

## Bristol City Council Equality Impact Assessment Form

(Please refer to the Equality Impact Assessment guidance when completing this form)



Name of proposal	Hackney carriage and private hire Fit and Proper Person Policy to review DBS requirements and to include DBS Update Service and amend requirements in respect of expired licences
Directorate and Service Area	Growth and Regeneration, Regulatory Services
Name of Lead Officer	Emma Lake, Licensing Team Leader

### Step 1: What is the proposal?

Please explain your proposal in Plain English, avoiding acronyms and jargon. This section should explain how the proposal will impact service users, staff and/or the wider community.

#### 1.1 What is the proposal?

To review the current policy relating to taxi drivers requiring DBS checks and expired licences. Following approval by the Public Safety and Protection Committee in February 2020 officers propose to take a further report to committee in June to amend the requirements in respect of expired licences. To undertake a public consultation on adding to the policy that applicants and drivers are required to sign up to the DBS Update Service and amendments to the requirements in respect of expired licences.

### Step 2: What information do we have?

Decisions must be evidence-based, and involve people with protected characteristics that could be affected. Please use this section to demonstrate understanding of who could be affected by the proposal.

#### 2.1 What data or evidence is there which tells us who is, or could be affected?

Based on the demographics of the City of Bristol the majority of citizens which

are potential taxi customers:

- 78% are White British compared to the national average of 80%
- 17% have a Limiting Long-term Illness or Disability which is lower than the national average of 18%
- 50% are women which is slightly lower than the national average of 51%

### **Disability**

The Office for Disability Issues has updated Department for Work and Pensions estimates which show there are 11.2 million disabled people in Great Britain, of whom 5.2 million are adults of working age, 5.2 million are over state pension age and 0.8 million are children (Disability prevalence estimates 2010/11).

Taxis and minicabs are vital for many disabled and older people and for some the only accessible transport mode (Beuret, 1995).

### **Licence holders**

In Bristol there are currently 1,881 licensed hackney carriage drivers and private hire drivers in total. Anecdotally the majority of Bristol taxi drivers are Male, and a large proportion of taxi drivers are of Black, Asian and Minority Ethnicity (BAME), and Muslim.

### **COVID-19**

The taxi trade in Bristol has been severely impacted in 2020 by coronavirus lockdown measures, and taxi drivers are among those most likely to die from COVID-19, according to ONS figures<sup>1</sup>.

2.2 Who is missing? Are there any gaps in the data?

We do not currently hold equalities data on the profile of licensed taxi/private hire drivers. We have recently sent a survey to existing drivers and applicants to try and gain this information.

2.3 How have we involved, or will we involve, communities and groups that could be affected?

The Hackney carriage and private hire trade will be consulted with via the taxi newsletter, which is sent out to the trade via email, and also the taxi forum

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<sup>11</sup> [Office of National Statistics: Coronavirus \(COVID-19\) related deaths by occupation, England and Wales: deaths registered up to and including 20 April 2020](#)

meetings, which are held monthly.

Consultation on draft policies may be published on the Councils Consultation Finder. Equalities Groups will be specifically targeted for feedback.

### **Step 3: Who might the proposal impact?**

Analysis of impacts on people with protected characteristics must be rigorous. Please demonstrate your analysis of any impacts in this section, referring to all of the equalities groups as defined in the Equality Act 2010.

#### **3.1 Does the proposal have any potentially adverse impacts on people with protected characteristics?**

**All:** There may be some negative impact when drivers fail to subscribe or maintain subscription to the service as a new application and fee will be required and this could delay their licence being issued. Also if the status of a DBS check changes then this could impact on the licence of a driver and delay applications. However this is mitigated by private hire drivers and vehicle proprietors being required to inform the Council in respect of convictions etc. and that in the interests of Public Safety the Council need to be able to consider information. Also drivers may be required to attend the Gold Standard training course if they submit an application within 12 months of their previous licence expiring. However this is mitigated by drivers being required to complete this requirement by their next application.

**Age:** No negative impact identified

**Disability:** No negative impact identified

**Ethnicity:** Due to their high numbers BAME licensed taxi drivers are likely to be disproportionately impacted by the initial financial cost of the DBS Update Service and attending the Gold Standard course where required.

**Sex:** No negative impact identified. Approximately 98% of licensed drivers are male.

**Pregnancy and Maternity:** No negative impact identified.

**Religion & belief:** No negative impact identified.

**Sexual orientation:** No negative impact identified

**Gender reassignment:** No negative impact identified.

**3.2 Can these impacts be mitigated or justified? If so, how?**

The impact with regard to the initial cost of the DLVA Update Service or the Gold Standard which can be justified through the improved protection for the travelling public, the savings over time (provided no change to DBS status and continued subscription to the service) and that they will be given until their next application to complete the Gold Standard.

The DBS update service is portable so if drivers are engaged in other activities requiring a certificate this can also be used for that purpose. The DBS update service currently costs £13 per annum plus the cost of the original DBS application which is currently set as £49.50.

There are currently delays with the DBS in terms of the turnaround time of applications which can be exacerbated when applicants have a complex address history. This can potentially delay licences being issued and therefore have a negative effect on the livelihood of drivers. By subscribing to the DBS update service these delays should no longer occur.

**3.3 Does the proposal create any benefits for people with protected characteristics?**

The impact on applicants and drivers will over time save money, allowing drivers to apply for three year licences more frequently, and reduce the administrative burden for all drivers and applicants, particularly when there are often delays with DBS certificates which can subsequently impact on whether a licence is issued and therefore impact on driver's earnings.

In respect of the public this service will enable checks to be carried out on drivers more frequently therefore it is likely to increase public safety.

**3.4 Can they be maximised? If so, how?**

We will ensure there are clear communications, and effective consultation on the proposed changes.

**Step 4: So what?**

The Equality Impact Assessment must be able to influence the proposal and decision. This section asks how your understanding of impacts on people with

protected characteristics has influenced your proposal, and how the findings of your Equality Impact Assessment can be measured going forward.

4.1 How has the equality impact assessment informed or changed the proposal?
At this stage the EqIA process has highlighted the potential impact of the proposal, particularly for BAME taxi drivers – and the steps we intend to take to mitigate these, balanced with our overall priority to protect the travelling public.
4.2 What actions have been identified going forward?
Public consultation to seek views on the proposal.  Present a report to the Public Safety and Protection Committee with recommendations including findings of the consultation.
4.3 How will the impact of your proposal and actions be measured moving forward?
Through statistics relating to the number of drivers that fail to maintain subscription to the DBS update service, and the number of drivers that have DBS update check status changes.

Service Director Sign-Off:  	Equalities Officer Sign Off: <i>Reviewed by Equality and Inclusion Team</i>
Date: 29/05/20	Date: 18/5/2020