

Appendix 2

Equality Impact Assessment

This Equality Impact Assessment has been developed at a Greater Manchester level, with Salford specific information included where relevant.

Title of the assessment: GM Common Minimum Licensing Standards

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1) What is the main aim and purpose of the activity?

The main purpose of the activity is to propose a set of taxi and private hire minimum licensing standards for adoption by Greater Manchester's ten local authorities. The purpose of this is to standardise licensing conditions and policies across Greater Manchester (GM) so that the travelling public can have greater assurance regarding the safety and risk assessments that have taken place for licensed drivers and vehicles, including the emissions standard of vehicles they are travelling in. The activity will also provide a valuable platform from which to raise public awareness about the variance in standards nationally and deter the use of non-GM licensed vehicles within the conurbation, thereby protecting business within GM.

2) List the main elements of the activity

The project includes a set of standards split into 4 main categories: Drivers, Vehicles, Operators and Local Authority. The standards are a set of policy requirements or licence conditions by which licence holders and local authorities must adhere to.

3) What outcomes does the activity aim to achieve?

The project aims to:

1. Meet the requirements of the Department for Transport's Statutory Guidance for Taxis and Private Hire
2. Improve public safety
3. Improve customer experience (both passenger customers and licensee customers)
4. Achieve clean air objectives
5. Deter GM residents and visitors from using non-GM licensed vehicles

4) Who are, or will be, the main beneficiaries of the activity?

Passengers who use taxi/PH services, taxi/PH operators, proprietors and drivers, and licensing authorities themselves.

5) Do you need to consult with people who might be affected by it directly or indirectly?

Yes, a public consultation has already taken place, alongside targeted direct consultation with impacted groups.

6) Having due regard for the equality duty involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics
- Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people
- Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

Please complete the sections below and give reasons, evidence, and comment where appropriate to support your judgement(s).

- Record where you think that the activity could have a positive impact on any of the target groups or contribute to promoting equality, equal opportunities or improving relations within equality target groups.
- Record where you think that the activity could have an adverse impact on any of the equality target groups i.e., it could disadvantage them, and impact is high.
- Give reason/comments/evidence where appropriate to support your judgement.

Age

Target group: Children and Young People (aged 19 and under)

Positive impact: Highly likely

Adverse impact: Very low likelihood

Comments or evidence:

Children and young people are by definition 'vulnerable' individuals. Improvements to the way licence applicants are assessed and monitored for compliance can only serve to improve the quality and safety of the licensed fleets and reduce the risk of harm to the travelling public, particularly those classed as vulnerable. The MLS should also serve to raise greater awareness of the risks of travelling in vehicles licensed outside of GM to unknown standards, with little to no proactive compliance activity within GM.

There is a risk that the higher standards across GM will result in higher licence fees and improved compliance across the board, and this could mean that whilst they are able to, GM based operators could still choose instead to obtain licences outside of GM authorities. These operators may provide school contract-based services, and this could be a risk if the processes and compliance monitoring of other authorities are not as robust as the GM MLS. This risk could be mitigated by authorities amending their school contracts to require the use of licensed vehicles in the area where the school is based only.

Target group: Older People (aged 60 and over)

Positive impact: Highly likely

Adverse impact: Medium – high risk

Comments or evidence:

Many older people are reliant on taxis and private hire vehicles to travel. Improvements to the way licence applicants are assessed and monitored can only serve to improve the quality and safety of the licensed fleets and reduce the risk of harm to the travelling public.

There is a risk of the activity causing a reduction in the Hackney licensed fleet (cost of vehicles meaning risk of individuals leaving this trade), and a risk of licensees going to authorities outside of GM to get licensed due to the applications criteria, standards, compliance and therefore cost being higher; so GM travelling public could be forced to travel in vehicles with drivers of a lower quality and assessment standard.

The MLS (if adopted in full) will likely result in higher costs to some licensees as proposals include additional testing requirements (e.g. enhanced driving test), additional processing/checking requirements in the application process (background checks), and in some areas additional compliance activity to ensure the integrity of the activity, which in turn will result in higher licence fees. Data we currently hold on the age profile of our licensed fleet of drivers shows that around 40% of our licensees are over the age of 50, with 13% of licensees over the age of 60.

Disability

Target group: Disability (people with physical impairments, communication or sensory impairments, a learning disability or cognitive impairment, mental health problems, longstanding illness/health condition, other disability impairment)

Positive impact: Highly likely

Adverse impact: Medium - high risk

Comments or evidence:

Improvements to the way licence applicants are assessed and monitored for compliance can only serve to improve the quality and safety of the licensed fleets and reduce the risk of harm to the travelling public, particularly those classed as vulnerable. The proposals also seek to increase the number of Wheelchair Accessible and Accessibility enhanced public hire vehicles (Purpose built Hackneys with sight and audio adaptations) across the conurbation which would result in reducing the risk of people with disabilities not being able to get a suitable vehicle on a public rank. The MLS also seeks to improve the quality of training required of licensed drivers, including their awareness of their responsibilities towards passengers with disabilities, as well as improve the level of proactive compliance to ensure these standards are being adhered to and improve public confidence to report, as complaints from people with disabilities are traditionally low.

The MLS should also serve to raise greater awareness of the risks of travelling in vehicles licensed outside of GM to unknown standards, with little to no proactive compliance activity within GM.

However, the proposed MLS also carries a fairly high risk of reducing the licensed Hackney fleet, thereby conversely increasing the risk of people with accessibility needs not being able to access a suitable vehicle either by pre-booking or on a public rank. The MLS will also likely lead to increased licence fees, which in turn will result in increased fares, potentially affecting people with disabilities disproportionately if the individual is more reliant on accessible vehicles not widely available in the private hire industry or for public hire.

Gender

Target group: Men

Positive impact: Highly likely

Adverse impact: Medium - high risk

Comments or evidence:

The positive impacts of MLS will affect all members of the travelling public that use Taxi and Private Hire services, by providing a higher quality fleet of drivers and vehicles that will be assessed and monitored to be safe and minimise risk to the public.

If there are any adverse implications of the MLS proposals for licensees, then this will affect men more than women, as 97% of our licence holders are male* (identified from their stated title on their licence application).

There is a risk that if the proposed MLS drives growth of non-GM licensed vehicles being used by operators within GM, then all passengers will be travelling in vehicles with drivers to unknown standards with minimal compliance.

Target group: Women

Positive impact: Highly likely

Adverse impact: Low/medium risk

Comments or evidence:

The positive impacts of MLS will affect all members of the travelling public that use Taxi and Private Hire services, by providing a higher quality fleet of drivers and vehicles that will be assessed and monitored to be safe and minimise risk to the public.

There is a risk that if the proposed MLS drives growth or non-GM licensed vehicles being used by operators within GM, then all passengers will be travelling in vehicles with drivers to unknown standards with minimal compliance, and females are more vulnerable when travelling alone in that regard.

Target group: Trans people

Positive impact: Highly likely

Adverse impact: Low risk

Comments or evidence:

The positive impacts of MLS will affect all members of the travelling public that use Taxi and Private Hire services, by providing a higher quality fleet of drivers and vehicles that will be assessed and monitored to be safe and minimise risk to the public.

There is a risk that if the proposed MLS drives growth or non-GM licensed vehicles being used by operators within GM, then all passengers will be travelling in vehicles with drivers to unknown standards with minimal compliance.

Target group: LGBT+

Positive impact: Highly likely

Adverse impact: Low risk

Comments or evidence:

The positive impacts of MLS will affect all members of the travelling public that use Taxi and Private Hire services, by providing a higher quality fleet of drivers and vehicles that will be assessed and monitored to be safe and minimise risk to the public.

There is a risk that if the proposed MLS drives growth or non-GM licensed vehicles being used by operators within GM, then all passengers will be travelling in vehicles with drivers to unknown standards with minimal compliance.

Race

Target group: Asian or Asian British Backgrounds (This includes Pakistani, Indians and Bangladeshi, Chinese or any other Asian background)

Positive impact: Highly likely

Adverse impact: Medium - high risk

Comments or evidence:

Whilst race and ethnicity data is not collected or recorded as part of the licensing process, but we know from seeing our applicants in person and our daily interactions that the vast majority of our licensed fleet are non-white males (both British and non-British); therefore any impacts, both positive and adverse will likely affect this target group disproportionately.

BAME licensees are also more likely to live in Lower Super Output Areas (LSOAs) with higher levels of deprivation and this is borne out in the postcode data of our licence holders where the overwhelming majority have postcodes identified as LSOAs. It would be a reasonable inference that these licence holders are more likely to have socio-economic pressures and live in housing that is less likely to have private parking and the ability therefore for at home EV charging; therefore requirements for more expensive fully electric vehicles carry an adverse risk to the viability of these individuals continuing in the industry.

All sections of the travelling public should benefit from MLS.

Target group: Black or Black British Backgrounds (This includes Caribbean, African or any other black background)

Positive impact: Highly likely

Adverse impact: Medium - high risk

Comments or evidence:

Whilst race and ethnicity data is not collected or recorded as part of the licensing process, we know from seeing our applicants in person and our daily interactions that the vast majority of our licensed fleet are non-white males (both British and non-British); therefore any impacts, both positive and adverse will likely affect this target group disproportionately.

BAME licensees are also more likely to live in Lower Super Output Areas (LSOAs) with higher levels of deprivation and this is borne out in the postcode data of our licence holders where the overwhelming majority have postcodes identified as LSOAs. It would be a reasonable inference that these licence holders are more likely to have socio-economic pressures and live in housing that is less likely to have private parking; therefore requirements for more expensive fully electric vehicles carry an adverse risk to the viability of these individuals continuing in the industry.

All sections of the travelling public should benefit from MLS.

Target group: Mixed /Multiple Ethnic Groups (This includes White and Black Caribbean, White and Black African, White and Asian or any other mixed background)

Positive impact: Highly likely

Adverse impact: Medium - high risk

Comments or evidence:

Whilst race and ethnicity data is not collected or recorded as part of the licensing process, we know from seeing our applicants in person and our daily interactions that the vast majority of our licensed fleet are non-white males (both British and non-British); therefore any impacts, both positive and adverse will likely affect this target group disproportionately.

Salford's ethnic minority groups differ from those in GM, with a higher Yemeni Arab population and smaller groups of Pakistani and Bangladeshi heritage / British Pakistani and British Bangladeshi. However, the taxi and private hire workforce includes a high proportion of Pakistani and Bangladeshi and Yemeni individuals, principally men.

BAME licensees are also more likely to live in Lower Super Output Areas (LSOAs) with higher levels of deprivation and this is borne out in the postcode data of our licence holders where the overwhelming majority have postcodes identified as LSOAs. It would be a reasonable inference that these licence holders are more likely to have socio-economic pressures and live in housing that is less likely to have private parking; therefore requirements for more expensive fully electric vehicles carry an adverse risk to the viability of these individuals continuing in the industry.

All sections of the travelling public should benefit from MLS.

Target group: White British Background (This includes English, Scottish & Welsh, Irish and Gypsy or Irish Travellers)

Positive impact: Highly likely

Adverse impact: Low risk

Comments or evidence:

Whilst all sections of the travelling public should benefit from MLS, there is little to no evidence to suggest that this target group would be particularly adversely affected over any other.

Target group: Non-British White Backgrounds (This includes Irish, Polish, Spanish, Romanians and other White backgrounds)

Positive impact: Highly likely

Adverse impact: Low risk

Comments or evidence:

Whilst all sections of the travelling public should benefit from MLS, there is little to no evidence to suggest that this target group would be particularly adversely affected over any other.

Target group: Any other background not covered by any of the above

Positive impact: -

Adverse impact: -

Comments or evidence:

Data on race and ethnicity not held.

Religion

Target groups: Buddhists, Christians, Hindus, Jews, Muslims, Sikhs, Others

Positive impact: -

Adverse impact: -

Comments or evidence:

Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver

Sexual orientation

Target groups: Gay men, lesbians, bisexual

Positive impact: -

Adverse impact: -

Comments or evidence:

Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver

7) Have you identified two or more high adverse impacts in the table above?

Yes

8) If you have identified one high adverse impact or any medium/low adverse impacts, what improvements to the activity could you make to mitigate high/medium/low adverse impacts? Please give details of the improvements you plan to make.

The highest cost risk is that around the requirements for vehicles. Mitigation has already been identified in the form of a substantial Clean Taxi Fund to assist with the purchase/upgrade to compliant vehicles and discussions are ongoing with central government with regards to additional funding support in this area. Engagement with the trade continues to understand the ongoing impacts and risks, particularly in the recovery from the pandemic.

Further mitigation is proposed by way of an extended exemption period for the CAP, for GM licensed Hackneys and Private Hire vehicles.

To mitigate the risk of introducing MLS in the absence of wider and meaningful national reform, a public awareness campaign is essential to encourage residents and visitors to use only GM licensed vehicles (and drivers) when travelling.

A decrease in the number of licensed vehicles has the potential for the highest impact to affect the most vulnerable (e.g., those with a disability) as this group can be particularly reliant on this form of transport; the risk is being mitigated by the steps outlined above. The overall effect of the changes should improve the service residents receive and has the potential to have a disproportionate positive impact on those that are reliant on such services, including vulnerable persons.

9) Have you set up equality monitoring systems to carry out regular checks on the effects your activity has on the following groups?

Age: No - whilst we capture this data, we are not monitoring regularly. In order to monitor we'd have to change our Data sharing agreements to explain how this will be used.

Disability: Yes - We review all complaints received and take appropriate action. We monitor all complaints for issues that may impact on persons or groups with protected characteristics.

Gender / race / religion belief / sexual orientation: No - we would have to have a clear reason for capturing in our data sharing agreement and to begin to capture and monitor this information would increase processing (and therefore licence fee) costs.

Other: No.

10) How will you measure the success of any equality monitoring systems identified in Question 9 above? How will you ensure that everyone involved in the activity knows and understands what improvements you intend to make and is able to put the activity into practice with those improvements?

Regular engagement sessions with trade representatives have taken place throughout the activity. Feedback and information gathered from these sessions helps inform the assessment of the identified risks. Ongoing engagement will ensure that any adverse impacts are identified and responded to.

11) List all of the information that you have taken into account in carrying out this Equality Analysis.

Data held on the Council's licensing business system.
Information known by Service Managers through service delivery and daily interaction with customers.

Relevant Salford specific demographic data held through consultation with Salford City Council's Policy, Research and Partnership's team, including officers leading on Equality considerations.