the licensing process/no fees		20	1.9%		
Wheelchair accessibility should be a requirement		5	0.5%		
Should be bulk discounts for larger operators		3	0.3%		
Introduce a licence specifically for single vehicle operators		2	0.2%		
Increase costs to discourage further increase in private hires		2	0.2%		
Greater range of fees needed		2	0.2%		
Should be a cap i.e. no operator should be allowed more than 1000 vehicles		2	0.2%		
Fee should depend on number of drivers		2	0.2%		
A base fee for all and an additional fees for very large companies		2	0.2%		
Agrees with reviewing the various licensing fees in order to provide a better and more diverse service		1	0.1%		
Should promote vehicles for shared use		1	0.1%		
Fee based on revenue or miles should be considered		1	0.1%		

Alternative/Suggestion	Should depend on vehicle type	1	0.1%		
	Small should be 1-10 cars, then 11+ with a higher fee	1	0.1%		
	Should be two categories. 1) up to 5000, 2) over 5000	1	0.1%		
	Should licence operators not vehicles	1	0.1%		
	Licences should only be for one year	1	0.1%		
	This so of change requires a full cost:benefit analysis	1	0.1%		
	Recoup costs through non-compliance	1	0.1%		
	Subsidised fees to encourage greater diversity	1	0.1%		
	Operators with 500+ vehicles should pay more	1	0.1%		
	Fees should be tied to activity levels rather than number of vehicles	1	0.1%		
Cost	Ultimately will result in increased costs for passengers	122	11.4%	199	18.6%
	Unfairly increases costs for large operators	90	8.4%		
	OK as long as costs don't rise for consumers	1	0.1%		
Detail	Licence costs should be reduced/already too expensive	123	11.5%	202	18.9%
	Level playing field - same fees for all	32	3.0%		
	Fees should only cover admin costs/shouldn't be used as money-making scheme	24	2.2%		
	Licensing costs should be increased	13	1.2%		
	Shouldn't be linked to emissions/wheelchair accessibility	4	0.4%		
	Shouldn't create loopholes	3	0.3%		
	Fleet should be ten vehicles minimum	2	0.2%		
	Licence fee should be charged annually and based on number of drivers	1	0.1%		
	Fees shouldn't be payable on larger fleets (e.g. 1000+)	1	0.1%		
	Admin costs could very much depend on the IT systems of specific operators	1	0.1%		
Ability for fee payments to be spread over several months	1	0.1%			
Detail	Avoiding a banding approach as it unfairly penalises	1	0.1%		
Market/Competition	Anti-competitive/stifles private hire market/discourages growth	171	16.0%	197	18.4%

	Taxi protectionism	43	4.0%		
	Shouldn't be set so as to put off people entering the market	11	1.0%		
	TfL should not be trying to take advantage of successful operators	4	0.4%		
	Let the market decide	4	0.4%		
	Proposed changes shouldn't reduce the availability of either private hire or taxis	1	0.1%		
Other	Tax on private hire/money making scheme/just revenue for TfL	92	8.6%	165	15.4%
	Should be incentives for lower emission/wheelchair accessible vehicles	47	4.4%		
	Small operator fee too expensive	6	0.6%		
	Will result in operators using multiple licences	6	0.6%		
	Should cater for disabled/ pets as mandatory - no incentives etc.	6	0.6%		
	Don't trust TfL to use this power appropriately	6	0.6%		
	Fees should stay ring-fenced	4	0.4%		
	TfL has a conflict of interest	1	0.1%		
	Uber should be taxed properly	1	0.1%		
	Hire share should be banned - too dangerous	1	0.1%		
Passenger	Doesn't affect customer	1	0.1%	1	0.1%
Query/Concern	Depends on the benefits/justification for change	8	0.7%	12	1.1%
	Depends if the driver is an employee or affiliate	2	0.2%		
	What proportion of a fleet would need to be wheelchair accessible to get the discount?	1	0.1%		
	Why are fees non-refundable?	1	0.1%		
Question misleading/unclear	Too ambiguous/not really a proposal/evidence should have been provided	79	7.4%	123	11.5%
Question misleading/unclear	No justification/flawed logic	45	4.2%		
Regulation	Over regulation/bureaucracy	65	6.1%	113	10.6%
	Introduces unnecessary complexity	50	4.7%		
	Should affect taxis too	5	0.5%		

	The current systems seems unfair	2	0.2%		
	Difficult to define fleet because of the way a lot of private hire operators do business	1	0.1%		
Technology	TfL should seek efficiencies e.g. better use of technology	11	1.0%	11	1.0%
Unnecessary	No change required	99	9.2%	99	9.2%
Not answered	Not Answered/Answer Not Relevant/Question Misunderstood	68	6.3%	68	6.3%
	Total	1,346			
Count of respondents		1,071			

Table 61: TfL intends to introduce controls on ride sharing in licensed vehicles. If you don't agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Alternative/Suggestion	The ride sharers should have to know each other	14	0.4%	16	0.5%
	Users should have to "friend" another user before being able to share a ride with them	1	0.0%		
	Introduce an initial pilot phase	1	0.0%		
Detail	Licence drivers rather than vehicles	1	0.0%	2	0.1%
	Fares should be agreed in advance of journey starting	1	0.0%		
Driver/Operator	Operators' decision if they want to allow sharing	67	1.9%	67	1.9%
Enforcement	Ban customers who abuse ridesharing	1	0.0%	1	0.0%
	Ridesharing should be encouraged for environmental/decongestion benefits	834	23.6%	842	23.8%
	Ridesharing will cause more congestion due to reduced cost of car travel	5	0.1%		
Market/Competition	Ridesharing should be encouraged for providing cheap option to consumers	699	19.8%	1,526	43.2%
	Passengers' decision if they want to share	545	15.4%		
	Leave it to the market	428	12.1%		
	Protectionist proposal in favour of taxis	82	2.3%		
	Ridesharing will put buses and public transport out of business	2	0.1%		
	Ridesharing threatens the taxi industry	1	0.0%		
	Other	Ridesharing works in other countries	123	3.5%	499
	Consumers already share other modes of transport e.g. buses, trains	114	3.2%		
	Ridesharing acceptable as destinations/price split agreed before start of journey or by app	114	3.2%		
	Works for taxis so should also for private hire	83	2.4%		
	If vehicle is licensed then ridesharing is fine	54	1.5%		
	The proposal is a backlash against Uber	29	0.8%		
	Any ridesharing should only be on public transport	2	0.1%		

Other	No demand for the services - we already have shared transport, e.g. bus	1	0.0%		
Query/Concern	Private hire drivers don't have the skills or knowledge for ride sharing; shouldn't be allowed.	27	0.8%	44	1.2%
	Regulation would be unworkable anyway - passengers would pretend to know each other	12	0.3%		
	Ridesharing being used as regulatory loophole	5	0.1%		
Question misleading/unclear	Proposal not currently detailed enough	190	5.4%	328	9.3%
	Lack of clarity over differences between sharing with friends and strangers	133	3.8%		
Regulation	Ridesharing will never be safe / should be banned	469	13.3%	553	15.7%
	Too early to be regulating - address problems as/if they arise	57	1.6%		
	Only taxis should be allowed to ride-share	17	0.5%		
	Can't trust TfL to provide sensible controls	5	0.1%		
	Same regulations should apply as for single passenger journeys	1	0.0%		
Safety	Respondent questions safety concerns	237	6.7%	650	18.4%
	Focus on making it safe and successful rather than banning	299	8.5%		
	Checks on users are/can be made prior to the trip to ensure safety	81	2.3%		
	Define safety criteria - give operators chance to meet it	68	1.9%		
	Does not agree with proposal - safety is not an issue	14	0.4%		
	Ridesharing can be safer than exclusive hires	3	0.1%		
	Banning ridesharing would make people less safe as alternatives aren't viable (e.g. paying full fare)	1	0.0%		
Safety	Safer option than night bus	1	0.0%		
Not answered	Not Answered/Answer Not Relevant/Question Misunderstood	244	6.9%	244	6.9%
	Total	5,066			
	Count of respondents	3,531			

Table 62: Amendment of advertising regulation to include “in” vehicle. If you don’t agree, please explain why.

Theme	Code	Count	Share of Respondents	Theme Count	Share of Respondents
Alternative/Suggestion	No advertising on or in private hire at all	82	13.1%	82	13.1%
Cost	Another source of income/reduction in fares	11	1.8%	11	1.8%
	Proceeds should make fares cheaper	1	0.2%		
Detail	Up to the owner/operator to decide	44	7.0%	90	14.3%
	Advertising should be allowed inside and out	27	4.3%		
	Shouldn't prevent operators from showing their name/logo	8	1.3%		
	Adult content should be banned	3	0.5%		
	Provided it doesn't obstruct view/distract other drivers	3	0.5%		
	Stricter controls on the what is advertised on the outside of vehicles	3	0.5%		
	Shouldn't apply to online advertising	2	0.3%		
	Should only be allowed on taxis	1	0.2%		
	Shouldn't allow third party advertising	1	0.2%		
	No self-advertising	1	0.2%		
	No advertising inside	1	0.2%		
Enforcement	Enforcement of existing rules	5	0.8%	7	1.1%
	Too difficult to enforce	3	0.5%		
Market/Competition	Decrease competition	1	0.2%	2	0.3%
	Decrease innovation	1	0.2%		
	Taxi protectionism	1	0.2%		
Other	Private hire should clearly display they must be pre-booked (inside and out)	4	0.6%	8	1.3%
	Requires a separate consultation as change is significant	1	0.2%		
	Operators forcing advertising on their drivers	1	0.2%		
	Way to distinguish between brands	1	0.2%		

Other	Provides information to consumers	1	0.2%		
Query/Concern	Will increase private hire illegal activities	9	1.4%	9	1.4%
Question misleading/unclear	Don't understand proposal/lacks detail on what Regulation 8 is/confusing use of in and on/no explanation	203	32.3%	203	32.3%
Regulation	Over-regulation	58	9.2%	131	20.9%
	Same should apply to taxis	27	4.3%		
	Not TfL's responsibility	19	3.0%		
	Unfair restraint on private hire	17	2.7%		
	No change to regulation needed	13	2.1%		
	Advertising regulation should be abolished	4	0.6%		
	A matter for the Advertising Standards Agency	1	0.2%		
Unnecessary	Unnecessary	87	13.9%	89	14.2%
Not Answered	Not Answered/Answer Not Relevant/Question Misunderstood	44	7.0%	44	7.0%
	Total	689			
	Count of respondents	628			

Control Sheet

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Consultation Analysis

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Private Hire Vehicles Regulation Proposals

Integrated Impact Assessment

January 2016

Transport for London

Private Hire Vehicles Regulation Proposals

Integrated Impact Assessment

January 2016

Transport for London

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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.

TfL is the authority responsible for the licensing, regulation and enforcement of all taxi and private hire services in London.¹ Recent developments within the industry, including advances in technology and changes to the way customers engage and use private hire services, have led TfL to review the existing regulations. In undertaking a review of private hire regulations, TfL conducted consultation in March 2015, the results of which helped to develop a series of 25 detailed proposals for changes to private hire regulations in London. These were consulted on from September to December 2015.² The results of this consultation as well as the findings from the IIA will be fed into the TfL decision-making process and a final decision will be made by the TfL Board on 17th March 2016.

About the IIA

Scope

TfL commissioned an IIA that considered the potential health, equality, environmental and economic and business impacts that may arise as a result of the proposed changes to private hire regulations put forward by TfL. An overview of the focus for the four assessments 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 equalities issues, particularly protected characteristic groups which include: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex; and sexual orientation
Environmental impact assessment ³	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 and business impact assessment	Identifies and assesses impacts on businesses (in this case PHV operators) as a result of the proposed changes. This also considers any potential wider economic impacts where relevant and possible to assess with data available.

¹ It should be noted that there are key differences in the two parts of the licensed 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, PHVs cannot ply for hire or use taxi ranks and must be pre-booked electronically, by telephone or by calling in person at an office and the customer is expected to agree the fare at the time of booking. The scope of the review and the IIA is the PHV sector.

² It should be noted that the full details of the consultation findings have been available in time to incorporate these into our report. See section 3.4 of this report for more details.

³ 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.

The timeline for the production of this IIA has been as follows:

- **Commission of the IIA:** December 1st 2015, with a requirement to produce an initial report based on a data and evidence review before Christmas 2015.
- **Production of internal report:** 23rd December 2015
- **Commission of engagement to inform the impact assessment:** 7th January 2016. Once the TfL public consultation had closed, engagement was commissioned to explore impacts with operators, drivers, industry and equality groups where possible.
- **Engagement with stakeholders:** 11th – 22nd January 2016 – originally planned to complete on 20th January but extended to enable more stakeholders to participate.
- **Submission of IIA report:** The final report was submitted on 27th January 2016.
- **Announcement by the Mayor on the proposals:** 20th January 2016. During the period of engagement for the IIA an announcement was made about which proposals may not be proceeded with on the basis of initial findings of TfL’s consultation. TfL plans to make the final decision on the proposals to take forward at the TfL Board meeting on the 17th March 2016.
- **TfL consultation on impacts:** Given that the timescale for this IIA has been brief, as well as commissioning this IIA, TfL has chosen to undertake a further four week consultation with stakeholders on impacts of the proposals. This will run from 27th January to 24th February 2016.

Approach

The IIA assessed each of the 25 proposals across each of the four assessment topics. It used the following criteria in order to ensure a systematic assessment:

- **Temporal / duration:** this considers whether an impact is expected to be long-term, medium-term or short-term.
- **Distribution / scale:** this considers how many receptors⁴ might be affected by a proposal or impact. This criterion also takes into account 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.

Using the duration, scale and sensitivity criteria each impact could then be classified according to a seven-point scale so as to highlight where beneficial and adverse impacts are most likely to be experienced and by whom.⁵

Seven-point impact scale

XXX	Major adverse
XX	Moderate adverse
X	Minor adverse
0	Neutral
✓	Minor beneficial
✓✓	Moderate beneficial
✓✓✓	Major beneficial

⁴ A receptor is defined as a person (passenger or driver), organisation (business or operator) or condition / context (e.g. local economic / environmental conditions) which is experiencing the impact.

⁵ More detail is provided in Appendix C

Summary of proposal impacts

From the initial desk-based assessment of the 25 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, as long as some clear definitions and careful implementation plans are developed following the review, there are some key potential benefits with respect to passenger safety. These could be disproportionately experienced by those equality groups which have heightened personal safety concerns or are more vulnerable passengers. Proposals 1 and 7 are examples of where passenger safety benefits are particularly likely to accrue.

It should be noted that there is evident support amongst the industry to sustain and where possible improve the personal safety credentials of the PHV sector. This is a key priority which has emerged through the stakeholder engagement process.

- **Potential adverse impacts:** There are some areas where adverse impacts are anticipated unless appropriate mitigating actions are taken. Proposals which could require considerable investment by operators, or where a proposal fundamentally affects a business operating model and current (or potential) income stream, would need careful consideration before being progressed due to the associated costs that operators would face; in some cases these may have de-stabilising effects.

This IIA has identified that proposals 2, 7, 14, 15, 20 and 22 are the most likely to require mitigation measures if they were implemented. It is understood, however, that following the Mayor's announcement on 20th January there is already an intention not to proceed with proposals 2, 15 and 22 and TfL is also considering amendments to proposals 7 and 20.

It is also worth highlighting a few headline issues by topic. These are briefly summarised in the next few sections.

Health and equality

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

- Some protected characteristic groups are more likely to use PHVs than other sections of the population (those from BAME backgrounds, young people (16-24), women and disabled people); however the difference in terms of use is generally quite marginal according to latest published data.
- 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);

- the likely financial cost of using PHV services, because several of the protected characteristics are more likely experience socio-economic disadvantage or live in low income households; and
- the ease with which passengers can make bookings and be assured about their journey details, which is especially the case for disabled people.
- Disproportionate adverse effects in terms of equality are likely where there are changes which could:
 - increase the waiting time for a PHV vehicle as this could decrease feelings of personal security, which affects certain protected characteristics; and
 - limit the ability of certain sections of the population (primarily those who do not speak English as a first language) from employment in the PHV industry (as drivers).

In implementing the proposals, the main equality benefits can be enhanced through raising greater public awareness about the safety benefits that are likely to be realised through the new regulations, plus phasing some of the proposals thereby providing more time to adjust to the changes. Some further specific engagement with groups as part of TfL's next planned consultation process and during the implementation of the proposals is also advisable.

Environment

The assessment of specific impacts from each of the proposals has demonstrated that proposals 23 and 24 could have the potential to slightly reduce emissions of NO_x, PM₁₀ and CO₂ following implementation. These impacts are expected to be marginal in the short term; however once the proposals are further developed, the potential reduction of these emissions may be greater than current assumptions can allow. Given the wider air quality agenda in London, if these proposals are taken forward understanding the potential for air quality impacts in greater detail would be sensible.

Business and economics

Depending on how they are implemented, many of the proposals could require considerable operator costs in order to implement, such as increased investment in technology, resources to provide additional services to passengers, changes to business practices and potential impacts in revenue. In summary:

- Should the proposals be implemented at once (with similar expectations anticipated from each operator group) then the cumulative costs may be destabilising to some small-medium scale firms.
- Many proposals specifically address the practices of technologically focused and app-driven operators, given that this is a relatively new operating model in the market.
- There are also proposals which will require operators to implement new administrative procedures or updated technologies, which may have a disproportionately negative impact on smaller-scale operators, which do not have existing systems or overheads required to meet the new requirements.
- There is a risk, where new costs are incurred by operators, that this cost will be passed on to passengers.

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

- Where proposals require a technological change to business practices, TfL should provide guidance for all operators to meet these technological requirements.
 - TfL could consider working with technology providers to establish a usable solution for small/local-level operators at a reasonable rate.
 - TfL could oversee the negotiations around new technological solutions to where they are required to secure economies of scale.
- Phasing of the introduction of the proposals will be helpful to minimise impacts

Cumulative and wider impacts

It is important to consider the 'cumulative' and wider impacts of the proposals. From the work undertaken for this IIA, the following key issues have been raised:

- As a full set of proposals, there is a view amongst some operators in the industry that they are fairly prescriptive in nature. There is concern that the impact of this will be to dampen innovation and dynamism in the sector. This could prevent the market from responding flexibly to passenger demand⁶ and may also affect the reputation of London's PHV sector (in terms of attracting future investment).
- Linked to above, the prescriptive nature of the proposals may affect future competitiveness in the sector – for example if all PHV operators are required to offer the same type of service unique selling points are reduced.⁷
- Where proposals require significant operating or technical changes to operator models, the capital cost up-front and costs associated with ongoing maintenance may be passed on to passengers; as such, there is a risk that this will limit the efficiencies realised for passengers to date as a result of technological developments.
- If introduced some of the proposals will affect utilisation of vehicles and vehicle allocation; this potentially affects the number of trips and potential revenue but there is also the potential for this to increase both congestion and emissions.⁸
- Some of the proposals have been cited by stakeholders as having important implications in terms of maintaining the definition of PHV sector and the taxi sector and providing customers with a clear choice about type of service.⁹ It is important to understand that there could be knock-on consequences on the taxi trade. There may be instances, for example, where anticipated adverse impacts for the PHV sector may result in positive impacts on the taxi sector and, indeed, vice versa.
- Taken together some of the proposals, whilst seeking to provide some safeguards to drivers and passengers, do also affect labour market flexibility and may have the inadvertent effect of limiting the growth of the industry.¹⁰
- It should also be noted that there are other policies that the PHV sector is required to respond to over a similar timescale, which could have financial implications; notably the ultra-low emission zone (ULEZ) initiative.

⁶ Proposals 2, 3 and 5 were particularly referenced, for example.

⁷ Proposals 5 and 7 were particularly referenced, for example.

⁸ Proposals 2 and 5 were particularly referenced, for example.

⁹ Proposals 2, 7, 8, 10 and 11 were particularly referenced for example.

¹⁰ Proposals 14, 15 and 21 were particularly referenced, for example

- It is also worth considering that there could be knock on consequences of these proposals on other parts of the transport sector and ultimately the environment. For example, enhancing regulation of the sector so that it is safer and better able respond to passenger demand could encourage modal shift. If modal shift is seen in the form of fewer people driving their own car this could be positive in terms of congestion, the environment and wider public health. However, if demand for PHVs is drawn from other more sustainable transport modes (e.g. walking, cycling and public transport) the environmental benefits would be less easy to realise.

Moving towards implementation

Following TfL's final decision-making process implementation of the proposals is critical to consider. There are several elements to this and many views were shared during the stakeholder engagement interviews including:

- Greater clarity on some proposals would be greatly appreciated by the sector.¹¹
- Phased introduction of the proposals would help to provide time for industry preparation or adjustments. This could help to minimise some of the potential adverse impacts.
- Continued engagement with the sector throughout the implementation period would be valued, as this would help both TfL and operators to keep abreast of any inadvertent consequences and work together to help minimise adverse impacts
- Once the proposals have been decided and are in place, monitoring and enforcement across the industry in relation to existing and new regulations will remain key.

¹¹ Proposals 3, 4, 23 and 24 were amongst those highlighted by many operators.

1 Introduction

1.1 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.

TfL is the authority responsible for the licensing, regulation and enforcement of all taxi and private hire services in London.¹² Private hire regulation was first introduced in London in the early 2000s following the 1998 Private Hire Act. As the industry regulator, TfL has the statutory power to set new and amend existing regulations.

1.1.1 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. They are heavily used for business-related trips and it is estimated that around a quarter of all taxi/PHV trips are to/from work and a further 10% are in-work trips.¹³ They are an important mode of transport for servicing both the domestic and overseas visitor economy, particularly for airport-related trips. 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 carrying up to eight passengers. The licensing of private hire services covers drivers, vehicles and operators.

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. There are now over 95,000 drivers, 75,000 vehicles and almost 3,000 operators within London.¹⁴ There are also around 3,000 specialist accessible vehicles.¹⁵

1.1.2 The PHV regulations review

The regulations governing the private hire industry have remained largely unchanged since their introduction almost two decades ago. Recent developments within the industry, including advances in technology and changes to the way customers engage and use private hire services have led TfL to review the existing regulations.

¹² It should be noted that there are key differences in the two parts of the licensed 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, PHVs cannot ply for hire or use taxi ranks and must be pre-booked electronically, by telephone or by calling in person at an office and the customer is expected to agree the fare at the time of booking. The scope of the review and the IIA is the PHV sector.

¹³ Jacobs (2014): Ultra Low Emissions Zone Integrated Impact Assessment: Economic and Business Assessment'

¹⁴ TPH Licensing Team Update, Week Commencing 28th December 2015

¹⁵ TfL (2015) response to Assembly Transport Committee report into Taxi and Private Hire Services – 'Future Proof'

In undertaking a review of private hire regulations, TfL conducted consultation throughout 2015. The initial consultation was held in March 2015, the results of which helped to develop a series of 25 detailed proposals for changes to private hire regulations in London, which were consulted on from September to December 2015.¹⁶ These proposals were aimed at improving passenger safety, maintaining a clear distinction between the taxi and private hire trades and improving the quality and accessibility of private hire services.

Further to this an announcement was made by the Mayor's office on 20th January 2016 explaining some initial amendments to the proposals that were consulted on by TfL, as well as setting out intentions about those proposals which may not be progressed further. This announcement followed TfL's review of the consultation responses. A final decision will be made by the TfL Board on 17th March 2016.

A summary of the proposals is included in Appendix A.

1.2 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 identify potential positive and native impacts and, where possible, minimise negative impacts of proposals and identify enhancement opportunities (within the scope of the proposals being considered by the authority in question).

TfL will use the findings of the impact assessment along with the findings from the consultation process to help inform its decision-making process on the amendments to private hire regulations to ensure that they remain appropriate and fit for purpose. TfL has also decided to undertake a consultation of a period of four weeks on the impact assessment itself.

TfL commissioned an IIA that considered the potential health, equality, environmental and economic and business impacts that may arise as a result of the proposed changes to private hire regulations 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.

¹⁶ It should be noted that summary consultation findings were provided by TfL and have been incorporated into this report. See section 3.4 of this report for more details.

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 equalities issues, particularly protected characteristic groups which include: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex; and sexual orientation
Environmental impact assessment ¹⁷	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 and business impact assessment	Identifies and assesses impacts on businesses (in this case PHV operators) 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 follows an evidence review process (undertaken between the 1st and 23rd December 2015) and some engagement with the industry (undertaken between 7th and January 22nd January 2016). See Chapter 2 for more details on the methodology.

1.3 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

¹⁷ 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

2.1 Introduction

This section of the report briefly 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.

2.2 IIA methodology

2.2.1 Scoping

The first task was an initial scoping exercise to understand which of the 25 proposals were relevant to each assessment topic (health; equalities; environment; business and economic streams). This was informed by a desktop review of the literature and evidence to ensure a thorough understanding of the assessment areas under consideration in relation to the proposed changes to private hire regulations. It involved using research from a range of secondary sources, including academic journals; 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 proposals 12, 16, 19 and 25 are primarily administrative changes with limited resource requirement attached, therefore 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.

The scoped in proposals formed the basis of the internal report submitted in December 2015. It should be noted that the decision to scope in or out proposals was revisited when we undertook engagement with stakeholders.¹⁸

2.2.2 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 and also passengers. 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 provides sets this out, which is not the case with this assessment.

¹⁸ The scoping table in appendix B shows the findings of the initial scoping exercise, which guided our further assessment work. The scoping exercise did not limit which particular proposals were eventually considered to have an impact rating.

Definition: A 'receptor' is a person (e.g. passengers or driver), businesses (operators) or conditions (the way the market operates / or wider economic or environmental conditions)

- **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. For example, a proposal could affect a few operators, many operators or most operators; likewise a judgement can be made about the proportion of a given equality group which might be affected by a proposal. 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, 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 number	Private Hire Regulations Review Proposal	Description of the impact	Identification of receptors (operators, drivers, users and others)	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 below and more detail is provided in Appendix C.

Table 2.2: Seven-point impact scale

Impact rating	
XXX	Major adverse
XX	Moderate adverse
X	Minor adverse
0	Neutral
✓	Minor beneficial
✓✓	Moderate beneficial
✓✓✓	Major beneficial

Source: Mott MacDonald

In order to understand the range of impacts expected to be realised should all 25 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, impacts on principal receptors (PHV operators, drivers and passengers) at an individual proposal level, rated based on the evidence available are set out in Chapter 3.
- Secondly, the potential headline issues resulting from these impacts as a whole are discussed set out in Chapter 4, the conclusions. There is also a consideration of cumulative impacts.

Definition: '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.

2.2.3 Engagement

Following the initial evidence review to inform the IIA, TfL commissioned additional engagement work to inform the IIA, as it was regarded as essential to integrate stakeholder experience, judgement and expertise into the assessment. This IIA has drawn on three broad groups of stakeholders, namely:

- PHV operators, trade representations and driver representatives
- Equality, transport and passenger groups

The stakeholder list was informed with guidance and input from TfL about PHV industry stakeholders who should be engaged with. Assistance was also provided by TfL with regard to making contact with equality stakeholders. A full list of organisations invited to participate in the IIA can be found in Appendix D.

2.2.4 Topic specific methodologies

Each technical discipline 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 detailed in Appendix E.

2.3 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 25 regulation proposals that were consulted on between September and December 2015.
- The timeline provided by TfL for the production of this IIA is as follows:
 - **Commission of the IIA:** December 1st 2015, with a requirement to produce an initial report based on a data and evidence review before Christmas 2015.
 - **Production of internal report:** 23rd December 2015
 - **Commission of engagement to inform the impact assessment:** 7th January 2016. Once the TfL public consultation had closed, engagement was commissioned to explore impacts with operators, drivers, industry and equality groups where possible.
 - **Engagement with stakeholders:** 11th – 22nd January 2016 – originally planned to complete on 20th January but extended to enable more stakeholders to participate.
 - **Submission of IIA report:** The final report was submitted on 27th January 2016.
 - **Announcement by the Mayor on the proposals:** 20th January 2016. During the period of engagement for the IIA an announcement was made about which proposals may not be proceeded with on the basis of initial findings of TfL's consultation. TfL plans to make the final decision on the proposals to take forward at the TfL Board meeting on the 17th March 2016.

- **TfL consultation on impacts:** Given that the timescale for this IIA has been brief, as well as commissioning this IIA, TfL has chosen to undertake a further four week consultation with stakeholders on impacts of the proposals. This will run from 27th January to 24th February 2016.
- 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. The purpose of the IIA and this report is not to focus on whether stakeholders agree or do not agree with proposals; instead the scope is to set out the impacts (positive and negative) of the proposals should they be implemented.
- The IIA has drawn on consultation findings from the private hire consultation in May 2015 and some emerging findings from the September 2015 consultation; full consultation results from September 2015 were not available before the submission deadline for the IIA report however TfL has subsequently provided an overall summary of responses to the consultation which closed on 23rd December 2015.
- Operator impacts have been broadly separated into the following categories based on the differential impacts that have been identified for those groups:
 - Operators which use a digital platform only; to our knowledge there is only one operator with this model in London at present. The types of issues identified would also relate to any future operators potentially using this type of model and potentially, operators where the vast majority of trade is via a digital platform.
 - Operators which offer digital **and** phone based and/or office based (at an operating centre) services. It is assumed that many operators fall within this category
 - Operators which rely on office based (at an operating centre) and / or phone based contact to accept private hire bookings. This is important because of the complexity of the market. For further information about assumptions about market share see Appendix F.
- Related to the above point, it should be noted that an important part of the economics and business assessment is analysis of the breakdown of the PHV market by the identified operator groups. Providing a quantification of impacts is reliant on a significant amount of industry data; much of which is presently absent. The engagement with operators has been used to provide more detail and assurance for this assessment around the key impacts that could be experienced by different parts of the sector, but this does not yet provide an industry-wide picture as data gaps still remain. Insight from the operators has particularly been required around technological capability; costs that could be incurred with regard to implementing certain proposals; and implications around the need to change business models should proposals be implemented.
- For the purposes of the IIA the Taxi PHV Diary Report¹⁹ and the Taxi and Private Hire Licensee Customer Satisfaction Survey²⁰ 2014/15 and Private Hire Supply and Demand study published in 2001 make up the majority of this evidence. An updated Private Hire Supply and Demand study was undertaken by TfL in late 2015, with analysis due to be published later in 2016; however the findings were not published in time for inclusion in this IIA.

¹⁹ TfL (2009) Taxi PHV Diary Report

²⁰ TNS (2015) CSS TPH Licensees Report, Profile of Licensees

- It is understood that that the impacts of some of these proposals, and whether they are implemented or not, could have wider impacts on other transport providers, for example public transport and the taxi sector. Engagement has not been undertaken with representatives of these wider transport provider groups to date as part of this IIA.
- Engagement has been undertaken with representatives of some drivers.
- It is understood that the four-week consultation that TfL is undertaking on impacts of 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.

3 Assessment outcomes

This chapter sets out the assessment of each proposal, considering (where relevant) whether impacts will be experienced by operator, drivers and/or passengers. An assessment summary table is presented for each per 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.

A full explanation of the assessment is provided in a detailed technical assessment framework provided in Appendix G. This chapter provides a summary of that evidence.

3.1 Proposal 1: Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking

3.1.1 Health

3.1.1.1 Passenger impacts

The provision of driver and vehicle identification in advance of a journey commencing is likely to reduce the risk of passengers getting into the wrong PHV and minimise the risk of passengers inadvertently using unlicensed vehicles. This will help to provide passenger with confidence on the legitimacy of the driver and operator. This is likely to have positive benefits in terms of addressing actual personal safety risks (e.g. potential assault) and is also likely to improve passenger perceptions of safety. There will, therefore, be a long term impact health benefit on the basis of personal safety

The proposal is assessed as **moderate beneficial**.

Proposal specific health mitigation measures / opportunities for enhancement

- Raising public awareness of this proposal and the personal safety implications will help to realise the full benefits of this proposal.

3.1.2 Equality

3.1.2.1 Passenger impacts

As outlined above, this proposal will minimise the risk of passengers inadvertently using unlicensed vehicles. There are likely to be disproportionate equality benefits of this proposal as certain equality groups have heightened personal safety and security concerns whilst travelling compared to other travellers. These groups include disabled people; lesbian gay and bisexual (LGB²¹) people; people from black, Asian and minority ethnic (BAME) groups; females and young people.²²

²¹ TfL recognises that there may be barriers to transport faced by some transgender women and men, however TfL does not yet have sufficient data to provide a detailed analysis. LGB is used where data for transgender women and men is not available.

²² For evidence see Appendix G

It should be noted, in terms of considering the scale of the impact on equality groups, that there is some evidence to suggest that certain groups are higher users of PHVs than the general population, either because they lack their own private transport or due to personal accessibility or safety requirements. Females and disabled people are amongst these groups.²³

There is also evidence relating to unlicensed minicab use, which suggests that some equality groups are disproportionate users of unlicensed PHVs. For example, recent data collected by TfL highlighted that 29% of BAME Londoners reported that they would use an illegal mini cab compared to 21% of Londoners.²⁴ The proposal in itself will not prevent use of unlicensed vehicles, but it could help to limit inadvertent use.

A supplementary impact of this proposal is that those without access to the internet or a smartphone will not necessarily be able to benefit from being provided with photographic evidence. Use of technology continues to grow across all equality groups in terms of internet access and smartphone use in London. However, although there has been growth in technology use amongst older and disabled Londoners, use remains lower for these groups than for the overall population.²⁵ These groups, therefore, may not be able to benefit to the same extent as some other population groups (at least in the short term), although there will still be advantages of receiving driver name and vehicle details before travel. However, due to the limited distribution of these groups throughout London and the limited benefit that will be realised, this particular impact is not estimated to be significant.

In summary this proposal will enhance (the perception of) personal safety and reduce the risk of using unlicensed vehicles. It will deliver long term benefits and will be experienced by a range of different equality groups. As such, it is considered **moderate beneficial**.

Proposal specific equality mitigation measures / opportunities for enhancement

To maximise the benefits of this proposal, consideration could be given to:

- A campaign to raise awareness of the new regulations to increase confidence in PHV use and ensure that passengers have expectations of receiving this information prior to travel. Consideration should also be given to targeting this at groups who are more likely to use PHVs in general and more likely to use unlicensed vehicles more specifically.
- To maximise the enforcement and the associated benefits, operator systems should be required to keep a record of the confirmation details that were issued and the time / date that they were sent.
- Consideration should be given to providing this information in accessible formats (i.e. those with visual impairments.)

²³ For evidence see Appendix G

²⁴ Transport for London (2012): Understanding the travel needs of London's diverse communities

²⁵ Transport for London (2015): 'Travel in London: Understanding our diverse communities'. Transport for London.

3.1.3 Business and economy

3.1.3.1 Operator impacts

This proposal requires operators to ensure that their booking confirmation practices meet the specific vehicle details and photo ID requirements. As business practices and reliance on technology differ between various operator groups, the impacts of this proposal will be felt differently across the market.

- **Operators offering digital only booking:** The scale of impact for this operator is not envisaged to be significant, if at all, as the capability including photo ID is more likely to already be in place than other operator groups. This proposal is assessed as a **minor adverse** impact.
- **Operators offering digital booking:** Whilst it is assumed that many operators provide some sort of digital service at present, it is assumed that not all of the operators will have the current technological capability to implement this proposal in full at present. The scale of impact on those affected operators will vary depending on the extent of technical updates required to meet the needs of this proposal. The capability of including photo ID confirmation is considered to be more easily facilitated via online/app methods of booking, as such the impact is expected to be experienced in the short term. However, depending on the way this regulation is implemented, operators may still have to make considerable changes to their business practices. Due to the relatively high PHV market share expected to be negatively impacted by this proposal and the likely operator cost required to implement these changes, the proposal is assessed as a **minor adverse** impact.
- **Operators offering phone or office based booking:** It is assumed that fewer operators do not provide a digital service as compared to those which do. However, the impacts on these operators will be greater because the costs of implementing this proposal are considered to be greater than for those with a digital capability already. Therefore, the proposal is assessed as **moderate adverse**.

It should be noted that there is the possibility that these costs could be passed on to passengers in the form of fare increases or incurred by operators.

Proposal specific economic / business mitigation measures / enhancement opportunities

- Phrasing the proposal so that the provision of photo ID is optional could reduce the costs and, therefore, negative impacts of this proposal on operators.
- Phrasing the introduction of this regulation may make it easier for firms, especially small firms, to meet costs required and therefore minimise any de-stabilisation effects.
- Generally the practicalities and costs of implementing should be borne in mind. For example, should the proposals require all operators to adhere to a set format of distributing driver information and photo ID; costs are likely to be higher than if there is some flexibility in implementation delivery of this requirement by operators.

3.1.4 Summary

Table 3.1: Summary

Topic	Operators	Drivers	Passengers
Health			Moderate beneficial
Equality			Moderate beneficial
Environment			
Economics and business:			
Digital only	Minor adverse		
Digital and phone / office based bookings	Minor adverse		
Phone / office-based bookings only	Moderate adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL intends to proceed with this proposal for customers who are able to receive the information. TfL will consider any phasing required to take current technology into account, particularly for smaller operators.

3.2 Proposal 2: Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing

3.2.1 Health

3.2.1.1 Passenger impacts

The introduction of this proposal is designed to ensure that there is sufficient time in which vehicle and driver confirmation details (which are the subject of proposal one) can be issued to passengers and also to maintain the distinction between the taxi and PHV sectors.

Whilst this proposal may reduce the likelihood of using unlicensed minicabs or drivers, there could be health and safety implications for passengers as a result of the increased waiting time²⁶, particularly where passengers are waiting in an unsafe area and / or at night as it leaves them vulnerable. In a high level review of the qualitative comments received as part of TfL's September – December 2015 consultation, some responses suggest that there are likely to be safety implications of this proposal due to the possible increase in waiting times. As such, even though the increase in waiting time²⁷ is expected to be fairly small, this impact for passengers is assessed to be **moderate adverse**.

²⁶ There is no industry-wide current data on the current wait-time for PHVs. As a proxy the average waiting time for taxis has been used; according to TfL's Supply and Demand study (2001) across all of London this is an average two minutes (although on Sundays between 8pm and 6am this increases to four minutes and during Monday-Friday from 8pm-6am the average wait time is three minutes). See Appendix H for more details.

²⁷ As compared to current PHV waiting times (although see above for limitations on baseline data).

3.2.1.2 Driver impacts

Drivers may experience health and safety impacts if passengers become agitated at being unable to commence their journey immediately. The extent of this impact is unknown; however drivers who are able to contact their operators for assistance should a situation escalate will be better equipped to deal with such instances. This for drivers is considered as **minor adverse**.

3.2.2 Equality

3.2.2.1 Passenger impacts

Similar to health impacts above, this proposal could help to avoid inadvertent minicab use but there is also the potential for this proposal to introduce a longer waiting time than at present for a PHV.

Any increase in waiting times is likely to have disproportionate adverse impacts on those groups with higher personal safety concerns. These groups include females; disabled people; LGBT people; those from BAME backgrounds; and young people.²⁸ It is considered that this will be enhanced particularly when travelling at night. Although the increase in waiting time that the proposal could introduce is considered to be small, and is therefore, likely to have a marginal impact per journey, as there is a disproportionate impact on certain equality groups the proposal is considered **moderate adverse**.

3.2.3 Business and economy

3.2.3.1 Operator impacts

This proposal could add time and therefore cost to journeys for all operators, as all operators in theory have the ability to offer customers a service, where vehicles are made available in less than the proposed five minutes.²⁹ There is currently an absence of industry-wide data on wait times for PHVs booked. Interviews with stakeholders suggest that some current average wait times are below five minutes (notably digital based operators) whilst other average wait times are currently above this. This 'additional wait time' will be slightly less.

- **Operators offering digital only bookings:** Whilst all operators could be impacted by this proposal in theory, the operator group expected to be most affected by this proposal will be those only offering digital booking because the technology used is aimed at providing more immediate private hire. Stakeholder engagement also suggests that current average wait times for this operator group are below five minutes. Services could be deemed less flexible/convenient to passengers as a result of this proposal and therefore there is a risk that this could reduce patronage. This proposal is also likely to impact on vehicle utilisation, and the potential to offer more trips which would affect income.³⁰ As this is a long term impact which could affect business operations and trade the impact has been assessed as **major adverse**.

²⁸ See proposal one and Appendix G, under proposal one, for relevant evidence about personal safety concerns relating to certain equality groups.

²⁹ See footnote 24 above.

³⁰ Time value impacts, and therefore aggregate cost to operators themselves and also business users as a result of this proposal cannot be established given the current limited data.

- **Operators offering digital and phone / office based bookings or just phone / office based bookings:** All other operators could also be affected by this proposal as it could affect vehicle utilisation, disrupt vehicle allocation and therefore the ability to offer more trips, affecting income. However, as it is assumed that amongst these operator types there are fewer trips that currently have less than a five minute wait time, the impact is assessed **moderate adverse**.

Proposal specific economic / business mitigation measures / enhancement opportunities

- More data on current waiting times across the industry would help to provide more insight on the economic / financial impacts of this proposal.

3.2.4 Summary

Table 3.2: Summary

Topic	Operators	Drivers	Passengers
Health		Minor adverse	Moderate adverse
Equality			Moderate adverse
Environment			
Economics and business:			
Digital only	Major adverse		
Digital and phone / office based bookings	Moderate adverse		
Phone / office based bookings only	Moderate adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL does not intend to proceed with this proposal.

3.3 Proposal 3: Operators will be required to seek TfL approval before changing their operating model

3.3.1 Business and economy

3.3.1.1 Operator impacts

This proposal is likely to affect all types of PHV service operator. Current data on the frequency with which PHV operators change their operating model is not available. However, evidence does suggest that there has been a recent increase in passenger app-use³¹ which may lead more operators to offer services via digital means in future (although engagement with industry representatives indicates that for many operators this step-change has already taken place).

³¹ TNS 2014: Black cab and minicab report

It is considered that this proposal could result in delays to operators seeking to develop their model and potentially limit the pace with which they are able to respond to passenger demand. Depending on the level of structural change proposed (and what TfL need to be notified about and approve) stakeholders have noted that considerable TfL time is likely to be required to review operator proposals; these delays could impact considerably on operator income generation and the also affect dynamism and innovation in the industry. There may also be some direct operator administrative costs incurred to fulfil this requirement.

Whilst there is little information as yet available with regard to the delay and costs incurred of this proposal, as this proposal could potentially affect all operators, the impact is deemed **moderate adverse**.

Proposal specific economic / business mitigating actions / enhancement opportunities

- Stakeholders have required a clearer definition of the level of change to an ‘operator model’ which would help operators to understand the level of impact on their business models.

3.3.2 Summary

Table 3.3: Summary

Topic	Operators	Drivers	Passengers
Health			
Equality			
Environment			
Economics and business:			
Digital only	Moderate adverse		
Digital and phone / office based bookings	Moderate adverse		
Phone / office based bookings only	Moderate adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL intends to proceed with an amended version of this proposal with operators required to inform TfL of any proposed changes to their operating model rather than seek approval.

3.4 Proposal 4: Security for app based booking platforms

3.4.1 Health

3.4.1.1 Passenger impacts

The introduction of this proposal is designed to increase the security of app-based booking platforms, including requiring operators to demonstrate that they have appropriate measures in place to protect passengers from fraudulent use of their accounts.

There is presently an absence of industry-wide data on the level of security currently in place. However, stakeholders have highlighted that this proposal could help to address some potential app safety and security issues as set out below:

- Issues identified by some stakeholders include the potential for app-based booking platforms to be used by an unlicensed driver and, thereby, pick up passengers illegally. This proposal could have a positive safety impact if it does help to prevent unlicensed drivers from logging into a licensed driver's app. However, operators have suggested that they do already have security in measures in place which address some of these concerns.
- A concern was raised that if security measures are not in place to protect data such as email address, telephone number and bank details, this information could potentially be used for other purposes without passenger consent. However, it was also highlighted that there are data protection regulations already in place to guard against this.

There could be a long term impact, as changes to the security of app bookings could result in a permanent enhancement in personal safety for app-users. However, as there is limited evidence to suggest that there is a severe lack of security in the PHV sector, or that digital security issues are frequent / widespread the proposal is rated as **moderate beneficial**.

3.4.2 Equality

3.4.2.1 Passenger impacts

It is considered that younger people are likely to be disproportionate beneficiaries of the enhanced security measures being proposed because they are high users of app-based booking services compared to other age groups.^{32 33} Given this, there will be some disproportionate benefits in personal security for young people. It is anticipated that these impacts will be fairly marginal as other data protection regulations exist and young people's high use of app-based booking indicates a relatively high confidence level in this mode at present. Therefore, the proposal is considered to be **minor beneficial** in terms of equality impacts.

³² TNS (2014): Taxi and minicab customer satisfaction survey. Please note that younger people in this report in the majority of cases refers to 16-24 year olds, however research in this report only classifies between 16-19 and 20-29 year olds.

³³ Transport for London (2015): Travel in London: Understanding our diverse communities.

3.4.3 Business and economy

3.4.3.1 Operator impacts

Operators offering digital bookings: This proposal could have a cost implication for operators providing apps, particularly the requirement for enhanced driver recognition technology. Operators have highlighted they already have some security features in place to tackle the issues around unlicensed driver activity, but they do not necessarily meet the specifications set out in the proposal. For example, one operator explained that they have app software which ensures that only the licensed driver can access the app, through pin security. As such, there could be significant cost implications across the industry for all types and sizes of operator if hand-sets and supporting systems needed to be updated. Qualitative responses to the TfL's September - December 2015 consultation also highlighted that current driver ID confirmation methods do not meet all of the details of this current proposal and therefore changes could be considerable.

In terms of anti-fraud measures, additional costs from this aspect of the proposal are deemed to be less than those associated with driver recognition technology. However engagement with representatives of operators suggests that the use of apps and payment by credit card already requires anti-fraud measures via the online solutions, plus data protection regulations also exist.

If both elements of this proposal were introduced the impact is expected to be **moderate adverse** (especially if there is no flexibility of how this is introduced).

Proposal specific economic / business mitigating actions / enhancement opportunities

- De-coupling the two elements of this proposal (ensuring only the licensed driver is driving the vehicle and protecting passenger's personal data security) would provide greater clarity.
- Working with operators to find a way of improving security, but allowing flexibility in approaches to achieve this would help to minimise cost impacts.
- Provision of greater guidance on software as well as phasing the introduction of the regulation would help with implementation of this proposal and would allow operators to spread costs involved/incorporate them into their investment cycles.
- TfL's guidance and involvement in negotiating with the technology companies to secure a more economical solution would be well-received by the operators.

3.4.4 Summary

Table 3.4: Summary

Topic	Operators	Drivers	Passengers
Health			Moderate beneficial
Equality			Minor beneficial
Environment			
Economics and business:			
Digital only	Moderate adverse		
Digital and phone / office based bookings	Moderate adverse		
Phone / office based bookings only			

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is not intending to bring forward an immediate change but will work with the technology industry and trade to develop solutions to enhance security.

3.5 Proposal 5: Operator must offer a facility to pre-book up to seven days in advance

3.5.1 Equality

3.5.1.1 Passenger impacts

The introduction of this proposal is designed to make it easier to plan journeys in advance. It is anticipated that ensuring that all PHV operators offer a facility to book up to seven days in advance may deliver disproportionate benefits to disabled passengers in particular and assist them in making secure travel arrangements; given that there are a relatively small number of fully accessible PHVs, disabled passengers have a higher tendency seek to book in advance.³⁴

This proposal could deliver long term benefits for disabled people, however, given that most operators (it is assumed) already provide an advance booking service, it is considered that this proposal is **minor beneficial** in terms of equality impacts.

Proposal specific equality mitigation measures / opportunities for enhancement

- To maximise benefits for disabled people, TfL could consider requiring operators to publicise the number of accessible vehicles it has available and the time slots that they are available (if they are not available 24/7) to make bookings easier. Alternatively TfL may want to consider collating this information and publicising this in one location for easy reference.

³⁴ TfL (2015): Private Hire Regulations Review: Response to consultation and Proposals

3.5.2 Business and economy

3.5.2.1 Operator impacts

- **Operators offering digital only bookings:** Engagement suggests that introducing this would require a change in operating model. The need to change to a new model would have financial impacts in the short term in order to adapt systems to accommodate this service, but also long term impacts as it would affect the way vehicles are allocated and reduce utilisation. This could compromise the number of trips provided and, therefore, potential income. The overall impact is considered as **major adverse**.
- **Operators offering digital and phone / office based booking facilities or phone / office based only:** It is assumed that operators which offer the facility to book by phone or in person at an operating centre will allow passengers to book up to seven days in advance. As such, for these operator groups limited costs will be incurred in implementing this proposal. However, some stakeholders have stated that this proposal could have a negative impact on some of these operators as if all operators are required to offer this service, it could potentially result in a loss of market share. For this reason, there is considered to be a **minor adverse** impact on these operator groups.

3.5.3 Summary

Table 3.5: Summary

Topic	Operators	Drivers	Passengers
Health			
Equality			Minor beneficial
Environment			
Economics and business:			
Digital only	Major adverse		
Digital and phone / office based bookings	Minor adverse		
Phone / office based bookings only	Minor adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL does not intend to proceed with this proposal.

3.6 Proposal 6: TfL proposes to no longer issue licences for in-venue operators or temporary events

3.6.1 Health

This proposal is designed to address some concerns around current safety and security levels associated with this type of licences. It also reflects advances in technology, which have enabled prospective passengers to book a PHV via a mobile / smartphone telephone, thereby reducing the necessity for on-site bookings.

No data has been available about the number of in-venue operators or those who service temporary venues or the number of passengers that use these PHV options. However, some stakeholders consider that the existence of in-venue operating centres can, in itself, attract unbooked vehicles to the venue and give rise to illegal plying for hire or touting (whereby touts join the licensed operator staff outside the venue, causing confusion for the public who can't distinguish between the legitimate and illegal services). As such removing these licences could be beneficial on health and safety grounds.

Conversely, it should be noted that there is concern amongst some stakeholders that the cessation of these licences may have negative health and safety implications for passengers as existing in-venue operator facilities can help to provide a safe waiting place for passengers and also reduce the vulnerability of waiting outside.

Given the differences in stakeholder views on impacts, and the lack of data to indicate the numbers of passengers that could be affected, this impact of this proposal has currently been rated as **neutral** in terms of potential health implications.

Proposal specific health mitigation measures / opportunities for enhancement

- If this proposal is implemented, measures should be considered in conjunction with venues which currently have these facilities in place to enable passengers to remain inside whilst making a booking, if they have not done this in advance.
- Sufficient warning and advertisement of the change in provision should also be considered.

3.6.2 Equality

3.6.2.1 Passenger impacts

The removal of in-venue operators or temporary events is likely to disproportionately impact passengers who have heightened personal safety concerns for the reasons outline above in the 'health section'. These groups include disabled people, LGB people, BAME groups, females and young people.³⁵ It should further be noted, however that some of these groups do face barriers in terms of accessing alternative modes of transport which may make travel to and from these events more difficult and potentially more expensive although this is unlikely to be significant issues for young people as they are high users of mobiles / smartphones so are unlikely to be totally reliant on in-venue or temporary licensed services).

³⁵ For evidence see Appendix H

Given the potential pros and cons for personal safety, for the same reason as for health above, this proposal is currently assessed as **neutral**.

Proposal specific equality mitigation measures / opportunities for enhancement:

- Similar to the health mitigations cited above.
- TfL could consider working with venue owners / managers and temporary venue organisers, which currently have PHV licence arrangements, to ensure that there is space for PHVs to collect passengers close to the venue. This would help to alleviate some of the potential adverse equality impacts.

3.6.3 Business and economy

3.6.3.1 Operator impacts

This proposal to no longer issue licences for in-venue operators or temporary events will be experienced by operators currently offering this service. Those in an agreement with an in-venue operator (data is not available as to how many operators this affects) will be adversely affected by this proposal due to the potential cut in income. The impacts would be expected to be medium term (as the impact would be sustained when the proposal was introduced and then in the immediately transitional period). The sensitivity of the operator would depend upon what proportion of their business that was generated through in-venue services.

There are likely to be significant income impacts on operator groups which lose this business; however as this will not affect all operators and operators will still have the opportunity to obtain passenger bookings by other methods. Without further data on the number of operators which rely on these licences as a key source of trade, this proposal has been given a cautionary assessment of **moderate adverse**.

Proposal specific economic / business mitigation measures / enhancement opportunities

- Operators engaged with suggested that it would be useful to de-couple this proposal and consider in-venue licensing and temporary events licensing separately.

3.6.4 Summary

Table 3.6: Summary

Topic	Operators	Drivers	Passengers
Health			Neutral
Equality			Neutral
Environment			
Economics and business:			
Digital only			
Digital and phone / office based bookings	Moderate adverse		
Phone / office based bookings only	Moderate adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is intending to proceed with this proposal and will consider how best to introduce these changes.

3.7 Proposal 7: Operator must have a fixed landline telephone which must be available for passenger use at all times

3.7.1 Health

3.7.1.1 Passenger impacts

This proposal has two separate elements: the proposal to provide booking facilities via a landline during hours of operation and the proposal to provide a customer care and complaints service via a landline during hours of operation. This would provide passengers with the ability to address concerns ‘in real time’ rather than relying on less reactive electronic communication. Health impacts associated with these proposals include:

- Bookings: Some stakeholders indicate that this measure is likely to have a positive impact on passenger safety, as passengers would be able to contact the operator directly, with regards to enquiries about how long the car will take to arrive for example.
- Customer care: Some stakeholders stated that the ability to make complaints and enquiries by phone, rather than through a digital platform, is important for reasons of relatives checking on PHV users and customers being able to raise concerns and get an immediate response in an emergency situation.

It is understood that many operators already provide this service so passengers would not necessarily see a significant change in services provided. However, given the potential for this proposal to minimise some passenger risks the proposal is estimated to have a **moderate beneficial** impact on passenger safety.

3.7.1.2 Driver impacts

Although this proposal is aimed at passengers, many stakeholders noted that this could have positive impacts on drivers, who may need to call the control centre for assistance in the case of passenger verbal or physical assault, or when they may be an issue with the vehicle. This would be beneficial to all drivers, however scale of the impact is relatively low as many operators already offer this facility. As such this proposal is estimated to have a **moderate beneficial** impact on driver safety.

3.7.2 Equality

3.7.2.1 Passenger impacts

There may be benefits in terms of personal security for those groups who are more vulnerable travellers (see Appendix G) because some of these groups may benefit (in terms confidence to travel) from the ability to speak to customer care representative at any time during operation. Representatives of disabled users of PHVs also identified that this proposal is likely to have a particular benefit because a phone line is generally more accessible for disabled people to use than a computer or smartphone and will allow deaf users to enable a text-relay option. Given this evidence this proposal impact is rated as **moderate beneficial**.

3.7.3 Business and economy

3.7.3.1 Operator impacts

Given the variation in business models, the impacts of this proposal will be felt differently across the market.

- **Digital only booking:** Engagement suggests that implementing this proposal to allow both bookings and customer care via a fixed landline would necessitate considerable changes to the business model, with considerable associated costs. As such, this proposal is assessed as having a **major adverse** impact.
- **Digital and phone / office based bookings and phone / office based bookings only:** It is assumed that whilst operators in this category will already be taking phone bookings during all hours of operation, some will not have a customer services landline which is permanently staffed during business hours. For those not in this position, putting in place this service is anticipated to require extra resource, which could be a significant cost for both larger scale operators with a wide client base; smaller, local-level operators with fewer resources; and particularly for operator-drivers for whom this proposal would be difficult to implement. As such, this proposal is assessed as having a **moderate adverse impact**.

Proposal specific economic / business mitigating actions / enhancement opportunities

- Consideration of a tiered approach (aligned to operator size) to this regulation, or a reduced number of hours during which the landline needs to be staffed for could be considered, in recognition of the increased operator costs that could be realised from this proposal.
- Phasing the implementation of the proposal could minimise the full cost impacts and allow operators time to adapt to meet this requirement.

Table 3.7: Summary

Topic	Operators	Drivers	Passengers
Health		Moderate beneficial	Moderate beneficial
Equality			Moderate beneficial
Environment			
Economics and business:			
Digital only	Major adverse		
Digital and phone / office based bookings	Moderate adverse		
Phone only or phone and office based bookings	Moderate adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is intending to proceed with an amended version of this proposal which will require operators to provide customers with a way of speaking to an operator verbally at all times while bookings are being undertaken. Operators will not be required to take bookings by phone.

3.8 Proposal 8: Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app

3.8.1 Equality

3.8.1.1 Passenger impacts

The inability to show a vehicle for immediate hire on an app is likely to affect the convenience, and possibly the sense of security, associated with booking a PHV for those sections of the population who are higher users of app technology (younger passengers, as set out in proposal four above).³⁶ Due to this it is considered that there would be a **minor adverse** effect in terms of equality.

Proposal specific equality mitigation measures / opportunities for enhancement

- In implementing the proposal, ensuring that operators were still able to show visibility of a passenger’s driver location once the booking is made would help to reassure passengers of the proximity of the vehicle and help to reduce any service convenience / safety implications.

³⁶ TNS (2014): Taxi and minicab customer satisfaction survey

3.8.2 Business and economy

3.8.2.1 Operator impacts

- **Digital only booking:** This proposal would have a significant negative impact on the this type of business model due to the way in which bookings are currently made, with considerable associated costs to administer the change and the way in which vehicles are booked and allocated. As such, this has been rated **major adverse**.
- **Digital and phone / office based bookings:** Operators who offer this service but who do not rely solely on this function to allocate vehicles, may need to alter their digital platform, although data is not available to indicate how much of the market this would apply to. These operators would need to implement some change although it is likely to be less substantive as the entire business model would not have to change and, therefore, there would be less of a disruption to trade. As such, this proposal has been rated as having a **minor adverse** impact.

3.8.3 Summary

Table 3.8: Summary

Topic	Operators	Drivers	Passengers
Health			
Equality			Minor adverse
Environment			
Economics and business:			
Digital only	Major adverse		
Digital and phone / office based bookings	Minor adverse		
Phone / office based bookings only			

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is not intending to proceed with this proposal.

3.9 Proposal 9: Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis

3.9.1 Health

3.9.1.1 Passenger impacts

Stakeholders identified that this proposal will help TfL to respond to reports of breaches of conduct. Providing TfL with more information may improve passenger safety by making it easier for TfL to identify and take action against unlicensed drivers touting using licensed vehicles and any licensed drivers who commit crimes whilst on duty. TfL would also be able to use this information to check that hire and reward insurance is in place. Additionally, increasing TfL's access to operator and driver information may dissuade drivers from acting illegally by reducing their perception of anonymity. This should improve passenger safety. As a result, the overall health impact is **moderate beneficial**. Although stakeholders were keen to highlight that these impacts will only be realised if this information is monitored and acted upon on receipt.

3.9.2 Business and economy

3.9.2.1 Operator impacts

This proposal is likely to affect all operators as it could require additional administrative input and resource for operators. It is likely to impact those operators with limited electronic record keeping to a greater extent; data is not available on current capability but this is not expected to be extensive. Any cost impacts are expected to be relatively low and short term. As such, this proposal is currently rated as **minor adverse**.

Proposal specific economic / business mitigating actions / enhancement opportunities

- Phasing the introduction of this proposal would help to minimise some of the adverse effects.
- Providing more definition of 'regularly' and how this information would be useful to provide greater clarity to the industry on this proposal.
- It is worth noting that this proposal could require more TfL resource to monitor effectively.

3.9.3 Summary

Table 3.9: Summary

Topic	Operators	Drivers	Passengers
Health			Moderate beneficial
Equality			
Environment			
Economics and business:			
Digital only	Minor adverse		
Digital and phone / office based bookings	Minor adverse		
Phone / office based bookings only	Minor adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is intending to proceed with this proposal and will consider how best this can be introduced.

3.10 Proposal 10: Operators must specify the fare prior to the booking being accepted

3.10.1 Health

3.10.1.1 Driver impacts

Stakeholders highlighted that in some cases passengers request a journey change after the journey has commenced (e.g. an additional passenger drop off). If implementation of this proposal requires the driver to stop and recalculate the fare, there is some concern that some passengers may become impatient and potentially abusive, which could put driver safety at risk. The realisation of this impact is therefore dependent on how it is implemented. Given that not all journeys will be redirected and not all will react negatively, this impact has been rated as **minor adverse**.

3.10.2 Equality

3.10.2.1 Passenger impacts

This proposal is likely to improve the transparency of PHV fares. This will have particular benefits for those on low incomes who will experience the benefits of this transparency to a disproportionate extent; they will be able to plan their journey with more information and confidence. As detailed in Appendix G, women, older people, those from some BAME groups and disabled people are more likely to be in low-income households compared to the overall population.

There is also some evidence to suggest that disabled people, in particular, would benefit from this upfront fare transparency due to experiences of being required to pay higher fares for PHV particularly if an assistance dog is required.³⁷ Engagement with disability representatives reveal that some disabled people will also disproportionately benefit by being able to prepare the fare in advance.

In summary, the introduction of this proposal would introduce long term benefits from low-income equality groups including, in particular, disabled people. Whilst other modes of transport are available to these groups, the greater fare transparency that this proposal is likely to realise suggests it is **moderate beneficial** in terms of equality impacts.

Proposal specific equality mitigation measures / opportunities for enhancement

- Enforcing this regulation, to ensure that the specified fare is the price that is eventually charged will be important to help fully realise benefits.

3.10.3 Business and economy

3.10.3.1 Operator impacts

This proposal could affect any operator which currently provides fare estimates rather than fare specified fares. Qualitative responses from TfL's September-December 2015 consultation highlighted that specifying the fare will mean it is difficult to take into account traffic or other similar factors. Therefore there is a risk that income will be lost as a result.

Some evidence gathered through the stakeholder engagement process suggests that customers making bookings by telephone are more likely than those booking through a digital platform to receive a specified fare.³⁸ As such, the impacts for different operating models are likely to vary:

- **Digital only booking:** Income loss through under-estimation of fares could be experienced (as with other operator types), but this proposal may also require some changes in operating model. This has therefore been rated as a **moderate adverse** impact.
- **Digital and phone / office-based booking and phone / office based booking only:** Income loss through under-estimation of fares could be experienced (as with other operator types). However, as stakeholders indicated that in nearly all cases, phone booking operators do or can provide a specified fare to passengers this proposal is not considered to substantially affect the business model or the service that these operators are offering to customers. Therefore this has been rated as a **minor adverse impact**.

³⁷ GfK (2015): Accessibility Mystery Traveller Survey – Taxi / Private Hire Vehicle Report - Q1 2015/6.

³⁸ However, there is currently insufficient industry-wide evidence which confirms that this is always the case.

Proposal specific equality mitigation measures / opportunities for enhancement

-
- It is further suggested by stakeholders that there needs to be acknowledgement from TfL that there will be a minority of instances where the destination cannot be confirmed and therefore the journey price cannot be estimated / specified. For example, journeys which have been booked through a third party such as a restaurant / hotel or executive services where there may be journeys that have multiple destinations. As such implementation may not always be practical.

3.10.3.2 Passenger impacts

There is a risk that operators will build a contingency into the fare charged to passengers in order to account for congestion or other delays and minimise the negative income impacts that are identified above. If this was the case there would be adverse effects on passengers and this would also minimise the beneficial impacts set out for equality groups (see section 3.11.2.1). However as likelihood of this is not known at present, this impact is considered to be **minor adverse**.

3.10.4 Summary

Table 3.10: Summary

Topic	Operators	Drivers	Passengers
Health		Minor adverse	
Equality			Moderate beneficial
Environment			
Economics and business:			Minor adverse
Digital only	Moderate adverse		
Digital and phone / office based bookings	Minor adverse		
Phone / office based bookings only	Minor adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is intending to proceed with an amended version of this proposal to require an estimated fare to be given to the passenger ahead of the journey starting. TfL will consider how best this proposal can be implemented to ensure accuracy in fare estimates.

3.11 Proposal 11: Operators must record the main destination for each journey which must be specified at the time the booking is made

3.11.1 Health

3.11.1.1 Passenger impacts

This proposal could improve the safety of all passenger groups across London if such information can then be stored and used by the Metropolitan police to investigate crimes. It should be noted that for the vast majority of PHV bookings this is already recorded so passengers wouldn't necessarily see a change in safety standards immediately but the potential to aid the police in tackling crime could be significant. As a result this impact has been rated as **moderate beneficial**.

3.11.2 Business and economy

3.11.2.1 Operator impacts

This proposal could affect any operator which currently does not record the main destination at the time that the booking is made. As with proposal 10 above, engagement during the IIA engagement process suggests that there is some variability across the industry at present, whereby digital bookings do not always need the specification of the end destination at point of booking but phone based services do always record this information.

- **Digital bookings only:** This could require some change in the way in which platforms operate with associated costs, but this is not considered to be substantial, given that there is the option already exists to specify the destination (albeit that this is not mandatory to do this at present). As such, this is considered to be **minor adverse**.
- **Digital and phone / office based bookings and phone / office based bookings only:** Stakeholders representing these operators stated that bookings which do not have a final destination constitute a small proportion of their businesses overall. This could result in some changes in business practices for some operators (and associated costs), so impact has been given a cautionary rating of **minor adverse** to reflect this.

Proposal specific equality mitigation measures / opportunities for enhancement

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- As with proposal 10- above, it is suggested that there needs to be acknowledgement from TfL that there will be a minority of instances where the destination cannot be confirmed at the time of booking. As such implementation may not always be practical.

3.11.3 Summary

Table 3.11: Summary

Topic	Operators	Drivers	Passengers
Health			Moderate beneficial
Equality			
Environment			
Economics and business:			
Digital only	Minor adverse		
Digital and phone / office based bookings	Minor adverse		
Phone / office based bookings only	Minor adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is intending to proceed with an amended version of this proposal to require the main destination to be captured prior to the journey starting.

3.12 Proposal 13: Limit on the number of business names attached to each operator’s licence

3.12.1 Business and economy

3.12.1.1 Operator impacts

This proposal to limit the number of business names attached to each operator does have the potential to affect all of the PHV market but is likely to impact upon some operator groups more than others. For example, this proposal may have long term advantages for locally focused companies due to reduced competition that would result from the implementation of this proposal.

However, conversely, this proposal has the potential to have some short term negative consequences for some larger operators which have accrued multiple companies over a long period of time. It is also understood through stakeholder engagement, that the PHV industry is one defined by frequent mergers and acquisitions, so it is not uncommon for well-established operators to consist of multiple smaller operators. Yet, engagement also identified that those with more than five operating names (which is the proposed limit) are not particularly common.³⁹

Given the current lack of data and absence of evidence which suggests that this proposal would have a significant effect on business models or income, this proposal is currently assessed as **neutral**.

³⁹ Industry-wide data to support how many operators current trade with more than five operating names has not been available.

Proposal specific economic / business mitigating actions / enhancement opportunities

- If this proposal is taken forward it is suggested that a dialogue is established between TfL and operators which do have more than five names and also to phase in the proposal to allow time for adjustment.

3.12.2 Summary

Table 3.12: Summary

Topic	Operators	Drivers	Passengers
Health			
Equality			
Environment			
Economics and business:			
Digital only	Neutral		
Digital and phone / office based bookings	Neutral		
Phone / office based bookings only	Neutral		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is intending to proceed with this proposal.

3.13 Proposal 14: Specific requirement for an English Language test

3.13.1 Health

3.13.1.1 Passenger impacts

The introduction of a specific requirement for drivers to demonstrate that they have sufficient knowledge of English language at an intermediate level is likely to improve communication between passengers and drivers. According to engagement with stakeholders improved communication may help to reduce the potential for misunderstandings and improve passenger safety and their perception of safety, for example, it will alleviate the potential for passenger uncertainty and anxiety when a driver is unable to explain why they are taking an alternative route. Benefits could also be realised in the case of a health issue where the passenger requires medical assistance. These are potential positive outcomes of this proposal, however, as there is no evidence to suggest that the drivers’ lack of English is currently a widespread issue with regard to current levels of passenger safety, the proposal is presently considered a **minor beneficial** health impact.

3.13.2 Equality

3.13.2.1 Driver impacts

The PHV trade attracts a high number of drivers from BAME groups - the national census shows that a high proportion of taxi and PHV drivers are from BAME groups.⁴⁰ Whilst many people from ethnic minority groups speak fluent English it is possible that some drivers from BAME backgrounds do not have English as a first language and could therefore be affected by this proposal.

The introduction of this proposal will affect new drivers wishing to enter the trade and those drivers renewing their licence (required every three years). This would disproportionately affect some drivers from BAME groups; potentially providing a barrier to income generation. The impact is likely to be most significant for those who are already working in the PHV trade and generating an income, with a licence which is due for renewal. The new test could also act as a barrier to those seeking new employment opportunities in the PHV sector.

The sensitivity of this impact is expected to be high as new and renewal drivers who do not speak English to the level required will not be able to work as a driver until the qualification has been acquired. Whilst some will be able to pass the test relatively quickly, this will not apply to all and there could be costs involved in training and sitting the test. For present drivers this could create a period of unemployment and reduced income. Given this the impact this proposal is assessed as **major adverse**.

Proposal specific equality mitigation measures / opportunities for enhancement

- Phasing the introduction of this regulation would help to minimise the adverse effects. This would provide more time for sufficient training to be taken up before refusal of a PHV driver's licence.

3.13.2.2 Passenger impacts

The improved communication impacts identified in the health section above (section 3.14.1.1) may have a disproportionate positive impact on people with learning difficulties and hearing difficulties. This is because these groups are more likely to already experience some barriers to communication; the requirement for drivers to have a competent understanding of English will reduce the risk of miscommunication. The proposal is assessed as **minor beneficial**.

⁴⁰ For evidence see Appendix H

3.13.3 Business and economy

3.13.3.1 Driver impacts

Whilst a high proportion of PHV drivers are from ethnic minority groups, assumptions cannot be made, based on this, on the proportion of drivers who would not be able to pass an English language test. However, this proposal impacts on all new entrants to the market and every PHV driver looking to renew their licence. Therefore this proposal will have a negative impact for drivers who do not meet the test requirements as it will be a barrier to employment and they will be at significant risk of reduction or loss of income, whilst they train to acquire the required language skills required or seek alternative employment. As a result this proposal has been assessed to have a **moderate adverse** impact on drivers' income and entry to the market.

3.13.3.2 Operator impacts

All operator groups could be affected by this proposal. It is understood that the test could significantly affect the labour pool from which the industry is able to draw. However, it should be noted that some operators do already test (albeit less formally) or gauge applicants' English language skills during recruitment so some of the issues that the proposal is looking to address are already met, in part, by some section of the industry.

There is no industry-wide data to suggest how many and which operators have a high reliance number of drivers without sufficient levels of English but given the potential implications for the labour pool, a conservative estimate of the impact on operators across the market is **moderate adverse**.

Proposal specific economic / business mitigation measures / opportunities for enhancement

- TfL could consider phasing the introduction of the test so that current drivers seeking renewal of their licence have time to improve their English language skills. A phased introduction will also help the market to prepare and adjust accordingly to minimise impacts on business operations.

3.13.4 Summary

Table 3.13: Summary

Topic	Operators	Drivers	Passengers
Health			Minor beneficial
Equality		Major adverse	Minor beneficial
Environment			
Economics and business:		Moderate adverse	
Digital only	Moderate adverse		
Digital and phone / office based bookings	Moderate adverse		
Phone / office based bookings only	Moderate adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is intending to proceed with this proposal and will consider how best to introduce these changes.

3.14 Proposal 15: Drivers to only work for one operator at a time

3.14.1 Health

3.14.1.1 Passenger impacts

This proposal aims to stop drivers working excessive hours for a number of different operators, therefore potentially reducing the number of hours drivers work. It is not possible to calculate the exact number of sleep related accidents, but research shows that driver fatigue may be a contributory factor in up to 20% of road accidents.⁴¹ This proposal is, therefore, likely to have positive safety impacts in terms of helping to improve passenger safety. Stakeholders have shared that there is tendency for drivers to work long hours in the PHV industry, which currently needs to be closely monitored (although some of the bigger operators do have systems in place to try to police this). Due to the potentially long term and wide ranging distribution of this impact, this proposal is assessed to have a **moderate beneficial** impact.

3.14.1.2 Driver impacts

Similar to the above, there is evidence to suggest that reducing fatigue in drivers reduces the chance of road traffic accident which will improve safety outcomes for drivers as well as passengers. As this proposal only impacts on drivers currently working for more than one operator at a time, the distribution of the impact is lower for drivers, and therefore the proposal is assessed to have a **moderate beneficial** impact on this receptor.

3.14.2 Business and economy

3.14.2.1 Operator impacts

With the development of apps and more flexible ways for PHV drivers to work for operators, it is assumed that there are fewer and fewer barriers to drivers working for more than one operator. Engagement as part of the IIA process indicated that driving for more than one operator is commonplace. This proposal, therefore, has the potential to affect all operators across the industry.

It is considered that the effects will be more dependent on size, coverage and profile of the operator rather than whether an operators accepts bookings via a digital platform or more traditional modes. If required to only work for one operator, drivers are more likely to choose operators which have a large potential geographical coverage and customer base. Locally focused PHV operators, with a smaller geographical coverage are less likely attract drivers, whilst sole trader operator-drivers would not be able to add to their income by undertaking trips for other firms. For these reasons, and the uncertainty about the way in which the reduced driver flexibility will affect industry operations, this proposal is considered to have a **moderate adverse** impact.

⁴¹ Further evidence of the link between driver fatigue and passenger health impacts can be found in Appendix H.

3.14.2.2 Driver impacts

As stated above many drivers work for more than one operator. Engagement with operator representatives highlighted that in addition to this, those drivers which provide disability or education services often do so under several different contracts with different operators, and that the executive end of the market disproportionately work for more than one operator than other PHV drivers. As such it is considered that many drivers will be affected by this proposal; it will affect the ability to work and provide services as they do at present and could also have significant effects on their income. For PHV drivers this proposal is assumed to have a **major adverse** impact.

Proposal specific economic / business mitigating actions / enhancement opportunities

- Consider a limit higher than one of the number of operators a driver can work for.
- Consider whether PHV operators can offer a guaranteed amount of hours (that would sustain a living wage) for individual drivers (i.e. so they can do enough work with one operator so they have no need to work for multiple operators).
- Consider whether there could be a cross-industry approach to monitor the amount of hours worked by PHV drivers.

3.14.3 Summary

Table 3.14: Summary

Topic	Operators	Drivers	Passengers
Health		Moderate beneficial	Moderate beneficial
Equality			
Environment			
Economics and business:		Major adverse	
Digital only	Moderate adverse		
Digital and phone / office based bookings	Moderate adverse		
Phone / office based bookings only	Moderate adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is not intending to proceed with this proposal.

3.15 Proposal 17: Vehicle licence to be revoked if driver licence revoked

3.15.1 Health

3.15.1.1 Passenger impacts

This impact is likely to have positive health and safety impacts as it offers an additional safeguard to passengers; however, offering PHV services without a PHV driver licence is already unlawful so the slight extension of this proposal is anticipated to have minor implications in terms of improved personal security and wellbeing. Therefore the proposal is assessed as having a **minor beneficial impact**.

3.15.2 Business and economy

3.15.2.1 Driver impacts

Data on driver and vehicle licences highlights that there is a significantly higher proportion of PHV driver licences than vehicles⁴² indicating that some sharing of vehicles occurs; however engagement with operator representatives suggests that multiple drivers sharing the same vehicle is fairly uncommon. This proposal could potentially affect any drivers (in terms of loss of income) who share a vehicle owned by another driver, if that driver had their licence revoked. In addition, for any owner-driver who had had their licence revoked, they would be unable to sell or rent their vehicle resulting in a lost source of income. However, in the absence of any specific data on shared use and taking into account that many drivers rent their vehicles (which would not result in a vehicles licence revocation), this scenario is thought to be fairly infrequent so the proposal is assessed as **minor adverse**.

3.15.2.2 Operator impacts

A large proportion of PHV vehicles are owned (or rented) by drivers as opposed to the operators.⁴³ Whilst there is the potential for a minor knock-on impact on operators and the labour pool the likelihood of this scenario is anticipated to be low and as such, this proposal is assessed as **neutral**.

Proposal specific economic / business mitigation measures / enhancement opportunities

- It will be important to ensure that drivers who have their driver licence revoked due to a health issue (e.g. heart attack or seizure) do not get penalised by this proposal.

⁴² For evidence see Appendix G

⁴³ For evidence see Appendix G

3.15.3 Summary

Table 3.15: Summary

Topic	Operators	Drivers	Passengers
Health			Minor beneficial
Equality			
Environment			
Economics and business:		Minor adverse	
Digital only	Neutral		
Digital and phone / office based	Neutral		
Phone / office based bookings only	Neutral		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is intending to proceed with this proposal.

3.16 Proposal 18: Checks on convictions of operator staff

3.16.1 Health

3.16.1.1 Passenger impacts

Thorough checks on operator staff are expected to deliver additional benefits through improved personal safety for passengers, reducing the risk of emotional and/or physical harm. Stakeholders also identified that operator staff such as controllers have access to personal details including customers' addresses. There are likely to be positive benefits if checks are put in place to ensure that staff with past dishonesty or serious convictions cannot access customers' personal details. Therefore the proposal is rated as **minor beneficial**. In assigning this proposal as minor beneficial, however, it is assumed that disclosure of a conviction of sufficient seriousness would require the cessation of employment or prevention of taking up employment with another PHV firm. Implementation of this proposal will therefore be key.

3.16.2 Equality

The personal safety issues mentioned above may be disproportionately experienced by some equality groups that are known to experience more personal safety vulnerabilities or concerns.⁴⁴ However, it is assumed that public awareness of this proposal, if introduced, will be low, and therefore the impact is considered **minor beneficial**.

⁴⁴ See Appendix G

3.16.3 Business and economy

3.16.3.1 Operator impacts

Qualitative responses from TfL’s September-December 2015 consultation suggested that DBS process could well impact on operators. There was some concern amongst stakeholders about who this proposal would apply to, due to the wording of proposal 18, which states that ‘operators should undertake checks on all employees who come into contact with passengers and booking details.’

- **Digital booking only:** The technology-led nature of this operator group means that there is not a direct ‘operator staff’ interaction with customers when a booking takes place. Impacts could be **minor adverse** as there are likely to be some administrative and, therefore, potential cost implications.
- **Digital and phone / office based bookings and phone / office based only bookings:** This proposal could add some administrative costs and DBS checks could impose delays and, therefore capacity issues. Therefore the impact of this proposal on these operator groups is expected to **minor adverse**.

Proposal specific economic / business mitigation measures / enhancement opportunities

- A clarification has been provided by TfL that this proposal will only apply to operator staff that have face to face contact with the public (e.g. at an operating centre). This will therefore likely eradicate all of the potential impacts identified for digital booking only operators and some for digital and phone/office based operators.

3.16.4 Summary

Table 3.16: Summary

Topic	Operators	Drivers	Passengers
Health			Minor beneficial
Equality			Minor beneficial
Environment			
Economics and business:			
Digital only	Minor adverse		
Digital and phone / office based bookings	Minor adverse		
Phone / office based bookings only	Minor adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is intending to proceed with this proposal. As mentioned above, it was clarified by TfL that this proposal will only impact on staff who have face to face contact with the public.

3.17 Proposal 20: Hire and reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence

3.17.1 Health

3.17.1.1 Passenger impacts

The introduction of this proposal is designed to help ensure that passengers are not transported without the adequate insurance in place; therefore, should an incident occur they would be more covered / protected. As there is not any data on the extent to which vehicles are being used when hire and reward insurance is not in place or the level of incidents that occur where hire and reward insurance has been lacking, this proposal is presently considered to be **minor beneficial** in terms of its health impact.

3.17.2 Business and economy

3.17.2.1 Driver impacts

An estimated 75% of drivers own their own vehicle.⁴⁵ It is understood that some of these drivers do not currently insure their vehicle with hire and reward insurance for the full length of its licence due to seasonal work or the high value of the vehicle not justifying a considerable cost year-round. This proposal is therefore likely to introduce additional costs for some drivers on an annual basis. Engagement with operator representatives indicates that the potential costs of this proposal on independent or small-scale drivers who do not currently employ hire and reward insurance for the full length of the vehicle licence could potentially destabilise their livelihood. As a result the impact has been considered as **major adverse**.

3.17.2.2 Operator impacts

In the same way as there could be an impact for drivers, there could also be an impact for some operators who do own their own vehicles and where those vehicles are not covered by separate fleet insurance cover. The proportion of PHVs owned by operators is far smaller⁴⁶ and this proposal will not affect all operators; however, the potential financial cost of this proposal for operators to whom it does apply (for example operators who own vehicles for seasonal use such as weddings) is significant according to industry representatives. As such the impact of this proposal is considered to be **minor adverse**.

⁴⁵ TNS (2015) CSS TPH Licensees Report, Profile of Licensees

⁴⁶ TNS (2015) CSS TPH Licensees Report, Profile of Licensees: 31% of PHV operators responded that they provide vehicles for their drivers, whilst 75% of PHV operators responded that drivers must provide their own vehicle.

3.17.3 Summary

Table 3.17: Summary

Topic	Operators	Drivers	Passengers
Health			Minor beneficial
Equality			
Environment			
Economics and business:		Major adverse	
Digital only			
Digital and phone / office based bookings	Minor adverse		
Phone / office based bookings only	Minor adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is intending to proceed with an amended version of this proposal to require hire and reward insurance in place at all times while a driver / vehicle are registered to an operator.

3.18 Proposal 22: Hire and reward fleet insurance in place by operators

3.19.1 Health

3.18.1.1 Passenger impacts

Similar to proposal 20 above, the introduction of this proposal is designed to help ensure that passengers are not transported without the adequate insurance in place which will help to ensure additional passenger protection should an incident occur. As there is not any data on the extent to which vehicles are being used when appropriate hire and reward insurance is not in place or the level of incidents that occur where hire and reward insurance has been lacking, this proposal is presently considered to be **minor beneficial** in terms of its health impact.

3.18.2 Business and economy

3.18.2.1 Operator impacts

This proposal would potentially affect all operators which don't currently have fleet insurance in place. It is difficult to determine the scale of impact without an appreciation of current level of fleet-wide insurance within the industry but the following assumptions can broadly be made if this proposal was introduced:

- The need for fleet insurance may negatively affect any small and locally focused operators which do not currently have it in place, imposing additional overheads to potentially small revenue schemes.

- For larger operators, the cost could also be considerable and there is some concern that they are likely to lose their no claims bonus and will be hit by a particularly significant increase in cost for their entire fleet of vehicles.

Due to long term impacts (annual fees) and high sensitivity in that this cannot be avoided, this proposal is considered to have potential **major adverse** impacts.

3.18.3 Summary

Table 3.18: Summary

Topic	Operators	Drivers	Passengers
Health			Minor beneficial
Equality			
Environment			
Economics and business:			
Digital only	Major adverse		
Digital and phone / office based bookings	Major adverse		
Phone / office based bookings	Major adverse		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is not intending to proceed with this proposal however will explore avenues to implement a requirement for indemnification insurance and suggest an alternative proposal at a later date.

3.19 Proposal 23: Consideration of additional categories of operator licence type

3.19.1 Environment

3.19.1.1 All receptors⁴⁷

This proposal includes the possibility of introducing incentives for zero emission vehicles. If this was implemented it could contribute to changes in the breakdown of vehicle types within the existing PHV fleet. If there was a replacement of existing diesel and petrol fuelled vehicles with zero emission vehicles this would potentially reduce pollutant emissions and contribute to improvements in air quality and reduce CO₂ emissions.

⁴⁷ Potential impacts from emissions of NO_x, PM₁₀ and CO₂ have the potential to affect air quality and therefore all receptors within London and not just operators, drivers and users of PHVs. Therefore results are discussed in the context of overall change.

TfL has currently not undertaken any studies to determine the likely uptake of zero emission vehicles as a result of the proposal. A high level assessment has been undertaken based on a proxy assumption that the proposal would lead to a 2% reduction in the use of older vehicles within the PHV sector (vehicles classified as Euro III and Euro IV and registered before 2008) and that these vehicles would be replaced by zero emission electric vehicles. (See Appendix H for details). The assessment demonstrates that this proposal would have a benefit on emissions of NO_x, PM₁₀ and CO₂, however, the percentage reduction of pollutants from the baseline (based on the 2% replacement assumption) is less than one percent.

Engagement with industry representatives also suggest that the providing operator licensing incentives would do little to substantially change the environmental credentials of PHVs in the short term as it is drivers, not operators, who own the vehicles in the majority of cases. In addition the additional cost of buying or renting a zero emission car is considered to outweigh any discount on the licence. Given this the environmental impact of this proposal is considered **neutral**.

Proposal specific environmental mitigation measures / opportunities for enhancement

- This proposal could be possibly be enhanced if a lower licence fee was applied to drivers to incentivise them to use lower emission vehicles (rather than operators) because vehicles are often owned by drivers rather than operators.
- This proposal could be enhanced through additional operator subsidies for the use of zero emission vehicles.

3.19.2 Business and economy

3.19.2.1 Operator impacts

Implementation of this proposal would mean additional category/categories to operator licence types to better reflect and recover costs of the licensing, compliance and enforcement functions. This proposal will affect all operators across the PHV industry with more 1,000 licensed vehicles registered to them. There are known to be only two operators of this size in London at present; they fall within the **digital-only and digital and phone booking / office based** categories. It is not anticipated that the increase in licence fee would be destabilising in terms of impacts on these operators but, as the proposal does not state what the additional licence fee might be, it is difficult to reach a final conclusion on this impact. Therefore, this proposal had a cautionary **minor adverse** rating.

Proposal specific business / economics mitigation measures / opportunities for enhancement

- TfL could consider introducing more of a gradual scale with regard to operator size and then assign licence fees accordingly.
- It would also be helpful if the proposal was disaggregated so that the issues around size, accessible vehicles and low emission vehicles were separated; this would provide greater clarity on this proposal.

3.19.3 Summary

Table 3.19: Summary

Topic	Operators	Drivers	Passengers
Health			
Equality			
Environment	Neutral	Neutral	Neutral
Economics and business:			
Digital only	Minor adverse		
Digital and phone booking	Minor adverse		
Phone only booking			

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is intending to proceed with this proposal and will consult separately on proposed changes to the licence fee structure for operators.

3.20 Proposal 24: Controls on ridesharing⁴⁸ in licensed vehicles

3.20.1 Health

3.20.1.1 Passenger impacts

A number of health and safety risks have been identified in relation to ridesharing, including sharing an enclosed space with a stranger and a conflict arising. Controls on ridesharing could therefore lead to improved passenger safety; however, there is currently no data available on the number of violent or hostile incidents that have occurred during ride-sharing. Therefore, the proposal to implement controls on ridesharing is assessed to have a **minor beneficial** impact for passengers.

3.20.1.2 Driver impacts

Similar to the potential passenger impacts above, greater control on ridesharing services would help to provide greater safety for any drivers offering this service, for example, driver safety could be compromised if they were in a position where they had to mediate between passengers splitting the fare. Without data on ridesharing incidents that have risked driver safety or data on the number of drivers which offer ridesharing, this proposal is considered to have with a potential **minor beneficial** health impact.

⁴⁸ Whilst informal ridesharing has long since been a feature of PHV industry, ride-sharing which is offered as a service by a PHV operator is new to the London market and data on demand / supply / experience etc. is not yet available.

3.20.2 Environment

3.20.2.1 All receptors

The implementation of clear controls and guidance on ride sharing safety could help to make PHV ride sharing more appealing to both passengers and drivers, therefore potentially increasing its use and number of shared journeys. This could, therefore, lead to a net result in the total distance travelled by PHVs. As with proposal 23 above, a high level assessment has been undertaken on the basis of a proxy 2% reduction of PHV trips. If this reduction was evidenced (as a direct result of this proposal rather than wider market influences), there would be a reduction of the total vehicle kilometres travelled by the whole PHV fleet of (approximately) 520 km per year per vehicle; this would result in a 2% emissions saving. (See Appendix H for more details)

However, without data on how much this proposal in itself would encourage more ride-sharing and whether that modal shift would be from independent PHV / taxi / private car trips rather than public transport trips, the environmental impact of this proposal is considered **neutral**. In addition, any wider impacts of this proposal are unlikely to be experienced in the short term as the 'controls' would take time to define, implement and experienced by passengers / drivers.

3.20.3 Business and economy

3.20.3.1 Operators

There is some stakeholder concern that introduction of 'controls' on ride-sharing could lead to delays or disruption to the development, roll out and implementation of this type of service. This this could affect the potential income to be derived from this service. Impacts will be experienced to a greater extent by operator groups already offering this service than for those which do not currently provide this as a customer option; it is understood that only more operator is offering this service at present. The proposal in itself will not prevent this operator, or others looking to implement this type of service, from offering other single-user PHV services and collecting revenue from passengers.

Informal ridesharing (for example at the end of a tube line) already takes place and is provided by a number of different operator groups. How this proposal may impact these operators providing these services is unclear, and therefore this has been assessed as a **neutral** impact.

In summary, at present, without more historical data on PHV ride-sharing services the impact is rated as **minor adverse** for the digital only operators, and **neutral** for other operators.

Proposal specific business / economic mitigation measures / enhancement opportunities

- TfL is already considering working with DfT to develop ridesharing guidance for the industry.
- The definition of ridesharing needs to be clarified to understand which operator groups are being impacted by this proposal.

3.20.4 Summary

Table 3.20: Summary

Topic	Operators	Drivers	Passengers
Health		Minor beneficial	Minor beneficial
Equality			
Environment	Neutral	Neutral	Neutral
Economics and business:			
Digital only	Minor adverse		
Digital and phone / office based booking	Neutral		
Phone / office based booking only	Neutral		

On 20th January the Mayor announced that, subject to TfL Board approval and following consultation, TfL is intending to work with the Department for Transport to develop guidelines for ridesharing.

4 Conclusions

This 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 25 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, as long as some clear definitions and careful implementation plans are developed following the review, there are some key potential benefits with respect to passenger safety. These could be disproportionately experienced by those equality groups which have heightened personal safety concerns or are more vulnerable passengers. Proposals 1 and 7 are examples of where passenger safety benefits are particularly likely to accrue.

It should be noted that there is evident support amongst the industry to sustain and where possible improve the personal safety credentials of the PHV sector. This is a key priority which has emerged through the stakeholder engagement process.

- **Potential adverse impacts:** There are some areas where adverse impacts are anticipated unless appropriate mitigating actions are taken. Proposals which could require considerable investment by operators, or where a proposal fundamentally affects a business operating model and current (or potential) income stream, would need careful consideration before being progressed due to the associated costs that operators would face; in some cases these may have de-stabilising effects.

This IIA has identified that proposals 2, 7, 14, 15, 20 and 22 are the most likely to require mitigation measures if they were implemented. It is understood, however, that following the Mayor's announcement on 20th January there is already an intention not to proceed with proposals 2, 15 and 22 and TfL is also considering amendments to proposals 7 and 20.

It is also worth highlighting a few headline issues by topic. These are briefly summarised in the next few sections.

4.1.1 Health and equality impacts

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

- Some protected characteristic groups are more likely to use PHVs than other sections of the population (those from BAME backgrounds, young people (16-24), women and disabled people); however the difference in terms of use is generally quite marginal according to latest published data.
- 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);
 - the likely financial cost of using PHV services, because several of the protected characteristics are more likely experience socio-economic disadvantage or live in low income households; and
 - the ease with which passengers can make bookings and be assured about their journey details, which is especially the case for disabled people.
- Disproportionate adverse effects in terms of equality are likely where there are changes which could:
 - increase the waiting time for a PHV vehicle as this could decrease feelings of personal security, which affects certain protected characteristics; and
 - limit the ability of certain sections of the population (primarily those who do not speak English as a first language) from employment in the PHV industry (as drivers).

In implementing the proposals, the main equality benefits can be enhanced through raising greater public awareness about the safety benefits that are likely to be realised through the new regulations, plus phasing some of the proposals thereby providing more time to adjust to the changes. Some further specific engagement with groups as part of TfL's next planned consultation process and during the implementation of the proposals is also advisable.

4.1.2 Environment

The assessment of specific impacts from each of the proposals has demonstrated that proposals 23 and 24 could have the potential to slightly reduce emissions of NO_x, PM₁₀ and CO₂ following implementation. These impacts are expected to be marginal in the short term; however once the proposals are further developed, the potential reduction of these emissions may be greater than the current assumptions can allow. Given the wider air quality agenda in London, if these proposals are taken forward understanding the potential for air quality impacts in greater detail would be sensible. See also section 4.2 below.

4.1.3 Business and economics

Many of the proposals are likely to require considerable operator costs in order to implement, such as increased investment in technology, resources to provide additional services to passengers, changes to business practices and potential impacts in revenue. In summary:

- Should the proposals be implemented at once (with similar expectations anticipated from each operator group) then the cumulative costs may be destabilising to some small-medium scale firms.

- Many proposals specifically address the practices of technologically focused and app-driven operators, given that this is a relatively new operating model in the market.
- There are also proposals which will require operators to implement new administrative procedures or updated technologies, which may have a disproportionately negative impact on smaller-scale operators, which do not have existing systems or overheads required to meet the new requirements.
- There is a risk, where new costs are incurred by operators, that this cost will be passed on to passengers.

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

- Where proposals require a technological change to business practices, TfL should provide guidance for all operators to meet these technological requirements.
 - TfL could consider working with technology providers to establish a usable solution for small/local-level operators at a reasonable rate.
 - TfL could oversee the negotiations around new technological solutions to where they are required to secure economies of scale.
- Phasing of the introduction of the proposals will be helpful to minimise impacts.

Section 4.2 below raises some additional wider economic issues.

4.2 Cumulative and wider impacts

It is important to consider the ‘cumulative’ and wider impacts of the proposals. From the work undertaken for this IIA, the following key issues have been raised:

- As a full set of proposals, there is a view amongst some operators in the industry that they are fairly prescriptive in nature. There is concern that the impact of this will be to dampen innovation and dynamism in the sector. This could prevent the market from responding flexibly to passenger demand⁴⁹ and may also affect the reputation of London’s PHV sector (in terms of attracting future investment).
- Linked to above, the prescriptive nature of the proposals may affect future competitiveness in the sector – for example if all PHV operators have to offer the same type of service unique selling points are reduced.⁵⁰
- Where proposals require significant operating or technical changes to operator models, the capital cost up-front and costs associated with ongoing maintenance may be passed on to passengers; as such, there is a risk that this will limit the efficiencies realised for passengers to date as a result of technological developments.
- If introduced some of the proposals will affect utilisation of vehicles and vehicle allocation; this potentially affects the number of trips and potential revenue but there is also the potential for this to increase both congestion and emissions.⁵¹

⁴⁹ Proposals 2, 3 and 5 were particularly referenced, for example.

⁵⁰ Proposals 5 and 7 were particularly referenced, for example.

⁵¹ Proposals 2 and 5 were particularly referenced, for example.

- Some of the proposals have been cited by stakeholders as having important implications in terms of maintaining the definition of PHV sector and the taxi sector and providing customers with a clear choice about type of service.⁵² It is important to understand that there could be knock-on consequences on the taxi trade. There may be instances, for example, where anticipated adverse impacts for the PHV sector may result in positive impacts on the taxi sector and, indeed, vice versa.
- Taken together some of the proposals, whilst seeking to provide some safeguards to drivers and passengers, do also affect labour market flexibility and may have the inadvertent effect of limiting the growth of the industry.⁵³
- It should also be noted that there are other policies that the PHV sector is required to respond to over a similar timescale, which could have financial implications; notably the ultra-low emission zone (ULEZ) initiative.
- It is also worth considering that there could be knock on consequences of these proposals on other parts of the transport sector and ultimately the environment. For example, enhancing regulation of the sector so that it is safer and better able respond to passenger demand could encourage modal shift. If modal shift is seen in the form of fewer people driving their own car this could be positive in terms of congestion, the environment and wider public health. However, if demand for PHVs is drawn from other more sustainable transport modes (e.g. walking, cycling and public transport) the environmental benefits would be less easy to realise.

4.3 Moving towards implementation

Following TfL's final decision-making process implementation of the proposals is critical to consider. There are several elements to this and many views were shared during the stakeholder engagement interviews including:

- Greater clarity on some proposals would be greatly appreciated by the sector.⁵⁴
- Phased introduction of the proposals would help to provide time for industry preparation or adjustments. This could help to minimise some of the potential adverse impacts.
- Continued engagement with the sector throughout the implementation period would be valued, as this would help both TfL and operators to keep abreast of any inadvertent consequences and work together to help minimise adverse impacts
- Once the proposals have been decided and are in place, monitoring and enforcement across the industry in relation to existing and new regulations will remain key.

⁵² Proposals 2, 7, 8, 10 and 11 were particularly referenced for example.

⁵³ Proposals 14, 15 and 21 were particularly referenced, for example

⁵⁴ Proposals 3, 4, 23 and 24 were amongst those highlighted by many operators.

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Appendix A. List of proposals TfL consulted on

A summary of the 25 proposals are outlined below:

1. Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking in advance of the journey commencing.
2. Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing. This interval will ensure that the driver and vehicle information is communicated to passengers.
3. Operators will be required to seek TfL approval before changing their operating model. This will enable TfL to determine whether a new operating model is compliant with private hire legislation in the interests of passenger safety.
4. Security for app based booking platforms to prevent unauthorised use. App based platforms must be able to demonstrate during pre-licensing checks and compliance inspections, appropriate security measures to prevent the app being used by a person other than the licence driver. Operators must also be able to demonstrate security measures they have in place to protect passengers from fraudulent use.
5. Operator must offer a facility to pre-book up to seven days in advance. This will widen the choice of PHV customers and also assist disabled passengers to secure journeys.
6. TfL proposes to no longer issue licenses for in-venue operators or temporary events; however, TfL will continue to assist with arrangements for temporary taxi ranks and parking areas for pre-booked PHVs when requested for major sports and temporary events.
7. Operator must have a fixed landline telephone which must be available for passenger use at all times during operating business hours. This is to ensure that passengers can speak to operator staff for the purposes of customer care, complaints and when booking private hire journeys.
8. Operators must not show vehicles being available for immediate hire, either visibly (e.g. signage or otherwise on the street) or virtually via an app
9. Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis
10. Operators must specify the fare prior to the booking being accepted to provide certainty to customers and minimise the risk of customers being overcharged and/or additional charges/tariffs being applied after the journey commencing.
11. Operators must record the main destination for each journey which must be specified at the time the booking is made
12. Harmonise retention periods for records (e.g. complaints, lost property and driver and vehicle records) for up to 12 months.
13. Limit on the number of business names attached to each Operator's licence to only five which will avoid confusion amongst customers.
14. Specific requirement for an English Language test to ensure that drivers are able to demonstrate they have sufficient knowledge of the English language at an intermediate level
15. Drivers to only work for one operator at a time to reduce the risk of drivers working excessive hours for a number of different operators and to assist enforcement and compliance activity.
16. Driver and Operator licence applicants to provide National Insurance numbers and share with Department for Work and Pensions (DWP)
17. Vehicle licence to be revoked if driver licence revoked where TfL believes it is in the interest of public safety to do so
18. Checks on convictions of operator staff including Disclosure and Barring Service (DBS) checks.

19. TfL to stop accepting payment by Postal Order (PO) and cheque
20. Hire and Reward insurance to be checked at point of licensing and must be in place at all times for the duration of vehicle licence. No licence can be issued without evidence that the appropriate insurance is in place.
21. Drivers to carry or display a copy of insurance details at all times
22. Hire and Reward fleet insurance in place by operators
23. Operator licence type to introduce additional category/categories that better reflect and recover the costs of the licensing, compliance and enforcement functions, for example, a greater licence fee cost for operators that have 1,000 vehicles available.
24. Controls on ridesharing in licensed vehicles unless there are very clear controls in place to protect the safety of passengers and drivers.
25. Amendment of advertising regulation to include “in” vehicle

Appendix B. Summary scoping matrix

Proposal number	Health	Equality	Environment	Business & economy
1	Scoped in	Scoped in	Scoped out	Scoped in
2	Scoped out	Scoped in	Scoped out	Scoped in
3	Scoped out	Scoped out	Scoped out	Scoped in
4	Scoped out	Scoped in	Scoped out	Scoped in
5	Scoped out	Scoped in	Scoped out	Scoped in
6	Scoped out	Scoped in	Scoped out	Scoped in
7	Scoped out	Scoped in	Scoped out	Scoped in
8	Scoped out	Scoped in	Scoped out	Scoped in
9	Scoped out	Scoped out	Scoped out	Scoped in
10	Scoped out	Scoped in	Scoped out	Scoped in
11	Scoped in	Scoped out	Scoped out	Scoped in
12	Scoped out	Scoped out	Scoped out	Scoped out
13	Scoped out	Scoped out	Scoped out	Scoped in
14	Scoped out	Scoped in	Scoped out	Scoped in
15	Scoped in	Scoped out	Scoped out	Scoped in
16	Scoped out	Scoped out	Scoped out	Scoped out
17	Scoped in	Scoped out	Scoped out	Scoped in
18	Scoped in	Scoped in	Scoped out	Scoped in
19	Scoped out	Scoped out	Scoped out	Scoped out
20	Scoped out	Scoped out	Scoped out	Scoped in
21	Scoped in	Scoped out	Scoped out	Scoped out
22	Scoped out	Scoped out	Scoped out	Scoped in
23	Scoped out	Scoped out	Scoped in	Scoped in
24	Scoped out	Scoped out	Scoped in	Scoped in
25	Scoped out	Scoped out	Scoped out	Scoped out

Appendix 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:

Table C.1: Seven point scale

Impact rating		
XXX	Major adverse	
XX	Moderate adverse	
X	Minor adverse	
0	Neutral	
✓	Minor beneficial	
✓✓	Moderate beneficial	
✓✓✓	Major beneficial	

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:

Table C.2: Severity of impact criteria

Severity of impact criteria	Severity of impact criteria	Severity of impact criteria	Impact rating
H	H	H	Major
H	H	M	Major
H	H	L	Moderate
H	M	M	Moderate
H	M	L	Moderate
H	L	L	Minor
M	M	M	Moderate
M	M	L	Moderate
M	L	L	Minor
L	L	L	Minor

Appendix 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 17 interviews were conducted.

Table D.1: Local stakeholders

Organisation	Outcome
Operators, trade representatives and driver representatives	
ACS	Response not received
Addison Lee	Interview conducted
Carey International Inc.	Interview conducted
GMB	Interview conducted
LPHCA	Interview conducted
Private Hire Board	Interview conducted
Smartmove Cars	Interview conducted
Tristar	Interview conducted
Uber	Interview conducted
Equality groups and representatives	
Action on Hearing Loss	Response not received
Africa Centre	Response not received
Age UK	Response not received
Bangladesh Centre	Response not received
British Bangladesh Minicab Drivers Association	Response not received
Centred	Declined interview
Council of Somali Organisations	Response not received
Disabled Persons Transport Advisory Committee	Response not received
Galop	Declined interview
Ghanaian Welfare Association	Response not received
Guide Dogs	Interview conducted
Inclusion London	Response not received
Independent Disability Advisory Group	Interview conducted
Iranian Association	Response not received
Joint Committee on Mobility for Disabled People	Interview conducted
London Accessible Transport Alliance	Response not received
National Union of Students	Response not received
Pakistan Society	Response not received
People First	Response not received
RNIB	Response not received
Stonewall	Declined interview
Suzy Lamplugh Trust	Interview conducted
Transport for All	Interview conducted

Organisation	Outcome
TfL Youth Panel	Response not received
Turkish Education Group	Response not received
West London Bangladesh Welfare Association	Response not received
Transport and other groups	
Cabs Enforcement Unit	Response not received
Heart of London	Response not received
Heathrow Airport	Response not received
London Travel Watch	Interview conducted
London City Airport	Interview conducted
Living Streets	Response not received
London Chamber of Commerce and Industry	Response not received
London Councils	Response not received
Metropolitan Police	Interview conducted
New West End Company	Interview conducted

Appendix E. Topic specific methodologies

Each technical discipline has taken an individual approach, informed by best practice, in order to complete the assessment framework for each proposal. These methodologies are outlined below, along with some of the likely objectives / impact areas that each assessment area has considered.

E.1 Health

Following discussions with health impact representatives within TfL, 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.

E.2 Equality

The equality impact assessment (EqIA), in accordance with the Equality Act 2010 has considered the needs and challenges of the following 'protected characteristics' when implementing the regulations: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race and ethnicity; religion or belief; sex; and sexual orientation.

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:
 - Equality and inclusion objectives for TfL
 - 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.
- A meeting with a representative from the TfL Equality and Inclusion Team was held to explore potential impacts and feed into the assessment.
- Initial contact was made with other cities who have introduced similar policies (with particular reference to the English language test proposals)⁵⁵
- 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.

E.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.

Baseline levels of emissions of NO_x, PM₁₀ and CO₂ have been calculated using the breakdown of the existing licenced Private Hire Vehicle (PHV) fleet information that has been provided by TfL. This data provides details on the number of licenced PHVs, their fuel type and year of Driver and Vehicle Licence Agency (DVLA) registration.

⁵⁵ Discussion was had with one representative at another Local Authority which has implemented the ELT; however they did not have data on impacts to hand. We did not receive a response from the other two representatives.

To assess changes in emissions of NO_x, PM₁₀ and CO₂ the DVLA registration data has been used to determine the age of the vehicle and therefore the emission standards that they were designed to meet. To calculate total emissions, Defra's Emission Factor Toolkit version 6.0.2 has been used and it has been assumed that the average distance travelled per year by each PHV is 26,000 kilometres at an average speed of 48km/hr. It would be anticipated that some PHVs would travel further and some less distance and therefore this is considered to represent an average of the fleet. In addition speed would vary depending on the location that trips are taken and therefore 48km/hr (30 mph) has been assumed as this is considered to represent the speed limit on many roads within London.

The potential changes in emissions resulting from Proposal 23 and 24 have been assessed by changing the following data and assumption within the emission calculations:

- increasing the percentage of zero emission vehicles within the PHV fleet
- reducing the total kilometres travelled by the existing PHV fleet

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.

E.4 Economics and business

The economic and business impact assessment (EBIA) 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.

Feeding from the evidence review above, the PHV market was broken down into two broad services (executive and non-executive) and three categories of operators to provide these services (digital only, digital and phone booking, and phone booking only). The broad market share between these categories of operators, and the key players within these categories, was estimated based on the sources of evidence above. This allowed the impacts of each of the scoped-in proposals to be mapped more specifically to operators, and the particular operator category / key players within that operator group.

Evidence of characteristics of drivers within each group of the operator groups was reviewed. This provided a broad understanding of the labour market within this sector. This allowed the impacts of each of the scoped-in proposals to be mapped more specifically to particular employee groups, and potentially identify which operator groups these employees will fall within.

A short term engagement exercise was undertaken to discuss the impacts of these proposals with key stakeholders; stakeholders were targeted with regards to business and economic 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.

Based on the evidence gathered through the literature review and engagement mentioned above, and the mapping of each of the envisaged impacts from the proposal were assessed in terms of duration, distribution & scale, and sensitivity and assigned an impact rating based on the seven- point scale

Appendix F. Market share assumptions

F.1 Background

Many of the 25 proposals are likely to have business / operator costs associated with them, and therefore it is necessary to understand the breakdown of the PHV market in order to make some judgement on the extent of operators impacted by certain proposals.

Current data on market share, driver numbers and operator type has been taken from TfL's Taxi and Private Hire (TPH) Licensing Team Update from week commencing 28 December 2015 and the 2009 Taxi PHV Diary. An updated Supply and Demand study is due to be published later this year, however this was not made available ahead of the activities of this report.

The PHV market in London is diverse; covering non-executive minicabs through to luxury and/or chauffeur-driven services for passengers⁵⁶. The most recent market estimates available indicate:

- 61% of PHV drivers are non-executive minicab drivers; and
- 27% of PHV drivers are chauffeur drivers⁵⁷.

Therefore, the split between chauffeur-executive and non-executive PHV services is assumed to be one third executive and two thirds non-executive.

The operators that provide these services vary considerably across the sector as well. Currently TPH issues two types of licence; Small (for those operators with two or fewer vehicles) covering 33% of operators and standard (for those operators with more than two vehicles) which makes up 67% of operators⁵⁸:

- 51% of operators are self-employed⁵⁹, of which many are made up of small, locally focused operators operating under a 'Small' licence.
- 42% of operators operate as a company with 6% in a partnership⁶⁰; which can include medium-scale operators (operating under a 'standard' licence) operating from a minicab office and serving a local area or Borough of London, through to established London-wide operators with hundreds of cars in their fleet, offering services via both a telephone booking system and an online presence.

⁵⁶ TNS (2015) CSS TPH Licensees Report, Profile of Licensees P.62

⁵⁷ TNS (2015) CSS TPH Licensees Report, Profile of Licensees P.62

⁵⁸ TNS (2015) CSS TPH Licensees Report, Profile of Licensees P.62

⁵⁹ TNS (2015) CSS TPH Licensees Report, Profile of Licensees P.62

⁶⁰ TNS (2015) CSS TPH Licensees Report, Profile of Licensees P.62

F.2 Assumptions made for this report

As a result of evidence review and discussion with key stakeholders from the PHV industry, it is clear that operators can be divided into groups in terms of how they offer their services. These three broad categories are:

- **Digital only:** operators which provide passengers with an app/online booking option only.
- **Digital and phone / office-based booking;** operators which enable vide passengers to book a PHV via their telephone; online/ via an app; and/or in a booking office.
- **Phone / office-based booking only:** operators without an online/app presence.

In order to understand the distribution of impacts on the PHV operator market some conservative estimates on the distribution and density of these operator groups have been made. Given the limited market wide data available on the PHV market, along with the absence of the updated 2016 Supply and Demand study, these estimates are based on latest available data from TfL and supplemented through evidence provided via engagement with key industry representatives.

The following table sets out the estimated proportions and characteristics of these operators:

Operator business model	Characteristics and market share
Digital only	Recent figures estimate that at present there is only one operator in this group which has over 20,000 drivers in London (around one fifth of the total number of drivers as recorded by TPH) ⁶¹ . However, it should be noted that average hours/week worked by drivers for this operator is around 25 hours per week, and therefore there is a likelihood that some of these drivers also work for other operators. This operator delivers a London-wide service and both an executive and non-executive service.
Digital and phone /office-based booking	Engagement with key operator representatives highlighted that the majority of operators which offer both local and London-wide services now deliver their services via an app in addition to traditional phone booking. Operators in this group will vary in size. They could offer an executive and/or non-executive service. As a result, this operator group is assumed to include the majority of operators in the PHV market .
Phone / office-based booking only	Engagement with representatives of the trade highlights that traditional minicab firms operating via telephone / office-based bookings only from a local base with a pool of drivers are present in the market. Operators in this group could vary in size, although are likely to be smaller in coverage, possibly many of them based in suburban areas, and could offer an executive and/or non-executive service. Limited data on such operators with no digital services means that the proportion of the market that this group makes up cannot be estimated .

These categories have been used throughout the report and appendices to identify which group of operators are particularly impacted by these proposals.

⁶¹ From engagement with this stakeholder

Appendix G. Technical assessment frameworks

Health Impacts

Proposal number	Private Hire Regulations Review proposal (Scoped in proposals only)	Identification of receptors (operators, drivers, users and others)	Description of the impact	Positive or negative impact	Temporal duration (please indicate short, medium, long term and assign definitions)	Distribution / scale of impact (quantification of impact where possible or scale of deviation from the baseline)	Sensitivity of impact (to what extent are identified receptors able to respond to the impact)	Impact rating (as per the five point scale)	Mitigation measures required or opportunities of enhancement	TfL's latest position
1	Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking	Passengers	<p>This information provides customers with details of the vehicle and driver, giving confidence that the vehicle is legitimate and that the driver can be held to account in the event of a crime. (TfL (2010): 14/10 Safety advice for PHV passengers.pdf). Stakeholders stated that they believe this measure will help to reduce the risk of passengers getting into the wrong car after they have booked a PHV and will help passengers to identify the driver if they need to make any complaint about their journey.</p> <p>There are a number of risks associated with unlicensed mini cabs. Safer minicabs, an organisation that aims to improve safety within the mini cab sector, has reported that on average just over 2 sexual offences, as a result of unlicensed minicabs, are reported to police every week. Women are one of the largest user groups of PHVs. (Safer minicabs (2011) See: http://www.safeminicab.com/safety-advice)</p> <p>Baseline: Several City Councils already implement photo ID regulations to taxi and PHV services in their area. E.g. Sandwell Council, Plymouth Council and Bristol City Council.</p>	Positive: reduced crime / improved safety ensuring passengers do not get into unlicensed PHVs.	Long term as this is a permanent change in passenger safety.	<p>It is unknown how many PHV operators are currently not using some form of photo ID in any part of London. However, it is known that some of the larger operators already implement this, which may diminish distribution of positive impact to some degree.</p> <p>See: http://edition.pagesuite-professional.co.uk/launch.aspx?eid=1d0e1c28-b6bf-4ca1-be10-4eee55edd9f3 See pages 21-23.</p> <p>Users of minicab apps are already benefitting from this.</p> <p>The scale of current actual risk to passenger safety cannot be quantified; as a precautionary measure this has been rated as medium.</p>	The sensitivity of this proposal is estimated as medium as passenger safety is not perceived as a systemic issue within the PHV trade at present however the impact of this proposal is likely to result in an increase in safety as well as perception of safety.	Moderate beneficial	Raise public awareness of this proposal and the personal safety implications to help realise the full benefits of this proposal.	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal for operators to provide this information to customers who are able to receive it.
2	Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing	Passengers	Stakeholders identified this as having a negative impact on passengers, who may find themselves in situations in which they feel unsafe, particularly late at night or in an unknown area of London. Stakeholders also stated that in cases where passengers are waiting in an area in which they feel unsafe there may be an increased likelihood that they will get into an unlicensed minicab which has associated safety risks.	Negative: Potential for passengers to feel unsafe and to be encouraged to use unlicensed minicabs.	Short term as passengers and drivers adapt to change.	This will affect all passengers and as such this has been rated as high . Stakeholders highlighted that there could be safety implications of this proposal as a result of extended waiting time, including increased opportunity for criminal activity and unlicensed PHV drivers to pick up passengers. It should be noted that additional wait times, compared to the baseline wait time, may not be increased significantly	The sensitivity of this impact is estimated to be medium as passengers will not be able to commence a journey until five minutes has elapsed from the time of booking. However, passengers do have a choice to book a PHV in advance.	Moderate adverse		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is not intending to proceed with this proposal

Proposal number	Private Hire Regulations Review proposal (Scoped in proposals only)	Identification of receptors (operators, drivers, users and others)	Description of the impact	Positive or negative impact	Temporal /duration (please indicate short, medium, long term and assign definitions)	Distribution / scale of impact (quantification of impact where possible or scale of deviation from the baseline)	Sensitivity of impact (to what extent are identified receptors able to respond to the impact)	Impact rating (as per the five point scale)	Mitigation measures required or opportunities of enhancement	TfL's latest position
		Drivers	Stakeholders also identified a negative impact on drivers, whose safety may be impacted upon if passengers become frustrated at being unable to commence their journey.	Negative: Potential for drivers to feel threatened or under pressure from passengers to commence journey before five minutes has elapsed.	Short term as passengers and drivers adapt to change.	This could potentially affect all drivers, but it is not anticipated that many passengers will put drivers at significant safety risk. It should also be noted that additional wait times from the baseline waiting time is not considered to be significant. Therefore distribution is medium .	The ability of drivers to respond to this impact is unknown. Stakeholders stated that some drivers who are able to phone their operator for assistance will be better equipped to deal with this situation than drivers who are operating individually. This has therefore been rated as low at this stage.	Minor adverse		
4	Security for app based booking platforms	Passengers	Stakeholders identified potential safety and security issues with apps which could be resolved by this proposal. Issues identified by stakeholders include that app-based booking platforms could currently allow an unlicensed driver to log into the system and pick up passengers illegally. Stakeholders also identified that apps require users to provide personal details such as email address, telephone number and bank details. If security measures are not in place to protect this data the information could potentially be used to stalk and harass others. This proposal could have a positive safety impact if it prevents unlicensed drivers from logging in to a licensed driver's app and improves the security of personal data held on customers.	Positive: Potential improvements to passenger safety.	Long term as this is a permanent change to passenger services.	This will affect all passengers using app-based booking platforms. In 2014 8% of minicab bookings were booked via an app. This is an increase of 5% from the previous year. Whilst there has been an increase in the usage of apps there is no evidence to suggest that apps are the cause of significant passenger safety problems. This has been rated as low , but noting that the percentage of passengers using an app to book is likely to increase year on year.	The sensitivity of this proposal has been rated as medium because passengers who use an app to book a journey are dependent on the security of the app to protect their personal information.	Moderate beneficial		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is not seeking to make an immediate change, but will work with the trade and tech industry to develop any necessary security solutions. TfL will explore options to ensure that where operators use app-based platforms, that these are safe and secure and cannot be fraudulently used.
6	TfL proposes to no longer issue licenses for in-venue operators or temporary events.	Passenger	No data has been available about the number of in-venue operators or those who service temporary venues or the number of passengers that use these PHV options. However, some stakeholders consider that the existence of in-venue operating centres can, in itself, attract unbooked vehicles to the venue and give rise to illegal plying for hire or touting (whereby touts join the licensed operator staff outside the venue, causing confusion for the public who can't distinguish between the legitimate and illegal services). Conversely, it should be noted that there is concern amongst some stakeholders that the cessation of these licences may have negative health and safety implications for passengers as existing in-venue operator facilities can help to provide a safe waiting place for passengers and also reduce the vulnerability of waiting outside. Given the differences in stakeholder views on impacts, and the lack of data to indicate the numbers of passengers that could be affected, this impact of this proposal has currently been rated as neutral in terms of potential health implications.	Neutral	Medium term impact as passengers will eventually become used to organising alternative transport for these events/venues	It is unknown how many passengers use in-venue operators or PHVs at temporary events. As a precaution this has been rated as medium .	This sensitivity of this proposal is rated as medium as passengers who rely on in venue or temporary event operators will have to find an alternative provision. However there are still alternative methods of transport available to these passengers, and PHVs could be booked in advance.	Neutral	If this proposal is implemented, measures should be considered in conjunction with venues which currently have these facilities in place to enable passengers to remain inside whilst making a booking, if they have not done this in advance. Sufficient warning and advertisement of the change in provision should also be considered.	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. TfL has already stopped issuing variations to licences where the application is for an in-venue operation, and no further variation applications of this nature will be approved. TfL will, however, explore alternative measures to assist customers in late night temporary venues whilst minimising the potential of plying for hire or touting.
7	Operators must have a fixed	Passengers	Engagement with stakeholders indicates that this measure will likely have a positive impact on	Positive	Long term as this is a	This will affect all passengers, however scale of the impact is relatively low as	The sensitivity of this proposal is rated as	Moderate beneficial.		The Mayor has announced that, subject to TfL Board

Proposal number	Private Hire Regulations Review proposal (Scoped in proposals only)	Identification of receptors (operators, drivers, users and others)	Description of the impact	Positive or negative impact	Temporal /duration (please indicate short, medium, long term and assign definitions)	Distribution / scale of impact (quantification of impact where possible or scale of deviation from the baseline)	Sensitivity of impact (to what extent are identified receptors able to respond to the impact)	Impact rating (as per the five point scale)	Mitigation measures required or opportunities of enhancement	TfL's latest position
	landline which must be available for passenger use at all times		passenger safety, as passengers are able to contact the operator directly, with regards to enquiries about how long the car will take to arrive and any issues with the driver. Stakeholders stated that the ability to make complaints and enquiries by phone rather than through a digital platform is particularly important for safety related concerns, for example if someone is concerned that a friend or family member did not return home after getting in a PHV. Stakeholders also noted having a phone line available is important as not all passengers have access to a computer or smart phone.		permanent change	many operators already offer this facility, and in many cases passengers experiencing a safety risk may call emergency services under the existing situation.	medium as although there are already other means of contacting operators available there are particular benefits of passengers being able to speak to the operator on the phone rather than via a digital platform. This will help to promote personal safety benefits to all passengers.			approval in March 2016, TfL is intending to proceed with an amended proposal, making it clear that the requirement is for a customer to be able to speak to an operator verbally at all times when journeys are being undertaken, rather than specifying a landline per se. The requirement will be mandatory for enquiries or complaints in relation to booked journeys, but it will not be compulsory for operators to have to accept bookings by phone.
		Drivers	Although this proposal is aimed at passengers, many stakeholders noted that this will also have positive impacts on drivers, who may need to call the control centre for assistance in the case of passenger verbal or physical assault, or when they may be an issue with the vehicle.	Positive	Long term as this is a permanent change.	This will affect all drivers however scale of the impact is relatively low as many operators already offer this facility. Therefore this is rated as low.	The sensitivity of this proposal is rated as medium as although there are already other means of contacting operators available there are particular benefits of passengers being able to speak to the operator on the phone rather than via a digital platform.	Moderate beneficial.		
9	Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis	Passengers	Stakeholders identified that this proposal will help TfL to respond to reports of breaches of conduct. Providing TfL with more information will improve passenger safety by making it easier for TfL to identify and take action against unlicensed drivers touting using licensed vehicles and any licensed drivers who commit crimes whilst on duty. Additionally, increasing TfL's access to operator and driver information may dissuade drivers from acting illegally by reducing their perception of anonymity. This should improve passenger safety.	Positive	Long term as this is a permanent change in business practices.	This will affect all passengers however, as there is no evidence that the lack of this is causing major passenger safety concerns, this has been rated as medium .	The sensitivity of this proposal is rated as medium .	Moderate beneficial.		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. This proposal would enable TfL to quickly trace back the driver to the operator where illegal activity is suspected or a complaint is made, and will ensure that TfL can quickly establish the facts in the event of a complaint or incident, including helping to identify drivers/vehicles which are licensed but are not registered to a Private Hire operator. This would enable targeted enforcement against touting and plying for hire.

Proposal number	Private Hire Regulations Review proposal (Scoped in proposals only)	Identification of receptors (operators, drivers, users and others)	Description of the impact	Positive or negative impact	Temporal /duration (please indicate short, medium, long term and assign definitions)	Distribution / scale of impact (quantification of impact where possible or scale of deviation from the baseline)	Sensitivity of impact (to what extent are identified receptors able to respond to the impact)	Impact rating (as per the five point scale)	Mitigation measures required or opportunities of enhancement	TfL's latest position
10	Operators must specify the fare prior to the booking being accepted	Drivers	In cases where the passengers request that a journey changes once the journey has commenced (e.g. additional passenger drop off), drivers may have to be responsible for conveying that this might not be possible as the fare has been specified. Engagement with industry representatives indicated therefore that drivers may be at risk.	Negative: risk to driver safety	Medium term impact as passengers will eventually become used to the set fare journeys.	This will affect all drivers, however the frequency of this occurrence has been estimated to be a minority of journeys by stakeholders and as such this has been rated as low .	The sensitivity of this proposal is deemed to be low.	Minor adverse		<p>The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to amend the proposal to require an estimated fare to be provided prior to the journey commencing.</p> <p>The existing regulations already require operators to provide, and make a record of, an estimated fare if requested by the customer when booking a journey. This proposal would make it mandatory for operators to provide and make a record of the estimated fare for every journey, whether the customer has requested this or not. This would help prevent instances where customers are charged more than they expected at the end of the journey. Any changes to the booking mid-journey would need to be agreed with the operator and a new estimate provided.</p>
11	Operators must record the main destination for each journey which must be specified at the time the booking is made	Passengers	If such information aids crime reduction in police investigations then this proposal could improve the safety of all passenger groups across London.	Positive: improved security for all passengers	Long term as this is a permanent change.	This proposal could improve the safety of all passenger groups across London. Engagement with law enforcing authorities has highlighted that keeping a record of this information will be beneficial when following up on investigations. This proposal is rated as medium .	The sensitivity of this proposal is deemed to be low, as there may be other means of accessing information about the PHV journey (e.g. CCTV records, other booking information etc.).	Moderate beneficial		<p>The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to amend the proposal to require the main destination to be recorded prior to the journey commencing.</p> <p>Operators already have to record the main destination if specified by the customer at the time of booking, and this proposal will mandate the requirement to take this information prior to the journey commencing. It will ensure a complete record of each journey, thus supporting passenger safety, and would also be an essential requirement to implement proposal 10. Any changes to the booking mid-journey would need to be agreed with the operator and a new destination recorded.</p>

Proposal number	Private Hire Regulations Review proposal (Scoped in proposals only)	Identification of receptors (operators, drivers, users and others)	Description of the impact	Positive or negative impact	Temporal /duration (please indicate short, medium, long term and assign definitions)	Distribution / scale of impact (quantification of impact where possible or scale of deviation from the baseline)	Sensitivity of impact (to what extent are identified receptors able to respond to the impact)	Impact rating (as per the five point scale)	Mitigation measures required or opportunities of enhancement	TfL's latest position
14	Specific requirement for an English language test	Passengers	Stakeholders stated that introducing an English language test will improve communication between passengers and drivers which will have associated safety benefits. Stakeholders identified potential for conflict when passengers and drivers are unable to communicate effectively including feelings of uncertainty that can prompt stress and conflict between the passenger and driver. For example, if a driver is unable to explain why they have made a certain decision, such as driving an alternate route, passengers may become anxious, and feel vulnerable and uncertain about what is happening due to communication barriers. This could increase the risk for both the driver and passenger.	Positive: improved communication between passengers and drivers, reducing the risk of conflict	Medium term impact for passengers	The distribution of the impact is not known as no reliable data exists on how many PHV drivers have lower levels of English, however the scale of the impact is expected to be low as conflict as a result of miscommunication is thought to happen very rarely.	The sensitivity of this proposal is estimated to be low as there other means for improving communication other than requiring drivers to pass an English language test.	Minor beneficial		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. TfL is considering progressing with English level B1 (intermediate) as a standard of English required by the Home Office for immigration purposes.
15	Drivers to only work for one operator at a time	Passengers	This proposal aims to stop drivers working excessive hours for a number of different operators (TfL PHV proposals, 2015). Studies in Singapore, Australia, USA and UK have shown that it is not uncommon for drivers to work in excess of 10hrs a day and that fatigue caused from long shifts increase the likelihood of getting into car accidents (Dalziel and Soames Job (1997); Lim and Chia (2015); Insure Taxi (2013)).	Positive: reduces likelihood of being involved in fatigue-related road accidents and experiencing physical injury or psychological trauma.	Long term positive impact for passengers - assured safe journeys	Medium term as not all drivers work long hours; however, engagement with industry representatives suggests that there is tendency to work long hours.	This proposal has the potential to affect a small number of drivers in a situation where they are not able to work sufficient hours for one operator to earn a living wage (due to the operator offering a limited number of hours). Conversely, the whole passenger population	Moderate beneficial		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is not intending to proceed with this proposal. TfL will now work with the DfT to consider how else to tackle the issue of excessive working hours.
		Drivers		Positive:	Long term	Proportion of drivers working for multiple	Moderate			

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			<p>It is not possible to calculate the exact number of sleep related accidents, but research shows that driver fatigue may be a contributory factor in up to 20% of road accidents, and up to one quarter of fatal and serious accidents. Research has found shift workers are particularly high risk for tiredness-related crashes, particularly after long shifts (The Royal Society for the Prevention of Accidents (2011): Driver fatigue and road accidents). Reducing car use in London would bring health benefits to all Londoners (drivers included). (Greater London Authority (2015): Health Impacts of Car Use in London)</p> <p>Baseline: Private hire casualties accounted for up to 2% of all 30, 785 casualties in 2014 (p.3). Although comparatively smaller in number, all PHV occupant casualties increase by 18% to 641 when compared to 2013 figures. (TfL (2015): Casualties in Greater London during 2014). Problem: tiredness difficult to establish as cause of collision.</p> <p>In a survey of 220 drivers, insure Taxi's 'Taxi Driver Survey 2013' shows that 31% of drivers work more than 50hrs a week. 11% said they work over 60hrs/week. (Taxi Driver Survey 2013 (2013) See: https://www.insuretaxi.com/taxi-driver-survey-2013/)</p> <p>The Taxi/PHV Diary Report (2009) showed that on average, each taxi driver works just under 40hrs in a typical week. Minicab drivers work slightly longer hours (42hrs on average), whilst chauffer/executive drivers were found to work the longest hours at 48hrs/week on average. Given that taxi drivers, minicab drivers and chauffer's/executive drivers work an average of 4.6, 4.8 and 5.1 days a week, respectively, drivers are working between 8hrs.40mins and 9hrs.20mins per day (exec. summary). Using diary information, the average shift recorded by minicab drivers and chauffer/exec. drivers was 9hrs and 11hrs respectively (p.61). Shifts are much higher than indicated at recruitment and are higher than in the taxi sector. The vast majority of drivers (89% of minicab drivers and 92% of chauffer's) had no other paid employment (p.55)</p>	<p>reduces risk of exhaustion and likelihood of being involved in fatigue-related road accidents. May further improve health by changing poor lifestyle and/or eating/drinking habits (A Singapore based study found that a high proportion of drivers were obese and had fatigue due to lack/quality of sleep, having an additional part-time job, drinking three or more caffeinated drinks daily and driving more than 10hrs a day).</p>	<p>impact in terms of safety impacts are also long term.</p>	<p>operators. Particularly for those who are not self-employed as their hours are more likely to be dictated / regulated. Through engagement with law enforcing authorities, it felt that this proposal will serve no real purpose other than to penalise drivers trying to make a legitimate living and it may have a counterproductive effect (i.e. drivers will work illegally to substitute their income). This proposal is assessed as medium.</p>	<p>(other road users, pedestrians, passengers and society) are sensitive to allowing unsafe practices to be permitted an unregulated. Yet there is no evidence which demonstrates there is currently a high sensitivity to driver fatigue. Overall this proposal is deemed as medium.</p>	<p>beneficial</p>		

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17	Vehicle licence to be revoked if driver licence revoked	Passenger	TfL reasoning: 'the 1998 Act suggests that the suspension or revocation of a licence can only be for a reason connected to the fitness of the vehicle for use as a PHV. This is causing concern in situations where, for example, a licensed driver is convicted of a sexual offence or touting in a licensed vehicle and may attempt to keep working (while unlicensed) in that vehicle'. (TfL proposal). Stakeholders also identified potential passenger safety benefits as a result of this proposal and saw it as an additional safeguard to ensure that passengers do not get into vehicles with unlicensed drivers. Baseline: The Metropolitan Police (2015) 'Cab Enforcement News' highlights that offering PHV services without a valid PHV drivers licence is not uncommon.	Positive: improved passenger safety if PHV driver licence has been revoked for a sexual offence. revoking vehicle licence will reduce chance of increased risk to passengers.	Long term: it is assumed that license revocation is on a long term basis.	Through engagement with law enforcing authorities, it was felt that implementation of this proposal would be beneficial as revoking vehicle and driver licence would limit the number of drivers working illegally. This will impact all PHV users; however, offering PHV services without a valid PHV driver licence is already illegal, therefore the scale of this impact is deemed to be low	Low sensitivity as it is already unlawful to offer PHV services with revoked drivers licence.	minor beneficial		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. To be clear, this does not mean that a vehicle licence would be automatically revoked if a driver licence is revoked. However, it gives TfL the power to do so under specific circumstances; for example, if there is a concern that a vehicle could be used for hire and reward by somebody without a PHV driver licence. Where a driver is renting a vehicle or using a vehicle belonging to an operator this would not apply.
18	Checks on convictions of operator staff	Passengers	This proposal would be intended to reduce the risk of previously convicted operator staff in contact with the general public, thereby reducing the personal security risk to passengers. Stakeholders also identified that operator staff, such as controllers, have access to personal details including customers' addresses there are likely to be positive benefits if checks are put in place to ensure that staff with past convictions cannot access customers' personal details. Baseline: information on the number of people working within the PHV industry with a criminal conviction is unknown	Positive: Improved passenger safety. Reduces risk of emotional and physical harm if thorough and frequent checks are undertaken	Medium term - proposal will require thorough and continuous checks of new and current employees for operators, and this will eventually become normal working practices	This could affect all passengers, however the scale of the impact is expected to be small as it is not thought that there are currently significant safety issues associated with operator staff having access to personal data. This has therefore been rated as low .	The sensitivity of this impact is estimated to be low as there are already data protection laws in place and it is illegal for staff to use personal data for unlawful purposes.	minor beneficial		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. This would only apply to operator staff who have face-to-face contact with the public e.g. at minicab offices. Given the regular interaction with the public and access to personal information that such staff have access to, this will help to increase public safety

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20	Hire and reward insurance to be checked at point of licensing and must be in place for duration of vehicle license	Passengers	The introduction of this proposal is designed to help ensure that passengers are not transported without the adequate insurance in place; therefore, should an incident occur they would be more covered / protected. As there is not any data on the extent to which vehicles are being used when hire and reward insurance is not in place or the level of incidents that occur where hire and reward insurance has been lacking, this proposal is presently considered to be minor beneficial in terms of its health impact.	Positive: Improved passenger safety	Long term as this is a permanent change	This could potentially affect all passengers, however the scale of the impact is estimated to be low as there is no data to suggest the severity of the issue.	The sensitivity of the impact is estimated to be low as passengers are unlikely to experience a significant change to the way in which they currently receive services.	Minor beneficial		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with a variation of this proposal requiring Hire & Reward (H&R) insurance to be in place at all times whilst a vehicle is registered to an operator. For this proposal to be enforceable, it would need to operate in conjunction with proposal 9, which requires operators to regularly provide details of those vehicles that are registered to their operating platforms so that TfL can check these against the Motor Insurers' Bureau database. The amended proposal ensures that H&R insurance is in place at all times while a vehicle is registered to an operator but allows vehicles to be 'de-registered' from operators' booking platforms during periods when they are not being used for H&R purposes.
22	Hire and reward fleet insurance in place by operators	Passengers	The introduction of this proposal is designed to help ensure that passengers are not transported without the adequate insurance in place which will help to ensure passenger protection should an incident occur. As there is not any data on the extent to which vehicles are being used when appropriate hire and reward insurance is not in place or the level of incidents that occur where hire and reward insurance has been lacking, this proposal is presently considered to be minor beneficial in terms of its health impact.	Positive: Improved passenger safety	Long term as this is a permanent change	This could potentially affect all passengers, however the scale of the impact is estimated to be low as there is currently no data available to understand the extent of the issue.	The sensitivity of the impact is estimated to be low as drivers should already have appropriate insurance in place	Minor beneficial		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is not intending to proceed with this proposal at this time. However, there is broad agreement across the industry that there is an issue with indemnification in the event that a driver, intentionally or not, does not have the appropriate insurance in place. TfL will work with the trade to explore this in more detail and will seek to come forward with a new proposal in due course.

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24	Ensure PHVs cannot be used for ridesharing in London unless very clear controls are in place	Passenger	A number of health and safety risks have been identified in relation to ridesharing, including sharing an enclosed space with a stranger and conflict arising. Controls on ridesharing could therefore lead to improved passenger safety; however, there is currently no data available on the number of violent or hostile incidents that have occurred during ride-sharing. Therefore, the proposal to implement controls on ridesharing is assessed to have a minor beneficial impact for passengers.	Positive: putting in place controls on ridesharing will improve passenger safety.	Long term - as this is a permanent change to business practices.	Ridesharing in the traditional sense is only currently offered by one operator within the digital market. In the first three weeks of the launch of ridesharing via this operator, 50,000 shared trips were recorded in London. Whilst the operator is one of the largest in the market, it is still only a portion of the market as a whole. Ridesharing in the non-traditional sense takes place on PHV school runs, and at tube stations at the end of the line where passengers make their own arrangements. The scale of the impact is not known as there is no data available on the number of incidents which have occurred when passengers are ride-sharing, however it is not currently thought to be a common occurrence. Therefore the scale and distribution is deemed to be low.	The sensitivity of this impact is estimated to be low as both drivers and passengers could use non ride-sharing alternatives and the existence of controls on ridesharing is not expected to stop the practice altogether.	Minor beneficial.		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL will work with the DfT to develop guidance for ridesharing.
		Driver	Similar to the potential passenger impacts above, greater control on ridesharing services would help to provide greater safety for any drivers offering this service. Without data on ridesharing incidents that have risked driver safety or data on the number of drivers which offer ridesharing, this proposal is considered to have with a potential minor beneficial health impact.	Positive: putting in place controls on ridesharing will improve driver safety.	Long term - as this is a permanent change to business practices.	As above	As above	Minor beneficial.		

Equality impacts

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1	Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking	Passengers - groups more likely to use an unlicensed minicab (evidence suggests BAME groups).	Some groups are more likely to use unlicensed minicabs than others and therefore will be disproportionately impacted by this proposal. Baseline: Recent data collected by TfL has highlighted that BAME Londoners are more likely than Londoners overall to use an illegal/unlicensed minicab: 29% of BAME Londoners have said they would use an illegal minicab compared to 21% of Londoners. (TfL, (2015) Understanding the travel needs of London's diverse communities).	Positive	Long term as this will be a permanent change to the way in which services are provided.	This proposal, if implemented, would likely increase the barriers to providing an illegal minicab service. This could help minimise the risk to users, and particularly BAME users, of using an unlicensed vehicle and being exposed to the associated safety/security issues associated with this. In terms of the scale of the impact, there is some evidence to suggest that certain groups are higher users of PHVs than the general population.	Sensitivity is expected to be low , as those from BAME backgrounds have other options in terms of alternative modes of transport.	Moderate beneficial	To maximise the benefits of this proposal, consideration could be given to: A campaign to raise awareness of the new regulations to increase confidence in PHV use and ensure that passengers have expectations of receiving this information prior to travel.	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal for operators to provide this information to customers who are able to receive it.
		Passengers - those with higher safety concerns.	This proposal should realise improvements in terms of actual passenger safety and also feelings and perceptions of personal safety when using a PHV for journeys; it will improve confidence that a vehicle is legitimate and that drivers can be held into account for their service. Stakeholders from disability organisations also identified that the impact is likely to be more greatly felt by disabled passengers and older passengers as people from these groups may require a greater degree of certainty about their journey and this proposal provides passengers with additional information which will give them greater certainty about their journey. Baseline: Recent data (TfL (2015) Understanding the travel needs of London's diverse communities) suggests that disabled people (68%), lesbian, gay and bisexual (LGB) (69%), BAME (70%) and female (70%) Londoners are the least likely to be 'unworried' when travelling on public transport networks as compared to other travellers (compared to the overall London average of 75%). The data additionally highlighted that young people (aged 25 and under) (65%), BAME (62%) and women (61%) were most likely to limit their travel due to safety and security concerns. Conversely, Londoners over the age of 65 are the most likely to feel safe when using public transport (83%) and are least affected by security concerns.	Positive	Long term as this will be a permanent change to the way in which services are provided.	The scale/distribution of the impact of this proposal on actual perception of safety at an individual level is expected to be medium as the distribution of impact may be considerable; scoping evidence suggests that LGB, BAME and female Londoners all face a higher likelihood of safety concerns when travelling. However, the visibility of this regulation to the public will not be very high.	Medium as other modes of transport are available to these groups, but many equality groups do have a higher reliance on PHV services.	Moderate beneficial	To maximise the enforcement and the associated benefits, operator systems should be required to keep a record of the confirmation details that were issued and the time / date that they were sent. Consideration should be given to the information provided to the passenger, and making sure that it is provided in an accessible format for people with visual impairments i.e. the driver photo needs to be provided in such a way that it does not interfere with the way that the other information is read out if someone	

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			<p>There is also evidence to suggest that younger people may be more at risk when using public transport than other age groups, particularly at night. Young Londoners (aged under 25) are slightly more likely to have experienced a worrying event whilst travelling on public transport in London, in the last three months (20% of 16 to 24 year olds compared with 17% of all Londoners) Younger Londoners who have experienced a worrying incident in the three months prior to being surveyed were much more likely to have experienced this during night-time (71% of the most recent episodes of worry were experienced at night compared with 58% among all Londoners who have experienced a worrying incident) (TfL, 2015, 'Travel in London: Understanding our diverse communities', pp.157-158).</p> <p>9% of women aged 16-24 use a PHV at least once a week compared to an average across all ages and both genders of 6% a week. 7% of men aged 16-24 use a PHV at least once a week compared to average across all ages and both genders of 6% a week. 8% of those aged 16-24 use a PHV at least once a week compared to an average across all ages of 6%.</p> <p>Using TfL's typology of worry to assess Londoners' attitudes to safety and security when using the public transport network, BAME Londoners are less likely than white Londoners to be 'unworried' (70% BAME compared with 80% white) and also more likely to be classified as 'worried' (seven per cent BAME compared with four per cent white). A slightly higher proportion of BAME Londoners than white Londoners take precautions against crime when using public transport (40% BAME compared with 38%). (TfL, 2015, 'Travel in London: Understanding our diverse communities', p.23). When looking at ethnicity and transport modes, those from Black backgrounds are more likely to use PHVs at least once a week (8%) compared to the average (6%) (Travel in London, TfL, 2015).</p>						is using a text reader.	

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2	Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing	Passengers - those with higher safety concerns including women, younger people, LGB people, people from a BAME background and disabled people (particularly wheelchair users) due to fewer alternative transport options.	<p>This proposal will sometimes increase waiting times for passengers. The increased waiting times may disproportionately impact on groups with higher personal safety concerns, particularly when travelling at night. Groups with higher safety concerns include women, younger people, LGBT and BAME groups (please see evidence presented in proposal 1). In addition, this proposal may disproportionately impact disabled people, who also have higher safety concerns.</p> <p>In 2014 66% of minicab passengers were women, and 3% of users were aged 16-19. Figures are not available for the percentage of passengers who are LGBT, under 18, from a BAME background or from a religious background. (Taxi and minicab Customer Satisfaction Survey Quarter 3 2014/15) However white Londoners and Londoners from a BAME background are thought to use minicabs at a similar frequency rate (6%). A lower proportion of disabled Londoners consider themselves to be 'unworried' about their personal security in London than non-disabled Londoners (68% compared with 76%). In terms of general worry, the disabled people who were surveyed felt slightly more worried than non-disabled people about their personal security when using public transport in London in the past three months (15% compared with 11%). Furthermore, among disabled Londoners who have experienced worry, more disabled people report experiencing such events on a regular basis – 29% say that they experienced a worrying event five times or more in the past three months, compared with 17% of non-disabled people who have experienced worrying events with this frequency.</p> <p>Disabled people are also more likely to be impacted by this proposal as they have fewer options in terms of alternative modes of transport. For example, research has indicated that teenage wheelchair users in the UK can experience social exclusion as a result of poor access to suitable transport. It was found that due to the limitations of public transport (i.e. inaccessibility of the vehicles), disabled teenagers preferred to make use of 'accessible' taxi services which incurred extra costs, both in relation to time and money. (Pyer, M., Tucker, F. (2014): 'With us, we, like, physically can't': Transport, Mobility and the Leisure</p>	Negative	Long term impact as this proposal requires a permanent change to the way PHVs are booked.	<p>The scale of the impact is assumed to be medium as it is not thought that the proposal will significantly increase waiting times or that a slight increase in waiting time will have a significant impact on the safety of users. For example, engagement with disability group representatives highlighted that although those who experience mobility issues are more likely to be inconvenienced by this wait, they considered that the impact would be relatively low.</p> <p>However there is still the issue of personal safety concerns which affect certain equality groups disproportionately more than others.</p>	The sensitivity of this impact is estimated to be medium ; although the increase in waiting time is likely to be minimal, and there is a chance to pre-book in most cases, some of these equality groups have limited alternatives due to lower levels of car ownership and barriers to accessing public transport.	Moderate adverse		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is not intending to proceed with this proposal

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			<p>Experiences of Teenage Wheelchair Users). Further increasing waiting times may disproportionately impact this group and there may also be disproportionate negative impacts in terms of safety as a result. The increased waiting time may leave wheelchair users vulnerable whilst they are waiting for the PHV to arrive. However, it is worth noting that during a consultation on disabled people's experience of taxis most participants felt that a wait time of 10-15 minutes was acceptable for a PHV which had not been pre-booked. Where there is no vehicle available within a 10 minute radius of the user it is likely that this proposal will increase waiting times to over 15 minutes which would negatively impact on this user group. The proportion of PHV users who have disabilities is unknown; however, there is data available on the percentage of disabled Londoners who use PHVs. In 2013/2014 49% of disabled Londoners used a PHV (compared to 58% of non-disabled Londoners) however disabled Londoners are slightly more likely to use minicabs frequently when compared with non-disabled Londoners; eight per cent of disabled Londoners use a mini-cab at least once a week compared with six per cent of non-disabled Londoners (TfL, 2015, Travel in London: Understanding our diverse communities).</p> <p>Baseline: Evidence on average wait times for PHVs booked for immediate hire has not been collected to date. As a proxy, the average wait times for taxis has been used. According to a 2001 SD study, the average wait time across all of London is two minutes. It should be noted that on Sundays between 8pm and 6am this increases to 4 minutes and during Monday-Friday from 8pm-6am the average wait time is 3 minutes.</p>							
		Passengers - those with limited mobility including disabled people and older people.	<p>Stakeholders identified that increased waiting times are likely to disproportionately impact people with certain physical disabilities including those with walking impairments. This is because introducing this proposal could potentially increase the time that they have to stand and wait which could have a detrimental impact on their health. Stakeholders also identified that where users have to wait outside and be exposed to harsh weather or low temperatures this could be particularly harmful for people with physical impairments who are likely to be more susceptible to the cold.</p>	Negative	Long term impact as this proposal requires a permanent change to the way PHVs are booked.	<p>The scale of the impact is assumed to be low as it is not thought that the proposal will significantly increase waiting times or that a slight increase in waiting time will have a significant impact on passengers' health.</p> <p>The distribution of the impact is estimated to be low.</p>	<p>The sensitivity of this impact is estimated to be medium; although the increase in waiting time is likely to be minimal, the people who are likely to experience this impact are likely to have limited alternative options.</p>	Moderate adverse		

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4	Security for app based booking platforms	Passengers - younger people.	<p>Younger people are likely to be disproportionate beneficiaries of any improvements to app based booking platforms as younger passengers are more likely to book a minicab via mobile phone app than by telephone/office. (TNS (2014) Taxi and minicab customer satisfaction survey p.20).</p> <p>In 2014 38% of those using mobile apps were aged 16-19. (TfL, 2015, Understanding our diverse communities). The use of smartphones among Londoners aged 16-24 is very high (96% compared with 77% of all Londoners) (TfL, (2015) Understanding our diverse communities). 8% of those aged 16-24 use a PHV at least once a week compared to an average across all ages of 6% (TfL, 2015, Understanding our diverse communities)</p> <p>Baseline: Information on operators using apps which currently have anti-fraud measures and driver ID facilities is not currently available.</p>	Positive	Long term impact as this proposal will permanently affect the security and safety of app-based booking platforms.	As part of the September-December 2015 consultation, some stakeholders highlighted that this proposal would help ensure safety of passengers. Whilst younger Londoners are more likely to have smartphones and make up a significant proportion of mobile app users (see baseline) the scale of the impact (in terms of benefits to safety and security) is likely to be fairly low . This is because the improvements to security of apps is unlikely to significantly change users' experiences and it is also assumed that many app platforms already have these safety and security measures in place.	The sensitivity of this impact is estimated to be low , whilst there is concern about the security of these apps, there is little evidence that security is currently a major issue. Moreover, not all young people use this method.	Minor beneficial		The Mayor has announced that, subject to TfL Board approval in March 2016 TfL is not seeking to make an immediate change, but will work with the trade and tech industry to develop any necessary security solutions. TfL will explore options to ensure that where operators use app-based platforms, that these are safe and secure and cannot be fraudulently used.
5	Operator must offer a facility to pre-book up to seven days in advance	Passengers - disabled people.	<p>Offering a facility to book up to seven days in advance is likely to assist disabled passengers to secure journeys. Due to the relatively small number of fully accessible PHVs, disabled passengers often look to book in advance (TfL (2015) Private Hire Regulations Review: Response to consultation and proposals. p.9). Stakeholders identified that disabled people are also more likely to need to plan their journeys in advance (e.g. for work) because of a greater number of uncertainties and potential barriers which may arise during their journey. Stakeholders anticipated that disabled people would experience a disproportionate benefit from the increased confidence given to passengers by the ability to book in advance.</p> <p>Baseline: The most recent data on the percentage of PHV passengers who are disabled is from 2009 when 3% of PHV passengers were registered disabled but not wheelchair users and an additional 1% of PHV passengers were wheelchair users. (TfL/GfK, 2009, Taxi/PHV Diary Survey 2009, p.95)</p>	Positive	Long term impact as this proposal will permanently affect the way PHVs can be booked.	<p>Engagement with disability representatives highlighted that people with limited mobility can take significantly longer to enter a vehicle than non-disabled people. By booking in advance, those with limited mobility are able to prepare for their journey and ensure they are at a position where they can get into the vehicle, rather than the vehicle waiting with the potential problem of the fare then increasing (on meter). This option is therefore beneficial for those passengers with limited mobility.</p> <p>However, the baseline evidence available suggests that disabled people are not disproportionately high users of PHVs whilst many operators already provide this service so the scale and distribution of impact is anticipated to be low.</p>	The sensitivity of this impact is estimated to be low as disabled passengers can choose between different operators.	Minor beneficial	<p>To maximise benefits for disabled people, TfL could consider requiring operators to publicise the number of accessible vehicles it has available and the time slots that they are available (if they are not available 24 / 7) to make bookings easier.</p> <p>Alternatively TfL may want to consider collating this information and publicising this in one location for easy reference.</p>	The Mayor has announced that, subject to TfL Board approval in March 2016 TfL is not intending to proceed with this proposal.
6	TfL proposes to no longer issue licences for in-venue operators or	Passengers - women, children and younger people, disabled people, BAME	The removal of in-venue operators or temporary events is likely to disproportionately impact passengers who have heightened personal safety concerns for the reasons outlined in the 'health section'. These groups include disabled people,	Neutral	Medium term impact as passengers get used to making new travel	There might be some adverse impacts in terms of increasing the waiting time for passengers at venues / attending temporary events and potentially less certainty about travel home. There	The sensitivity of this impact is estimated to be medium as it is likely that some equality groups experience barriers to	Neutral	If this proposal is implemented, measures should be considered in conjunction with	The Mayor has announced that, subject to TfL Board approval in March 2016 TfL is intending to proceed with this proposal. TfL has already stopped issuing variations

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	temporary events	people, and LGBT people.	<p>LGB people, BAME groups, females and young people. It should further be noted, however that some of these groups do face barriers in terms of accessing alternative modes of transport which may make travel to and from these events more difficult and potentially more expensive although this is unlikely to be significant issues for young people as they are high users of mobiles / smartphones so are unlikely to be totally reliant on in-venue or temporary licensed services. Given the potential pros and cons for personal safety, for the same reason as for health, this proposal is currently assessed as neutral.</p> <p>Baseline: information on passengers who use PHV to and from venues and temporary events is largely unknown. Baseline evidence with respect to groups that experience more safety and security issues is highlighted above.</p>		arrangements	<p>were comments made in the September-December 2015 consultation which indicated that this proposal may result in insufficient transport availability with safety implications. Engagement has noted that removing licenses for in-venue operators or temporary events may create issues around touting and therefore have safety implications on the passenger. Those from certain equality groups are more likely to experience safety and security concerns. However, it should also be noted that, according to the March 2015 consultation, there are some public safety concerns about the current in-venue offices (144 respondents, 6%). Given this, and the lack of data about the extent to which those from equality groups currently use in-venue and temporarily licensed operators, the scale of this impact is considered as relatively low.</p>	<p>using alternative modes of transport however given the number of alternative modes of transport in London it is unlikely that passengers will be left with no suitable alternative method of transport.</p>		<p>venues which currently have these facilities in place to enable passengers to remain inside whilst making a booking, if they have not done this in advance. Sufficient warning and advertisement of the change in provision should also be considered.</p> <p>TfL could consider working with venue owners / managers and temporary venue organisers, which currently have PHV licence arrangements, to ensure that there is space for PHVs to collect passengers close to the venue. This would help to alleviate some of the potential adverse equality impacts.</p>	<p>to licences where the application is for an in-venue operation, and no further variation applications of this nature will be approved. TfL will, however, explore alternative measures to assist customers in late night temporary venues whilst minimising the potential of plying for hire or touting.</p>

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7	Operator must have a fixed landline telephone which must be available for passenger use at all times	Passengers - particularly people from lower income groups. Women, disabled people, older people and people from a BAME background are more likely to live in low-income households.	Introducing a fixed landline telephone number may reduce the cost incurred from calling a PHV company as landline numbers tend to be cheaper, this would disproportionately benefit people on lower incomes. Potential positive impacts to passengers from lower income groups - women, disabled people, BAME Londoners and older people are more likely to live in low income households than other Londoners (TfL, Travel in London: Understanding our diverse communities', p.267). There may also be benefits in terms of personal security for those groups who are more vulnerable travellers (see above) because some of these groups might like the ability to have access to customer care at any hour of the day. These groups would therefore experience greater benefits as a result of this proposal than the general population as a whole. In addition, stakeholders as representatives of disabled users of PHVs identified that this proposal is likely to have a particular benefit for disabled users because a phone line is generally more accessible for disabled people to use than a computer or smartphone and will allow deaf users to enable a text-relay option. Baseline: information on the methods people use to book a PHV is unknown.	Positive	Long term impact as this proposal requires a permanent change to the way PHV operators offer their customer services.	Those with personal safety concerns and those on lower incomes will be the passenger groups most affected by this proposal. It should be noted that, although not a legal requirement, PHV operators are required to have a landline as part of their licence application and therefore it is assumed that most operators maintain this for the purposes of operation. The additional ability to use this number during all hours of business would be beneficial but the scale of the additional benefit is expected to be low .	The sensitivity of this impact is estimated to be medium as, if implemented this will ensure all operators provide a staffed customer service and booking facility which could provide reassurance or reduce costs for some equality groups.	Moderate beneficial		The Mayor has announced that, subject to TfL Board approval in March 2016 TfL is intending to proceed with an amended proposal, making it clear that the requirement is for a customer to be able to speak to an operator verbally at all times when journeys are being undertaken, rather than specifying a landline per se. The requirement will be mandatory for enquiries or complaints in relation to booked journeys, but it will not be compulsory for operators to have to accept bookings by phone.
8	Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app	Passengers - younger people.	Evidence outlined in proposal two has indicated that young Londoners are more likely to have experienced a worrying event whilst travelling on public transport, particularly at night, and they are more likely to book a minicab via a mobile app (please see evidence presented in proposal four). Removing this facility may therefore disproportionately impact younger people in terms of personal safety. Baseline: Two of the most well known apps in London (Taxi and minicab Customer Satisfaction Survey Quarter 3 2014/15, p.22) currently show vehicles available for immediate hire. In 2014 38% of those using mobile apps were aged 16-19. (Black cabs and minicabs 2014 report)	Negative	Medium term impact as passengers get used to this proposal	Distribution is estimated to be low as the proportion of total passengers impacted is low .	The sensitivity of this proposal is estimated to be low , as the impact is likely to be on the perception of safety rather than actual safety and it will not fundamentally change the way that young people book and use private hire vehicles. Young people are also likely to be a resilient group in terms of their ability to find and use alternatives most suited to their needs.	Minor adverse	In implementing the proposal, ensuring that operators were still able to show visibility of a passenger's driver location once the booking is made would help to reassure passengers of the proximity of the vehicle and help to reduce any service convenience / safety implications.	The Mayor has announced that, subject to TfL Board approval in March 2016 TfL is not intending to proceed with this proposal. However, it is likely that this concept will be tested in the courts, providing a determination on whether this constitutes plying for hire.

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10	Operators must specify the fare prior to the booking being accepted	Passengers - disabled people and those on low incomes	<p>This proposal is likely to improve the transparency of PHV fares, which is considered to particularly benefit disabled people due to experiences of additional charges and a preference for certainty in the specification of the fare. Stakeholders identified that people with particular disabilities may be disproportionately impacted. For example people with visual impairments may be particular beneficiaries as it will enable them to work out the correct change needed prior to getting into the vehicle. People with issues with dexterity e.g. due to arthritis may also find it difficult to count out the fare in the cab.</p> <p>However, this proposal could also have a negative impact on those with lower incomes. Engagement with key stakeholders identified that it is likely that contingency will be built into specified fares in order to account for congestion and other factors that could increase the estimated fare. As a result passenger fares will likely increase to account for this contingency cost.</p> <p>Baseline: information on the PHV fares paid by disabled people as opposed to a non-disabled user is unknown.</p> <p>Disabled Londoners are slightly less likely to have used a private hire/minicab in the last year than non-disabled Londoners (49% compared with 58%). However disabled Londoners are slightly more likely to use minicabs frequently when compared with non-disabled Londoners; 8% of disabled Londoners use a mini-cab at least once a week compared with 6% of non-disabled Londoners. (TfL, 2015, Travel in London, understanding our diverse communities).</p>	Positive	Long term impact as this proposal requires a permanent change to the way that PHV fares are charged.	People with disabilities are likely to be particular beneficiaries. Disabled people have reported that they often end up paying higher fares for PHV. One study highlighted that the 30 enquiries made about travelling with an assistance dog, one PHV company refused travel and five said that there would be an additional charge. (TPH AMTS - Q1 2015//6). A report by the charity SCOPE pulled together existing research on the cost of living for disabled people. It was found that disabled people can pay up to double the fare for a PHV compared to a non-disabled user. (SCOPE (2014) Priced out: ending the financial penalty of disability by 2020). In addition, engagement with disability representatives revealed that disabled groups will benefit from proposals which help passengers be as organised as possible before the driver arrives; having the ability to know the fare beforehand would be beneficial for people who have issues with dexterity e.g. arthritis for counting out the change etc. in advance. Given these potential benefits for this group, the benefits are expected to be medium .	The sensitivity of this proposal is estimated to be medium, as several equality groups are likely to be beneficiaries of this proposal and will experience the benefit whenever using a PHV service.	Moderate beneficial	Enforcing this regulation, to ensure that the specified fare is the price that is eventually charged will be important to help fully realise benefits.	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to amend the proposal to require an estimated fare to be provided prior to the journey commencing.
14	Specific requirement for an English language test	Drivers - from BAME groups	<p>The taxi and PHV industry attracts a high number of drivers from BAME groups; the national census shows that a high proportion of taxi and PHV drivers are from BAME groups. Latest figures from TfL on PHV Driver Licensee Country of Birth show 15% of PHV drivers are born in the UK, Pakistan, Bangladesh and Afghan make up the three most common countries of birth from 'other' categories. Figures suggest that the proportion of Pakistani men working as taxi / PHV drivers stands at around 25% (Equality and Human Rights Commission (2011): How Fair is Britain?). It is possible that some drivers from BAME backgrounds do not have English as a first language and, therefore, may well</p>	Negative	Long term .	<p>This proposal is aimed at new driver applicants and renewals. Engagement interviews have indicated that possessing a certain degree of the English language may lead to fewer situations being misinterpreted or escalated and therefore the scale of the impact will be significant.</p> <p>This proposal will not affect all drivers that are from BAME backgrounds as many of them will already speak a good level of English and need to do so for their topographical tests. As</p>	Sensitivity of impacts is expected to be high as new and renewal drivers who do not speak English will not be able to proceed via an alternative route.	Major adverse	Phasing the introduction of this regulation would help to minimise the adverse effects. This would provide more time for sufficient training to be taken up before refusal of a PHV drivers' licence.	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. TfL is considering progressing with English level B1 (intermediate) as a standard of English required by the Home Office for immigration purposes.

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			<p>be affected by this proposal. Therefore, the introduction of this proposal could disproportionately affect some BAME driver groups for whom English is not their first language; potentially providing a barrier to income generation.</p> <p>Baseline: despite the data above, assumptions cannot be made however on the proportion of drivers who would not be able to pass an English language test.</p>			such, the expected distribution of the impact is expected to be medium .	discriminatory to immigrants/workers with low English proficiency.			
		Passengers - disabled people	Stakeholders from disability groups identified that this proposal may have a positive impact on people with certain disabilities including people with learning difficulties and people with hearing difficulties. This is because they are more likely to already experience some barriers to communication which makes the requirement for drivers to have a competent understanding of English even more important. The proposal is expected to have a positive impact on these groups for this reason.	Positive	Long term	The distribution of the impact is expected to be low as it will only affect people with certain disabilities and the scale of the impact is rated as medium as it is expected that many drivers already speak a good level of English.	The sensitivity of this impact is estimated to be low as disabled passengers can choose between different operators.	Minor beneficial		
18	Checks on convictions of operator staff	Passengers - those with higher safety concerns	<p>This proposal reduces the likelihood of those with a conviction working as an operator with contact with the general public and ensuring bookings are discharged to a licensed driver. This may increase confidence about the safety of the PHV for passengers. (TfL (2010): 14/10 Safety advice for PHV passengers).</p> <p>Perceptions of safety from certain equality groups where safety concerns when travelling may increase as a result of this proposal. LGB Londoners (69%), BAME Londoners (70%) and women (70%) are the least likely to be 'unworried' (Travel in London, TfL, 2015). This is used as a proxy for our understanding of different equality groups and their perception of safety when travelling by PHV. Stakeholders from disability groups also identified that disabled people may be particularly at risk because operator staff are likely to have access to personal information including their address and that they have an impairment.</p>	Positive	Long term as this is a permanent change to business practices	<p>The scale of the impact of this proposal on perception of safety at an individual level is expected to be relatively low; the implementation of this proposal is unlikely to improve perception of safety considerably.</p> <p>The distribution of impact may be considerable, as the scoping evidence suggests that LGB, BAME and female Londoners all face a higher likelihood of safety concerns when travelling. However, it is understood that this proposal is more of a precautionary and safeguarding measure rather than response to safety concerns in the PHV industry. It is also considered that public awareness of this proposal, if introduced, will be low meaning that it will not have disproportionate effects in terms of feelings of safety.</p>	Low	Minor beneficial		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. This would only apply to operator staff who have face-to-face contact with the public e.g. at minicab offices. Given the regular interaction with the public and access to personal information that such staff have access to, this will help to increase public safety

Environment impacts

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23	Consideration of additional categories of operator licence type	All receptors - improvements in air quality have the potential to affect all receptors within London where the PHVs operate.	<p>Changes to the operator licensing categories and cost have the potential to lead to incentives for operators to utilise lower emission vehicles than those specified within existing TFL requirements. Changes to the PHV fleet could reduce mass emissions of NOx, PM10 and CO2 across the whole PHV fleet and may pending other incentives within Greater London contribute to an improvement in air quality.</p> <p>TfL has currently not undertaken any studies to determine the likely uptake of zero emission vehicles as a result of the proposal. A high level assessment has been undertaken based on a proxy assumption that the proposal would lead to a 2% reduction in the use of older vehicles within the PHV sector (vehicles classified as Euro III and Euro IV and registered before 2008) and that these vehicles would be replaced by zero emission electric vehicles. The assessment demonstrates that this proposal would have a benefit on emissions of NOx, PM10 and CO2, however, the percentage reduction of pollutants from the baseline (based on the 2% replacement assumption) is less than one percent.</p> <p>Engagement with industry representatives also suggest that the providing operator licensing incentives would do little to substantially change the environmental credentials of PHVs in the short term as it is drivers, not operators, who own the vehicles in the majority of cases. In addition the additional cost of buying or renting a zero emission car is considered to outweigh any discount on the licence</p> <p>Baseline: based on currently available licence data, PHVs are calculated to contribute approximately 950 tonnes of NOx, 70 tonnes of particulate matter and 240,000 tonnes of CO2 to the atmosphere.</p>	Potentially positive: impact on air quality and CO2 emissions through reduction in mass emissions.	Long term impacts as this proposal will require permanent changes to licensing.	Evidence on the number of existing licensed vehicles that would be replaced with lower emission alternatives as a result of the proposal is not available. However, it has been estimated that if 2% of the oldest proportion of the fleet (vehicles which are from 2008 and older) were to be replaced with newer zero emission vehicles approximately 0.6% of baseline NOx emissions 0.3% of baseline PM emissions could be saved. If 2% of the existing PHV conventionally powered fleet were replaced by zero emissions vehicles approximately 24,000 tonnes of CO2 would be saved. The assessment demonstrates that this proposal is likely to have a benefit on emissions of NOx, PM10 and CO2. However, the percentage reduction of pollutants from the baseline is less than one percent. This change is considered to be permanent and is described as neutral in accordance with the criteria adopted for this assessment.	Any reduction in emissions of NOx and PM has the potential to affect all receptors within London. The potential changes identified are small considering total pollutant emissions within London. However, the potential reductions in emissions in combination with wider initiatives such as the future ultra-low emission zone could have a significant impact on air quality and lead to health benefits.	Neutral	This proposal could be possibly be enhanced if a lower licence fee was applied to drivers to incentivise them to use lower emission vehicles (rather than operators) because vehicles are often owned by drivers rather than operators. This proposal could also be enhanced through additional operator subsidies for the use of zero emission vehicles.	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. The specific revisions to the licence fee structure will be consulted on separately.

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24	Controls on ridesharing in licensed vehicles	All receptors - improvements in air quality have the potential to affect all receptors within London where the PHVs operate.	<p>The implementation of clear controls and guidance on ride sharing safety could help to make PHV ride sharing more appealing to both passengers and drivers, therefore potentially increasing its use and number of shared journeys. This could, therefore, lead to a net result in the total distance travelled by PHVs. As with proposal 23 above, a high level assessment has been undertaken on the basis of a proxy 2% reduction of PHV trips. If this reduction was evidenced (as a direct result of this proposal rather than wider market influences), there would be a reduction of the total vehicle kilometres travelled by the whole PHV fleet of (approximately) 520 km per year per vehicle; this would result in a 2% emissions saving. However, without data on how much this proposal in itself would encourage more ride-sharing and whether that modal shift would be from independent PHV / taxi / private car trips rather than public transport trips, the environmental impact of this proposal is considered neutral. In addition, any wider impacts of this proposal are unlikely to be experienced in the short term as the 'controls' would take time to define, implement and experienced by passengers / drivers.</p> <p>Baseline: based on currently available licence data, PHVs are calculated to contribute approximately 950 tonnes of NOx, 70 tonnes of particulate matter and 240,000 tonnes of CO2 to the atmosphere.</p>	Potentially positive: impact on air quality and CO2 emissions through reduction in mass emissions.	Long term impacts as this proposal will require permanent changes to ridesharing.	Evidence on the extent that ride sharing could reduce journey provision and an overall reduction in vehicle kilometres travelled is not available. However, it has been estimated that if a 2% reduction in vehicle kilometres across the whole of the PHV fleet was to be achieved there would an approximate reduction in emissions of 20 tonnes of NOx, 1 tonne of PM and 5000 tonnes of CO2. Estimated reductions in emissions are small in comparison to baseline emissions and wider emission sources in London	Any reduction in emissions of NOx and PM has the potential to affect identified receptors. The potential changes identified are small when considering total emissions within London. However these reductions in emissions in combination with wider initiatives such as the future ultra-low emission zone could have a significant impact on air quality and lead to health benefits.	Neutral		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL will work with the DfT to develop guidance for ridesharing.

Business and economics impacts

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1	Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking	Operators	<p>Digital only operators provide a photo ID to passengers, but further clarification is needed on the proposal to confirm to what extent digital operators may be affected. It is not clear whether what their current photo ID would be sufficient.</p> <p>Digital and phone and / or office bookings</p> <p>Operators that already provide bookings via means which can incorporate photo ID and driver information (such as apps or via email) may also incur some additional operator costs having to incorporate this into their usual practices.</p> <p>Baseline: Whilst the vast majority of passenger bookings for PHVs are still made via the telephone (90%), when surveyed, bookings are also made online (70%), by text (43%) and via an app (22%) or email (8%). Each of these is capable of providing this information to the passenger.</p>	<p>Negative: Potential change to business practice</p> <p>Negative: Potential change to business practice</p>	<p>Short term impact whilst operators adapt apps, email systems etc. if required to provide driver information and photo ID for passengers.</p> <p>Short term impact whilst operators adapt apps, email systems etc. to provide driver information and photo ID for passengers.</p>	<p>The scale of the impact for these operators is not envisaged to be significant, if at all, as the capability of including photo ID confirmation to adhere to this proposal is likely to already be in place or be more easily facilitated than other operator groups.</p> <p>As a result, the distribution of this impact is low.</p> <p>This may affect the proportion of operators who accept bookings via apps and other electronic formats. In the majority of cases, booking confirmation is provided to passengers, however confirmation containing photo ID is not. Many operators do in fact offer some form of digital confirmation.</p> <p>The scale of the impact for these operators is not envisaged to be significant, as the capability of including photo ID confirmation is likely to be more easily facilitated by these operators compared to those operators who only use telephone bookings.</p> <p>As a result, the distribution of this impact is medium.</p>	<p>The increased operator cost to address this proposal will be required from all operator groups not currently offering this service. Digital operators already have the capability to provide photo ID confirmation and any modification to adhere to a new TfL requirement is likely to be easily facilitated. As such sensitivity is expected to be low.</p> <p>The increased operator cost to address this proposal will be required from all operator groups not currently offering this service. There are limited alternative ways that operators which do not currently provide photo ID can meet this requirement. As such sensitivity is expected to be low.</p>	<p>Minor adverse</p> <p>Minor adverse</p>	<p>Consideration of the cost involved in implementing this measure may reduce the potential likelihood that such cost will destabilise smaller firms. For example, should the proposals require all operators to adhere to a set format of distributing driver information and photo ID, this may increase the cost required and therefore the negative impacts of this proposal.</p> <p>Phasing of the introduction of this regulation may make it easier for firms, especially small firms, to meet costs required and</p>	<p>The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal for operators to provide this information to customers who are able to receive it.</p>

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		Only phone and/or office booking	<p>Assumption: not all operators will have the technological capability to implement this in their present business operational model and will therefore incur some costs and inconvenience implementing the appropriate facilities.</p> <p>Baseline: The baseline for the number of operators who currently have the capability to provide these details electronically is currently unavailable. However, according to CSS TPH Licensee 2014-2015 data, the vast majority of passenger bookings for PHVs are still made via the telephone (90%). This could suggest that this regulation (with particular reference to providing driver photo ID) will be difficult to implement for current 'business as usual' bookings. Those who don't have these facilities already (likely to be those that currently rely on more telephone-bookings) will be disproportionately impacted by this regulation.</p>	Negative: Increased cost	Medium term impact expected for operators, as options to provide driver information will likely require a change to the usual business practices of bookings. The impact will be experienced at the point of implementation and potentially in the immediate aftermath of the new facilities being installed, due to the costs incurred and the change in business operations.	<p>All operators which fall into this category and do not have app technology to deliver this proposal will face a significant capital cost to create the technical solution and a considerable ongoing cost to maintain this offer to passengers.</p> <p>All operators in this category will be impacted by this but overall the share of the operators not already providing some sort of digital confirmation is regarded as smaller compared to those who are. As a result, the distribution of this impact is medium.</p>	<p>Depending on the way in which this regulation is implemented, many operators may have to make considerable changes to their business practices, which they will not be able to avoid.</p> <p>Engagement with operators highlights that businesses without the current technological capabilities in place will face a significant upfront cost which could potentially destabilise all operators in this category. As such sensitivity is expected to be high.</p>	Moderate adverse	<p>therefore minimise any de-stabilisation effects.</p> <p>Considering making the photo ID requirement optional could reduce the negative impacts of this proposal.</p>	
2	Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing	Operators	<p>It is estimated that operators offering a PHV service which facilitates on-demand hire or hire with very little waiting time will be impacted by an imposed 'wait time'. Engagement with stakeholders' highlighted that fewer journeys will be able to take place in a day, and one of the unique offerings of this operator will be removed.</p> <p>Data from the September consultation response from this operator suggests that if the 5 minute wait time had been imposed in September 2015, passengers would have been waiting an approximate 3,000,000 minutes, which could translate to as much as £2,000,000 in foregone fares.</p> <p>Baseline: Evidence on average wait times for PHVs booked for immediate hire has not been collected to date and therefore has not been available for use in this IIA. As a proxy, the average wait times for taxis has been used. According to the 2001 SD study, the average wait time across all of London is two minutes. It should be noted that on Sundays between</p>	Negative: delays to business operators and potential increase in cost	Long term impacts as this proposal is requiring a permanent change in business practices	<p>This operator's business model will be impacted by this proposal. As a result, distribution of this impact is high.</p> <p>This operator represents just under 20% of the total PHV drivers in the market, however as the average driver for this operator 25 hours a week it is likely that these drivers only work part-time and / or work for other operators.</p>	Sensitivity to this proposal is assumed to be high as this operator will likely be unable to avoid making serious changes to their business model to accommodate this proposal.	Major adverse	<p>More data on current wait times across the industry will help to provide more insight on the economic/financial impacts of this proposal.</p>	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is not intending to proceed with this proposal

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			<p>8pm and 6am this increases to four minutes and during Monday-Friday from 8pm-6am the average wait time is three minutes (2001 SD study).</p> <p>Digital and phone and / or office bookings</p> <p>In theory all private hire operators should have the capacity to provide an on-demand service to their passengers.</p> <p>For journeys where a passenger requires immediate pick up, when there are multiple cars in the area there will be a business cost as the closest car may no longer be the car assigned to the passenger (to ensure there is a 5 minute gap between booking and the journey commencing).</p> <p>Only phone and/or office booking</p> <p>Baseline: Evidence on average wait times for PHVs booked for immediate hire has not been collected to date and therefore has not been available for use in this IIA. As a proxy, the average wait times for taxis has been used. According to the 2001 SD study, the average wait time across all of London is two minutes. It should be noted that on Sundays between 8pm and 6am this increases to four minutes and during Monday-Friday from 8pm-6am the average wait time is three minutes (2001 SD study).</p>			<p>In theory all private hire operators should have the capacity to provide an on-demand service to their passengers. However, anecdotal evidence suggests that current waiting times are in some cases more than 5 minutes so this may not be a substantial impact. As a result, all operators in these categories could be impacted by this proposal and therefore distribution of this impact is medium.</p> <p>This proposal also impacts upon vehicle utilisation.</p>	<p>Potential impact on revenue is expected, though operators in these categories are less likely to have a business model with a solely on demand service and thus the sensitivity has been rated as medium.</p>	Moderate adverse		
3	Operators will be required to seek TfL approval before changing their operating	Operators	<p>Digital only</p> <p>This proposal would result in less flexibility in the management of PHV companies; likely to affect all types of PHV operator.</p> <p>Digital and phone and / or office bookings</p> <p>Baseline: Evidence on the current trend in PHV operators changing their operating model is not available.</p>	Negative: delay to operators seeking to change their model	Short term impact as this will affect firms in a transitional period between changing operating models. However, this is	This proposal could result in severe delays and potentially associated loss of income to operators seeking to develop their company model, depending on the level of structural change proposed.	Operators would not be able to introduce changes to their service whilst waiting approval and this might impact on their revenue. However, they would be able to continue to trade	Moderate adverse	Stakeholders have requested a clearer definition of the level of change to an 'operator model' which would help operators to understand the level of impact on	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with an amended proposal, requiring operators to inform TfL of changes to their operating model prior to

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	model		Only phone and/or office booking			potentially a recurrent impact as operators would be required to reapply for approval each time a change is desired.	However, according to operator representatives (unless every small change requires approval), the need to change operating models regularly is not envisaged to be an impact which affects many operators; for example many operators are already delivering services via an app if they are at the relevant scale. As a result of the above and the potential for this to impact all operators in the industry, distribution of this impact is medium .	using their current model. As a result, the sensitivity of this impact is rated as medium .		their business models. It is understood that TfL is currently already considering refining this proposal to require operators to 'inform' rather than 'seek approval' about changes to the operating model but greater clarification on how this would be implemented would be advised.	implementation. TfL carry out significant checks before licensing an operator and are proposing to carry out the same due diligence ahead of any substantial changes to the way they operate.

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4	Security for app based booking platforms	Operators and digital only operators and phone and / or office bookings	<p>This proposal could have a cost implication for operators to meet the fraudulent security and driver identification needs of this proposal. Qualitative responses to the September-December 2015 consultation say technology is insufficient for driver ID confirmation.</p> <p>App based booking platforms are a growing characteristic in the PHV sector: 2014-2015 CSS TPH Licensee survey - 12% of PHV operators allocate drivers via an app. 21% of PHV drivers use a booking app. Minicab users reported that they were using minicabs more frequently and were more likely to book them through smartphone/tablet apps. (TNS (2014): Taxi and minicab customer satisfaction survey Q3 2014/5 p5.</p> <p>Latest data shows an increase in the use of mobile apps to book minicab services - minicab booking via an app increased from 3% to 8% 2013-2014; (TNS 2014 Black cab and minicab report).</p> <p>Baseline: Information operators using apps which currently have anti-fraud measures and driver ID facilities not available.</p>	Negative: increased costs	Short term impact as operators adapt apps to meet the needs of this requirement and then absorb costs.	<p>In terms of anti-fraud measures, from engagement with representatives of operators, it is assumed that the majority of apps already apply anti-fraud measures via the online solutions, so it is not anticipated that this aspect of the proposal would affect a large amount of operators.</p> <p>In terms of driver identification, in most cases a password/pin is used currently. This proposal could potentially affect all operators if a prescribed way of providing driver recognition was introduced by TfL. Costs could be significant for large operators and be challenging for some small operators.</p> <p>As a result, the distribution of this impact is rated as high.</p>	Those operators which offer an app-based booking platform will be required to implement the new security system, although some systems may already adhere to standards. Operators will have no alternative to implement and therefore sensitivity will be high if implemented without flexibility.	Moderate adverse	<p>It is understood that TfL is currently already considering refining this proposal, following a review of responses to the September-December 2015 consultation, whereby TfL work with the trade and technology industries to develop the necessary security solutions. Other mitigations could include:</p> <ul style="list-style-type: none"> – De-coupling the two elements of this proposal (driver recognition and personal data security) would provide greater clarity. – Working with operators to find a way of improving security, but allowing flexibility in approaches to achieve this would help to minimise cost impacts. – Provision of greater guidance on software as well as phasing the introduction of the regulation would help with implementation of this proposal and would allow operators to spread costs involved/incorporate them into their investment cycles. – TfL's guidance and involvement in negotiating with the technology companies to secure a more economic solution would be well-received by the operators. 	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is not seeking to make an immediate change, but will work with the trade and tech industry to develop any necessary security solutions. TfL will explore options to ensure that where operators use app-based platforms, that these are safe and secure and cannot be fraudulently used.

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		Only phone and/or office booking	N/A	N/A	None	Not relevant		N/A		
5	Operators must offer a facility to pre-book up to seven days in advance	Digital only	In most cases, it is assumed that PHV operators offer a facility to pre-book a PHV. Qualitative responses in the Sept-Dec 2015 consultation say this proposal adds a further burden to operators in terms of admin, IT, staffing and costs.	Negative: increased costs	Long term as this will be an ongoing change to business practices	This is the only operator that does not currently have the capability to offer seven day advance booking. The distribution of this impact is medium as this operator, whilst the largest in the market, is still only a portion of the market as a whole.	The sensitivity of this proposal is estimated to be medium as this operator will be required to change their booking facilities to accommodate the longer advance facility. However it should not affect their ability to trade whilst the change is introduced.	Major adverse		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is not intending to proceed with this proposal.
		Digital and phone and / or office bookings and only phone and/or office booking	It is assumed that operators who offer a facility to book by phone will already have this facility. However, stakeholders have stated that they believe this will have a negative impact on these operator types. This is because requiring operators who only offer a near immediate service via an app to provide seven day booking could potentially result in other operators losing a share of the market which is not currently an area of competition with digital operators. Baseline: the proportion of the PHV market currently offering / not offering a seven day booking facility is not known	Negative: Increased competition between digital only and other operators, which could lead to some operators being unable to compete	Long term impact: This could result in some digital and phone operators and only phone operators struggling to compete with digital operators.	It is assumed this will impact all digital and phone booking and only phone booking operators. However, smaller operators who rely only on phone bookings are likely to experience the greatest impact. This is because these operators are assumed to be least likely to absorb the impact of the change in market. This rating has therefore been assigned as low .	Sensitivity is low as it is not guaranteed that passenger behaviour will change in such a way as to significantly change behaviour and therefore revenue.	Minor adverse		
6	TfL proposes to no longer issue licences for in-venue operators or temporary events	Digital only	Digital only operators will not be impacted by this proposal as they do not hold licences for in-venue or temporary events.					N/A		The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. TfL has already stopped issuing variations to licences where the application is for an in-venue operation, and no further variation applications of this nature will be approved. TfL will, however, explore alternative measures to assist customers in late night temporary venues whilst minimising the potential of plying for hire or touting.
		Digital and phone and / or office bookings	Certain PHV operators in an agreement with an in-venue operator or maintaining a contract with a temporary event will be negatively impacted by this proposal. Baseline: Data on the number of operators which hold in-venue licences does not exist. There is also limited data on operators that tender for licences for temporary events. However, it is worth noting that in 2009 9% of minicab journeys took place between 10pm and 6am Friday and Saturday nights. There is data from 2009 which suggests that 3% of minicabs and 3% of chauffeur services	Negative: in-venue licensed / temporary event PHV operators impacted	Medium term impacts as this proposal is requiring a permanent change in business practices and potentially could affect income.	Figures for the number of in-venue operator / temporary event licences, their location and details about the venues are not available. Engagement with operator representatives reveals that many locally based operators enter into licence agreements with venues and temporary events, especially executive service providers, where this work makes up a considerable amount of their practice.	The sensitivity of this proposal is estimated to be medium , as those operators affected may lose a portion of their income; however, it is likely that operators will be able change the way their business operates over time.	Moderate adverse	Operators engaged with suggested that it would be useful to de-couple this proposal and consider in-venue licensing and temporary events licensing separately.	

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		Only phone and/or office booking	commenced from a night venue. 18% of minicab journeys to/from sport/entertainment/social events, with 34% between 8pm and 6pm Mon-Fri and 45% between 8pm-6am Sat/Sun. Particularly affecting minicabs linked with in-venue operators, as opposed to app-based and chauffeur services.			In terms of scale of impact, the removal of this licence is expected to cut a considerable revenue stream from the operator groups affected. Distribution has been set at medium on a cautionary basis as it could have destabilising effects on operators.				
7	Operator must have a fixed landline telephone which must be available for passenger use at all times	Operators	<p>Digital only</p> <p>Considerable change to business practices. Engagement with stakeholders highlights that this is the only operator which does not provide an option for passengers to liaise by telephone with the operator.</p> <p>It is assumed that whilst operators in this category will already be taking phone bookings during all hours of operation, some will not have a customer services landline which is permanently staffed during business hours. For those not in this position, putting in place this service is anticipated to require extra resource, which could be a significant cost for both larger scale operators with a wide client base; smaller, local-level operators with fewer resources; and particularly for operator-drivers for whom this proposal would be difficult to implement.</p> <p>Baseline: data on operators with or without a fixed landline and whether this landline is staffed is not available.</p>	Negative: additional operator costs to set this up	Long term impact as business practices to meet this requirement and the costs involved in resourcing this going forward will be a permanent increase.	Engagement with stakeholders highlights that this is the only operator which does not provide an option for passengers to speak to the operator by telephone; therefore the distribution of this impact is medium as this operator, whilst the largest in the market, is still only a portion of the market as a whole. However, scale of change from the baseline is high.	The sensitivity of this proposal is estimated to be high , as this involves a change in business practices which cannot be avoided.	Major adverse	Consideration of a tiered approach (aligned to operator size) to this regulation, or a reduced number of hours during which the landline needs to be staffed for could be considered, in recognition of the increased operator costs that could be realised from this proposal. Phasing the implementation of the proposal could minimise the full cost impacts and allow operators time to adapt to meet this requirement.	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with an amended proposal, making it clear that the requirement is for a customer to be able to speak to an operator verbally at all times when journeys are being undertaken, rather than specifying a landline per se. The requirement will be mandatory for enquiries or complaints in relation to booked journeys, but it will not be compulsory for operators to have to accept bookings by phone.
		Digital and phone and / or office bookings and only phone and/or office booking		Negative: additional operator costs to set this up	Long term impact as for those operators who do not have these facilities in place operators will need to adapt business practices to meet this requirement and the costs involved in resourcing this going forward will be a permanent increase.	The number of operators without a fixed landline which is available for bookings and customer services is not available; there is not enough evidence to make assumptions on which particular operator groups would be disproportionately negatively impacted by this proposal. In terms of scale of impact, it is assumed that the increased operator cost of installing a landline where operators previously did not have one is in itself not a potentially destabilising cost. However, the requirement to ensure that passengers can make bookings and also access customer care services during all of the operator's business hours is anticipated to require	The sensitivity of this proposal is estimated to be medium , as whilst the increased operator cost to address this proposal will be required from all operator groups not currently offering this service, already be in place in most cases from which to build upon to meet this requirement.	Moderate adverse		

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						considerable extra resources, for large scale operators with a considerable client base; smaller, local-level operators with less resources and particularly for operator-drivers. The distribution of this impact is medium .				
8	Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app	Operators	Digital only	This proposal would have a significant negative impact on the this type of business model due to the way in which bookings are currently made, with considerable associated costs to administer the change and the way in which vehicles are booked and allocated Baseline: information operators showing visibility via an app is unknown.	Negative: potential reduction in trade	Long term impact as this will impact operators and potential trade on a permanent basis	Digital operator groups will be most impacted by this proposal - engagement with stakeholders highlights that many apps show availability and therefore the potential distribution of this impact is high . This is a precautionary measure in the absence of certified data as it is understood that this is not the case in all apps.	The sensitivity of this proposal is estimated to be high , as operators will be required to change their operating model.	Major adverse	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is not intending to proceed with this proposal. However, it is likely that this concept will be tested in the courts, providing a determination on whether this constitutes plying for hire.
			Digital and phone and / or office bookings	Operators who offer this service but who do not rely solely on this function to allocate vehicles, may need to alter their digital platform, although data is not available to indicate how much of the market this would apply to. These operators would need to implement some change although it is likely to be less substantive as the entire business model would not have to change and, therefore, there would be less of a disruption to trade.	Negative: potential reduction in trade	Long term impact as this will impact operators and potential trade on a permanent basis	Engagement with stakeholders highlights that some operators who accept digital and phone bookings may have to slightly adapt their business model, but this is in a minority of cases. The vast majority of operators will not need to do so. As such this has been rated as low .	The sensitivity of this proposal is estimated to be relatively low as operators would not necessary need to change their business model.	Minor adverse	
		Only phone booking	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
9	Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis	Operators	Digital and phone and / or office bookings, and only phone and/or office booking	This could require additional administrative input and resource from some operators (particularly those not as automated as the app-based operators) to adhere to full due diligence of record keeping. Baseline: the current record-keeping practices of all operator groups is unknown.	Negative: increased administration	Short term impact whilst operators adapt business practices to meet the needs of this requirement	This proposal is likely to impact on all operator groups, however it is expected that in most cases operators already collect this data. Following engagement with operator representatives the administrative requirement (e.g. a simple Excel spreadsheet) is not expected to impose a considerable burden on these smaller operators. The actual proportion of these operators without	The sensitivity of this proposal is estimated as low as for many operators it will be easier to implement.	Minor adverse	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. This proposal would enable TfL to quickly trace back the driver to the operator where illegal activity is suspected or a complaint is made, and will ensure that TfL can quickly establish the facts in the event of a complaint or incident, including helping to identify drivers/vehicles which are licensed

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						automated/electronic records however is unknown. The estimated distribution of this impact is low .				but are not registered to a Private Hire operator. This would enable targeted enforcement against touting and plying for hire.
10	Operators must specify the fare prior to the booking being accepted	Operators	<p>Digital only</p> <p>This proposal will have more of an impact on digital operators who tend to offer fare estimates instead of a specified fare. There is potential for operators to lose out on potential revenue if they under-estimate their fares (see baseline below). Qualitative responses from the September-December 2015 consultation highlighted that specifying the fare does not take into account traffic or other similar factors.</p> <p>Baseline: In 2014 79% of minicab users found that the actual costs matched the estimated costs and 5% and 11% found the actual cost to be 'a lot more' or 'a little bit more' than the estimate. (TNS (2014): taxi and minicab customer survey p.25, 26).</p>	Negative: potential increase in costs	Long term impact as this will affect operators permanently	<p>There is a possibility that PHV operators will underestimate the fare in the eventuality of factors to increase the actual cost of the journey (as shown in the evidence) and therefore receive less revenue than the cost of the journey.</p> <p>This operator is the only digital only operator and therefore offers fare estimates more often than other more traditional PHV operators. The distribution of this impact is medium as this operator, whilst the largest in the market, is still only a portion of the market as a whole.</p>	Those operators currently not providing a specified fare and therefore impacted by this regulation have few alternative options, and therefore this could affect their revenue. However, the frequency of this happening is assumed to be low, so the sensitivity of this proposal is estimated to be medium .	Moderate adverse	<p>Stakeholders suggested that TfL should acknowledge that there will be a minority of instances where the destination cannot be confirmed and therefore the journey price cannot be estimated / specified. For example, journeys which have been booked through a third party such as a restaurant / hotel or executive services where there may be journeys that have multiple destinations. As such implementation may not always be practical.</p>	<p>The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to amend the proposal to require an estimated fare to be provided prior to the journey commencing.</p> <p>The existing regulations already require operators to provide, and make a record of, an estimated fare if requested by the customer when booking a journey. This proposal would make it mandatory for operators to provide and make a record of the estimated fare for every journey, whether the customer has requested this or not. This would help prevent instances where customers are charged more than they expected at the end of the journey. Any changes to the booking mid-journey would need to be agreed with the operator and a new estimate provided.</p>
			<p>Digital only, digital and phone and / or office bookings, and only phone and/or office booking</p> <p>Stakeholders indicated that in nearly all cases, phone booking operators can provide a specified fare to passengers. However, it should be noted that across all operator groups there are some instances where the destination cannot be recorded at the time of booking (due to how the booking is made e.g. from a third party) or the destination changes once the journey has commenced and therefore fares cannot be specified. This was raised through engagement with industry representatives.</p> <p>Baseline: information on operators not currently recording final destinations is not available.</p>	Negative: potential increase in costs	Long term as operators will have to continue to implement this requirement	This could affect all operator groups, so distribution is widespread, however whilst engagement with operators highlighted that all operator groups could be impacted by difficulties in specifying the end destination, the occurrence of this was acknowledged to not be very frequent compared to standard journeys, therefore distribution is low .	Sensitivity is low as engagement with stakeholders suggested that passengers using these types of operators often already receive a specified fare.	Minor adverse		
		Passengers	All	As operators, particularly those driven by technology, will likely be impacted by this proposal, engagement with key stakeholders identified that it is likely that contingency will be built into specified fares in order to account for congestion and other factors that could increase the estimated fare. As a result passenger fares will likely increase to account for this contingency cost.	Negative: cost increased	Long term impact as this is a permanent change	This will potentially affect all passengers and particularly those who use technology only operators where this proposal is more likely to lead to a contingency amount being applied to fares (as evidenced from engagement with key stakeholders). Therefore the distributions rating of this proposal is medium .	Passengers will not be able to avoid the increased costs from technology driven operators, however as other operators are less likely to increase their fare to take account of a contingency amount, the sensitivity of this rating is rated as medium .	Moderate adverse	

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11	Operators must record the main destination for each journey which must be specified at the time the booking is made	Operators	Digital only It is expected that there will be more impact on an operator which previously offered services without the need for a confirmed end destination. Qualitative responses to the September-December 2015 consultation said adding the end destination will add delays and cause confusion to operators.	Negative: change in business practices	Short term impact whilst operators adapt business practices to meet the needs of this requirement	Digital only operators offer the option of recording an end destination in their app but this is recognised as a choice for the consumer. This proposal would require a change to digital only operators business model and the app itself. This change could also affect income due to under-estimates in the fare. The distribution of this impact is low as this operator, whilst the largest in the market, is still only a portion of the market as a whole.	The sensitivity of this proposal is anticipated to be high as the operator impacted cannot avoid implementing this requirement and the changes to consumer behaviour it may cause.	Minor adverse	Stakeholders suggested that there should be acknowledgement from TfL that there will be a minority of instances where the destination cannot be confirmed at the time of booking. As such implementation may not always be practical.	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to amend the proposal to require the main destination to be recorded prior to the journey commencing. Operators already have to record the main destination if specified by the customer at the time of booking, and this proposal will mandate the requirement to take this information prior to the journey commencing. It will ensure a complete record of each journey, thus supporting passenger safety, and would also be an essential requirement to implement proposal 10. Any changes to the booking mid-journey would need to be agreed with the operator and a new destination recorded.
			Digital and phone and / or office bookings, and only phone and/or office booking These operators may also have to change their business practices for a minority of bookings where they do not currently record the final destination of the journey, for example where a passenger requires a car for a certain amount of time rather than to be driven to a specific end destination. Baseline: information on operators not currently recording final destinations is not available.	Negative: change in business practices	Short term impact whilst operators adapt business practices to meet the needs of this requirement	Stakeholders state that the bookings which do not have a final destination attached to them constitute a small proportion of their business overall. This is likely to have less impact in terms of changes to model but it might require a change to business practices.	The sensitivity of this proposal has been rated as medium as operators are unlikely to be able to avoid this impact on revenue as a result of the change in business practice.			
13	Limit on the number of business names attached to each operator's licence	Operators	All operators This proposal to limit the number of business names attached to each operator does have the potential to affect all of the PHV market but is likely to impact upon some operator groups more than others. For example, this proposal may have long term advantages for locally focused companies due to reduced	Positive: increased market share, but also negative: penalty against the operator	Medium term impact - whilst the market adapts	It is anticipated this would most likely affect locally focused operators where their existing passenger base is not impinged by an alternative operator choosing to use a geographically focused name	It is anticipated that the market may have a fairly low sensitivity to the impact, but in a few cases business may increase their share of the market due to fewer competing names.	Neutral	If this proposal is taken forward it is suggested that a dialogue is established between TfL and operators which do have more than five names and also to	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. Although some alternatives to the five business name limit were proposed in the consultation which

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			<p>competition resulting from the implementation of this proposal.</p> <p>However, conversely, this proposal has the potential to have some short term negative consequences for some larger operators which have accrued multiple companies over a long period of time. It is also understood through stakeholder engagement, that the PHV industry is one defined by frequent mergers and acquisitions, so it is not uncommon for well-established operators to consist of multiple smaller operators. Yet, engagement also identified that those with more than five operating names (which is the proposed limit) are not particularly common.</p>			<p>even if they are not based in the local area. Locally-focused operators make up over half of the total PHV market according to our market assessment.</p> <p>Therefore, the distribution of this proposal is ranked as low.</p>			<p>phase in the proposal to allow time for adjustment.</p>	<p>are being considered by TfL, including how operators register their business names with TfL.</p>
14	Specific requirement for an English Language test	Drivers	<p>This proposal will affect some driver groups that may not meet the test requirements and therefore the labour force more widely.</p> <p>A high proportion of PHV drivers are from ethnic minority groups, where it is more likely that English is not their first language. For example, around 25% of Pakistani men work within this sector which is significantly higher than the national average (EHRC (2010) How Fair is Britain?).</p> <p>According to the Taxi PHV 2009 Diary Report the majority of drivers (48%) are British (therefore highly likely not impacted by this proposal) and 35% of PHV minicab drivers are Asian and 6% are African. In terms of executive drivers, these are much more likely</p>	Negative - limited income and barriers to entry	Long term impact as drivers affected may experience prolonged barriers to entry	<p>Engagement with operators highlights that drivers already have to pass the topographical test to earn their licence, there is already a requirement to be able to communicate in English and this should be met by all drivers. The proportion of drivers who will not be able to meet the requirements of this proposal is unknown; as can be seen from the baseline information there is a high proportion of drivers where English is unlikely to be their first language. Therefore a conservative estimate of the distribution of this proposal is medium.</p>	The sensitivity is regarded as medium as drivers will need to improve their English language skills if they are unable to currently speak an appropriate level of English.	Moderate adverse	<p>TfL could consider phasing the introduction of the test so that current drivers seeking renewal of their licence have time to improve their English language skills. A phased introduction will also help the market to prepare and adjust accordingly to minimise impacts on business operations.</p>	<p>The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. TfL is considering progressing with English level B1 (intermediate) as a standard of English required by the Home Office for immigration purposes.</p>

Proposal number	Private Hire Regulations Review proposal (Scoped in proposals only)	Identification of receptors (operators, drivers, user groups)	Description of the impact	Positive or negative impact	Temporal /duration (please indicate short, medium, long term and assign definitions)	Distribution / scale of impact (quantification of impact where possible or scale of deviation from the baseline)	Sensitivity of impact (to what extent are identified receptors able to respond to the impact)	Impact rating (as per the seven point scale)	Mitigation measures required or opportunities of enhancement	TfL's latest position
		<p>Digital only operators</p> <p>Operators</p> <p>Digital and phone and / or office bookings operators</p> <p>Phone and/or office only bookings operators</p>	<p>to be British (74%), with only 17% Asian and 6% African. Therefore, non-executive PHV drivers are more likely to be impacted by this proposal.</p> <p>Latest figures from TfL on PHV Driver Licensee Country of Birth, show 15% of PHV drivers are born in the UK. Pakistani, Bangladeshi and Afghani make up the three most common countries of birth from 'other' categories.</p> <p>Baseline: despite the data above, assumptions cannot be made however on the proportion of drivers who would not be able to pass an English language test.</p>	Negative - impacted workforce	Medium term as operator market adapts	<p>This proposal will have a negative impact for some operators that rely more heavily on drivers with a higher likelihood of not passing the English language test; either because English is not their first language or another reason.</p> <p>As information of the full extent of operators who rely more heavily on drivers from backgrounds other than the UK, and therefore with less likelihood of English as a first language, is unavailable, a conservative estimate of the distribution of this proposal impact across all operators is medium.</p>	The sensitivity is regarded as medium as some operators may find it difficult to absorb the initial impact of this proposal.	Moderate adverse		
15	Drivers to only work for one operator at a time	<p>Operators</p> <p>Digital only operator</p> <p>Digital and phone and / or office bookings operators</p>	<p>With the development of apps and more flexible ways for PHV drivers to work for operators, it is assumed that there are fewer and fewer barriers to drivers working for more than one operator. Engagement as part of the IIA process indicated that driving for more than one operator is commonplace. This proposal, therefore, has the potential to affect all operators across the industry.</p> <p>It is considered that the effects will be more dependent on size, coverage and profile of the operator rather than whether an operators accepts bookings via a digital platform or more traditional modes. If required to only work for</p>	Negative: lose drivers to competitors	Long term impact as employment models would shift significantly reducing employment flexibility over the life of the driver and impacting on operators as a result.	<p>It is assumed that under this proposal, drivers are likely to choose operators that offer greatest flexibility to working. As a result, there is a risk that smaller and locally focused operators and those operators are likely to be negatively impacted as drivers move to more flexible competitors.</p> <p>These operators make up a significant proportion of the PHV sector, and for this reason the distribution of this proposal is</p>	Sensitivity is expected to be medium as once drivers make a choice between the operators they work for, this could have considerable effects on the available labour source and future business.	Moderate adverse	<p>TfL could consider a limit higher than one of the number of operators a driver can work for. TfL could consider whether PHV operators can offer a guaranteed number of hours (that would sustain a living wage) for individual drivers (i.e. so they can do enough work with one operator so they have no need to work for multiple operators).</p> <p>The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is not intending to proceed with this proposal. TfL will now work with the DfT to consider how else to tackle the issue of excessive working hours.</p>	

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		Phone and/or office bookings only operators	one operator, drivers are more likely to choose operators which have a large potential geographical coverage and customer base. Locally focused PHV operators, with a smaller geographical coverage are less likely attract drivers, whilst sole trader operator-drivers would not be able to add to their income by undertaking trips for other firms. For these reasons, and the uncertainty about the way in which the reduced driver flexibility will affect industry operations, this proposal is considered to have a moderate adverse impact.			rated as medium .			TfL could consider whether there could be a cross-industry approach to monitor the number of hours worked by PHV drivers.	
		Drivers - those working for more than one operator	With the development of apps and more flexible ways for PHV drivers to work for operators, it is assumed that there are fewer barriers than before to drivers working for more than one operator. Baseline: information on drivers working for more than one operator is unknown.	Negative: total number of hours worked and therefore income could decrease	Long term impact as employment models would shift significantly reducing employment flexibility over the life of the driver.	During stakeholder engagement operator representatives noted that given the frequency of independent PHV drivers working multiple short term contracts for more than one operator to deliver school runs / disability transport services, this will have negative impacts on drivers and operators. This engagement also revealed that those drivers at the executive end of the market are disproportionately likely to work for more than one operator compared with other PHV drivers. PHV drivers could therefore be working for multiple 'operators' yet most of the services will be frequent short term commitments and so the definition of operator needs more clarification if this is to be implemented. With the increasing trend in apps there are currently few barriers for drivers to work for multiple operators; suggesting that the number of drivers	It is anticipated there is a medium sensitivity of impact as whilst there is no appropriate market adaptation measure, income streams will still be open to the driver.	Major adverse		

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						potentially impacted by this proposal to be large. Therefore a cautionary rating for this proposal's distribution is high .																
17	Vehicle licence to be revoked if driver licence revoked	<table border="1"> <tr> <td>Operators</td> <td> <p>Digital only operators</p> <p>Digital and phone and / or office bookings operators</p> <p>Only phone and/or office bookings operators</p> </td> <td> <p>A large proportion of PHV vehicles are owned (or rented) by drivers as opposed to the operators. Whilst there is the potential for a minor knock-on impact on operators and the labour pool the likelihood of this scenario is anticipated to be low.</p> </td> <td>Neutral</td> <td> <p>Short term impact – as drivers adapt to changes in regulations.</p> </td> <td> <p>All operators whose drivers own their own vehicles and share vehicles could be at risk of drivers retreating from the market if they lose their vehicle. There are now over 95,000 drivers and 75,000 vehicles licenced in London, indicating that there is a significant amount of vehicle sharing across the operator groups. The likelihood of those drivers sharing a vehicle having to retreat from providing their services as a result of losing their shared vehicle through no fault of their own is not expected to be high however, and therefore distribution of this proposal is low.</p> </td> <td> <p>It is assumed that operators will be sensitive to this proposal due to the negative impact on revenue of limits to driver supply, however as mentioned previously the occurrence of this is estimated to be low. The ranking is set as low.</p> </td> <td>Neutral</td> <td> <p>It will be important to ensure that drivers who have their driver licence revoked due to a health issue (e.g. heart attack or seizure) do not get penalised by this proposal.</p> </td> <td> <p>The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal.</p> <p>To be clear, this does not mean that a vehicle licence would be automatically revoked if a driver licence is revoked. However, it gives TfL the power to do so under specific circumstances; for example, if there is a concern that a vehicle could be used for hire and reward by somebody without a PHV driver licence. Where a driver is renting a vehicle or using a vehicle belonging to an operator this would not apply.</p> </td> </tr> <tr> <td>Drivers</td> <td> <p>Drivers who are vehicle licensees</p> </td> <td> <p>Data on driver and vehicle licences highlights that there is a significantly higher proportion of PHV driver licences than vehicles indicating that some sharing of vehicles occurs; however engagement with operator representatives suggests that multiple drivers sharing the same vehicle is fairly uncommon. This proposal could potentially affect any drivers (in terms of loss of income) who share a vehicle owned by another driver, if that driver had their licence revoked. In addition, for any owner-driver who had had their licence revoked, they would be unable to sell or rent their vehicle resulting in a lost source of income. However, in the absence of any specific data on shared use and taking into account that many drivers rent their vehicles (which would not result in a vehicles licence revocation), this scenario is thought to be fairly infrequent so the proposal is assessed as minor adverse.</p> <p>Baseline: Evidence suggests that 75% of PHV drivers must have their own vehicle, 31% operators provide vehicles to drivers, 6% other. (Taxi and Private Hire Licensee Customer Satisfaction Survey 2014/15).</p> </td> <td>Negative: loss of income</td> <td> <p>Short term impact – as drivers adapt to changes in regulations.</p> </td> <td> <p>This proposal could mean that drivers that share a vehicle could no longer be able to continue to provide the service as their vehicle could be revoked through no fault of their own.</p> <p>Where drivers own the car and lose their private hire licence, once the proposals are in place then the driver will not be able to lease out their vehicle to other drivers, and will therefore lose a potential revenue stream. This would be more likely to impact executive service drivers as their vehicle could be deemed a larger asset with more reason to hire out to other drivers.</p> <p>The likelihood of those drivers sharing a vehicle having to retreat from providing their services as a result of losing their shared vehicle through no</p> </td> <td> <p>The sensitivity of the proposal is uncertain. At this stage, it is assumed a high sensitivity due to the mandatory nature of the proposed.</p> </td> <td>Minor adverse</td> <td></td> <td></td> </tr> </table>	Operators	<p>Digital only operators</p> <p>Digital and phone and / or office bookings operators</p> <p>Only phone and/or office bookings operators</p>	<p>A large proportion of PHV vehicles are owned (or rented) by drivers as opposed to the operators. Whilst there is the potential for a minor knock-on impact on operators and the labour pool the likelihood of this scenario is anticipated to be low.</p>	Neutral	<p>Short term impact – as drivers adapt to changes in regulations.</p>	<p>All operators whose drivers own their own vehicles and share vehicles could be at risk of drivers retreating from the market if they lose their vehicle. There are now over 95,000 drivers and 75,000 vehicles licenced in London, indicating that there is a significant amount of vehicle sharing across the operator groups. The likelihood of those drivers sharing a vehicle having to retreat from providing their services as a result of losing their shared vehicle through no fault of their own is not expected to be high however, and therefore distribution of this proposal is low.</p>	<p>It is assumed that operators will be sensitive to this proposal due to the negative impact on revenue of limits to driver supply, however as mentioned previously the occurrence of this is estimated to be low. The ranking is set as low.</p>	Neutral	<p>It will be important to ensure that drivers who have their driver licence revoked due to a health issue (e.g. heart attack or seizure) do not get penalised by this proposal.</p>	<p>The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal.</p> <p>To be clear, this does not mean that a vehicle licence would be automatically revoked if a driver licence is revoked. However, it gives TfL the power to do so under specific circumstances; for example, if there is a concern that a vehicle could be used for hire and reward by somebody without a PHV driver licence. Where a driver is renting a vehicle or using a vehicle belonging to an operator this would not apply.</p>	Drivers	<p>Drivers who are vehicle licensees</p>	<p>Data on driver and vehicle licences highlights that there is a significantly higher proportion of PHV driver licences than vehicles indicating that some sharing of vehicles occurs; however engagement with operator representatives suggests that multiple drivers sharing the same vehicle is fairly uncommon. This proposal could potentially affect any drivers (in terms of loss of income) who share a vehicle owned by another driver, if that driver had their licence revoked. In addition, for any owner-driver who had had their licence revoked, they would be unable to sell or rent their vehicle resulting in a lost source of income. 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			The number of active PHV drivers and vehicles increased to 94,841 and 74,510 respectively (TPH Licensing report, 28/12/2015)			fault of their own is not expected to be high however, and therefore distribution of this proposal is low .					
18	Checks on convictions of operator staff	Operators	Digital only operators	Negative: administrative cost and delays to recruitment	Long term impact for operators as this will be a requirement for each new member of operator staff that comes into contact with passengers and/or has access to booking details.	This operator is led by technology and there is no face-to-face operator staff interaction when customers book a PHV through the app. However some staff may have access to booking details and so the operator staff this proposal relates to still needs clarification. The distribution of this impact is expected to be low .	The sensitivity of the proposal is anticipated to be low .	Minor adverse	A clarification has been provided by TfL that this proposal will only apply to operator staff that have face to face contact with the public (e.g. at an operating centre). This will therefore likely eradicate all of the potential impacts identified for digital booking only operators and some for digital and phone/office based operators.	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. This would only apply to operator staff who have face-to-face contact with the public e.g. at minicab offices. Given the regular interaction with the public and access to personal information that such staff have access to, this will help to increase public safety.	
			Digital and phone and / or office bookings operators			This proposal could add administrative costs and capacity issues (due to delays) for operators. Qualitative despondences from the Sept-Dec 2015 consultation highlighted that the DBS will be too burdensome on operators.	Engagement with operator representatives suggests that there is a high level of churn in the business and recruitment happens very frequently and at a fast pace. Ensuring DBS checks were in place for operator staff would cause considerable delays and impact on business operations. However as the DBS check is only the preference for implementing this proposal the scale of impact is rated as low .				The sensitivity of the proposal is anticipated to be low .
			Only phone and/or office booking operators			Baseline: number of operators currently implementing a DBS check is unknown.					
20	Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence	Operators	Digital only operators	N/A	N/A	N/A	N/A	N/A	N/A	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with a variation of this proposal requiring Hire & Reward (H&R) insurance to be in place at all times whilst a vehicle is registered to an operator. For this proposal to be enforceable, it would need to operate in conjunction with proposal 9, which requires operators to regularly provide details of those vehicles that are registered to their operating platforms so that TfL can check these against the Motor Insurers' Bureau database. The	
			Digital and phone and / or office bookings operators	This proposal covers the vehicle at the point of licensing - this will have different impacts on different operators, depending on their vehicle ownership model. - Smaller operators are more likely to be impacted by this proposal, and seasonal operators which hire out executive vehicles for only a proportion of the year (the particular example used by stakeholders was operators who own vehicles for wedding use) may be negatively impacted if they are expected to maintain Hire and Reward insurance throughout the length of the licence.	Negative: increased costs for some operators that own private hire vehicles but for for other operators.	Long term impact as costs associated with this proposal will be incurred going forward.	It cannot be assumed that all operators that own their own vehicles already have this in place for all of their vehicles. However it is known that the majority of vehicles are owned by drivers. A conservative estimate for the distribution of this impact has therefore been set as low .	It is assumed that those operators impacted by this proposal will have higher overheads to cover such costs therefore sensitivity is low .	Minor adverse		

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			<p>Baseline: number of vehicles with H&R insurance in place for the duration of the vehicle licence is unknown. 75% of PHV drivers own their own vehicle. In addition to this, 31% of operators provide their own vehicles.</p>							amended proposal ensures that H&R insurance is in place at all times while a vehicle is registered to an operator but allows vehicles to be 'de-registered' from operators' booking platforms during periods when they are not being used for H&R purposes.
		Drivers	<p>All drivers as vehicle licensees</p> <p>This proposal covers the vehicle at the point of licensing - this will have different impacts on different drivers. Seasonal drivers which only utilise their vehicle as a PHV for a proportion of the year may be negatively impacted if they are expected to maintain Hire and Reward insurance throughout the length of the licence. This should not affect full-time drivers.</p> <p>Baseline: number of vehicles with H&R insurance in place for the duration of the vehicle licence is unknown. 75% of PHV drivers own their own vehicle. In addition to this, 31% of operators provide their own vehicles.</p>	Negative: increased cost	Long term impact as costs associated with this proposal will be incurred going forward.	<p>It is known that more drivers own their vehicles than operators. Some PHV drivers may not currently insure their vehicle for the full length of the licence due to seasonal work or the high value of the vehicle not justifying such a considerable cost year-round. The requirement to do so will incur costs.</p> <p>Distribution is therefore rated as medium.</p>	<p>Estimations undertaken from the digital only operator estimates a typical annual H&R insurance policy at £2-2.5k; a considerable upfront cost to drivers.</p> <p>It is assumed that drivers will be highly sensitive to this proposal due to the financial costs involved which some may find difficult to absorb.</p>	Major adverse	Engagement with trade representatives highlights that the burden of ensuring adequate insurance is in place should be placed on operators rather than drivers, as is the practice currently in the industry.	
22	Hire and Reward fleet insurance in place by operators	<p>Digital only operators</p> <p>Digital and phone and / or office bookings operators</p> <p>Only phone and/or office booking operators</p>	<p>This proposal will affect operators who operate a fleet of cars but do not have fleet-wide insurance in place. There will be financial costs which could potentially destabilise the company (depending in size and structure).</p> <p>Baseline: the number of operators with fleets which do / do not have H&R insurance already in place is not known.</p>	Negative: increased costs to operators	Long term impact as this will last the full length of the licence.	<p>This proposal will directly impact the operator in this group.</p> <p>The distribution of this impact is medium as this operator, whilst the largest in the market, is still only a portion of the market as a whole.</p> <p>It is difficult to determine the scale of impact of the proposed regulation without an appreciation of current level of fleet wide insurance. It is assumed that fleet wide insurance may negatively affect small and locally focussed operators, imposing additional overheads to potentially small revenue schemes.</p> <p>Engagement with operator representatives indicate that the two largest operators maintain their own bespoke insurance policies. If this proposal is implemented across the</p>	<p>It is assumed that operators will be highly sensitive to this proposal due to the financial costs involved.</p> <p>It is assumed that operators will be highly sensitive to this proposal due to the financial costs involved which some may find difficult to absorb.</p>	Major adverse		<p>The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is not intending to proceed with this proposal at this time. However, there is broad agreement across the industry that there is an issue with indemnification in the event that a driver, intentionally or not, does not have the appropriate insurance in place. TfL will work with the trade to explore this in more detail and will seek to come forward with a new proposal in due course.</p>

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						industry, other medium and large sized operators will lose their no claims bonus and will be hit by a particularly significant increase in cost. Distribution is rated as medium .				
23	Consideration of additional categories of operator licence type	Digital only operators	This proposal has the potential to increase licence costs for operators with more than 1000 vehicles; i.e. largest operators in the market. Engagement with operators suggests that additional licensing will not incentivise the provision of specialist services. Baseline: Satisfaction with value for money of operator licensing fees has increased from 47% in 2008-2009 to 60% in 2015-2015. (Source: Taxi and Private Hire Licensee Customer Satisfaction Survey 2014/15). 67% of operators have a standard licence (more than two vehicles) with only 4 PHV operators owning over 100 vehicles. (Source: Taxi/PHV Diary Survey 2009.)	Negative: potential to increase licence costs for operators with more than 1000 vehicles; i.e. largest operators in the market	Long term impact through higher annual licensing costs	This proposal will only affect operators with more than 1000 vehicles. The digital only operator will definitely be impacted by this proposal. The distribution of this impact is low as this operator, whilst the largest in the market, is still only a portion of the market as a whole.	The sensitivity of the proposal is anticipated to be low as large scale operators have higher revenue streams, and this additional direct cost is unlikely to be destabilising (although it depends on the new rates decided by TfL).	Minor adverse	Clarification on the increased licence costs is needed to fully assess the impacts of this proposal. TfL could consider introducing more of a gradual scale with regard to operator size and then assign licence fees accordingly. Operator representatives suggest that licence type should reflect the effort and time involvement from TfL rather than number of cars that are licensed to the operator.	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL is intending to proceed with this proposal. The specific revisions to the licence fee structure will be consulted on separately.
		Operators Digital and phone and / or office bookings operators	This proposal has the potential to increase licence costs for operators with more than 1000 vehicles; i.e. largest operators in the market. Engagement with operators suggests that additional licensing will not incentivise the provision of specialist services. Baseline: Satisfaction with value for money of operator licensing fees has increased from 47% in 2008-2009 to 60% in 2015-2015. (Source: Taxi and Private Hire Licensee Customer Satisfaction Survey 2014/15). 67% of operators have a standard licence (more than two vehicles) with only 4 PHV operators owning over 100 vehicles. (Source: Taxi/PHV Diary Survey 2009.)	Negative: potential to increase licence costs for operators with more than 1000 vehicles; i.e. largest operators in the market	Long term impact through higher annual licensing costs	A select few of the largest operators will be impacted by this proposal. Whilst these operators maintain significant number of PHV drivers, these operators are not estimated to make up a majority of the total market share, and therefore overall distribution of this proposal is low .	The sensitivity of the proposal is anticipated to be low as large scale operators have higher revenue streams, and this additional direct cost is unlikely to be destabilising (although it depends on the new rates decided by TfL).	Minor adverse		
		Only phone and/or office booking operators	Baseline: The proportions of PHV operators are; 33% small (two or fewer vehicles) (Source: Taxi/PHV Diary Survey 2009.)	N/A	N/A	N/A	N/A	N/A		

Proposal number	Private Hire Regulations Review proposal (Scoped in proposals only)	Identification of receptors (operators, drivers, user groups)	Description of the impact	Positive or negative impact	Temporal /duration (please indicate short, medium, long term and assign definitions)	Distribution / scale of impact (quantification of impact where possible or scale of deviation from the baseline)	Sensitivity of impact (to what extent are identified receptors able to respond to the impact)	Impact rating (as per the seven point scale)	Mitigation measures required or opportunities of enhancement	TfL's latest position
24	Ensure PHVs cannot be used for ridesharing in London unless very clear controls are in place	Digital only operators	The proposal will likely affect operators that accept bookings via apps which have introduced ridesharing recently. Baseline: Estimated figures on ridesharing offered by this operator are as follows: In the first three weeks of the launch of ridesharing via this operator, 50,000 shared trips were recorded in London.	Potential negative: hamper efficiency of operators	Medium term impact - for operators with ridesharing functions as regulation may limit growth.	In the first three weeks of the launch of ridesharing via this operator, 50,000 shared trips were recorded in London. The digital only operator will definitely be impacted by this proposal. The distribution of this impact is medium as this operator, whilst the largest in the market, is still only a portion of the market as a whole.	Sensitivity is low as operators should still be able to offer their services and collect revenues from passengers.	Minor adverse	TfL is already considering working with DfT to develop ridesharing guidance for the industry. The definition of ridesharing needs to be clarified to understand which operator groups are being impacted by this proposal.	The Mayor has announced that, subject to TfL Board approval in March 2016, TfL will work with the DfT to develop guidance for ridesharing.
		Operators Digital and phone and/or office bookings, as well as only phone and/or office booking operators	Whilst only one operator has introduced ridesharing via an app recently, in fact informal ridesharing which passengers arrange between themselves still takes place for example at tube stations at the end of the line. Operators from all groups (apart from technology only operators which cannot currently be booked long in advance) could potentially offer these services and therefore be impacted by the proposals. Baseline: information on operators delivering these services is not available.	Potential negative: hamper efficiency of operators	Medium term impact - as regulation may limit growth.	Informal ridesharing which passengers arrange between themselves is likely to already take place for example at tube stations at the end of the line. Information on the proportion of all operators, large or small within these groups offering these services is unknown, however the distribution of this impact is expected to be low .	Sensitivity is low as operators should still be able to offer their services and collect revenues from passengers.			
					Potential positive: increase security and therefore patronage	Medium term impact - as regulation may change passenger behaviour to view ridesharing as a safer practice.	Informal ridesharing which passengers arrange between themselves is likely to already take place for example at tube stations at the end of the line. Information on the proportion of all operators, large or small within these groups offering these services is unknown, however the distribution of this impact is expected to be low .	Sensitivity is low as the low visibility of this proposal is unlikely to change passenger behaviour dramatically		

Appendix H. Environmental assessment calculations

H.1 Environmental assessment: modelling

Baseline levels of emissions of NO_x, PM₁₀ and CO₂ have been calculated using the breakdown of the existing licenced Private Hire Vehicle (PHV) fleet information that has been provided by TfL. This data provides details on the number of licenced PHVs, their fuel type and year of Driver and Vehicle Licence Agency (DVLA) registration.

To assess changes in emissions of NO_x, PM₁₀ and CO₂ the DVLA registration data has been used to determine the age of the vehicle and therefore the emission standards that they were designed to meet. To calculate total emissions, Defra's Emission Factor Toolkit version 6.0.2 has been used and it has been assumed that the average distance travelled per year by each PHV is 26,000 kilometres at an average speed of 48km/hr. It would be anticipated that some PHVs would travel further and some less distance and therefore this is considered to represent an average of the fleet. In addition speed would vary depending on the location that trips are taken and therefore 48km/hr (30 mph) has been assumed as this is considered to represent the speed limit on many roads within London.

H.1.1 Proposal 23

Table I.1 presents the calculated baseline emissions based on the existing number of licenced PHVs, their age, fuel type and estimated distance travelled per year.

Table H.1: Calculated baseline emissions

Pollutant	Baseline emissions Tonnes / Year
NO _x	727
PM ₁₀	66
CO ₂	197,614

Notes: All figures rounded to nearest tonne, Source: Mott MacDonald

Table I.2 presents the calculated savings in emissions assuming 2% of the oldest PHV fleet vehicles are replaced with zero emission electric vehicles.

Table H.2: Calculated emission savings

Pollutant	Emissions Tonnes / Year	Saving Tonnes / Year	% Saving compared to baseline
NO _x	723	4	0.6
PM ₁₀	66	0	0.3
CO ₂	196,842	772	0.4

Notes: All figures rounded to nearest tonne, Source: Mott MacDonald

H.1.2 Proposal 24

Table I.3 presents the calculated baseline emissions based on the existing number of licenced PHVs, their age, fuel type and estimated distance travelled per year.

Table H.3: Calculated baseline emissions

Pollutant	Baseline Emissions Tonnes / Year
NOx	727
PM10	66
CO2	169,614

Notes: All figures rounded to nearest tonne, Source: Mott MacDonald

Table I.4 presents the calculated savings in emissions assuming a 2% reduction in PHV kilometres travelled across the existing PHV fleet

Table H.4: Calculated emission savings

Pollutant	Emissions Tonnes / Year	Saving Tonnes / Year	% Saving compared to baseline
NOx	713	14	2
PM10	65	1	2
CO2	197,614	3,952	2

Notes: All figures rounded to nearest tonne, Source: Mott MacDonald

**Private Hire Regulations Review:
Integrated Impact assessment
Consultation
January 2016**

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SUMMARY

Transport for London (TfL) is carrying out a wide-ranging review of private hire regulations. Detailed proposals were published for consultation in September 2015 and that aspect of the consultation closed on 23 December. On 20 January 2016 we gave a preliminary indication of which proposals we intend to progress. However, decisions on which proposals to be implemented, if any, will be taken by the TfL Board in March.

As part of the consultation process, Mott MacDonald, an independent consultancy, has assessed the impacts of the original proposals and we are now publishing this assessment and inviting any further comments.

The consultation will close on 24 February 2016 and responses will be taken into account before any final decisions are taken.

INTRODUCTION

Transport for London (TfL) is a statutory body established by the Greater London Authority Act 1999 and is the licensing authority for London's taxi and private hire industries. It is the largest licensing authority in the country, being responsible for licensing over a third of all taxis and private hire vehicles (PHVs) in England and Wales.

Private hire operators, drivers and vehicles licensed by TfL provide a range of vital services as part of London's transport system which include minicab, chauffer/ executive and specialist accessible vehicle services.

London has a large and vibrant private hire sector, which has existed since the 1960s to cater for a wide range of journeys. The private hire industry has been regulated by primary legislation since the early 2000s, to ensure improved public safety. In recent years, new technology has emerged and app-based platforms now offer near instantaneous private hire bookings at the touch of a button. This has triggered a rapid growth in the sector and now there are more than 95,000 private hire drivers, 75,000 private hire vehicles and almost 3,000 private hire operators in London.

Given the scale of change and fact that regulations have not been comprehensively updated in almost two decades, TfL is seeking to bring the regulations up to date and has undertaken an extensive consultation exercise to support this. During summer 2015, TfL held broad discussions with the industry to determine an initial set of 25 proposals. We consulted on these between September and December 2015 and received a huge response from the public, the taxi and private hire industry and other stakeholders.

Following a competitive tender process carried out between September and November 2015, we commissioned Mott MacDonald to conduct an Integrated Impact Assessment (IIA) to understand the health, equality, environmental and business and economic impacts of each of the proposals. The IIA is the subject of this part of the consultation process.

PURPOSE OF THE CONSULTATION

The purpose of this part of the consultation is to understand the views of the private hire industry, users of private hire services and other interested parties in relation to the impacts of the proposals set out in our private hire regulations review consultation that was published in September 2015. These impacts are assessed in the IIA report prepared by Mott MacDonald.

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. An IIA of the proposals is required in order to have a comprehensive understanding of the impacts on both the industry and passengers. This IIA report considers the potential health, equality, environmental and business and economic impacts that may arise as a result of the proposed changes to private hire regulations put forward by TfL.

Consultees are invited to comment on any aspect of the impacts and are invited to provide evidence relevant to the impacts that are identified in the report produced by Mott MacDonald.

The IIA produced by Mott MacDonald is published as an Annex to this document and is available online at consultations.tfl.gov.uk/tph/private-hire-proposals-iiia.

PRIVATE HIRE REGULATIONS REVIEW

TfL's consultation on the private hire regulations review attracted almost 16,000 individual responses as well as substantial campaign activity.

As part of the consultation TfL also carried out extensive engagement with users of private hire services including:

- An online survey via the GLA Talk London website which received over 800 responses
- An online survey via research by Future Thinking where over 2,500 responses were received
- Telephone interviews with 100 customers
- Nine customer focus groups to discuss the proposals in detail and understand customer views and reactions to specific proposals

Following a review of responses to the public consultation so far and the results from the customer research conducted, TfL has set out which proposals it proposes to recommend to the TfL Board that will modernise the Capital's private hire industry.

Subject to the outcome of this consultation, TfL proposes to amend some of the proposals from those originally proposed as a result of the issues identified so far throughout the consultation process.

Consultees now have the opportunity to comment on the impacts of the original proposals, and those that we are considering inviting the TfL Board to implement in amended form.

The responses to this consultation will be taken into account by the TfL Board before decisions are taken.

The proposed measures, listed below, which it is proposed will be put to the TfL Board for approval in March, would enhance standards of safety in light of the impact of new technology and the rising numbers of private hire vehicles in London.

A summary of the original proposals, summary findings from the September consultation, the findings from Mott MacDonald's Integrated Impact Assessment and the latest proposals which were announced on 20 January 2016 are listed below.

PROPOSALS

PART 1: PRIVATE HIRE OPERATORS

1. Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking

Original proposal

We proposed that the information to be provided would be the vehicle registration number and the name and photograph of the driver. Clearly the method by which the operator provides this information is dependent on the means by which the customer can receive it. For example, if the customer is using a mobile phone without smartphone technology then it would not be possible to send the driver photograph. However, the proposal is that operators must ensure they provide all passengers with sufficient detail about the driver that is undertaking the booking and the vehicle that will be used.

Summary of consultation responses

The proposal received widespread support across the industry and particularly strong support from customers and customer groups.

Summary of Mott MacDonald Integrated Impact Assessment findings

This has been assessed as a moderate beneficial impact to passengers for health and equality, improving passenger perceptions of safety and reducing the risk of using unlicensed vehicles, delivering long term benefits by a range of different equality groups.

The scale of the business and economic impact to PHV operators will be felt differently across the market with a minor adverse impact to operators offering digital bookings and a moderate adverse impact to operators offering phone or office based bookings.

Latest position (announced on 20 January 2016)

We intend to proceed with this proposal for operators to provide this information to customers who are able to receive it.

TfL will work with the trade to explore more detailed implementation and any phasing required to take into account current technology available to smaller operators.

Having these details would reduce the risk of a passenger getting into the wrong vehicle, possibly with an unlicensed driver, and will help to deter illegal touting or plying for hire. It allows for very simple, but effective, safety messages to the public so they look out for this booking confirmation, and check the details, before entering the vehicle. Many operators have the facility to do this already, but this change would make it compulsory for all operators.

2. Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing

Original proposal

We proposed changes to the PHV Regulations that would require operators to ensure that there is a time interval between a booking being accepted and the commencement of that journey to allow the driver and vehicle information to be communicated to passengers. The proposed specified time interval was five minutes.

Summary of consultation responses

There was strong and widespread opposition to this proposal from customers and the business community, as well as from the main Taxi trade organisation and the Private Hire trade.

Summary of Mott MacDonald Integrated Impact Assessment findings

This has been assessed as a moderate adverse impact to health and equality impacts for passengers and minor adverse impact to drivers. A major adverse impact was assessed for operators offering digital bookings only, whilst this proposal was assessed to have a moderate adverse impact on all remaining operator groups.

Latest position (announced on 20 January 2016)

We do not intend to proceed with this proposal.

3. Operators will be required to seek TfL approval before changing their operating model

Original proposal

We proposed to amend the PHV Regulations to require operators to inform TfL prior to implementing specified changes to their operating model.

Summary of consultation responses

While there was some support for this proposal, business groups and parts of the PHV trade raised concerns as they felt it discouraged innovation and would prevent a better service for Londoners. Amongst those supporting the proposal a number thought that this proposal should be applied in a proportionate way so as to minimise the impact on business.

Summary of Mott MacDonald Integrated Impact Assessment findings

This proposal could result in delays to operators from across the industry seeking to develop their model and respond to passenger demands and has therefore been assessed as having a moderate adverse business and economic impact to PHV operators.

Latest position (announced on 20 January 2016)

We intend to proceed with an amended proposal, requiring operators to inform TfL of changes to their operating model prior to implementation.

This amended proposal will ensure that TfL, as the regulator, will be able to determine whether the new operating model is compliant with Private Hire Legislation in the interests of passenger safety. It will help licenced operators ensure that they remain within the regulatory and legislative framework and within the terms upon which their licence was granted. TfL carry out appropriate checks before licensing an operator and are proposing to carry out the same due diligence ahead of any substantial changes to the way they operate.

This amended proposal will mitigate the impacts identified in the IIA conducted by Mott MacDonald by providing TfL with oversight of any proposed new operating model without causing unnecessary delays to operators who wish to develop their operating model. This will still ensure compliance with legislation.

4. Security for app based booking platforms

Original proposal

To prevent unauthorised use of apps, we proposed to make it a requirement that app based platforms could demonstrate during pre-licensing checks and compliance inspections, appropriate security measures to prevent the app being used by a person other than the licensed driver they are allocating bookings to. We also proposed to require operators to demonstrate what security measures they have in place to protect passengers from fraudulent use of their accounts and/or personal data.

Summary of consultation responses

This proposal was strongly supported by customers and customer groups.

Summary of Mott MacDonald Integrated Impact Assessment findings

The health impact for passengers is assessed as being moderate beneficial with a minor beneficial equality impact on passengers. Business and economic impacts are assessed as moderate adverse to PHV operators offering digital bookings. Mott MacDonald has identified opportunities to mitigate impacts and enhance the impacts of this proposal.

Latest position (announced on 20 January 2016)

We will not seek to make an immediate change, but will work with the trade and technology industry during 2016 to develop any necessary security solutions.

It is important that where a licensed operator uses an app based platform, bookings must only ever be allocated to licensed drivers. TfL will explore options to ensure that where operators use app-based platforms, that these are safe and secure and cannot be fraudulently used.

5. Operator must offer a facility to pre-book up to seven days in advance

Original proposal

We proposed to amend the PHV Regulations to require licensed operators to offer the facility for customers to book a journey up to seven days in advance of that journey.

Summary of consultation responses

The majority of consultation respondents did not support this proposal, with users in particular saying there are numerous Private Hire operators in the market who provide this facility already, so there was no need to make it a mandatory requirement for all operators.

Summary of Mott MacDonald Integrated Impact Assessment findings

The equality impact for passengers has been assessed as minor beneficial as it could make it easier for passengers to plan their journey in advance, this may deliver disproportionate benefits to disabled passengers, particularly given that there are a relatively small number of fully accessible PHVs.

The business and economic impact was identified as major adverse for operators offering digital only bookings as it would require a change to the operating model. A minor adverse impact was also identified for all other operator groups due to loss of market share in offering this service.

Latest position (announced on 20 January 2016)

We do not intend to proceed with this proposal.

6. TfL proposes to no longer issue licenses for in-venue operators or temporary events

Original proposal

We proposed to no longer issue operating licences in respect of in-venue operations and for temporary events.

Summary of consultation responses

This proposal received mixed support with a majority of respondents supporting the proposal including Westminster City Council, which is where a significant number of in-venue operations are located. However there was some opposition from PHV trade and consumer groups. Typically these stakeholders felt that existing arrangements were beneficial to consumers and removing in-venue licenses would increase the likelihood of touting and other illegal activity. There was also concern that these arrangements are necessary as part of local licensing conditions in some areas.

Summary of Mott MacDonald Integrated Impact Assessment findings

This proposal attracted different views from stakeholders on the perceived health impacts for passengers. Some stakeholders considered that an in-venue operating centre can, in itself, attract unbooked vehicles and give rise to illegal plying for hire or touting. However other stakeholders suggested that the cessation of these licences could increase the vulnerability of passengers waiting outside. Given the differences in stakeholder views on personal safety impacts, and the lack of data available, both the health and equality impacts for this proposal have been rated as neutral. Business and economics impacts were rated as moderate adverse due to the potential loss of income for operators in this part of the PHV sector.

Latest position (announced on 20 January 2016)

We intend to proceed with this proposal. Technology and the marketplace have given consumers significant new options to book Private Hire journeys, while at the same time, the concept of in-venue operating centres has led to a number of issues including illegal plying for hire and unauthorised PHV 'ranks' outside popular late night venues.

TfL has already stopped issuing variations to licences where the application is for an in-venue operation, and no further variation applications of this nature will be approved. TfL will, however, explore alternative measures to assist customers in late night temporary venues whilst minimising the potential of plying for hire or touting.

7. Operator must have a fixed landline telephone which must be available for passenger use at all times

Original proposal

We proposed to amend the PHV Regulations to require all licensed private hire operators to have a landline number available at all times so passengers can speak to operator staff for the purposes of customer care, complaints and the booking of private hire journeys. The number of staff managing customer telephone enquiries would be required to be commensurate with the size of the operator and the volume of private hire bookings.

Summary of consultation responses

This proposal was supported by a majority of respondents. Many of those who were supportive sympathised with the importance of customers being able to contact an operator but did not necessarily agree that this should be prescribed as being through a landline. The proposal received mixed views from the PH trade, business groups and consumer organisations. Those opposing suggested that operators should be able to decide the methods by which they interact with customers and that reference to a landline was antiquated.

Summary of Mott MacDonald Integrated Impact Assessment findings

The health and equality impacts for passengers have been assessed as moderate beneficial for passenger safety as it would provide passengers with the ability to contact the operator directly to address concerns 'in real time' rather than relying on less reactive electronic communication. Although aimed primarily at passengers a moderate beneficial health impact for drivers has also been estimated. The business and economic impact on operators has been assessed as major adverse for operators offering digital only bookings and moderate adverse for all other operators.

Latest position (announced on 20 January 2016)

We intend to proceed with an amended proposal, making it clear that the requirement is for a customer to be able to speak to an operator verbally at all times when journeys are being undertaken, rather than specifying a landline per se. The requirement will be mandatory for enquiries or complaints in relation to booked journeys, but it will not be compulsory for operators to have to accept bookings by phone.

The ability to speak to a real person at all times when journeys are being undertaken is an important safety requirement and was supported in the consultation, particularly by groups representing disabled passengers.

This amended proposal will mitigate the impacts identified in the IIA conducted by Mott MacDonald by ensuring passengers can speak to an operator in the event of an enquiry or complaint but without the onerous requirement of mandating operators to accept bookings by phone.

8. Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app

Original proposal

We proposed to amend the PHV Regulations to require operators to ensure that private hire vehicles are not visibly shown to be available for immediate hire, whether physically (e.g. signage or otherwise on the street) or via an app, or other means.

Summary of consultation responses

This proposal was supported by the taxi trade but there was strong and widespread opposition against this proposal from customer groups and PHV operators.

Summary of Mott MacDonald Integrated Impact Assessment findings

The equality impact of this proposal has been rated as minor adverse as the inability to show a vehicle on an app may affect passengers' sense of security. The business and economic impacts have been rated as major adverse for operators offering digital only bookings and minor adverse for operators offering digital and phone/office based bookings.

Latest position (announced on 20 January 2016)

We do not intend to proceed with this proposal. However, it is likely that this concept will be tested in the courts, providing a determination on whether this constitutes plying for hire.

9. Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis

Original proposal

We proposed to require operators to provide TfL with information in such form, content and at such intervals as TfL specifies including details of drivers and vehicles.

Summary of consultation responses

The proposal was universally supported, including by the industry and customers.

Summary of Mott MacDonald Integrated Impact Assessment findings

The health impacts for passengers have been identified as moderate beneficial as this will help to improve passenger safety by making it easier for TfL to check appropriate insurance is in place and to identify and take action against unlicensed drivers. A minor adverse business and economy impact has been identified for PHV operators, particularly those operators with limited electronic record keeping; however impacts are expected to be relatively short term.

Latest position (announced on 20 January 2016)

We intend to proceed with this proposal. We will explore the optimum frequency of electronically uploading this information.

10. Operators must specify the fare prior to the booking being accepted

Original proposal

We proposed to require operators to provide a specified fare prior to the booking being accepted.

Summary of consultation responses

There was strong support for operators providing a specified fare prior to the booking being accepted from both customers and most of the taxi and private hire industries, whilst business groups were strongly opposed.

Summary of Mott MacDonald Integrated Impact Assessment findings

This proposal is likely to improve the transparency of PHV fares which will have particular long term benefits for those on low incomes. As several equality groups are more likely to be in low-income households, this is likely to realise moderate beneficial equality impacts; particularly for disabled groups.

The proposal could result in minor adverse impacts to drivers if implementation of this proposal requires the driver to stop and recalculate the fare.

It could have a moderate adverse impact on digital only bookings as income loss through under-estimation of a fare could be experienced which may require some changes to the operating model. Impacts on those operators offering bookings via the phone are assessed to be minor adverse. There is a risk that operators will build a contingency into the fare charged to passengers in order to minimise the negative income impacts that are identified above; therefore minor adverse economic impacts for passengers have been identified.

Latest position (announced on 20 January 2016)

We intend to amend the proposal to require an estimated fare to be provided prior to the journey commencing. TfL will work with the trade on the detailed implementation, including accuracy required to implement this effectively.

This amended proposal will mitigate the impacts identified in the IIA conducted by Mott MacDonald by ensuring a transparent fare estimate for passengers while also providing flexibility for operators to provide that estimate before the journey commences, thus local traffic conditions can be taken into consideration allowing for a more accurate estimate.

11. Operators must record the main destination for each journey which must be specified at the time the booking is made

Original proposal

We proposed to amend the Operators Regulations to require the operator to record the main destination of private hire journeys which must be specified at the time the booking is made.

Summary of consultation responses

The proposal to record the main destination at the time of the booking being made had strong customer and industry support, with the majority of operators already recording this information.

Summary of Mott MacDonald Integrated Impact Assessment findings

This proposal could improve the safety of all passenger groups as it has the potential to aid the police in tackling crime which could be significant. The health impact has therefore been rated moderate beneficial.

A minor adverse impact has been identified for business and economy impacts for all types of PHV operators; recognising the difficulty in confirming a main destination in every instance of PHV use.

Latest position (announced on 20 January 2016)

We intend to amend the proposal to require the main destination to be recorded by the operator prior to the journey commencing.

Operators already have to record the main destination if specified by the customer at the time of booking, and this proposal will mandate the requirement to take this information prior to the journey commencing. It will ensure a complete record of each journey, thus supporting passenger safety, and would also be an essential requirement to implement proposal 10. Any changes to the booking mid-journey would need to be agreed with the operator and a new destination recorded.

This amended proposal will mitigate the impacts identified in the IIA conducted by Mott MacDonald by capturing the most up to date information regarding the destination up to the point the journey commences.

12. Harmonise retention periods for records

Original proposal

We proposed to harmonise the retention period for records under the Operator Regulations to be 12 months where it is currently six months.

Summary of consultation responses

This proposal received strong support in the consultation, including from customers, and a majority of the industry welcomed the clarification in the record keeping process.

Summary of Mott MacDonald Integrated Impact Assessment findings

This was identified as primarily an administrative change with limited resource requirement and therefore is unlikely to have a disproportionate impact in relation to the four assessment topics.

Latest position (announced on 20 January 2016)

We intend to proceed with this proposal.

Having different retention periods for different records causes confusion to operators and doesn't allow a full compliance check to be done on records older than 6 months. The proposal is that the period for retention of records is made 12 months for all records as opposed to 6 months for some records (e.g. complaints, lost property) and 12 months for others (e.g. driver and vehicle records).

13. Limit on the number of business names attached to each Operator's licence

Original proposal

We proposed a limit of five on the number of business names attached to each Operator's licence.

Summary of consultation responses

There was strong support in the consultation from customers on this proposal, although some alternatives to the five business name limit were proposed which are being considered by TfL, including how operators register their business names and trading names with TfL to avoid facilitating 'passing off' and confusing the public.

Summary of Mott MacDonald Integrated Impact Assessment findings

This proposal is likely to impact some operator groups more than others however it has the potential to have some short term negative consequences for some larger operators which have accrued multiple companies over a long period of time, whilst this proposal may have long term advantages for operators which benefit from fewer competitors with a similar trading name., Engagement highlighted that operators with more than five operating names are not particularly common. The business and economic assessment is therefore rated as neutral.

Latest position (announced on 20 January 2016)

We intend to proceed with this proposal.

Having multiple names, or names similar to other operators, can cause confusion as to who customers are making a booking with. There is evidence of operators applying for names containing geographic areas they do not provide services in, or using personal names of other individuals or names similar to those of other operators.

PART 2: PRIVATE HIRE DRIVERS

14. Specific requirement for an English Language test

Original proposal

We proposed to make regulations that will require drivers to be able to demonstrate they have sufficient knowledge of English language at an intermediate level. The requirement will be applied to all new driver applicants and renewals. In the interim, as part of our review of the topographical test, we will ensure that the test centres are properly assessing the ability of candidates to communicate in English.

Summary of consultation responses

There was strong and near universal support in the consultation from both customers and the industry on this proposal, as it would ensure that drivers are able to converse with passengers to an adequate standard to take direction from them (for example, where to go/park safely on reaching a destination) and especially in the case of an incident (e.g. road traffic accident or passenger emergency).

Summary of Mott MacDonald Integrated Impact Assessment findings

Improved communication between passengers and drivers may help to improve passenger safety and their perception of safety. As such, this proposal is currently considered a minor beneficial health impact. Some equality groups may disproportionately benefit from improved communication and therefore there have been some minor beneficial equality impacts assessed for passengers.

The introduction of this proposal will affect drivers wishing to enter the trade or renew their licence. This could be significant for those already working in the trade as it could result in reduced income if they do not pass, whilst it could act as a barrier to new drivers. As such the equality impact of this proposal for drivers is assessed as major adverse. Due to the potential impacts on driver income and driver supply, business and economic impacts have been assessed as moderately adverse for both drivers and operators.

Latest position (announced on 20 January 2016)

We intend to proceed with this proposal. TfL is considering progressing with English level B1 (intermediate) as a standard of English required by the Home Office for immigration purposes.

15. Drivers to only work for one operator at a time

Original proposal

We proposed to make it a requirement that a PHV driver must be registered to a licensed operator and may only be registered to a single operator at any time.

Summary of consultation responses

Whilst there was general recognition in the consultation that the issue of excessive drivers' hours is one that needs to be addressed, there was mixed support to tackle it in this way.

Summary of Mott MacDonald Integrated Impact Assessment findings

A moderate beneficial health impact has been identified for both passengers and drivers with this proposal. However engagement as part of this IIA process has indicated that driving for more than one operator is becoming more and more commonplace, especially given the developments in technology.

Larger operators with higher profile, larger coverage and increased flexibility may benefit from this proposal as engagement highlighted these characteristics appeal to drivers. As a result, locally focused PHV operators with a smaller geographical coverage could be at significant risk of losing drivers as a result of this proposal. This proposal is considered to have a moderate adverse overall business and economic impact on operators. It is considered that many drivers will be affected by this proposal; it will affect the ability to work and provide services as they do at present and could also have significant effects on their income. For PHV drivers this proposal is assumed to have a major adverse impact.

Latest position (announced on 20 January 2016)

We do not intend to proceed with this proposal. The purpose of this proposal was to address concerns around drivers working excessive hours by working for multiple operators; as many are self employed and not subject to the EU working time directive.

TfL will now work with the DfT to consider how else to tackle the issue of excessive working hours.

16. Driver and Operator licence applicants to provide National Insurance numbers and share with Department for Work and Pensions (DWP)

Original proposal

We proposed an application requirement to provide a National Insurance number for private hire driver and operator licences (where the operator is an individual).

Summary of consultation responses

This proposal received strong customer support and widespread support across the industry and from HMRC.

Summary of Mott MacDonald Integrated Impact Assessment findings

This was identified as primarily an administrative change with limited resource requirement and therefore is unlikely to have any disproportionate impacts in relation to the four assessment topics.

Latest position (announced on 20 January 2016)

We intend to proceed with this proposal.

While a National Insurance number is not proof of identity, it does provide an additional safeguard to other identity checks. Furthermore, the information would be of use to the DWP in certain circumstances with their investigations. This will enable appropriate and proportionate data sharing with other government departments to ensure drivers and operators aren't making fraudulent claims for benefits or not declaring income to HMRC.

17. Vehicle licence to be revoked if driver licence revoked

Original proposal

Where a licensed driver has their driver's licence revoked, and that driver is the owner of a licensed vehicle, then we propose to also revoke the vehicle licence.

Summary of consultation responses

This proposal received strong support from customers and most of the industry.

Summary of Mott MacDonald Integrated Impact Assessment findings

This is likely to have positive health and safety impacts as it offers an additional safeguard to passengers and is therefore assessed as having a minor beneficial impact.

The business and economy impacts are assessed as minor adverse as it could negatively impact drivers who share vehicles.

Latest position (announced on 20 January 2016)

We intend to proceed with this proposal.

To be clear, this does not mean that a vehicle licence would be automatically revoked if a driver licence is revoked. However, it gives TfL the power to do so under specific circumstances; for example, if there is a concern that a vehicle could be used for hire and reward by somebody without a PHV driver licence. Where a driver is renting a vehicle or using a vehicle belonging to an operator this would not apply. TfL will explore whether (under data protection laws) on line advice regarding driver licence suspensions and revocations (see proposal 9) could be introduced to ensure that a company that rents/leases vehicles will be made aware that one of their drivers is no longer a licensed driver.

18. Checks on convictions of operator staff

Original proposal

We proposed to seek to add operator staff to the DBS list and amend the Regulations accordingly. As an interim measure we proposed to require operators to ask any person working for them to provide a basic disclosure as part of the application process.

Summary of consultation responses

This proposal received strong customer support and widespread support across the industry, but it was also noted that it should be delivered in a proportionate and practical way, and we will work with the trade on implementation plans.

Summary of Mott MacDonald Integrated Impact Assessment findings

Thorough checks on operator staff are expected to deliver additional benefits through improved personal safety for passengers, reducing the risk of emotional and/or physical harm. Therefore the health and equality impacts of this proposal are rated as minor beneficial. Due to the high level of churn for operator staff, and this proposal poses a potential administrative burden and therefore business and economic impacts are estimated to be minor adverse.

Latest position (announced on 20 January 2016)

We intend to proceed with this proposal.

This would only apply to operator staff who have face-to-face contact with the public e.g. at minicab offices. Given the regular interaction with the public and access to personal information that such staff have access to, this will help to increase public safety.

19. TfL stop accepting payment by PO and cheque

Original proposal

From 1 April 2016 we propose to no longer accept cheques or postal orders as payment for licence fees for PHV drivers, operators and vehicles.

Summary of consultation responses

This proposal received widespread support across the industry. Less than 1 per cent of licensing transactions to TfL are paid by cheque or postal order.

Summary of Mott MacDonald Integrated Impact Assessment findings

This was identified as primarily an administrative change with limited resource requirement and therefore is unlikely to have a disproportionate impact in relation to the four assessment topics.

Latest position (announced on 20 January 2016)

We intend to proceed with this proposal.

PART 3: PRIVATE HIRE INSURANCE

20. Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence

Original proposal

We proposed to check Hire and Reward insurance at the point of vehicle licensing and insurance will be required to remain in place for the duration of the licence. No licence can be issued without evidence that the appropriate insurance is in place.

Summary of consultation responses

The original proposal received strong customer and stakeholder support during the consultation.

Summary of Mott MacDonald Integrated Impact Assessment findings

This proposal is presently considered to be minor beneficial in terms of the health impact for passengers due to the protection provided by insurance. The business and economics impact was rated as major adverse for drivers who own their own vehicle due to the potentially significant additional costs of insuring their vehicle on an annual basis. A minor adverse impact was also identified for operators who own their vehicles and do not have fleet insurance.

Latest position (announced on 20 January 2016)

We intend to proceed with a variation of this proposal requiring Hire & Reward (H&R) insurance to be in place at all times whilst a vehicle is registered to an operator. For this proposal to be enforceable, it would need to operate in conjunction with proposal 9, which requires operators to regularly provide details of those vehicles that are registered to their operating platforms so that TfL can check these against the Motor Insurers' Bureau database.

Seasonal variations in customer demand means that some Private Hire vehicles are often taken out of operation during quieter times, and it would be punitive to expect drivers to pay H&R insurance premiums when their vehicles are not being used for these purposes.

This amended proposal will mitigate the impacts identified in the IIA conducted by Mott MacDonald. Amending the proposal to ensure that H&R insurance is in place at all times while a vehicle is registered to an operator would address this concern by allowing vehicles to be 'de-registered' from operators' booking platforms during periods when they are not being used for H&R purposes. This would prevent them being allocated jobs from their operator during those periods they are de-registered, while ensuring that appropriate insurance is in place when they are registered with an operator to accept bookings.

21. Drivers to carry or display a copy of insurance details at all times

Original proposal

We proposed to amend the Drivers Regulations to the effect that private hire drivers must carry a copy of their insurance documents at all times.

Summary of consultation responses

This proposal was strongly supported in the consultation although some sections of the private hire trade opposed it.

Summary of Mott MacDonald Integrated Impact Assessment findings

This was identified as primarily an administrative change with limited resource requirement and therefore is unlikely to have a disproportionate impact in relation to the four assessment topics.

Latest position (announced on 20 January 2016)

We intend to proceed with this proposal.

This proposal harmonises the requirements with those in the Taxi trade. Drivers will be required to carry or display a copy of their hire and reward insurance in the vehicles. It will reduce delays to passengers during real-time roadside checks of insurance and provide increased confidence/safety for customers that their vehicle is properly insured.

22. Hire and Reward fleet insurance in place by operators

Original proposal

We proposed that operators should be required to have Hire and Reward fleet insurance.

Summary of consultation responses

This proposal was supported by a majority of respondents, although some preferred the alternative insurance related proposals. There were mixed views from PH trade stakeholders: those supporting the proposal felt that it would strengthen the responsibility of operators to ensure that vehicles were properly insured; those opposing argued that fleet insurance was unnecessary if the driver was properly insured, and it would represent a significant financial burden, particularly for smaller operators, which would be passed on to consumers.

Summary of Mott MacDonald Integrated Impact Assessment findings

This is considered to be a minor beneficial health impact to passengers as the introduction of the proposal is designed to help ensure passengers are not transported without adequate insurance. However, without any data on the extent to which vehicles are being used without appropriate insurance, it can only be assigned a minor beneficial rating. . As the proposal would potentially affect all operators which don't currently have fleet insurance and have a long term impact with annual fees, it has been assigned major adverse business and economic impact.

Latest position (announced on 20 January 2016)

We do not intend to proceed with this proposal at this time. However, there is broad agreement across the industry that there is an issue with indemnification in the event that a driver, intentionally or not, does not have the appropriate insurance in place. TfL will work with the trade to explore this in more detail and will seek to come forward with a new proposal in due course.

PART 4: PRIVATE HIRE LICENSING

23. Operator licence type

Original proposal

We proposed to review the current operator licence type and look to introduce additional category/categories.

We currently issue two types of private hire operator licence: Small (less than two private hire vehicles available) and Standard (more than two private hire vehicles available). The current costs for these licence types are as follows:

	Small	Standard
Licence application fee (non-refundable)	£838	£838
Grant of licence fee (five-year licence)	£650	£1988
Total	£1488	£2826

A key element in both taxi and private hire licensing is that the licence fees can only be used to cover the costs of the licensing, compliance and enforcement functions, and cannot be used to fund other TfL activities.

Summary of consultation responses

This proposal was supported by a majority of respondents. Those who did not agree felt that this ultimately would increase costs to customers and, in any case, licensing costs should be reduced/minimised. It was also suggested that costs related to audit and enforcement should be funded through driver licences.

Summary of Mott MacDonald Integrated Impact Assessment findings

This proposal is considered to have a neutral environmental impact but will affect all operators with more than 1,000 licensed vehicles. As the proposal doesn't contain details of what a new licence fee might be it is difficult to reach a final conclusion on this impact on operators. This has therefore been rated a cautionary minor adverse business and economic impact.

Latest position (announced on 20 January 2016)

We intend to proceed with this proposal. The specific revisions to the licence fee structure will be consulted on separately.

At the moment, an operator with a very small number of vehicles pays the same licence fee as an operator with thousands of vehicles. This does not reflect the regulatory costs to TfL and the revised structure will be adjusted to reflect this. This will mean that the very small operators would pay less than they do at the moment, and largest operators would pay considerably more than they do now to appropriately reflect the costs of licensing, enforcement and compliance.

24. Controls on ridesharing in licensed vehicles

Original proposal

We proposed to explore measures to ensure that private hire vehicles cannot be used for ride sharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers.

Summary of consultation responses

The consultation and customer responses generally supported the principle to explore proposals to promote passenger safety.

Summary of Mott MacDonald Integrated Impact Assessment findings

A number of health and safety risks have been identified in relation to ridesharing so controls on this practice could therefore lead to improved passenger safety. This is assessed to have a minor beneficial health impact for passengers and drivers.

The original travel patterns of those using ridesharing prior to using this service are unclear, and therefore it is difficult to estimate whether the modal shift to ridesharing would be from other PHV / taxi / private car trips or from public transport trips. The environmental impact of this proposal is therefore considered neutral. The potential of this proposal to result in imposed controls which could lead to disruptions on ridesharing means that digital only operators may experience a minor adverse business and economic impact. Business and economic impacts to remaining PHV operators has been assessed as a neutral impact due to lack of historical data on current levels of informal ridesharing.

Latest position (announced on 20 January 2016)

We will work with the DfT to develop guidance for ridesharing.

Ridesharing is a big emerging market and there is lots of innovation from both existing players and new entrants. It is important that TfL as the regulator supports this. The purpose of the new guidance would be to reinforce the overall support for ridesharing; signpost new and existing operators to the right people to discuss business models; and give guidelines around the regulatory parameters for ridesharing (and how to differentiate between car-pooling and ride sharing for hire and reward).

25. Amendment of advertising regulation to include “in” vehicle

Original proposal

We proposed a small change to Regulation 8 of the Vehicle Regulations to clarify that advertising displayed “from” as well as “on” a vehicle is subject to the controls set out in that Regulation.

Summary of consultation responses

A majority of respondents supported this proposal although many felt it needed more explanation and/or rationale for why the change was being proposed. Respondents not supporting this proposal either felt it was unnecessary/over-regulatory, or they didn't believe there was enough detail to offer support.

Summary of Mott MacDonald Integrated Impact Assessment findings

This was identified as primarily an administrative change with limited resource requirement and therefore is unlikely to have a disproportionate impact in relation to the four assessment topics.

Latest position (announced on 20 January 2016)

We intend to proceed with this proposal.

Additional items

In addition, we will investigate the impact and feasibility of removing the Congestion Charge exemption for private hire vehicles in central London to tackle pollution and reduce congestion, given it is estimated that 1 in 10 vehicles entering the zone is now a private hire vehicle and the number of private hire vehicles circulating within the central London Congestion Charge zone has increased by over 50 per cent in the last two years.

Linked to the above, the Mayor has secured a commitment from the Government to progress separate legislation to enable TfL to regulate pedicabs, helping to tackle fare abuses prevalent among some pedicab drivers, whilst tackling the congestion they cause in central London, particularly in the evenings.

We will also, subject to approval by the TfL Board, alter the structure of licence fees paid by operators of different sizes to better reflect the costs of compliance and enforcement activity. This would provide further financial incentive for operators to maximise the efficiency of their operations and minimise the number of vehicles they use across London as a whole.

INTEGRATED IMPACT ASSESSMENT

The full IIA report is published as an Annex to this document and is available online at consultations.tfl.gov.uk/tph/private-hire-proposals-ia.

A summary of the impacts of each proposal against the four categories above and the proposed mitigations is also available from this web site.

HAVE YOUR SAY

We would like your answers to the following questions:

Health impacts and mitigations

- 1) Please provide any comments or evidence you have on the potential health impacts of implementing the proposals.
- 2) Will the proposed mitigations address these health impacts? If not, what other mitigations do you suggest?

Equalities impacts and mitigations

- 3) Please provide any comments or evidence you have on the potential equalities impacts of implementing the proposals.
- 4) Will the proposed mitigations address these equalities impacts? If not, what other mitigations do you suggest?

Environmental impacts and mitigations

- 5) Please provide any comments or evidence you have on the potential environmental impacts of implementing the proposals.
- 6) Will the proposed mitigations address these environmental impacts? If not, what other mitigations do you suggest?

Business and economic impacts and mitigations

- 7) Please provide any comments or evidence you have on the potential business and economic impacts of implementing the proposals.
- 8) Will the proposed mitigations address these business and economic impacts? If not, what other mitigations do you suggest?

Other impacts and mitigations

- 9) Please provide any comments or evidence you have on other potential impacts of implementing the proposals.

Revised proposals

- 10) We are inviting comments or evidence you have on the potential health, equality, environmental, business and economic impacts of the latest proposals.

HOW TO RESPOND TO THIS CONSULTATION

This consultation document seeks views on the Integrated Impact assessment (IIA) prepared for TfL by Mott McDonald, considering the impacts of the proposals for changes to private hire regulations. Consultation on those proposals took place between 29 September and 23 December 2015. Respondents are invited to comment on the Impact Assessment and to provide evidence to support their comments. We are publishing this document with the IIA online at

consultations.tfl.gov.uk/tph/private-hire-proposals-ia

and are sending a notice initially to the organisations and individuals listed in Appendix A. Comments from other interested organisations or individuals are also welcome. You are invited to pass this link or document on to anybody else that you think should see it. We welcome suggestions as to other organisations that should be aware of this consultation

Please let us know your views on these proposals by visiting our consultation website at consultations.tfl.gov.uk/tph/private-hire-proposals-ia. Responses must be received by 24 February 2016.

You can also contact us by emailing consultations@tfl.gov.uk, stating 'Private Hire Proposals IIA' in the subject line. Please state your views on the questions set out above. The online survey includes questions to help us classify respondents by connection with the private hire or taxi trade and equalities classifications, and it will be helpful if you include this information with any response. If you are responding on behalf of an organisation, please provide background information about your organisation, the people that you represent and your role in the organisation.

The Freedom of Information Act 2000 requires public authorities to disclose information they hold if it is requested. This includes information contained in responses to public consultations. If you ask for your response to be kept confidential this will only be possible if it is consistent with TfL's obligations under the Freedom of Information Act and if certain grounds for confidentiality under the Act apply.

Further copies of the consultation document and other materials can be obtained via the TfL consultation website shown above.

Enquiries about the contents of this consultation document may be made by email to consultations@tfl.gov.uk.

Alternatively, you can contact us by post at:

Private Hire Proposals IIA
FREEPOST TFL CONSULTATIONS

APPENDIX A - INITIAL CONSULTATION LIST

Consultees are welcome 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
- Driver Guides Association
- British Bangladesh Minicab Drivers Association

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
- 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 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
- Transport for All
- Visit London (London & Partners)



Private Hire Regulations
Review – Integrated
Impact Assessment
Consultation Analysis

Transport for London

Report

Our ref: 22938401

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Executive Summary

Overview

Transport for London (TfL) is the licensing authority and regulatory body for London's taxi and private hire industries. It is the largest licensing authority in the country, being responsible for licensing approximately one third of all taxis and private hire vehicles in England.

Due to a number of developments within the private hire industry, including advances in technology and changes to how people engage and share private hire services, TfL are reviewing the current regulations that govern the licensing of private hire operators, drivers and vehicles.

An initial consultation, conducted in March 2015, aimed to get a better picture of views about these proposals, and to invite other suggestions. Following that consultation, TfL developed detailed proposals for changes to regulations and published these for a further consultation in September 2015. As part of the consultation process, an independent consultancy, Mott MacDonald, completed an integrated impact assessment of the original proposals. TfL published this assessment in January 2016 and invited comments. This report provides a summary of the responses received, both from stakeholders and individual respondents.

Overall consultation findings

In total, there were 68 responses to the consultation, including 19 stakeholder responses, received via both the online portal and email.

Of the respondents who specified their connection with the private hire or taxi trade, roughly a third were stakeholders, 18% were connected with the taxi trade (taxi drivers) and 10% were connected with the private hire industry (private hire drivers). A further 10% of responses were from the general public.

A summary of the number of respondents discussing the impacts and mitigations of the consultation's 25 proposals is shown in Table 1.1.

Table 1.1: Number of respondents discussing impacts/mitigations of each proposal

Proposal Number	Detail	Stakeholders	Individual respondents
1	Operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking.	10	-
2	Operators must provide booking confirmation details to the passenger at least five minutes prior to the journey commencing.	4	-
3	Operators will be required to seek TfL approval before changing their operating model.	8	-
4	Security of app-based booking platforms.	6	-
5	Operator must offer a facility to pre-book up to seven days in advance.	5	-
6	TfL proposes to no longer issue licenses for in-venue operators or temporary events.	6	-
7	Operator must have a fixed landline telephone which must be available for passenger use at all times.	11	-

Proposal Number	Detail	Stakeholders	Individual respondents
8	Operators must not show vehicles being available for immediate hire, either visibly or virtually via an app.	6	-
9	Operators will be required to provide specified information including details of all drivers and vehicles to TfL on a regular basis.	11	-
10	Operators must specify the fare prior to the booking being accepted.	9	-
11	Operators must record the main destination for each journey which must be specified at the time the booking is made.	7	-
12	Harmonise the retention period for records to be 12 months where it is currently 6.	5	-
13	Limit the number of business names attached to each Operator's licence to five.	4	-
14	Specific requirement for drivers to be able to demonstrate they have sufficient knowledge of English language at an intermediate level.	5	-
15	A private hire vehicle driver must be registered to a licensed operator and may only be registered to a single operator at any time.	8	-
16	Driver and Operator licence applicants to provide National Insurance numbers and share with Department for Work and Pensions (DWP).	9	-
17	Vehicle licence to be revoked if driver licence revoked.	6	-
18	Checks on convictions of operator staff.	6	-
19	TfL to stop accepting payment by PO and cheque.	5	-
20	Hire and Reward insurance to be checked at point of licensing and must be in place for duration of vehicle licence.	7	1
21	Drivers to carry or display a copy of insurance details at all times.	9	-
22	Hire and Reward fleet insurance in place by operators.	10	-
23	Operator licence type.	10	-
24	Controls on ridesharing in licensed vehicles.	11	1
25	Amendment of advertising regulation to include "in" vehicle.	5	-
Additional issues raised	Including removing the Congestion Charge exemption for private hire vehicles	9	4

1 Introduction

Background

- 1.1 Transport for London (TfL) is a statutory body established by the Greater London Authority Act 1999 and is the licensing authority and regulatory body for London's taxi and private hire industries. It is the largest licensing authority in the country, being responsible for licensing approximately one third of all taxis and private hire vehicles (PHVs) in England. As of January 2016, TfL licensed and regulated over 2,900 private hire operators, 75,000 private hire vehicles and 95,000 private hire drivers.
- 1.2 The Private Hire Vehicles (London) Act 1998 (1998 Act), the primary legislation governing private hire services in London, provided for the introduction of 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.
- 1.3 TfL is 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.
- 1.4 TfL has identified a number of proposals for changes to these regulations through internal review and engagement with stakeholders. An initial consultation, conducted between March and June 2015, aimed to get a better picture of views about these proposals, and to invite other suggestions.
- 1.5 Following that consultation, TfL developed detailed proposals for changes to regulations and published these for the second part of the consultation between September and December 2015. TfL also announced some measures that it had introduced to improve enforcement and raise standards in the private hire trade.
- 1.6 On 20 January 2016, TfL gave a preliminary indication of which proposals they intended to progress. However, decisions on which proposals to be implemented, if any, will be taken by the TfL Board in March 2016.
- 1.7 As part of the consultation process, an independent consultancy, Mott MacDonald, commissioned by TfL, completed an Integrated Impact Assessment (IIA) to understand the health, equality, environmental and business and economic impacts of the 25 proposals set out in the September consultation document. Comments were invited on the identified impacts for each of the proposals and consultees could also comment on impacts they felt hadn't been identified.
- 1.8 TfL commissioned Steer Davis Gleave (SDG) to analyse and report on the responses to the IIA consultation. The findings from the IIA consultation responses are detailed in this report.

2 Methodology

The Consultation

- 2.1 The consultation ran from 28 January to 24 February 2016. It was designed to enable TfL to understand the views of private hire customers, trade members and others in relation to the Integrated Impact Assessment (IIA) that Mott MacDonald had prepared on the proposed changes to regulations governing private hire activity. This is part of a review that TfL 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 IIA and the proposed regulations;
- To help TfL identify any omissions or errors in the IIA
- To give respondents opportunity to present evidence relating to the impacts of the proposals, and
- To allow respondents to comment on other matters relating to the impacts of the proposed changes to regulations.

Who was consulted

- 2.2 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.
- 2.3 Individuals and organisations were invited to pass the details on to other organisations.

Consultation material, distribution and publicity

- 2.4 TfL produced a consultation document which:
- Set out the background to the regulations and the development of licensed private hire in London;
 - Discussed each proposal with a statement of the original proposal, the preliminary summary of responses to the September-December consultation, a summary of the findings of the IIA and TfL's intention regarding the proposal (as announced on 20 January);
 - Sought respondents' views or evidence relating to the health, equalities, environmental and business impacts, and any suggested mitigations of adverse impacts;
 - Invited respondents to suggest any other impacts or possible mitigations not covered in the IIA; and

- Invited respondents to comment on the impacts of the amended proposals as set out in TfL’s announcement on 20 January 2016¹.

- 2.5 This was published on the TfL consultation website in the form of a structured questionnaire, together with the IIA. It was also available as a downloadable file in PDF format.
- 2.6 An email was sent to stakeholders informing them of the consultation, highlighting key issues being discussed, and including a link to the consultation web site. This information was also promoted on the TfL Taxi and Private Hire (TPH) Twitter feed (@TfLTPH), an email distribution list, including around 60,000 licensed drivers, and circulated to trade press contacts.
- 2.7 TfL invited people to respond by completing the questionnaire online through their 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.
- 2.8 The consultation asked 10 questions about the impacts and mitigations under six headings.
- 2.9 In addition, questions were asked in order to identify and classify respondents including name; email address; organisation (if any); any role in the taxi or private hire trade; how they heard about the consultation; and questions for equalities classifications².

Analysis of Consultation Responses

- 2.10 Chapter 4 of this report includes analysis of the 68 responses to the consultation, including 19 stakeholder responses, received via both the online portal and email.
- 2.11 Stakeholder and individual responses were read, allocated to a proposal (if appropriate) and categorised according to the impacts and mitigations that they referred to. Other comments relating to the proposals were also captured. A summary of all responses, split according to proposal, is provided in Chapter 4.

¹ Available online at <https://tfl.gov.uk/info-for/media/press-releases/2016/january/tfl-sets-out-plans-to-modernise-and-enhance-london-s-private-hire-indust>

² The identification and classification questions were not included in the pdf version of the document, which was available to download.

3 Profile of Respondents

Connection with the Private Hire or Taxi Trade

3.1 This chapter describes the profile of the respondents to the consultation. TfL asked respondents how they were connected to the private hire or taxi trade, with the following options:

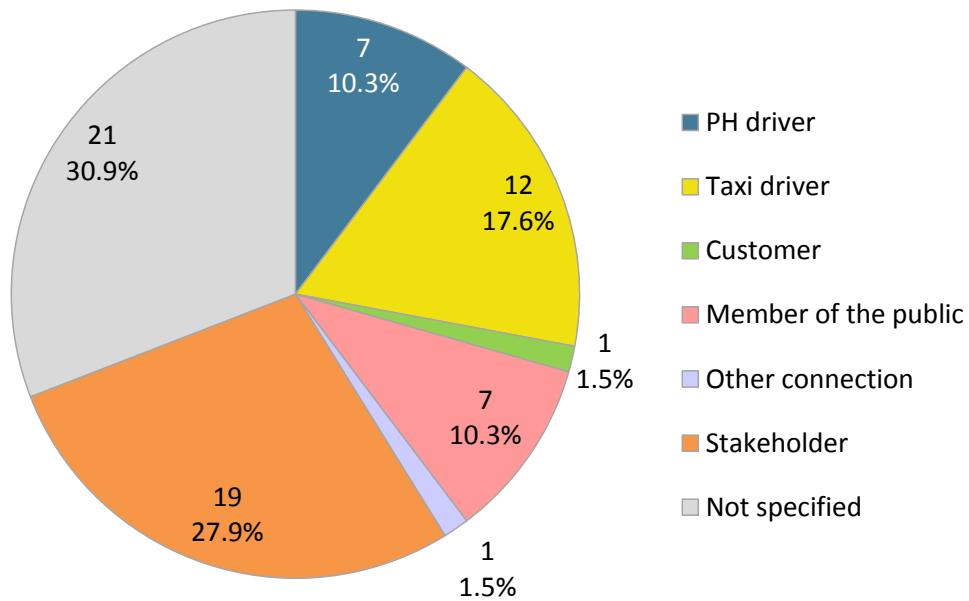
- Private hire operator;
- Private hire driver;
- Private hire vehicle owner;
- Taxi driver;
- Taxi owner;
- Customer;
- Member of the public; and
- Other connection with the taxi or private hire trade³.

3.2 Although this question allowed respondents to specify whether they were connected to the private hire or taxi trade, it was not compulsory and respondents were able to select more than one option. We therefore used information provided in an accompanying open text box to allocate respondents to either one of the eight types listed above, or to the category stakeholder. This process is described in more detail in [Appendix A](#).

3.3 Figure 3.1 shows the proportion of respondents by type. The highest proportion of respondents were stakeholders (28%), followed by taxi drivers (18%). It was not possible to identify the respondent type of 31% of respondents.

³ This category included individuals with a close personal connection to someone who works in the taxi trade or private hire industry, for example the spouse of a taxi driver.

Figure 3.1: Respondent type



Sample size: 68

3.4 Table 3.1 below sets out the number of respondents in each respondent type.

Table 3.1: Respondents answering consultation questions

Respondent Type	Number of respondents	Share of respondents
Stakeholder	19	27.9%
Taxi driver	12	17.6%
Member of the public	7	10.3%
PH driver	7	10.3%
Customer	1	1.5%
Other connection	1	1.5%
<i>Not specified</i>	<i>21</i>	<i>30.9%</i>
Total	68	100.0%

Demographic and Other Information

Gender

- 3.5 A breakdown of respondents' gender is shown in Table 3.2. The majority of respondents (60%) did not answer this question, including many respondents who submitted a letter or email response, rather than using the consultation portal.

Table 3.2: Respondents' gender

Gender	Total	Proportion
Male	20	29.4%
Female	2	2.9%
Gender neutral	1	1.5%
Prefer not to say	4	5.9%
Not answered	41	60.3%
Total	68	100.0%

Age

- 3.6 A breakdown of respondents' age is shown in Table 3.3. The majority of respondents (63%) did not answer this question, including many respondents who submitted a letter or email response, rather than using the consultation portal.

Table 3.3: Respondents' age

Gender	Total	Proportion
16 - 24	1	1.5%
25 - 34	2	2.9%
35 - 44	6	8.8%
45 - 54	11	16.2%
55 - 64	3	4.4%
65 plus	2	2.9%
Not answered	43	63.2%
Total	68	100.0%

Ethnicity

- 3.7 A breakdown of respondents' ethnicity is shown in Table 3.4. More than half of respondents did not answer the question, including many respondents who submitted a letter or email response, rather than using the consultation portal.

Table 3.4: Respondents' ethnicity

Ethnic Group	Total	Proportion
White	12	17.6%
Black/African/Caribbean	2	2.9%
Mixed/Multiple Ethnic Group	2	2.9%
Asian/Asian British	1	1.5%
Other Ethnic Group	1	1.5%
Prefer not to say	4	5.8%
Not Answered	46	67.6%
Total	68	100.0%

Disability

- 3.8 A breakdown of whether respondents' considered themselves to have a disability is shown in Table 3.5. A quarter of respondents did not consider themselves to have a disability. The majority of respondents (65%) did not answer the question, including many respondents who submitted a letter or email response, rather than using the consultation portal.

Table 3.5: Whether respondents considered themselves to have a disability

Disability	Total	Proportion
Yes	1	1.5%
No	18	26.5%
Prefer not to say	5	7.4%
Not Answered	44	64.7%
Total	68	100.0%

Faith

- 3.9 A breakdown of respondents' faith is shown in Table 3.6. Of those respondents who answered, the largest proportion (9%) stated that they were Christian.

Table 3.6: Respondents' faith

Faith	Total	Proportion
Christian	6	8.8%
No religion	5	7.4%
Muslim	2	2.9%
Other	2	2.9%
Prefer not to say	8	11.8%
Not Answered	45	66.2%
Total	68	100.0%

Sexual Orientation

- 3.10 A breakdown of respondents' sexual orientation is shown in Table 3.7. Of those respondents who answered, the largest proportion (25%) stated that they were heterosexual.

Table 3.7: Respondents' sexual orientation

Sexual Orientation	Total	Proportion
Heterosexual	17	25.0%
Other	2	2.9%
Prefer not to say	5	7.4%
Not Answered	44	64.7%
Total	68	100.0%

How Respondents Heard About the Consultation

- 3.11 Respondents were asked in a closed question how they heard about the consultation. Table 3.8 shows the breakdown of these responses. Roughly a third of respondents heard about the consultation having received an email from TfL.

Table 3.8: How respondents heard about the consultation

Channel	Total	Proportion
Received an email from TfL	21	30.8%
Other	4	5.9%
Saw it on the TfL website	2	2.9%
Social media	2	2.9%
Received a letter from TfL	1	1.5%
Not answered	38	55.9%
Total	68	100.0%

Stakeholder Profiles

- 3.12 A summary of the stakeholder respondents is provided below.

Private hire trade bodies

Licensed Private Hire Car Association

- 3.13 The Licensed Private Hire Car Association (LPHCA) is one of the principal bodies representing private hire operators in London and elsewhere. The Association consulted members and others in the London private hire trade to inform their responses, as well as meetings with TfL and with others.

Private Hire Board

- 3.14 The Private Hire Board (PHB) is another organisation of private hire operators that have also engaged with TfL throughout the review of regulations.

GMB Professional Driver's branch

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

Driver-Guides Association

- 3.16 The Driver-Guides Association (DGA) is the national professional association for qualified Blue Badge tourist guides who undertake tours in their own vehicles.

United Private Hire Drivers

- 3.17 United Private Hire Drivers (UPHD) is a new organisation representing some private hire drivers.

Major or specialised private hire operators and trade suppliers

Uber

- 3.18 Uber started operations in London in 2012 and is now the largest private hire operator in the capital. The customer makes a booking with a smartphone app. 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.

1st Class Executive Travel

- 3.19 1st Class Executive Travel is a chauffeur/executive operator, offering high specification vehicles and additional services such as close protection security or support for events and corporate roadshows.

eConnect

- 3.20 eConnect is a private hire operator in London providing a chauffeur-driven car service using all electric vehicles.

Taxi trade bodies

Licensed Taxi Drivers' Association

- 3.21 The Licensed Taxi Drivers' Association (LTDA) is the largest association of London taxi drivers, with over 10,000 drivers.

London Cab Drivers' Club

- 3.22 The London Cab Drivers' Club (LCDC) is an organisation of taxi drivers.

Unite the Union

- 3.23 Unite is the largest trade union in the UK, with a taxi trade branch representing a number of London taxi drivers.

United Cabbies Group

- 3.24 The United Cabbies Group (UCG) is an association of taxi drivers.

The National Union of Rail, Maritime and Transport Workers

- 3.25 The National Union of Rail, Maritime and Transport Workers (commonly known as the RMT) is a British trade union covering the transport sector and has a taxi trade branch.

AskPOB

- 3.26 AskPOB, a consultancy set up by a London taxi driver, responded with details of a survey the consultancy had conducted among taxi drivers and others.

Statutory bodies

Competition & Markets Authority

- 3.27 The Competition & Markets Authority (CMA) is an independent non-ministerial government department that works to promote competition for the benefit of consumers, with the aim of making markets work well for consumers, businesses and the economy.

London Boroughs: London Councils

- 3.28 We received responses from Westminster City Council (WCC) and the London Borough of Hillingdon (LBH).

Other

Motor Insurers' Bureau

- 3.29 The Motor Insurers' Bureau (MIB), established as a not-for-profit organisation in 1946, is funded through a levy paid by every company providing motor insurance in the UK. The MIB acts as the UK Green Card Bureau and Compensation Body supporting motorists making claims after an accident with a foreign vehicle in the UK and assisting UK victims after an accident in a foreign country. They manage the Motor Insurance Database (MID) which is the only central record of more than 37 million insured vehicles in the UK.

Member of Parliament

- 3.30 We received a response from Justine Greening, MP for Putney, Roehampton and Southfields.

4 Proposals

4.1 This chapter provides detail and analysis of the responses of 19 stakeholders and 49 individual respondents who answered questions asked in the consultation (through Transport for London's online consultation portal or via email).

4.2 The Integrated Impact Assessment was based on the original 25 proposals set out in the autumn consultation. On 20 January 2016 TfL announced its preliminary view based on responses to this consultation. Consultees in this part of the consultation were therefore asked to comment on the identified impacts for the original proposals, and were also being given an opportunity to comment on the revised proposals and any perceived impacts of them.

4.3 The questions asked in the questionnaire were:

Health impacts and mitigations

- Q1. Please provide any comments or evidence you have on the potential health impacts of implementing the proposals.
- Q2. Will the proposed mitigations address these health impacts? If not, what other mitigations do you suggest?

Equalities impacts and mitigations

- Q3. Please provide any comments or evidence you have on the potential equalities impacts of implementing the proposals.
- Q4. Will the proposed mitigations address these equalities impacts? If not, what other mitigations do you suggest?

Environmental impacts and mitigations

- Q5. Please provide any comments or evidence you have on the potential environmental impacts of implementing the proposals.
- Q6. Will the proposed mitigations address these environmental impacts? If not, what other mitigations do you suggest?

Business and economic impacts and mitigations

- Q7. Please provide any comments or evidence you have on the potential business and economic impacts of implementing the proposals.
- Q8. Will the proposed mitigations address these business and economic impacts? If not, what other mitigations do you suggest?

Other impacts and mitigations

- Q9. Please provide any comments or evidence you have on other potential impacts of implementing the proposals.

Revised proposals

- Q10. We are inviting comments or evidence you have on the potential health, equality, environmental, business and economic impacts of the latest proposals.

- 4.4 With a couple of exceptions, individual respondents did not refer to the impacts or mitigations of specific proposals. Their responses are therefore primarily summarised in the 'Other comments' section, starting on page 46. Responses provided by stakeholders, and the few individual respondent exceptions noted above, that were relevant to specific proposals are summarised from page 15 onwards.
- 4.5 Stakeholder and individual responses were read, allocated to a proposal (if appropriate) and categorised according to the impacts and mitigations that they related to. We assigned the summaries of comments to the most appropriate impact group(s), not necessarily the impact group(s) identified by consultees in their submissions. Other comments relating to the proposals were also captured.

Part I: Private Hire Operators

Proposal 1: Booking Confirmation – Driver and Vehicle Details

- 4.7 TfL proposed that operators must provide a booking confirmation to passengers containing the driver photo ID and details of the vehicle being used to discharge the booking, in advance of the journey commencing.
- 4.8 The proposal received widespread support across the industry during the autumn consultation and particularly strong support from customers and customer groups.
- 4.9 On 20 January 2016 TfL announced their intention to proceed with the proposal for operators to provide this information to customers who are able to receive it.
- 4.10 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

- 4.11 The taxi trade stated that private hire operator costs should not be prioritised over passenger safety and therefore that this proposal, with the potential to have at least a moderate beneficial health impact on passengers, should be implemented, regardless of the impact on private hire operators.
- 4.12 UPHD felt that the health impacts on private hire drivers should be explored, in particular relating to drivers' privacy in respect of this proposal. They cited examples of drivers' details being published online by disgruntled passengers. PHB was also concerned that drivers' safety could be compromised by this proposal.

Equalities impacts and mitigations

- 4.13 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

- 4.14 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

- 4.15 Uber was concerned that regulating the way that booking details are provided could inadvertently stifle innovation and competition. To the extent that changes would require operators to incur additional costs to ensure compliance, Uber was concerned that these costs would likely be passed to customers. Uber was not convinced with the argument that smaller operators might benefit from lower licence fees (Proposal 23) which would compensate for the expenditure incurred in the implementation of this proposal.

Other impacts and mitigations

- 4.16 There were no comments regarding other impacts and mitigations.

Other comments

- 4.17 1st Class Executive Travel stated that the specific driver details/photo should not need to be provided when the initial booking confirmation is issued, but rather included in a booking confirmation within a practicable time before the commencement of the service. This is because many chauffeur/executive services are booked weeks ahead of the date of the service and therefore the exact driver is not always known when the initial booking is made.

- 4.18 The DGA took that position that Blue Badge driver-guides should be exempt from this proposal's requirements as not all of them have the facility to send an electronic image to their clients. Similarly, not all clients necessarily have the facility to receive such information.
- 4.19 eConnect queried whether the photo ID referred to in the proposal would be made available from TfL for each driver or whether the operator would be required to obtain a compliant photo from a driver, upload it and pay for the booking and dispatch system to send out the photo ID once the driver had been allocated to a particular job.
- 4.20 The LPHCA felt that photos are likely to be superseded by other technology improvements for proving identity, including those that use secure biometrics.

Proposal 2: Booking Confirmation – Five Minute Interval

- 4.21 TfL proposed changes to the PHV Regulations that would require operators to ensure that there is a time interval between a booking being accepted and the commencement of that journey to allow the driver and vehicle information to be communicated to passengers. The proposed specified time interval was five minutes.
- 4.22 There was strong and widespread opposition to this proposal from customers and the business community, as well as from the main Taxi trade organisation and the Private Hire trade during the autumn consultation.
- 4.23 On 20 January TfL announced its intention not to proceed with this proposal.
- 4.24 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

- 4.25 The LCDC noted that the IIA, whilst identifying safety issues at night, failed to acknowledge that near-immediate private hire encourages passengers onto the street to make their booking but also to wait for the vehicles arrival. They cited passengers 'wave of smartphones' at passing vehicles as a concern and felt this would encourage touting by licensed and unlicensed vehicles.
- 4.26 UPHD suggested that when the proposal was first mooted, it was seen as a preventative measure to mitigate against passengers being hurt while running on to the road to find their car. The IIA didn't consider this and UPHD feels that it should have done so for completeness. They also suggested that the scenario of drivers being able to mitigate against passenger agitation (due to being unable to commence their journey immediately) by contacting their operator is increasingly unrealistic and that operators such as Uber have no driver support in real time and none out of hours.

Equalities impacts and mitigations

- 4.27 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

- 4.28 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

- 4.29 The LCDC stated that whilst the negative impact on private hire operators is justified, the positive impact on the taxi trade is ignored and that the two-tier service is undermined by the

near-immediate services offered by some private hire operators. The LTDA touched on this also, but agreed with the decision not to carry this proposal forward and wondered at what point booking becomes hailing, given “app-based near-immediate communication”. The LCDC also felt that the IIA failed to consider the rationale for a time delay, which was to allow sufficient time for drivers to plan an appropriate route, and therefore the utility to the consumer has been understated as this benefit could possibly outweigh a small increase in waiting time.

Other impacts and mitigations

4.30 There were no comments regarding other impacts and mitigations.

Other comments

4.31 The LCDC suggested that it should not be beyond the regulator to exempt in-person visits to a booking office from the five minute rule, if there was a feeling that this was not a sensible approach.

4.32 UPHD felt that TfL hadn’t assessed business risks adequately and the Impact Assessment was therefore “fatally flawed”. They suggest that implementing such a proposal would see drivers’ earnings decline by 17%.

Proposal 3: Seeking TfL Approval Before Changing Operating Model

4.33 TfL proposed to amend the PHV Regulations to require operators to inform TfL prior to implementing specified changes to their operating model.

4.34 While there was some support for this proposal during the autumn consultation, business groups and parts of the PHV trade raised concerns as they felt it discouraged innovation and would prevent a better service for Londoners. Amongst those supporting the proposal a number thought that this proposal should be applied in a proportionate way so as to minimise the impact on business.

4.35 On 20 January 2016 TfL announced their intention to proceed with an amended proposal, requiring operators to inform TfL of changes to their operating model prior to implementation.

4.36 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

4.37 There were no comments regarding health impacts and mitigations.

Equalities impacts and mitigations

4.38 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

4.39 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

4.40 The CMA, whilst welcoming TfL's decision to amend this proposal to require operators simply to inform TfL of changes to their business models, rather than seek approval of them, remained concerned that this requirement could raise administrative costs, thus placing smaller operators at a competitive disadvantage.

Other impacts and mitigations

4.41 There were no comments regarding other impacts and mitigations.

Revised proposals

4.42 UPHD disagreed with the revised proposal which they perceive as a diluted version of the original proposal. They argue that changes in operators' business models that are not subject to regulatory scrutiny could result in adverse impacts on the rights of drivers. UPHD used the example of a major operator deciding to switch from an owned fleet model to an owner driver model and the economic impact this would have on drivers.

Other comments

4.43 The LCDC commented that the IIA has not considered the impact on the regulator of technological advancements and that, while technology advances are to be welcomed, the purpose of some recent innovation is to circumvent legislation.

4.44 Uber stated that pre-screening of changes to business models is only justifiable when there is a substantial risk of firms unintentionally undermining existing regulation and causing harm in the process. Uber had particular concerns about this proposal's effect on operators ability to innovate quickly to attract customers.

4.45 Uber, 1st Class Executive Travel and the CMA stated that it is unclear what constitutes a 'change in operating model' and this needs further clarification.

4.46 The LPHCA expressed support for the proposal, stating that the regulator needs to know what activities those they regulate are undertaking.

Proposal 4: Security of App Based Booking Platforms

4.47 To prevent unauthorised use of apps, TfL proposed to make it a requirement that app based platforms could demonstrate, during pre-licensing checks and compliance inspections, appropriate security measures to prevent the app being used by a person other than the licensed driver they are allocating bookings to. TfL also proposed to require operators to demonstrate what security measures they have in place to protect passengers from fraudulent use of their accounts and/or personal data.

4.48 This proposal was strongly supported by customers and customer groups during the autumn consultation.

4.49 On 20 January 2016 TfL announced that they will not seek to make an immediate change, but will work with the trade and technology industry during 2016 to develop any necessary security solutions.

4.50 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

4.51 There were no comments regarding health impacts and mitigations.

Equalities impacts and mitigations

4.52 The taxi trade made a general point that proposals should be implemented if there is major or moderate beneficial impact on passengers, regardless of the impact on the operators

themselves. Another felt that implementing this particular proposal would have a major adverse effect on drivers.

Environmental impacts and mitigations

4.53 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

4.54 The LCDC felt that whilst there would be obvious additional costs for operators, they are justified to ensure security.

4.55 UPHD was concerned about allowing operators to collect biometric data given a high profile incident which led to customer credit card details being stolen. They expect that solutions would need to be fully secured before they are rolled out to customers.

Other impacts and mitigations

4.56 There were no comments regarding other impacts and mitigations.

Other comments

4.57 The taxi trade suggested that ruling out a proposal purely because operators will have to change their practices undermines the whole consultation process and that it would go against its purpose which is to improve passenger safety.

4.58 Uber felt the consultation didn't make it clear if there is a gap in the current regulatory framework and if so, what it was. They added that it also didn't acknowledge the progress the introduction of app-based booking and dispatch systems have brought in the area of customer safety.

4.59 UPHD felt that an assessment of the impact on drivers should have been carried out as there would be a risk of biometric data not being held securely.

Proposal 5: Pre-Booking Facility up to 7 Days in Advance

4.60 TfL proposed to amend the PHV Regulations to require licensed operators to offer the facility for customers to book a journey up to seven days in advance of that journey.

4.61 The majority of consultation respondents did not support this proposal during the autumn consultation, with users in particular saying there are numerous Private Hire operators in the market who provide this facility already, so there was no need to make it a mandatory requirement for all operators.

4.62 On 20 January 2016 TfL announced its intention not to proceed with this proposal.

4.63 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

4.64 There were no comments regarding health impacts and mitigations.

Equalities impacts and mitigations

4.65 The taxi trade disagreed with the impact assessment's assumption that most operators already offer an advanced booking service. They therefore considered it an understatement that making private hire operators offer a pre-booking service seven days in advance would

have a *minor* beneficial equality impact, stating that for vulnerable passengers, private transport is often the only option for getting around. AskPOB's response expressed concern that competition from private hire operators would contribute to a reduction in the number of London taxis present on the roads. Since these vehicles are wheelchair-accessible and guide dog-friendly, Ask POB believe their disappearance would significantly restrict the ability of vulnerable passengers to move around. As mitigation against this, they believe that a certain ratio of an operator's fleet should be available and equipped for pre-booking by disabled passengers and suggest a figure of 16% - equivalent to the proportion of working age adults in the UK who are disabled.

- 4.66 The LCDC stated that disabled passengers are currently being discriminated against by the private hire trade as the largest operator does not offer advance bookings. The LCDC believes that the best way to prevent this discrimination is to either go ahead with the proposal or otherwise require medium and large operators to make 25% of their fleet wheel-chair accessible.

Environmental impacts and mitigations

- 4.67 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

- 4.68 There were no comments regarding business and economic impacts and mitigations.

Other impacts and mitigations

- 4.69 There were no comments regarding other impacts and mitigations.

Proposal 6: Licencing of In-Venue Operators and Temporary Events

- 4.70 TfL proposed to no longer issue operating licences in respect of in-venue operations and for temporary events.

- 4.71 The majority of respondents during the autumn consultation supported this proposal. Westminster City Council, which is where a significant number of in-venue operations are located, fully support the proposal due to the issues caused by the licensing of in-venue operators. Conversely, the stakeholders who disagreed with the proposal felt that existing arrangements were beneficial to consumers and removing in-venue licenses would increase the likelihood of touting and other illegal activity. There was also concern that these arrangements are necessary as part of local licensing conditions in some areas.

- 4.72 On 20 January 2016 TfL announced its intention to proceed with this proposal.

- 4.73 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

- 4.74 The GMB thought that a facility to provide a safe option is better than no option at all. They were unhappy at suggestions that criminality is exhibited at venues and that the travelling public can simply use apps to book a vehicle. Westminster City Council, which is where a significant number of in-venue operations are located, fully support the proposal due to the issues caused by the licensing of in-venue operators.

- 4.75 The LCDC felt that the negative impact on passenger safety had been over-stated and the provision of a taxi rank at these venues would alleviate many of these safety concerns. The

decision to not go ahead with the five minute rule also negates any proposed safety concerns as it allows drivers to arrive promptly and will likely reduce touting.

4.76 The LPHCA argued that this proposal was a backward step saying that they felt that evidence suggests there are more touts where there isn't a licensed operator on site. They also disagreed that the health impacts would be neutral: the IIA report stated that there is little data available to indicate the numbers of passengers that would be affected. The LPHCA suggests an education programme to help passengers understand the dangers of walking out into the road and getting into a car without checking – something that they feel has been exacerbated by the advent of electronic booking apps. They also questioned a statement regarding concerns about the current safety and security levels associated with this type of licence, citing a lack of evidence from stakeholders and other interested parties.

4.77 The LPHCA also said that mobile/smartphones can never replace the presence of a licensed operator as they cannot escort a passenger into the right vehicle.

Equalities impacts and mitigations

4.78 The LPHCA suggested that the removal of in-venue operators or temporary events is likely to have a disproportionate impact on passengers who have heightened personal safety concerns including disabled people, LGB people, BAME groups, females and young people. Some of these groups also face barriers accessing alternative modes of transport, which may make travel to and from these events more difficult and potentially more expensive. Therefore they believe that to state the equalities impacts as neutral is both "irresponsible and misleading".

Environmental impacts and mitigations

4.79 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

4.80 The LCDC said that whilst in-venue operators would suffer with the ending of in-venue offices, it would present opportunities to non in-venue operators. As customer choice could be improved through a wider variety of operator options, they reject the conclusion of an overall adverse impact.

4.81 UPHD stated that the proposal will raise the risk of touting outside venues where operators will struggle to service demand.

Other impacts and mitigations

4.82 There were no comments regarding other impacts and mitigations.

Other comments

4.83 WCC suggested that both new and existing licences should be rescinded, including those attached to night clubs and other night time venues as they are the source of much illegal touting, informal ranking and more general traffic offences.

4.84 The LPHCA had concerns over the four week timeframe of the Integrated Impact Assessment, the fact that it took place over the Christmas holiday period and also the overlap with the previous consultation exercise which meant that it was looking at initial proposals rather than the final outcomes.

4.85 The LPHCA was also concerned about the lack of stakeholder engagement, particularly with some who they feel were primary contacts such as owners of venues, the Greater London

Authority (GLA), Disabled Persons Transport Advisory Committee and TfL's own Cabs Enforcement Unit – some of which have extensive experience at late-night venues. They sourced their own evidence from some of the missing stakeholders (mostly venues) and presented their findings. They are concerned that some of the feedback that was given by stakeholders didn't make it into the published IIA.

Proposal 7: Fixed Landline

- 4.86 TfL proposed to amend the PHV Regulations to require all licensed private hire operators to have a landline number available at all times
- 4.87 This proposal was supported by a majority of respondents at the autumn consultation. Many of those who were supportive sympathised with the importance of customers being able to contact an operator but did not necessarily agree that this should be prescribed as being through a landline. The proposal received mixed views from the PH trade, business groups and consumer organisations. Those supporting agreed that passengers want the reassurance of being able to speak in real time to operator staff if there is a problem with the journey. Those opposing suggested that operators should be able to decide the methods by which they interact with customers and that reference to a landline was antiquated.
- 4.88 On 20 January 2016 TfL announced that it intended to proceed with an amended proposal, making it clear that the requirement is for a customer to be able to speak to an operator verbally at all times when journeys are being undertaken, rather than specifying a landline per se. The requirement will be mandatory for enquiries or complaints in relation to booked journeys, but it will not be compulsory for operators to have to accept bookings by phone
- 4.89 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

- 4.90 The PHB, eConnect and the LPHCA agreed with the proposal based on the potential safety benefits for passengers. The LPHCA and the GMB stated that they would expect the proposal to be undertaken by licensed operating centres in London, as 'offshore' facilities were considered a risk with regard to data protection and the ability to carry out satisfactory audits.
- 4.91 The taxi trade stated that private hire operator costs should not be prioritised over passenger safety and therefore that this proposal, with the potential to have at least a moderate beneficial health impact on passengers, should be implemented, regardless of the impact on private hire operators.
- 4.92 UPHD categorically disagreed with the driver impact assessment which states that 'the scale of the impact is relatively low as many operators already offer this facility (ability to call control centre for assistance in the case of passenger verbal or physical assault)'. UPHD states that the largest private hire provider has no such facility and they are disappointed that the amended proposal makes no provision for driver support.

Equalities impacts and mitigations

- 4.93 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

- 4.94 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

- 4.95 The LCDC acknowledged that the adoption of this proposal would add costs to operators, however, they perceive it as a justifiable cost for the potential benefits for disabled and vulnerable users.
- 4.96 The CMA felt that this proposal could increase barriers to entry (entrants would have to provide both a number and staff to handle calls) as well as restricting innovation (including platform-based business models) and could therefore lead to reduced competition between private hire operators.

Other impacts and mitigations

- 4.97 There were no comments regarding other impacts and mitigations.

Revised proposals

- 4.98 The GMB disagreed with the revised proposal which they perceive as a diluted version of the original proposal and discriminates against those without smartphones or those with disabilities that may prevent smartphone use.

Other comments

- 4.99 Uber stated their opposition to this proposal because they do not consider that TfL should regulate how firms choose to meet the differing demands of their customers and are concerned that requiring operators to make a telephone line available will involve significant costs and therefore act as a barrier to entry for smaller operators.
- 4.100 The DGA highlighted that for operator-drivers, being able to be contactable at 'all times' is onerous, impractical and potentially dangerous if a journey is underway.

Proposal 8: Vehicles Being Available for Immediate Hire, Either Visibly or Virtually

- 4.101 TfL proposed to amend the PHV Regulations to require operators to ensure that private hire vehicles are not visibly shown to be available for immediate hire, whether physically (e.g. signage or otherwise on the street) or via an app, or other means.
- 4.102 This proposal was supported by the taxi trade during the autumn consultation but there was strong and widespread opposition against this proposal from customer groups and some PHV operators.
- 4.103 On 20 January TfL announced its intention not to proceed with this proposal.
- 4.104 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

- 4.105 The LCDC opposed the provisional outcome whereby TfL indicated it was minded not to take this proposal forward. They felt that, as noted by the GLA, the vehicles shown as available on a smartphone screen are often not an accurate representation. Therefore, the passenger could have a false sense of security and be inconvenienced by such misrepresentation.

Equalities impacts and mitigations

- 4.106 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

- 4.107 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

- 4.108 The taxi trade opposed the provisional outcome whereby TfL indicated it was minded not to take this proposal forward. They felt that allowing customers to see the location of private hire vehicle on an app and book them is effectively “plying for hire”. The two tier system between taxis and private hire, endorsed by the Law Commission, dictates that “plying for hire” is a privilege of taxis alone. They state that the taxi trade is subject to more stringent regulation than the Private Hire trade and it is felt “plying for hire” is a benefit awarded to taxi drivers in acknowledgement. It is felt that not proceeding with the proposal will have a major impact on taxi drivers’ business, as it will allow private hire vehicles to continue to ply for hire whilst offering more competitive fares and not being subject to the same stringent regulation.

Other impacts and mitigations

- 4.109 WCC notes additional support for the proposal because it will prevent private hire vehicles idling in certain areas, waiting for a fare, thereby reducing congestion in central London. They also question why the regulations review does not introduce any measures to address the increasing number of private hire vehicles on the road, as it is set to continue rising sharply and roads in central London are already subject to capacity constraints.

Proposal 9: Providing Driver and Vehicle Details to TfL on a Regular Basis

- 4.110 TfL proposed to require operators to provide TfL with information in such form, content and at such intervals as TfL specifies including details of drivers and vehicles.
- 4.111 The proposal was widely supported, including by the industry and customers during the autumn consultation.
- 4.112 TfL intended to proceed with this proposal and would explore the optimum frequency of electronically uploading this information.
- 4.113 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

- 4.114 The taxi trade expressed their support for this proposal and the potentially positive impact it could have on passenger safety, enforcement and compliance.

Equalities impacts and mitigations

- 4.115 UPHD was disappointed that the impact assessment failed to consider any driver impacts. They perceive that the terminology used in the discussion of this proposal conveys an attitude of ‘guilty until proven innocent’ from TfL in relation to drivers and as such has a severe adverse equalities impact.

Environmental impacts and mitigations

- 4.116 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

- 4.117 The taxi trade stated that private hire operator costs should not be prioritised over passenger safety and therefore that this proposal, with the potential to have at least a moderate beneficial health impact on passengers, should be implemented, regardless of the impact on private hire operators.
- 4.118 The DGA stated that, due to their business model, their drivers change operators rarely, if at all. The DGA notes that the format and the frequency with which the information is to be submitted has yet to be determined and suggests that submission should be by exception only i.e. where there is a change in drivers.
- 4.119 The DGA and 1st Class Executive Travel highlight that their work is seasonal and therefore having to prepare and submit regular lists of drivers at the height of the season could be quite onerous and merely be a snapshot of that particular time.

Other impacts and mitigations

- 4.120 There were no comments regarding other impacts and mitigations.

Other comments

- 4.121 Uber questioned what extra safety benefit or reduction in public harm would result from the adoption of this proposal. They argued that any such database or reporting mechanism should be automated and constructed in such a way that drivers are not prevented from moving easily from one operator to another. Uber believes that the costs of compliance have been under-estimated, particularly with regard to the security and encryption of data during the transfer from the operator to regulator.
- 4.122 The MIB recommended that TfL apply specific phraseology to this proposal which will leave them with the ability to adjust the frequency with which operators are required to supply data. They also recommend that sufficient incentives or consequences are in place for not fully complying with the proposal.

Proposal 10: Fares to be Specified Prior to a Booking Being Accepted

- 4.123 In the autumn consultation TfL proposed to require operators to provide a specified fare prior to the booking being accepted.
- 4.124 There was strong support for operators providing a specified fare prior to the booking being accepted from both customers and most of the taxi and private hire industries during the autumn consultation, whilst business groups were strongly opposed.
- 4.125 On 20 January 2016 TfL announced that it intended to amend the proposal to require an estimated fare to be provided prior to the journey commencing. TfL would work with the trade on the detailed implementation, including accuracy required to implement this effectively.
- 4.126 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

- 4.127 There were no comments regarding health impacts and mitigations.

Equalities impacts and mitigations

- 4.128 The LCDC was supportive of the proposal, claiming that it accorded with the original Private Hire Act and would adapt the regulations to prevent operators utilising technology to circumvent them. Technology has allowed operators to charge in a similar fashion to taxis but without the passenger safeguard of the regulator setting fares. They also state that fares can be and are changed by a digital operator mid-journey. Whilst a change will have a negative impact on private hire operators, it will have a positive impact on the taxi service.
- 4.129 Uber suggests that imposing the requirement could have a negative impact on passengers, as operators will be more inclined to price-in additional risk to begin with and therefore inflate fares. Passengers generally have the option of receiving a fare estimate range and if they want a fixed fare rather than an estimate, they can choose from a number of private hire operators that provide a fixed fare.

Environmental impacts and mitigations

- 4.130 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

- 4.131 The LCDC stated that any contract for hire is between passenger and operator and not between passenger and driver, and so any change in fare should be set and agreed between the passenger and the operator.
- 4.132 1st Class Executive Travel suggested that there needs to be the option of an hourly rate due to many executive/chauffeur services being employed on an 'as directed' basis with possibly no advance knowledge of the journey required by the passenger.

Other impacts and mitigations

- 4.133 There were no comments regarding other impacts and mitigations.

Revised proposals

- 4.134 Some of the taxi trade felt that a fair compromise was reached by insisting that operators provide an estimated fare before the journey commences which should offset concerns about under-estimation of fares. If there is any sort of multiplier of fares in operation, the actual fare should be stated rather than a base fare with a factor.

Other comments

- 4.135 The GMB felt that overall, a fixed price is the way forward and most operators already do this, although they feel this is more tricky now that some operators charge by both time and distance. They argue that estimated fares will cause friction between customers and drivers especially if the estimate is incorrect due to journey changes.
- 4.136 Uber is less in favour and states that there is a lack of evidence to show that passengers don't currently have sufficient information to make a decision on either choice of provider or that they are being misled on the costs of services. They suggest that fare estimates are available on request from all private hire operators and therefore this additional regulation is unnecessary. They also state that price comparison sites already exist for private hire fares and customers are already well informed.

- 4.137 The PHB highlighted the need for full pick up and drop off locations destinations to accurately estimate a fare, otherwise it could cause problems for the driver and disappointment for passengers.
- 4.138 The LPHCA agreed with the proposal as long as the wording is adjusted to state ‘at the time of booking’ rather than ‘before the journey commences’. Without this, it will be impossible to provide an accurate estimate. They state that where electronic bookings by app or internet are made there are no good reasons as to why the fare can’t be agreed before the journey commences.
- 4.139 UPHD felt that TfL had neglected to assess negative driver impact particularly if the journey takes longer than the estimated time provided by a fixed fare.

Proposal 11: Recording the Main Destination for Each Journey

- 4.140 TfL proposed to amend the Operators Regulations to require the operator to record the main destination of private hire journeys which must be specified at the time the booking is made.
- 4.141 The proposal to record the main destination at the time of the booking being made had strong customer and industry support during the autumn consultation, with the majority of operators already recording this information.
- 4.142 On 20 January 2016 TfL announced that it intended to amend the proposal to require the main destination to be recorded by the operator prior to the journey commencing. Operators already have to record the main destination if specified by the customer at the time of booking, and this proposal would mandate the requirement to take this information prior to the journey commencing.
- 4.143 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

- 4.144 The LPHCA felt the original wording of the proposal – “Operators must record the main destination for each journey which must be specified at the time the booking is made” – was more appropriate, as it ensures safety. They felt that the driver should know the destination before accepting a job so, for example, they can decide whether they are fit to undertake a longer journey particularly towards the end of a shift.

Equalities impacts and mitigations

- 4.145 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

- 4.146 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

- 4.147 There were no comments regarding business and economic impacts and mitigations.

Other impacts and mitigations

- 4.148 There were no comments regarding other impacts and mitigations.

Revised proposals

- 4.149 Uber welcomed the amendment to the proposal – entry before the commencement of a trip (rather than at booking). They agree this amendment is a more suitable approach, retaining flexibility for the customer while preventing journey discrimination. They recommend however that, because customers appreciate being able to make multiple stops and change their final destination as their plans change, there should be no requirement on drivers to inform the operator if the destination changes, as long as the route is recorded.

Other comments

- 4.150 eConnect supported the revised proposal as it will improve the safety of passengers and the accuracy of fare calculations at minimal cost for operators. eConnect highlight that, with the proposed move towards ultra-low emission vehicles, knowing the destination before the journey commences will be necessary to manage battery electric vehicles.
- 4.151 1st Class Executive Travel agreed with the proposal if the additional wording “if specified by the customer” is included, as many chauffeur/executive services can be ‘as directed’ with no prior knowledge of the destination.
- 4.152 The LPHCA, UPHD and PHB opposed the revised proposal. The LPHCA and UPDH felt that the original wording – “Operators must record the main destination for each journey, which must be specified at the time the booking is made” – was more appropriate. They state that knowing the destination at the time of booking allows drivers to better plan their routes, deters drivers from “plying for hire”, and encourages pick-up points to be recorded, which is also important for the safety of passengers. Furthermore, if drivers are to calculate fares and add journey details while the customer is inside the vehicle, it is more likely for disagreements to arise between the customer and driver, and for the customer to be delayed while they wait for the information to be entered.
- 4.153 Uber appreciated that the destination may be necessary in order to specify fares at the time of the booking, however they did not feel this should be a requirement for the interest of the customer. In terms of customer safety, there are other ways to locate a vehicle: GPS technology is used by some organisations to track vehicles continuously throughout passenger journeys.
- 4.154 UPHD did not understand the language used in passenger impact about providing police access to investigate crimes, as they felt such data should be protected from unnecessary state surveillance and the right to privacy must be respected.

Proposal 12: Harmonise the Retention Period for Records

- 4.155 TfL proposed to harmonise the retention period for records under the Operator Regulations to be 12 months where it is currently six months.
- 4.156 This proposal received strong support in the consultation, including from customers during the autumn consultation, and a majority of the industry welcomed the clarification in the record keeping process.
- 4.157 On 20 January 2016 TfL announced that it intended to proceed with this proposal.
- 4.158 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

4.159 There were no comments regarding health impacts and mitigations.

Equalities impacts and mitigations

4.160 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

4.161 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

4.162 There were no comments regarding business impacts and mitigations.

Other impacts and mitigations

4.163 Uber commented that neither the consultation document or the IIA detailed the need for this proposal. Uber welcomed efforts by TfL to clarify the intention, but was surprised that the IIA made no mention of the potential burdens on businesses that are part of the data storage process. They noted that while harmonisation can seem simple from a regulatory point of view, it can place significant burdens on businesses in terms of data storage and compliance. Uber also noted concerns about potential privacy with relation to this issue.

Other comments

4.164 The LCDC, PHB, 1st Class Executive Travel and LPHCA noted that they agreed with the proposal.

Proposal 13. Business Names Attached to an Operator's Licence

4.165 TfL proposed a limit of five on the number of business names attached to each operator's licence.

4.166 There was strong support from customers on this proposal during the autumn consultation, although some alternatives to the five business name limit were proposed which are being considered by TfL, including how operators register their business names and trading names with TfL to avoid facilitating 'passing off' and confusing the public.

4.167 On 20 January 2016 TfL announced that it intended to proceed with this proposal.

4.168 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

4.169 There were no comments regarding health impacts and mitigations.

Equalities impacts and mitigations

4.170 The LCDC commented on the impact of equality of the proposal. They support the proposal as it promotes transparency between the supplier and the passenger. The use of various names is thought to have the potential to confuse a passenger into using an operator they may not wish to use.

Environmental impacts and mitigations

4.171 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

4.172 There were no comments regarding business and economic impacts and mitigations.

Other impacts and mitigations

4.173 There were no comments regarding other impacts and mitigations.

Other comments

4.174 WCC considers the proposal to be too lenient and believes the business model should be one licence per company, to provide assurance to customers.

4.175 The LPHCA welcomes the proposal and the improved wording, which they feel will allow TfL to distinguish between legitimate trading names and those that could potentially be used to dupe the travelling public.

4.176 The DGA is opposed to this proposal. The company owns numerous operating centres and business names, but each centre trades as a separate business and the trading name is the name of the member who operates from that centre, so it is not confusing for customers. When sub-contracting occurs, the company provides the customer with the names of the sub-contractor and the initial operating centre.

4.177 In section 4.1 of the consultation document it is acknowledged that “.. where a proposal fundamentally affects a business operating model ... would need careful consideration before being progressed due to the associated costs that operators would face; in some cases these may have de-stabilising effects”. In relation to the DGA this restriction is one of those proposals. For the DGA the impact of this proposal would be considerable – they believe it would render their business model unworkable.

Part II: Private Hire Drivers

Proposal 14: Requirement for an English Language Test

- 4.178 TfL proposed to make regulations that will require drivers to be able to demonstrate they have sufficient knowledge of English language at an intermediate level. The requirement will be applied to all new driver applicants and renewals. In the interim, as part of TfL's review of the topographical test, TfL will ensure that the test centres are properly assessing the ability of candidates to communicate in English.
- 4.179 There was strong support during the autumn consultation from both customers and the industry on this proposal, as it would ensure that drivers are able to converse with passengers to an adequate standard to take direction from them (for example, where to go/park safely on reaching a destination) and especially in the case of an incident (e.g. road traffic accident or passenger emergency).
- 4.180 On 20 January 2016 TfL announced that it intended to proceed with this proposal and was considering progressing with English level B1 (intermediate) as a standard of English required by the Home Office for immigration purposes.
- 4.181 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.
- Health impacts and mitigations*
- 4.182 Uber felt that the proposal was unnecessary, as there is no evidence of a demonstrable need for English speaking drivers from customers.
- Equalities impacts and mitigations*
- 4.183 The LPHCA welcomed this proposal as they felt it would enhance standards of safety and customer service, for example it would ensure the driver and customer are able to discuss matters such as fares and routes.
- Environmental impacts and mitigations*
- 4.184 There were no comments regarding environmental impacts and mitigations.
- Business and economic impacts and mitigations*
- 4.185 There were no comments regarding business and economic impacts and mitigations.
- Other impacts and mitigations*
- 4.186 There were no comments regarding other impacts and mitigations.
- Other comments*
- 4.187 The GMB, PHB and eConnect made comments in support of the proposal. The GMB felt the standard of English should be higher than B1 (intermediate) English, as being considered by TfL, and that all drivers should be tested either when renewing their licenses or at TfL offices. The PHB noted that while they supported the proposal, the English language test must not become a block point like CRB checks have become. eConnect felt that existing drivers should be offered the opportunity to re-sit the test if they fail first time, otherwise the impact on their income will be severe. They also suggested that operators should be able to apply to become test centres.

- 4.188 Uber and UPHD left comments opposing the proposal. UPHD felt that retrospective application of such a standard is unfair and could result in drivers losing their jobs. They felt that the provision of more time to be inadequate mitigation for existing drivers. They also believed that the cost of English language training should be provided by TfL and/or the operator and that drivers should be compensated for loss of earnings due to the requirement of additional training.
- 4.189 Uber appreciated the need for communication between the driver and customer, however they note there is no evidence of customer detriment from drivers' lack of English language skills. Uber believed it would be more cost effective to let market forces determine whether English language skills are a necessity for drivers. Furthermore Uber notes that this could become an issue of discrimination and the cost of the additional training would likely be borne by the passenger. In addition, Uber recommends:
- The examination adopted is only mandatory at the point of licensing or at point of licence renewal, and not a requirement for existing licence-holders prior to the point of renewal;
 - British nationals are exempt as would be those who possess a secondary qualification from an English institution (consideration should be given to other relevant exemptions);
 - The examination is oral in nature and relates to customer service language only;
 - Given the nature of the transactions entered into by partners the CEFR A2 standard would be sufficient and mitigate the equality impacts noted by Mott MacDonald;
 - The examination should not be expensive to take or capacity constrained; and
 - The examination should be outsourced to a number of accredited parties (in the same way as the topographical examination).

Proposal 15: Limiting the Number of Operators that a Driver Can Work For

- 4.190 TfL proposed to make it a requirement that a PHV driver must be registered to a licensed operator and may only be registered to a single operator at any time.
- 4.191 Whilst there was general recognition during the autumn consultation that the issue of excessive drivers' hours is one that needs to be addressed, there was mixed support to tackle it in this way.
- 4.192 On 20 January TfL announced its intention not to proceed with this proposal.
- 4.193 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.
- Health impacts and mitigations*
- 4.194 The taxi trade bodies provided the same feedback on the health impacts of this proposal, proposing limiting drivers to work for one operator at any one time.
- 4.195 They agreed that the proposal would be moderately beneficial to the health of both drivers and passengers. They also noted that the proposal would reduce driver fatigue and therefore also benefit other road users (by helping to minimise accidents) and private hire operators' reputations. They go on to state that the proposal would have a major or moderate beneficial health impact on passengers and should therefore should be implemented, regardless of the impact on private hire operators.
- 4.196 They also state that any approach short of limiting one driver to one operator is a serious safety threat to all Londoners, not just those who travel in private hire vehicles. They reference that the IIA notes driver fatigue may be a contributory factor in up to 20% of road

accidents and state that TfL should re-consider introducing the proposal. They also reference that limiting drivers to one operator is commonplace at many other licensing authorities in the UK.

- 4.197 UPDH disagreed that the proposal will result in driver health benefits in reduced fatigue. They note that few operators are controlling driver hours. They state that an alternative proposal is to enforce that drivers are paid at least the London living wage to reduce the need for drivers to work excessive hours.

Equalities impacts and mitigations

- 4.198 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

- 4.199 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

- 4.200 The taxi trade bodies provided the same feedback on the business and economic impacts of the proposal, proposing limiting drivers to work for one operator at any one time.

- 4.201 With regard to the IIA findings that “driving for more than one operator is commonplace” and limiting the number of operators that a driver can work for could negatively affect drivers’ livelihood, the taxi trade bodies argued that is not the regulator’s responsibility to be concerned with drivers’ income but to ensure the safety of the public.

Other impacts and mitigations

- 4.202 The LCDC, after agreeing with the findings of the IIA noted a further concern regarding drivers having as many multiple devices for receiving fares and communicating with passengers (whilst working for multiple operators). In addition to this, reliance on satellite navigation results in a high level of demand on the driver’s attention, in addition to driving. Safety issues were highlighted as a primary concern..

Other comments

- 4.203 Both the London Borough of Hillingdon (LBH) and 1st Class Executive Travel noted that they agreed with the proposal.

Proposal 16: National Insurance Numbers

- 4.204 TfL proposed an application requirement to provide a National Insurance number for private hire driver and operator licences (where the operator is an individual).

- 4.205 This proposal received strong customer support and widespread support across the industry and from HMRC during the autumn consultation.

- 4.206 On 20 January 2106 TfL announced that it intended to proceed with this proposal.

- 4.207 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

- 4.208 Unite noted that a National Insurance number is not proof of identity and therefore DWP check would also be needed.

Equalities impacts and mitigations

4.209 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

4.210 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

4.211 UPHD thought that not carrying out an impact assessment for this proposal was a serious error. They were also concerned with regard to errors made by DWP, where a driver's income is withheld while DWP investigates where an error. UPHD is concerned about the length of time this process could take, and the potential impact on a driver to generate an income. They further note that taxi drivers are not subject to the same level of scrutiny.

4.212 LPCHA agreed with the proposal, primarily to ensure that drivers have the right to work in the UK and pay tax in the UK.

Other impacts and mitigations

4.213 There were no comments regarding other impacts and mitigations

Other comments

4.214 The LCDC agreed that there are no adverse impacts on passengers, drivers or operators.

4.215 1st Class Executive Travel, LBH and PHB noted that they agreed with the proposal.

Proposal 17: Revoking Vehicle Licences

4.216 Where a licensed private hire driver has their driver's licence revoked, and that driver is the owner of a licensed private hire vehicle, it was proposed that TfL would also revoke the vehicle licence.

4.217 This proposal received strong support from customers and most of the industry during the autumn consultation.

4.218 On 20 January 2016 TfL announced that it intended proceed with this proposal.

4.219 TfL made clear that this proposal does not mean that a vehicle licence would be automatically revoked if a driver licence is revoked. However, it gives TfL the power to do so under specific circumstances; for example, if there is a concern that a vehicle could be used for hire and reward by somebody without a private hire vehicle driver licence. Where a driver is renting a vehicle or using a vehicle belonging to an operator this would not apply. TfL intended to explore whether (under data protection laws) on line advice regarding driver licence suspensions and revocations (see proposal 9) could be introduced to ensure that a company that rents/leases vehicles will be made aware that one of their drivers is no longer a licensed driver.

4.220 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

4.221 There were no comments regarding health impacts and mitigations.

Equalities impacts and mitigations

4.222 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

4.223 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

4.224 The LCDC argued that in the event of a private hire driver licence revocation, any hardship imposed on the driver as a result of vehicle revocation would have been brought on the driver by his/her own actions or inactions and any hardship should therefore not be considered by the regulator.

4.225 The DGA don't believe that revocation should be automatic and that the reasons for it should be taken into consideration.

Other impacts and mitigations

4.226 There were no comments regarding other impacts and mitigations.

Revised proposals

4.227 The LCDC agreed with the revised proposal that revocation should not be automatic, with the reason for the revocation taken into consideration.

Other comments

4.228 1st Class Executive Travel commented that as all drivers carrying out private hire services must always hold a valid private hire vehicle driver licence and insurance, this should be sufficient.

4.229 The LBH, PHB and LPHCA noted that they agreed with the proposal.

Proposal 18: Convictions of Operator Staff

4.230 TfL proposed to seek to add operator staff to the Home Office list for DBS checks and amend the Regulations accordingly. As an interim measure it was proposed to require operators to ask any person working for them to provide a basic disclosure as part of the application process.

4.231 This proposal received strong customer support and widespread support across the industry during the autumn consultation, but it was also noted that it should be delivered in a proportionate and practical way.

4.232 On 20 January TfL announced that it intended proceed with this proposal.

4.233 TfL made clear that this would only apply to operator staff who have face-to-face contact with the public e.g. at minicab offices. Given the regular interaction with the public and access to personal information that such staff have access to, this would help to increase public safety.

4.234 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

4.235 There were no comments regarding health impacts and mitigations.

Equalities impacts and mitigations

4.236 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

4.237 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

4.238 1st Class Executive Travel, PHB and LPHCA noted concerns about the length of time that DBS checks take (and current delays) and an associated difficulty in filling positions and vacancies.

4.239 The LPHCA also noted that they were unaware of any incidents to date regarding issues relating to members of the public and licensed private hire operator staff.

Other impacts and mitigations

4.240 There were no comments regarding other impacts and mitigations.

Other comments

4.241 The LCDC agreed with the proposal, noting that it has particular relevance with staff involved in operations carried out at “satellite offices” and at “special events”.

4.242 The LBH noted that they agreed with the proposal.

Proposal 19: Payment by Postal Order and Cheque

4.243 From 1 April 2016 TfL proposes to no longer accept cheques or postal orders as payment for licence fees for PHV drivers, operators and vehicles.

4.244 This proposal received widespread support across the industry during the autumn consultation. Less than one per cent of licensing transactions to TfL are paid by cheque or postal order.

4.245 On 20 January TfL announced that it intended proceed with this proposal..

4.246 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

4.247 There were no comments regarding health impacts and mitigations.

Equalities impacts and mitigations

4.248 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

4.249 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

4.250 There were no comments regarding business and economic impacts and mitigations.

Other impacts and mitigations

4.251 There were no comments regarding other impacts and mitigations.

Other comments

- 4.252 The LCDC noted that there was no impact assessment for this proposal, presumably as it has no impacts on passengers, drivers or operators.
- 4.253 1st Class Executive Travel, LBH and the PHB noted that they agreed with the proposal.

Part III: Private Hire Insurance

Proposal 20: Hire and Reward Insurance – Checks and Duration

- 4.254 TfL proposed to check Hire and Reward insurance at the point of vehicle licensing and insurance would be required to remain in place for the duration of the licence. No licence can be issued without evidence that the appropriate insurance is in place.
- 4.255 The original proposal received strong customer and stakeholder support during the autumn consultation.
- 4.256 On 20 January TfL announced that it intended proceed with a variation of this proposal requiring Hire & Reward (H&R) insurance to be in place at all times whilst a vehicle is registered to an operator. For this proposal to be enforceable, it would need to operate in conjunction with proposal 9, which requires operators to regularly provide details of those vehicles that are registered to their operating platforms so that TfL can check these against the Motor Insurers' Bureau database.
- 4.257 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.
- Health impacts and mitigations*
- 4.258 There were no comments regarding health impacts and mitigations.
- Equalities impacts and mitigations*
- 4.259 There were no comments regarding equalities impacts and mitigations.
- Environmental impacts and mitigations*
- 4.260 There were no comments regarding environmental impacts and mitigations.
- Business and economic impacts and mitigations*
- 4.261 The LCDC noted that the proposal was inequitable for taxi drivers who either work part time or work seasonally, as they are required to have H&R insurance at all times whilst licensed.
- 4.262 The MIB recommended that in the proposal it is made explicitly clear that the operator/driver is consenting to TfL having the right to validate their compliance with the insurance requirement, by whatever means is effective and efficient, at any time. The MIB noted that this does not put a greater obligation or cost on the operator/driver than is currently the case and is also not introducing a barrier to applying for a licence.
- Other impacts and mitigations*
- 4.263 LCDC noted that continuous insurance cover should be of great benefit to passengers, rather than "minor beneficial" identified in this IIA.
- Other comments*
- 4.264 Uber noted that their drivers are automatically prevented from logging-in to their app when any document expires or becomes invalid for any reason and, therefore, receiving jobs. They noted that they conduct their own checks of insurance documents at recruitment and insurance renewal for all their drivers and additional spot checks over the course of the year. Uber also noted that the regulation should make clear that it is the driver's ultimate

responsibility to have adequate hire and reward insurance and operators should only be responsible for checking this is in place.

- 4.265 1st Executive Travel, LPHCA, LBH and PHB noted that they agreed with the revised proposal.
- 4.266 The LCDC opposed the revised proposal, arguing that taxi drivers are required to have H&R insurance at all times whilst licenced, regardless of whether the driver was working a seasonal or part time basis, and it was inequitable
- 4.267 An individual respondent queried TfL's latest position on this proposal, following the findings of the Integrated Impact Assessment. Due to seasonal variations in customer demand, some private hire vehicles are taken out of operation during quieter times, and TfL think that it would be punitive to expect drivers to pay Hire and Reward insurance premiums when their vehicles are not being used for these purposes. As a consequence, they intend to proceed with a variation of the proposal which will require Hire and Reward insurance to be in place at all times whilst a vehicle is registered to an operator. However, the respondent asked whether anyone had checked with insurance companies about the cost of short term Hire and Reward Insurance and stated that this type of short term insurance is typically more expensive than an annual Hire and Reward policy. They also queried whether it is possible for a driver to switch between social, domestic and pleasure, and Hire and Reward insurance on a regular basis.

Proposal 21: Carrying a Copy of Insurance Documentation

- 4.268 TfL proposed to amend the Drivers Regulations to the effect that private hire drivers must carry a copy of their insurance documents at all times.
- 4.269 This proposal was strongly supported in the autumn consultation although some sections of the private hire trade opposed it.
- 4.270 On 20 January 2016 TfL announced that it intended proceed with this proposal.
- 4.271 TfL explained that this proposal harmonises the requirements with those in the taxi trade. Drivers would be required to carry or display a copy of their hire and reward insurance in the vehicles.
- 4.272 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

- 4.273 The RMT commented with regard to the health impacts of this proposal. They noted that as many private hire drivers have a low income that passengers, other road users and pedestrians should have adequate compensation through insurance in the event of injuries following an accident caused by a private hire driver. They noted that not being able to claim against such insurance would have a negative impact on the health of these individuals.

Equalities impacts and mitigations

- 4.274 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

- 4.275 There were no comments regarding environmental impacts and mitigations.

Other impacts and mitigations

- 4.276 There were no comments regarding other impacts and mitigations.

Other comments

- 4.277 Uber, LBH and 1st Class Executive Travel stated that they agreed with the proposals .
- 4.278 The DGA, LPHCA and PHB did not agree that insurance documents should be displayed, with the DGA noting that this would be inappropriate for services using luxury vehicles and that producing documentation on demand should be sufficient. The LPCHA and PHB suggested an electronic validation of insurance documents with the Motor Industry Database and major insurers. LPHC suggested the regulations should be worded along the lines of ‘drivers must be able to prove they have valid Hire and Reward insurance at all times.’
- 4.279 The MIB commented that TfL should make their operating guidelines clearer to promote not just the need for but also the benefit to operators of drivers being adequately insured.

Proposal 22: Hire and Reward Fleet Insurance

- 4.280 TfL proposed that operators should be required to have Hire and Reward fleet insurance.
- 4.281 This proposal was supported by a majority of respondents during the autumn consultation, although some preferred the alternative insurance related proposals. There were mixed views from PH trade stakeholders: those supporting the proposal felt that it would strengthen the responsibility of operators to ensure that vehicles were properly insured; those opposing argued that fleet insurance was unnecessary if the driver was properly insured, and it would represent a significant financial burden, particularly for smaller operators, which would be passed on to consumers.
- 4.282 On 20 January TfL announced that it was minded not to proceed with this proposal. However, there is broad agreement across the industry that there is an issue with indemnification in the event that a driver, intentionally or not, does not have the appropriate insurance in place. TfL intended to work with the trade to explore this in more detail and will seek to come forward with a new proposal in due course.
- 4.283 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

- 4.284 The taxi trade disagreed with the IIA findings that introducing Hire and Reward operator insurance would have a minor beneficial impact on the health of passengers. They state that the proposal has a major beneficial health impact for passengers.
- 4.285 Their comments argued that some private hire drivers cancel Hire and Reward insurance once they have been accepted by a licensed operator and replace it with a cheaper Social, Domestic and Pleasure Policy. They also note examples of operators accepting fake or forged Hire and Reward policies, that ANPR cameras cannot differentiate between types of insurance and that not requiring the same condition for licensing minicab as taxis is wrong.
- 4.286 They go on to state that introducing Hire and Reward operator insurance would have ensured that all passengers travelling in a private hire vehicle in London are covered in the event of an accident. They also state that this proposal would have made TfL’s task of checking policies easier.
- 4.287 The stakeholders also note that the IIA does not offer a suggestion to mitigate the health impacts.

Equalities impacts and mitigations

4.288 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

4.289 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

4.290 The LCDC noted that, with fleet insurance, only annual production of an insurance certificate and occasional inspections are required.

4.291 They mention that the high cost of hire and reward insurance applies equally to taxi fleet owners. They also mention the failings of digital operators to make adequate checks on vehicle insurance and the issue where drivers have taken out hire and reward insurance in instalments and change to a domestic policy after presentation of a certificate to an operator. Each of these is detailed with regard to difficulties of compliance and enforcement. The LCDC states that the proposal would require much greater enforcement costs.

4.292 1st Class Executive Travel noted that the proposals would not be cost effective for small operators or executive/chauffeur operators, where frequent temporary vehicle and/or driver increases are common to cater for demand by sub-contracting to licensed owner/drivers.

4.293 The taxi trade noted that, with regard to the potential impacts on small or locally focused operators, a suggested mitigation is that operator insurance is mandatory for all operators with over 1,000 drivers. They argued that not proceeding with a proposal because it might increase operator costs is not justifiable and a proposal should only be discounted if it is concluded that it would not increase passenger safety, which the IIA has not done.

Other impacts and mitigations

4.294 There were no comments regarding other impacts and mitigations.

Revised proposals

4.295 UPHD noted particular disagreement with TfL's decision not to go ahead with the proposal. They commented that the suggestion that, because TfL doesn't have data to assess the risk the passenger benefits must be minor, is deeply flawed. On this basis they stated that TfL must proceed with an abundance of caution to protect the public and require fleet insurance.

4.296 The GMB commented that due to the revisions to the proposal drivers should be removing private hire discs and not able to benefit from the congestion charge exemption when not insured for Hire and Reward. They also commented that drivers who are not insured appropriately cost legitimate drivers work, create higher premiums and put the public at risk. In addition, with regard to the congestion charge the GMB questioned an app 'demanding drivers break the law to come in to the congestion charge zone with no pre-booking in place'.

Other comments

4.297 AskPOB commented that the proposal should go ahead and that the IIA has underestimated the beneficial impact of operator insurance.

4.298 The LBH noted their agreement with the proposal.

4.299 The MIB commented that they support any attempts to ensure that any use of a motor vehicle on our roads is fully compliant with all obligations, commenting that use of a vehicle without

insurance remains too high. They urged TfL to make their operating guidelines clear to promote not just the need for, but also the benefit to operators of being adequately insured.

Part IV: Private Hire Licensing

Proposal 23: Operator Licence Type

- 4.300 TfL proposed to review the current operator licence type and look to introduce additional category/categories.
- 4.301 This proposal was supported by a majority of respondents during the autumn consultation. Those who did not agree felt that this ultimately would increase costs to customers and, in any case, licensing costs should be reduced/minimised. It was also suggested that costs related to audit and enforcement should be funded through driver licences.
- 4.302 On 20 January TfL announced that it intended proceed with this proposal. Subject to approval by the TfL Board, TfL would alter the structure of licence fees paid by operators of different sizes to better reflect the costs of compliance and enforcement activity. This would provide further financial incentive for operators to maximise the efficiency of their operations and minimise the number of vehicles they use across London as a whole. The specific revisions to the licence fee structure will be consulted on separately.
- 4.303 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

- 4.304 There were no comments regarding health impacts and mitigations.

Equalities impacts and mitigations

- 4.305 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

- 4.306 AskPOB, LCDC and UCG note that a marginal short term gain in improving air quality from introducing these measures is not sufficient and that tackling air pollution needs to happen in the short term.
- 4.307 The LCDC noted that the IIA assessment finds it beneficial to offer discounts to encourage zero-emission vehicles. They commented that as most private hire vehicles are driver-owned rather than operator-owned, operator licence discounts would be unlikely to have any significant impact. They further comment about the Mayor's air quality plans which intend to make new taxis zero-emission capable by 2018 and indicate that if there is the same intention for new private hire vehicles there is no need to encourage such change via licence fee discounts.
- 4.308 Uber commented that they do not consider that the proposed mitigations affect the environmental impact.

Business and economic impacts and mitigations

- 4.309 The LCDC commented that despite an adverse impact on operators, it is equitable to have at least two tiers of licence fees. They further strongly comment that it is inequitable that an operator with 20,000 vehicles should be paying the same fee level as an operator with very few vehicles.
- 4.310 Uber commented that there has been speculation smaller operators will benefit from lower licence fees. They note however, that TfL have not provided any detail on this suggestion. They

comment that even if TfL were to lower licence fees, they think it would be better for the public for costs not to increase disproportionately.

Other impacts and mitigations

4.311 There were no comments regarding other impacts and mitigations.

Other comments

4.312 Uber supported that TfL will consult on this proposal separately. They state that in any consultation, TfL should set out clearly the problem with the current system in relation to consumer harm and the objectives that its new charging structure seeks to achieve.

4.313 They state that the charging structure should reflect the extent to which the systems of existing operators, such as electronic documentation and dedicated compliance teams, assist TfL in meeting its objectives to ensure the fee's proportionality and transparency.

4.314 Uber adds that agreed-upon, proportional thresholds should be set in core areas that operators would have to meet under the terms of their licence.

4.315 UPHD noted that where specific proposals have been developed in consultation with driver representatives TfL should return for a formal round of consultation.

4.316 The LBH, 1st Class Executive Travel and PHB noted their general agreement with the proposal.

Proposal 24: Ridesharing

4.317 TfL proposed to explore measures to ensure that private hire vehicles cannot be used for ride sharing purposes in London unless there are very clear controls in place to protect the safety of passengers and drivers.

4.318 The autumn consultation responses generally, and customers in particular, supported the principle to explore proposals to promote passenger safety.

4.319 On 20 January 2016 TfL announced that it intended proceed with this proposal. The purpose of the new guidance would be to reinforce the overall support for ridesharing; signpost new and existing operators to the right people to discuss business models; and give guidelines around the regulatory parameters for ridesharing (and how to differentiate between car-pooling and ride sharing for hire and reward). TfL therefore intended to work with the DfT to develop guidance for ridesharing.

4.320 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

4.321 There were no comments regarding health impacts and mitigations.

Equalities impacts and mitigations

4.322 There were no comments regarding other equalities and mitigations.

Environmental impacts and mitigations

4.323 The taxi trade noted that a marginal short term gain in improving air quality from introducing these measures is not sufficient and that tackling air pollution needs to happen in the short term.

- 4.324 Uber commented that they do not consider that the proposed mitigations affect environmental impact.
- 4.325 An individual respondent commented that placing limits on ridesharing reduced the opportunities to tackle congestion and pollution and maximise efficient use of road space.

Business and economic impacts and mitigations

- 4.326 1st Class Executive Travel agreed with the proposal and noted that ride sharing is a positive from a congestion perspective and should not be obstructed by any non-essential regulation.

Other impacts and mitigations

- 4.327 The GMB noted that ride sharing is dangerous and there is a current lack of data available. They state that full guidelines for ride sharing should be developed and that public ride sharing for non-licensed vehicles is a safety risk on multiple levels. In summary, the GMB believes that ride sharing poses a risk to passengers and drivers and TfL should not support the concept.
- 4.328 The LCDC stated that ride sharing in private hire vehicles should be banned, rather than controlled. They note that groups of up to seven strangers, of mixed sex, often late at night lends itself to conflict and dispute, both among the passengers and between passengers and drivers. They noted that ride sharing has the potential to create serious and costly compliance and enforcement problems for the regulator.

Other comments

- 4.329 The CMA encouraged TfL to consider the potential benefits to consumers that ridesharing could provide alongside the public safety objectives. They continued to note that TfL should consider how its objectives could be achieved restricting competition as little as possible.
- 4.330 The PHB commented that controls must be in place to protect the public with regard to this proposal.
- 4.331 The LBH noted that they agree with the proposal.

Proposal 25: In-Vehicle Advertising

- 4.332 TfL proposed a small change to Regulation 8 of the Vehicle Regulations to clarify that advertising displayed “from” as well as “on” a vehicle is subject to the controls set out in that Regulation.
- 4.333 A majority of respondents supported this proposal during the autumn consultation although many felt it needed more explanation and/or rationale for why the change was being proposed. Respondents not supporting this proposal either felt it was unnecessary/over-regulatory, or they didn’t believe there was enough detail to offer support.
- 4.334 On 20 January TfL announced that it intended proceed with this proposal.
- 4.335 Comments from respondents discussing the impacts and potential mitigations of this proposal are described below.

Health impacts and mitigations

- 4.336 There were no comments regarding health impacts and mitigations.

Equalities impacts and mitigations

- 4.337 There were no comments regarding equalities impacts and mitigations.

Environmental impacts and mitigations

4.338 There were no comments regarding environmental impacts and mitigations.

Business and economic impacts and mitigations

4.339 Uber noted that the proposal has the potential for significant costs (or profits foregone) for private hire operators to bear, to the detriment of customers. Uber also noted that the economic impact is not consistently given sufficient weight as there is no clear cost-benefit analysis carried out in the IIA.

4.340 The CMA and Uber commented that it was not clear what justification exists for the prohibition of advertising either inside or outside vehicles. They stated that the proposal has the effect of closing off a potential income stream for private hire drivers and operators and appears to be a disproportionate restriction on the private hire market, placing private hire at a commercial disadvantage compared to the taxi trade. They also noted that this proposal could reduce consumer choice and inhibit new entrants to the market.

Other impacts and mitigations

4.341 There were no comments regarding other impacts and mitigations.

Other comments

4.342 The CMA was not clear how the public interest is served by these restrictions and noted that a number of other local authorities do not apply equivalent regulations.

4.343 The LPHCA, 1st Class Executive Travel and LBH noted that they agree with the proposal.

Other comments

4.344 Justine Greening MP stated her broad agreement with the proposals for changes to private hire regulations, particularly those which enable her constituents to make full use of the range of options available in the private hire industry, including those from a digital platform. She expressed particular support for proposals which would help to protect passengers but noted it would be sensible to balance this priority with the ability of private hire companies to make the necessary changes within an appropriate time frame. She stated it would therefore be important to give them enough time, and information, to do so.

4.345 A number of individual respondents replied to the impacts and mitigations questions, but did not mention specific proposals. A summary of these responses is included below.

General health impacts and mitigations

4.346 Eight respondents stated that the high and increasing number of private hire vehicles in London is contributing to increased congestion, pollution, accidents and associated health disbenefits. Two respondents suggested that the number of private hire vehicles in London should be limited in order to mitigate against these impacts. On the contrary, four respondents commented that London's taxis are the primary concern with regard to health impacts as the majority run on diesel fuel. Two respondents commented that, in respect of mitigations, efforts should be made to encourage or force taxis to use more environmentally friendly fuel.

4.347 Further mitigations mentioned by respondents included: the need to apply rules and regulations fairly and commensurately to both taxis and private hire vehicles; introducing a system where high emission vehicles either pay a slightly higher cost of licensing or receive

grants/funds to install a catalytic converter; and increasing the fees that must be charged by taxis/private hire vehicles in order to operate in central London with the aim of reducing congestion and pollution and avoiding undermining public transport.

General equalities impacts and mitigations

- 4.348 There were no comments regarding general equalities impacts and mitigations.

General environmental impacts and mitigations

- 4.349 Seven respondents made general comments about the environmental impacts of the proposals. Of these, six commented that the number of private hire vehicles in the capital was having a severely adverse effect on congestion and consequently the levels of pollution. Five respondents stated that the only way to mitigate this is to cap the number of private hire licenses issued. Other proposed mitigations included requiring private hire drivers to complete an advanced drivers test (respondent considered private hire drivers' poor driving ability as contributing to congestion) and more stringent eligibility requirements for private hire driver applications in an effort to limit the number of people able to apply a licence.

- 4.350 One respondent stated that, taken as a whole, the proposals will not have a beneficial effect on the environment as taxis and buses will continue to generate pollution.

General business and economic impacts and mitigations

- 4.351 There were a number of themes addressed within the comments centred on general business and economic impacts of the proposals, from the treatment of drivers and customers to the fairness of the private hire and taxi industry. Almost half of the respondents (four out of nine) noted that private hire drivers struggle to make a living due to a combination of low pay and an increasing supply of drivers/vehicles. One respondent commented that the preponderance of private hire vehicles on the road was also having a detrimental impact on taxi drivers, who end up having to work longer hours in order to earn a living.
- 4.352 Two respondents commented that taxis are too expensive and therefore unaffordable for some customers whilst two respondents foresaw the destruction of the taxi trade, and consequently a reduction in consumer choice, if private hire vehicles are allowed to ply for hire via apps. One respondent expressed frustration that taxis are afforded both an exemption from the congestion charge and permission to use bus lanes, whilst for private hire vehicles the latter is not the case. Another respondent stated that the proposals fail to address the potential economic impacts on the taxi trade.
- 4.353 Respondents proposed a number of mitigations to the issues noted above, including capping private hire licences, stricter regulation of the private hire industry, the implementation of rules and regulations to safeguard both industries (including fairer and more commensurate application of those rules) and for private hire vehicles to both retain their exemption from the congestion charge and be permitted access to bus lanes.

Other general comments

- 4.354 Twenty three respondents did not comment on any of the individual proposals or any general impacts/mitigations but instead commented generally on the private hire regulations consultations, TfL's original and revised positions on the proposals, or gave abusive responses.
- 4.355 Aside from the abusive comments, respondents were concerned for the demise of the taxi trade, commented on the regulator's alleged leniency towards the private hire trade,

challenged the lack of a more public or widely advertised consultation process, expressed frustration at the slow speed with which TfL has embraced emerging technology and regulated accordingly, highlighted the impact of wider road improvement schemes (e.g. for bus lanes, cycle lane etc.) on the reliability of taxi journey times and lamented TfL's lack of foresight with regard to greener technology for London taxis and the expense of purchasing a hybrid taxi.

- 4.356 Finally, one individual respondent challenged the premise of the Integrated Impact Assessment's environmental assessment methodology. The full IIA report states that "To assess changes in emissions of NO_x, PM₁₀ and CO₂ (resulting from proposals 23 and 24)...(an average speed of) 48kmph (30 mph) has been assumed as this is considered to represent the speed limit on many roads within London". The respondent considers this to be an erroneous assumption and suggests that the actual average speed of a vehicle in central London is around 10-15mph due to congestion. The implication is that the calculations do not account for emissions during idling as a result of slow-moving traffic. The IIA evaluation of the environmental impact of proposals 23 and 24 is neutral.

Congestion Charge

- 4.357 On 20 January TfL announced it's intention to investigate the impact and feasibility of removing the Congestion Charge exemption for private hire vehicles in central London to tackle pollution and reduce congestion. Linked to this, the Mayor has secured a commitment from the Government to progress separate legislation to enable TfL to regulate pedicabs, helping to tackle fare abuses prevalent among some pedicab drivers, whilst tackling the congestion they cause in central London, particularly in the evenings.
- 4.358 Despite this part of the announcement not forming part of the Integrated Impact Assessment, some respondents commented on these aspects during the consultation on the IIA. These comments are summarised here for information and TfL will ensure these are fed into the review of the Congestion Charge exemption which is being dealt with separately.

Equalities impacts and mitigations

- 4.359 The PHB thought that the proposal to remove the congestion charge exemption for private hire vehicles would have a disproportionate impact on suburban passengers and drivers as they would attract a congestion charge for a single visit whereas those wanting to travel just within the zone could benefit from operators dividing the charge by many passengers in a day. The PHB considered that vulnerable passengers would include those travelling to and from the London teaching hospitals or those that cannot use other forms of public transport.

Environmental impacts and mitigations

- 4.360 Ask POB, UCG, Unite, LTDA and eConnect expressed support for the immediate implementation of the removal of the congestion charge exemption for private hire vehicles, in a bid to curb congestion and pollution in central London.
- 4.361 An individual respondent stated their support for the removal of the congestion charge exemption for private hire vehicles on the basis of environmental and air quality reasons. The respondent suggested that, in order to increase competition, operators with more than 1,500 private hire vehicles on their books should be forced to pay the full congestion charge for their entire fleet whilst smaller operators may benefit from reductions.

Business and economic impacts and mitigations

- 4.362 The CMA believed that applying the congestion charge only to private hire vehicles will have the effect of placing them at a competitive disadvantage in relation to taxis.
- 4.363 An individual respondent stated that businesses and the public will suffer if customers cannot use private hire vehicles within London's congestion zone. The respondent implied that they rely upon private hire vehicles as they offer cheaper fares than London taxis. Another individual respondent stated that removing the congestion charge exemption for private hire vehicles would be detrimental to his/her business and put taxis at an advantage. They encouraged TfL not to implement the congestion charge for private hire vehicles.

Other impacts and mitigations

- 4.364 WCC deemed that the removal of the congestion charge exemption for private hire vehicles in an effort to curtail their growth in number would have no impact on the streets at night or at weekends when the scheme is not operational. WCC also questioned whether the retention of the concession for taxis but not for the private hire sector would be anti-competitive.
- 4.365 The DGA expressed disappointment that TfL is considering removing the congestion charge exemption for private hire vehicles because their driver-guides spend the majority of their day in central London. Removing the congestion charge exemption for the DGA is unlikely to reduce the number of their drivers in central London, it will simply add to the cost of running their private hire vehicles/tours. The DGA also thought it was unfair and discriminatory that taxis will remain exempt even though they are often running more polluting engines. If the proposal is approved, the DGA will seek to gain an exemption.
- 4.366 eConnect agreed that a change to the structure of the licence fees to reflect more levels of operators would result in a more equitable split of the cost recovery between large and small operators.
- 4.367 1st Class Executive Travel sought to emphasise that private hire vehicles are a vital component of London's transport system and it is for that reason that they are exempt from the congestion charge. 1st Class Executive Travel deemed that a primary reason that congestion and emissions have increased is due to the amount of ongoing road improvements in London.
- 4.368 An individual respondent questioned the potential impact of removing the congestion charge exemption for private hire vehicles given that many minicabs are hybrid and therefore already exempt. The respondent suggested that capping the number of private hire licences that are issued would be a better policy tool for reducing congestion.



A Respondent Type Analysis

A.1 Although one of the questions of the consultation allowed respondents to specify whether they were related to the private hire or taxi trade, it was not compulsory and respondents were able to pick more than one option. We have therefore used information provided in the 'Other response' open text box to allocate respondents to a respondent type. This appendix details this process and the assumptions used.

A.2 We have used the following questions, in the order shown, to allocate respondents to groups:

- How are you connected to the Private Hire or Taxi Trade? (closed question); and
- How are you connected to the Private Hire or Taxi Trade? – other responses (open text box).

How are you connected to the Private Hire or Taxi Trade? (closed question).

A.3 Using this closed question it was possible to allocate 27 of the 68 responses, as detailed in Table A.1.

Table A.1: Respondent types determined using closed question

Category	Responses	Proportion
Taxi driver	11	16.2%
Member of the public	7	10.3%
PH driver	7	10.3%
Customer	1	1.5%
Other connection	1	1.5%
<i>Not specified</i>	41	60.3%
Total	68	100.0%

How are you connected to the Private Hire or Taxi Trade? –other responses (open text box)

A.4 Using this open question it was possible to allocate a further 20 of the 68 responses, including the 19 stakeholders, as detailed in Table A.2.

Table A.2: Respondent types determined using a combination of the closed and open elements of Q36

Category	Responses	Proportion
Stakeholder	19	27.9%
Taxi driver	12	17.6%
Member of the public	7	10.3%
PH driver	7	10.3%
Customer	1	1.5%
Other connection	1	1.5%
<i>Not specified</i>	21	30.8%
Total	68	100.0%

Control Sheet

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