

# Equality Impact Assessment [version 2.9]



Title: Taxi Policy Review 2021	
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input type="checkbox"/> Already exists / review <input checked="" type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Carl Knights
Service Area: Regulatory Services	Lead Officer role: Senior Licensing Officer

## Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

### 1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

To revise and amend all Bristol City Council Hackney carriage and private hire licensing policies into one document, and make a number of amendments due to:

- the introduction of statutory taxi and private hire vehicle standards by the Department for Transport
- changes identified in respect of private hire operators
- requests from the taxi trade to review the private hire vehicle policy in respect of tints
- a mandatory requirement for hackney carriages to have electronic payment facilities
- Updates to licence conditions and policies to remove old/outdated conditions or enhance public safety.

The key amendments include:

1. Adding a requirement to the policy that applicants and drivers are required to sign up to the Disclosure and Barring Service (DBS) Update Service and what happens if drivers do not sign up to the service or their status changes. *(Recommended by the Department for Transport Statutory Taxi and Private Hire Vehicle Standards issued under powers contained within section 177(1) of the Policing and Crime Act 2017 – the Department for Transport expects the recommendations in the standards to be implemented unless there is a compelling local reason not to).*
2. Introduction of certificate of good character for applicants and licence holders for drivers, vehicles and private hire operators from each country if they have lived outside of the UK for a continuous period of three months (or more) within the last five years of the date of their licence application, save in exceptional circumstances. *(Recommended by the Department for Transport Statutory Taxi and Private Hire Vehicle Standards).*
3. Introduction of requirement for the Council to be able to require applicants and licence holders to complete a mandatory test for their language proficiency for drivers and the ability for the Council to require drivers, vehicle proprietors and private hire operators to complete this test. *(Recommended by*

*the Department for Transport Statutory Taxi and Private Hire Vehicle Standards).*

4. To introduce a private hire operator policy and guidelines relating to the relevance of criminal behaviour and amend the conditions attached to such a licence. This will allow us to ensure that anyone who holds this licence is fit and proper to hold a licence. *(Majority of contents recommended by the Department for Transport Statutory Taxi and Private Hire Vehicle Standards).*

The policy will also mean that licence holders have to have minimum standards to ensure that all of their employees have the appropriate level of training in order to operate safely.

5. To introduce a policy in respect of mandatory card payments. Card payments would lead to an easier and quicker method for customers to pay taxis fares, While stopping the need for customers to ask Hackney Carriage drivers to stop off at cash machines if they need extra cash to pay a fare.

This technology can be beneficial is if a customer were to lose their cash and debit cards, the customer can if they wish use their smartphone device to pay a fare as if using a contactless debit card. This could stop the need for vulnerable people walking home at night and putting themselves in a potentially unsafe situation.

6. To amend the private hire vehicle policy and vehicle inspection standard so that tints are allowed in the rear side windows of private hire vehicles all other aspects of the policy remain unchanged.

*The current private hire inspection standard policy on tints was presented to members on 12 February 2013 and it was agreed that the implementation of the new standards would take effect from 1st April 2013.*

7. To consolidate and amend all Hackney carriage and private hire licensing policies/conditions in line with the published Department of Transport Statutory Taxi and Private Hire Vehicle standards which came into force in July 2020 into one cohesive policy document. These changes include revisions to Disclosure and Barring Service Checks (DBS), Licensee self-reporting in respect of convictions and caution they may receive, DBS checks for vehicle proprietors and operators, mandatory safeguarding training and significant changes to the guidelines relating to relevance of criminal behaviour.

## 1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

## 1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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## Step 2: What information do we have?

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

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
Based on the demographics of the City of Bristol the majority of citizens which are potential taxi customers:	<ul style="list-style-type: none"> <li>- 78% are White British compared to 80% the national average</li> <li>- 17% have a Limiting Long-term Illness or Disability which is slightly lower than the national average of 18%</li> <li>- 50% are women which is slightly lower than the national average of 51%</li> </ul>
Disability	<p>There are over 14.1 million disabled people in the UK<sup>1</sup>. 8% of children are disabled. 19% of working age adults are disabled 44% of pension age adults are disabled</p> <p>Taxis and minicabs are vital for many disabled and older people and for some the only accessible transport mode (Beuret, 1995).</p>
Licence holders	<p>In Bristol there are currently 459 licensed hackney carriage vehicles, 809 private hire vehicles, 624 hackney carriage drivers and 1047 private hire drivers. Anecdotally the majority of Bristol taxi drivers are male, and a large proportion of taxi drivers are from Black, Asian and minority ethnic backgrounds, and Muslim.</p>

<sup>1</sup> Source: [Family Resources Survey \(2018 to 19\)](#)

## 2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

## 2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

We have tried to carry out a diversity survey by circulating to the taxi trade. Currently we have received 38 responses. Therefore the statistics may not be representative of the taxi trade. However the responses show of the respondents:

### Age

11% of respondents were under 24 years old  
38% of respondents were between 25-49 years old  
26% of respondents were between 50-64 years old

### Disability

87% of respondents do not consider themselves to be a disabled person  
11% of respondents consider themselves to be a disabled person  
3% of respondents preferred not to say

### Sex

97% of respondents are male  
3% of respondents are female

### Ethnic background

15% respondents identified themselves as English/Welsh/Scottish/Northern Irish/Irish/British  
2% of respondents identified themselves as Gypsy or Roma  
9% of respondents identified themselves as East European  
2% of respondents identified themselves as any other White Background  
2% of respondents identified themselves as Indian  
19% of respondents identified themselves as Pakistani  
6% of respondents identified themselves as Bangladeshi  
8% of respondents identified themselves as any other Asian background  
8% of respondents identified themselves as White and Black African  
2% of respondents identified themselves as White and Asian  
2% of respondents identified themselves as Any other mixed background  
6% of respondents identified themselves as African  
11% of respondents identified themselves as Somali  
4% of respondents identified themselves as Arab

### Sexual orientation

58% of respondents identified their sexuality as Heterosexual/straight  
3% of respondents identified their sexuality as bisexual  
8% of respondents identified their sexuality as Other

### Religious beliefs

21% of respondents identified their religious belief as Christian

68% of respondents identified their religious belief as Muslim

#### **Pregnancy and maternity**

97% responded they were not pregnant or had given birth in the last 26 weeks

3% responded that they were pregnant or had given birth in the last 26 weeks

#### **Refugee**

95% responded that they did not consider themselves to be a refugee

5% responded that they consider themselves to be a refugee

#### **English as first language**

39% responded that English was their first language

61% responded that English is not their first language

## **2.4 How have you involved communities and groups that could be affected?**

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

External consultation took place between 16 February 2021 and 21 March 2021. The survey was published on the Council's Consultation and Engagement Hub, accessible to all members of the public, and advertised via social media channels. In addition to this the following parties were also notified:

- Hackney carriage and private hire licence holders,
- Equalities groups,
- Avon and Somerset Constabulary,
- Bristol City Council Councillors
- Partner agencies,

Members of the trade were also invited to briefing sessions so the proposals could be explained in further detail.

## **2.5 How will engagement with stakeholders continue?**

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

The proposals are to be presented to the members of the Council's Public Safety and Protection Committee on 27 July 2021. No further engagement with stakeholders will take place before this time.

However the proposals include a commitment to review the policy no later than 2026. The Licensing Team will continue to monitor the impact of the policy prior to this time and will take into account any feedback received. Meetings are held regularly with trade representatives and officers also attend other meetings with partner agencies. If any issues are raised that require a policy review prior to 2026 the matter will be referred to the Council's Public Safety and Protection Committee to seek approval to go out for consultation.

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

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

#### 3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

#### GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

All:

- a) **DBS Update Service** - 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 or their licence may be suspended or revoked.

Also, if the status of a DBS check changes then this could impact on the licence of a driver and delay applications or a drivers licence may be suspended or revoked.

However this is mitigated by private hire drivers and vehicle proprietors being required to inform the Council in respect of convictions etc. at the time they are received so in most cases there would be time to consider the impact on their suitability to hold a licence prior to the licence expiry date.

- b) **Private Hire Operator Policy** - None

- c) **Card Payments** - There may be some negative impact for Hackney carriage proprietors due to the cost element involved of having a card reader fitted to their vehicle.

- d) **Tints** - Tinted windows could reduce perceived confidence in the safety of private hire vehicles. The consultation showed that only 40% of members of the public agreed with tints being permitted on the rear passenger windows. Comments received from members argued against tints being permitted for the reasons of public safety, especially with respect to females (the ability to see into the vehicle before entry and for other people to be able to see into the vehicle at all times). One respondent also mentioned the issue that partially sighted passengers may have if they are unable to see out of the windows due to the level of tint in the glass.

New vehicles tend to have less transparent glass and additional costs of replacing windows is likely to have a disproportionate impact on Black, Asian and minority ethnic men, and Muslims because of their higher levels of representations in the taxi trade. The relaxation of tint requirements, if approved, may also result in more vehicles licensed by Bristol City Council, thereby improving the regulatory regime for consumers booking vehicles and travelling in Bristol.

However, based on a balanced consideration of the potential impacts, this amendment is not being recommended by officers. Members will be requested to consider the evidence and make a determination on the appropriate course of action.

- e) **Statutory Taxi and Private Hire Vehicle Standards** - All licensed drivers could be impacted as every licence will need to be reviewed and depending on the outcome there could be the potential for licences being suspended or revoked and new applicants being refused due to the changes to the convictions policy and the requirement for a language proficiency test.

#### PROTECTED CHARACTERISTICS

<b>Age: Young People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
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Potential impacts:	a) <b>DBS Update Service</b> - No negative impact identified
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	<ul style="list-style-type: none"> <li><b>b) Private Hire Operator Policy</b> - No negative impact anticipated.</li> <li><b>c) Card Payments</b> – No negative impact identified</li> <li><b>d) Tints</b> - Tinted windows could reduce perceived confidence in the safety of private hire vehicles for some younger or older passengers.</li> <li><b>e) Statutory Taxi and Private Hire Vehicle Standards</b> – No negative impact anticipated.</li> </ul>
Mitigations:	See general comments above
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li><b>a) DBS Update Service</b> - No negative impact identified</li> <li><b>b) Private Hire Operator Policy</b> - No negative impact anticipated.</li> <li><b>c) Card Payments</b> – No negative impact identified</li> <li><b>d) Tints</b> - Tinted windows could reduce perceived confidence in the safety of private hire vehicles for some younger or older passengers.</li> <li><b>Statutory Taxi and Private Hire Vehicle Standards</b> – No negative impact anticipated.</li> </ul>
Mitigations:	See general comments above
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li><b>a) DBS Update Service</b> - No negative impact identified</li> <li><b>b) Private Hire Operator Policy</b> - Any employees of an Operator with learning difficulties e.g. dyslexia could potentially be affected by introducing minimum standards of training. The level of training that will be given to employees will be rigorous and appropriate attention should be paid to employees whose protected characteristics mean extra training or tuition is necessary.</li> <li><b>c) Card Payments</b> – No negative impact identified</li> <li><b>d) Tints</b> - People with sight loss may be likely to have more reduced visibility through windows and reduced light inside vehicles could affect those with sight loss and other impairments.</li> <li><b>e) Statutory Taxi and Private Hire Vehicle Standards</b> – All new applicants must complete a mandatory test of their language proficiency, which should cover both oral and written English language skills to achieve the objectives stated above. The Council will have the right to require existing drivers to conduct this test if required by the Chair of the Public Safety and Protection Committee. Such a test will be completed the licensees expense.</li> </ul>
Mitigations:	<p><b>Statutory Taxi and Private Hire Vehicle Standards</b> – Any person sitting the mandatory test of their language proficiency would be allowed reasonable adjustments as necessary.</p> <p>See also general comments above</p>
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li><b>a) DBS Update Service</b> - No negative impact identified. Approximately 98% of licensed drivers are male.</li> <li><b>b) Private Hire Operator Policy</b> - No negative impact anticipated.</li> <li><b>c) Card Payments</b> – As ‘All’ above - there may be a disproportionate cost impact as approximately 98% of licensed drivers are male</li> <li><b>d) Tints</b> – As above: tinted windows could reduce perceived confidence in the safety of private hire vehicles for some female passengers.</li> <li><b>e) Statutory Taxi and Private Hire Vehicle Standards</b> - No negative impact anticipated.</li> </ul>
Mitigations:	See general comments above
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	

<b>Race</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<p><b>(a) DBS Update Service</b> - Due to their high representation Black, Asian and minority ethnic licensed taxi drivers are likely to be disproportionately impacted by the initial financial cost of the DBS Update Service and applying for DBS applications outside of normal timescales.</p> <p><b>(b) Private Hire Operator Policy</b> - There is no requirement for Operators to employ people with a minimum level of English language. There is potential for Operators to employ people who may experience issues in being trained to minimum standards when English is not their first language.</p> <p><b>(c) Card Payments</b> – As ‘All’ above – there may be a disproportionate cost impact for Black, Asian and minority ethnic licenced drivers due to their high representation.</p> <p><b>(d) Tints</b> - No negative impact identified.</p> <p><b>(e) Statutory Taxi and Private Hire Vehicle Standards</b> – Including the introduction of requirements relating to language proficiency, certificates of good character, changes in respect of the guidelines relating to the relevance of criminal behaviour and introduction of basic DBS for vehicle applications.</p> <p>Due to their high representation Black, Asian and minority ethnic licensed taxi drivers are likely to be disproportionately impacted by the financial costs of new DBS applications, certificates of good character.</p> <p>Black, Asian and minority ethnic drivers are also likely to be disproportionately impacted by the strengthening of the guidelines on the relevance of criminal behaviour (convictions policy) due to their higher representation amongst taxi drivers.</p> <p>Members of the trade or applicants who are Black, Asian or minority ethnic may also be disproportionately impacted by the requirements for a certificate of good character as they may be more likely to have lived outside of the UK for a continuous period of three months or more.</p> <p>The language proficiency test may affect existing licensees wishing to renew their licence. Those that obtained a licence prior to the introduction of the Gold Standard Training Program in 2011 have not previously had to undergo a language proficiency test. The English language requirement may therefore become a barrier to income generation should a driver be unable to renew their licence.</p> <p>All licensed drivers could be impacted as every licence will need to be reviewed and depending on the outcome there could be the potential for licences being suspended or revoked and new applicants being refused due to the changes to the convictions policy.</p>
Mitigations:	The proposals are justified on the basis of ensuring the safety of the travelling public.
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<p><b>(a) DBS Update Service</b> - No negative impact identified.</p> <p><b>(b) Private Hire Operator Policy</b> - No negative impact anticipated.</p> <p><b>(c) Card Payments</b> – As ‘All’ above - there may be a disproportionate cost impact for Muslim licensed drivers due to their high representation</p> <p><b>(d) Tints</b> - No negative impact anticipated.</p> <p><b>(e) Statutory Taxi and Private Hire Vehicle Standards</b> - No negative impact anticipated.</p>
Mitigations:	The proposals are justified on the basis of ensuring the safety of the travelling public.
<b>Marriage &amp; civil partnership</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>OTHER RELEVANT CHARACTERISTICS</b>	



<b>Socio-Economic (deprivation)</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	None
Mitigations:	None.
<b>Carers</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	All sections - No negative impact identified
Mitigations:	None
<b>Other groups</b> [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	Anecdotal evidence suggests that a number of members of the trade are refugees or asylum seekers. Data held (small sample) shows 5% of the trade identify as refugees. However the policy proposals will have no greater impact than on any other group.
Mitigations:	None. Proposals justified to ensure the safety of the travelling public.

### 3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

All proposals will enhance the safety of the travelling public. Full details of how the proposals will benefit those with protected or relevant characteristics can be seen in "Step 4" below.

## Step 4: Impact

### 4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

#### Summary of significant negative impacts and how they can be mitigated or justified:

**DBS Update Service** - The impact with regard to the initial cost of the DBS Update Service can be justified through the improved protection for the travelling public and the savings over time (provided no change to DBS status and continued subscription to the service).

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.

**Private Hire Operator Policy** - We will ensure that our communication about implementation of the policy is clear, concise and unambiguous.

**Card Payments** - The potential negative cost impact of installing a mandatory card readers is likely to be mitigated / offset by other benefits including:

- An easier and quicker payment method for taxis fares
- A reduction in the need to stop off at cash machines if customers need extra cash to pay a fare
- Benefit to disabled customers and wheelchair users who may be unable to easily alight from a vehicle to use a cash point. Customers will be able to arrive at transportation hubs such as Temple Meads without the need to ensure cash is carried to secure a taxi for hire.
- A potential increase in customers who may previously have avoided taxis due to the requirement to pay in cash

**Tints** - More vehicles licensed by Bristol City Council, thereby improving the regulatory regime for consumers booking vehicles and travelling in Bristol.

New vehicles tend to have less transparent glass and additional costs of replacing windows is likely to have a disproportionate impact on Black, Asian and minority ethnic men, and Muslims because of their high levels of representations in the taxi trade.

#### **Statutory taxi and private hire vehicle standards**

- It is recommended that the standards be put into to practice and administered appropriately to mitigate the risk posed to the public.
- The purpose of setting standards is to protect children and vulnerable adults, and by extension the wider public when using taxis and private hire vehicles.
- We will discuss with training providers how the tests can meet the needs of disabled people or people speaking English as additional language and safeguarding training.
- The ability to require existing licence holder to pass a language proficiency test will ensure that all licence holders can communicate effectively with the public. This is essential as improved communication will help reduce the potential for any 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. Existing licence holders will only be required to undergo the test if the public safety and protection committee or Licensing Manager decide its necessary. No criteria for this is currently available and no decision has been made yet on what support may be available
- It is also essential that all licence holders are able to fully understand the legislative requirements and conditions and communications from the council in its role as the regulator. Understanding these communications is vital in order to ensure passenger safety.
- Re. Certificates of Good Character – we will provide additional guidance for cases where an applicant is unable to provide documentation from their country of origin because they are a refugee etc.
- Reasonable adjustments should be made to ensure that applicants and licence holders are given appropriate support and time to ensure they can meet the standards by this policy.
- Guidelines on the relevance of criminal behaviour - The strengthening of the guidelines are in line with the national standards proposed by central government (Department for Transport). The DfT have stated that the guidelines they have set out should be taken to be a minimum in considering whether a licence should be granted or renewed in most cases. The Department’s view is that this places passenger safety as the priority while enabling past offenders to sufficiently evidence that they have been successfully rehabilitated so that they might obtain or retain a licence. Applicants/licence holders will however be given the opportunity to have their case heard on its own merits and will be entitled to a fair and impartial consideration of their application/suitability to hold a licence.
- Certificate of good character – these are also recommended by the national standards proposed by central government (Department for Transport). A Disclosure and Barring Service check cannot access criminal records held overseas, only foreign convictions that are held on the Police National Computer may, subject to the disclosure rules, be disclosed. Therefore, a DBS check may not provide a complete picture of an individual’s criminal record where there have been periods living or working overseas; the same applies when an applicant has previously spent an extended period (three or more continuous months) outside the UK. As such to ensure licence holders are fit and proper persons to hold a licence it is essential this certificate is required. As above should any negative information be received applicants/licence holders will be given the opportunity to have their case heard on its own merits and will be entitled to a fair and impartial consideration of their application/suitability to hold a licence.

#### **Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:**

**DBS Update Service** - The impact on applicants and drivers should 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

**Private Hire Operator Policy** - Yes. In creating a policy, the standard of operators will be established in respect of public safety.

Taxis are an integral part of the public transport network, and an overall minimum standard in respect of topics such as disability awareness and child sex exploitation would benefit and further enhance the safety element of using taxis as a safe means of transport.

**Card Payments** - Having a card payment facility for passengers would improve public safety for Hackney Carriage customers in Bristol. Customers would not have the need to stop and use cash machines late at night and therefore reduce the risk of robbery or other associated crimes.

**Tints** – The more vehicles licensed by Bristol City Council, thereby improving the regulatory regime for consumers booking vehicles and travelling in Bristol

**Statutory taxi and private hire vehicle standards** - Licensing authorities should consider the role that those in the taxi and private hire vehicle industry can play in spotting and reporting the abuse, exploitation or neglect of children and vulnerable adults. As with any group of people, it is overwhelmingly the case that those within the industry can be an asset in the detection and prevention of abuse or neglect of children and vulnerable adults.

The introduction of requirements such as safeguarding training, DBS update service, basic disclosures, certificate of good character will enable additional checks to be carried out to ensure licence holders are fit and proper to hold a licence. The introduction of safeguarding training will drivers to :

- provide a safe and suitable service to vulnerable passengers of all ages;
- recognise what makes a person vulnerable; and
- understand how to respond, including how to report safeguarding concerns and where to get advice.

The ability to require all licence holders to pass a language proficiency test is likely to have a 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.

## 4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Present a report to the Public Safety and Protection Committee with recommendations including findings of the consultation.	Carl Knights`	Due on 27 July 2021

## 4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

**DBS Update Service** - 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.

**Private Hire Operator Policy** - Through monitoring of licensed operators and enforcement visits/inspections. The policy will also create a requirement for licensed operators to report back to the council in respect of training undertaken for staff.


**Card Payments** - If approved it will be a mandatory requirement for all hackney carriage vehicles to be fitted with a card payment device. This will be checked by Fleet Services by way of their vehicle inspection check on the initial granting of the licence and each time the vehicle is due for renewal

**Tints** – If the proposal is not approved the Licensing Team will monitor the supply of new vehicles to see if the trend for manufacturer fitted tints increase and the subsequent cost implications of window replacement. If the proposal is approved any negative feedback from members of the public with regard to tints fitted on licensed vehicles will be monitored. This element of the policy will be kept under review to determine if any future change is required.

**Statutory Taxi and Private Hire Vehicle Standards** – Taking all of the above into consideration and with the added conditions in the statutory standards a more proactive approach on deciding whether a licence holder is deemed fit and proper to hold such a licence.

## Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director<sup>2</sup>.

<b>Equality and Inclusion Team Review:</b> <b><i>Reviewed by Equality and Inclusion Team</i></b>	<b>Director Sign-Off:</b> 
Date: 14/7/2021	Date: 15/7/2021

<sup>2</sup> Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.