

Equality Impact Assessment - Initial Screening

Title of the Assessment	Common Minimum Licensing Standards (MLS) for Taxi and Private Hire Services
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Question 1	
What is the main aim and purpose of the activity?	<p>Transport for Greater Manchester (TfGM) has been working collectively with the ten Greater Manchester local authorities since 2018 to develop a common set of proposed minimum licensing standards (MLS) for taxi and private hire services.</p> <p>Coordinated and supported by TfGM MLS has been developed using the insight and experience of GM's 10 Local Authorities' licensing sections. Development of the standards so far has been informed by public engagement exercise called the 'Let's Talk Taxi' conversation in the summer of 2018 and ongoing engagement with the taxi and private hire (PH) trade, Elected Members and other interested parties.</p> <p>To protect the public, taxis and private hire services must be licensed. The proposed minimum licensing standards are based on the principles that anyone using a licensed vehicle must:</p> <ul style="list-style-type: none"> • be able to trust its driver • be assured the vehicle is safe • trust any operator or driver to keep their information safe • understand the vehicle is not contributing to emissions that could harm drivers, passengers and residents of Greater Manchester. <p>These proposed minimum licensing standards are intended to form the cornerstone of the licensing framework used by all 10 GM Local Authorities to help deliver a shared vision for taxi and private hire services.</p> <p>This approach stands to benefit drivers and the trade more widely as public confidence in a well-regulated and locally licensed taxi and private hire services grows and will contribute directly to better air quality and lower carbon emissions.</p> <p>Establishing and implementing minimum licensing standards across Greater Manchester will help to ensure that all residents and visitors see these services as safe and reliable, and preferable to those not licensed by Greater Manchester local authorities.</p>

Question 2	
List the main elements of the activity?	<ol style="list-style-type: none"> 1. Identify what the starting position is (what current standards are in place now) 2. What impact will MLS have on the public, taxi/PHV passengers, taxi drivers, vehicle owners, taxi business owners 3. Will there be fare implications for passengers 4. What overall benefit will MLS bring to the districts

Question 3

What outcomes does the activity aim to achieve?

1. Local authorities are able to identify the gap between their current licensing standards and what they will need to do to reach MLS
2. What implication will there be on taxi drivers, taxi vehicle owners, business owners
3. What fare implications will there be for the public who use taxis

Question 4

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

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

Question 5

Do you need to consult with people who might be affected by it directly or indirectly?
Please justify your response

Yes – Consultation is taking place and consultation activity has been subject to a separate EQIA. Every effort will be made to engage with beneficiary groups across Greater Manchester with support of local authorities.

Question 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 table below and give reasons, evidence and comment, where appropriate, to support your judgement(s).

- Use the table below to 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.

- Use the table below to 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.

- Use the last column in the table below to give reason/comments/evidence where appropriate to support your judgement.

Age			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Children and Young People (aged 19 and under)	High	Low	<p>Young people are more reliant on public transport, taxis and PHVs to transport them to places of work education, and social/leisure activities.</p> <p>There may be potential increase in licensing fees which may result in fares increases.</p> <p>Increased fares would disproportionately impact this group in terms of affordability.</p>
Older People (aged 60 and over)	High	Medium	<p>Older people are more reliant on public transport, taxis and PHVs to transport them to places of health services and social/leisure activities.</p> <p>Increased travel costs incurred would disproportionately impact this group in terms of affordability.</p> <p>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.</p> <p>There is a risk of the activity causing a reduction in the Hackney licensed fleet (cost of vehicles meaning risk of individuals leaving in the trade or, in areas such as Oldham, Rochdale and Wigan that currently allow saloon hackneys, switching to become a PHV), and a risk of licensees being driven to go to authorities outside of GM to get licensed due to the applications criteria, standards, compliance and therefore cost being higher.</p> <p>Those aged 60 or over made up 19% of drivers. (Department for Transport: taxi and private hire vehicle statistics, England, 2019). These proposals could have a greater impact on individuals in these age groups if their vehicle do not meet the MLS vehicle requirements.</p>

Disability			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
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).	High	Medium	<p>People with disabilities are more reliant on public transport, taxis and PHVs to transport them to places of work education, and social/leisure activities. There may be potential increase in licensing fees which may result in fares increases. Increased fares would disproportionately impact this group in terms of affordability.</p> <p>The proposals also seek to increase the provision 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. This is particularly positive for Rochdale, Oldham, and Wigan which currently have a mixed fleet of hackney vehicles. However people with physical disabilities or mobility impairments but do not use a wheelchair may find WAV vehicles harder to use.</p> <p>Conversely, the proposed MLS also carries the risk of reducing the licensed Hackney fleet, which could potentially increase the risk of people with accessibility needs not being able to access a suitable vehicle either by pre-booking or on a public rank.</p>

Gender			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Men	High	Medium	<p>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.</p> <p>If there are any adverse implications of the MLS proposals for licensees, then this will affect men more than women, as over 90% of taxi drivers are male.</p>
Women	High	Low	<p>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.</p>
Transgender People	High	Low	<p>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.</p>

Race			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Asian or Asian British Backgrounds (This includes Pakistani, Indians and Bangladeshi, Chinese or any other Asian background)	High	High	<p>People from black and minority ethnic community backgrounds are more reliant on public transport therefore increased costs would affect them disproportionately.</p> <p>A high proportion of taxi drivers are from Asian and Asian British backgrounds. Any increases in business costs are therefore likely to be experienced disproportionately by this group.</p> <p>As part of the Minimum Licensing Standards consultation proposals, the licensing authority will need to ensure that sufficient background checks are conducted for those applicants who have spent six continuous months or more living outside the United Kingdom. Additionally, Licensing Authorities must require that all new drivers are able to communicate in English orally and in writing to a standard that is required to fulfil their duties, including in emergency and challenging situations. This should include:</p> <ul style="list-style-type: none"> • Conversing with passengers to demonstrate an understanding of the desired destination, an estimation of the time taken to get there and other common passenger requests; • Providing a customer with correct change from a note or notes of higher value than the given fare, and doing so with relative simplicity; and • Providing a legibly written receipt upon request. <p>Although it is unlikely that many taxi drivers are able to operate already without these fundamental requirements for their profession, they are more likely to impact on people who do not use English as a first language, compared to people who use English as a first language.</p>

<p>Black or Black British Backgrounds (This includes Caribbean, African or any other black background)</p>	<p>Medium</p>	<p>Medium</p>	<p>People from black and minority ethnic community backgrounds are more reliant on public transport therefore increased costs would affect them disproportionately.</p> <p>A high proportion of taxi drivers are from Asian and Asian British backgrounds. Any increases in business costs are therefore likely to be experienced disproportionately by this group.</p> <p>As part of the Minimum Licensing Standards consultation proposals, the licensing authority will need to ensure that sufficient background checks are conducted for those applicants who have spent six continuous months or more living outside the United Kingdom. Additionally, Licensing Authorities must require that all new drivers are able to communicate in English orally and in writing to a standard that is required to fulfil their duties, including in emergency and challenging situations. This should include:</p> <ul style="list-style-type: none"> • Conversing with passengers to demonstrate an understanding of the desired destination, an estimation of the time taken to get there and other common passenger requests; • Providing a customer with correct change from a note or notes of higher value than the given fare, and doing so with relative simplicity; and • Providing a legibly written receipt upon request. <p>Although it is unlikely that many taxi drivers are able to operate already without these fundamental requirements for their profession, they are more likely to impact on people who do not use English as a first language, compared to people who use English as a first language.</p>
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<p>Mixed /Multiple Ethnic Groups (This includes White and Black Caribbean, White and Black African, White and Asian or any other mixed background)</p>	<p>Medium</p>	<p>Medium</p>	<p>As part of the Minimum Licensing Standards consultation proposals, the licensing authority will need to ensure that sufficient background checks are conducted for those applicants who have spent six continuous months or more living outside the United Kingdom. Additionally, Licensing Authorities must require that all new drivers are able to communicate in English orally and in writing to a standard that is required to fulfil their duties, including in emergency and challenging situations. This should include:</p> <ul style="list-style-type: none"> • Conversing with passengers to demonstrate an understanding of the desired destination, an estimation of the time taken to get there and other common passenger requests; • Providing a customer with correct change from a note or notes of higher value than the given fare, and doing so with relative simplicity; and • Providing a legibly written receipt upon request. <p>Although it is unlikely that many taxi drivers are able to operate already without these fundamental requirements for their profession, they are more likely to impact on people who do not use English as a first language, compared to people who use English as a first language.</p>
<p>White British Background (This includes English, Scottish & Welsh, Irish and Gypsy or Irish Travellers)</p>	<p>High</p>	<p>Low</p>	<p>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.</p>

<p>Non-British White Backgrounds (This includes Irish, Polish, Spanish, Romanians and other White backgrounds)</p>	<p>High</p>	<p>Medium</p>	<p>As part of the Minimum Licensing Standards consultation proposals, the licensing authority will need to ensure that sufficient background checks are conducted for those applicants who have spent six continuous months or more living outside the United Kingdom. Additionally, Licensing Authorities must require that all new drivers are able to communicate in English orally and in writing to a standard that is required to fulfil their duties, including in emergency and challenging situations. This should include:</p> <ul style="list-style-type: none"> • Conversing with passengers to demonstrate an understanding of the desired destination, an estimation of the time taken to get there and other common passenger requests; • Providing a customer with correct change from a note or notes of higher value than the given fare, and doing so with relative simplicity; and • Providing a legibly written receipt upon request.
<p>Arabs</p>	<p>High</p>	<p>Medium</p>	<p>As part of the Minimum Licensing Standards consultation proposals, the licensing authority will need to ensure that sufficient background checks are conducted for those applicants who have spent six continuous months or more living outside the United Kingdom. Additionally, Licensing Authorities must require that all new drivers are able to communicate in English orally and in writing to a standard that is required to fulfil their duties, including in emergency and challenging situations. This should include:</p> <ul style="list-style-type: none"> • Conversing with passengers to demonstrate an understanding of the desired destination, an estimation of the time taken to get there and other common passenger requests; • Providing a customer with correct change from a note or notes of higher value than the given fare, and doing so with relative simplicity; and • Providing a legibly written receipt upon request. <p>Although it is unlikely that many taxi drivers are able to operate already without these fundamental requirements for their profession, they are more likely to impact on people who do not use English as a first language, compared to people who use English as a first language.</p>

<p>Any other ethnic background not covered by any of the above</p>	<p>High</p>	<p>Medium</p>	<p>As part of the Minimum Licensing Standards consultation proposals, the licensing authority will need to ensure that sufficient background checks are conducted for those applicants who have spent six continuous months or more living outside the United Kingdom. Additionally, Licensing Authorities must require that all new drivers are able to communicate in English orally and in writing to a standard that is required to fulfil their duties, including in emergency and challenging situations. This should include:</p> <ul style="list-style-type: none"> • Conversing with passengers to demonstrate an understanding of the desired destination, an estimation of the time taken to get there and other common passenger requests; • Providing a customer with correct change from a note or notes of higher value than the given fare, and doing so with relative simplicity; and • Providing a legibly written receipt upon request. <p>Although it is unlikely that many taxi drivers are able to operate already without these fundamental requirements for their profession, they are more likely to impact on people who do not use English as a first language, compared to people who use English as a first language.</p>
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Religion/Belief			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Buddhists	High	Low	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.
Christians	High	Low	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.
Hindus	High	Low	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.
Jews	High	Low	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.
Muslims	High	High	<p>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.</p> <p>Additional MLS requirements for drivers may have disproportionate adverse impact on this group.</p>
Sikhs	High	Low	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.

Others	High	Low	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.
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Sexual Orientation			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Gay men	High	Low	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.
Lesbians	High	Low	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.
Bisexual	High	Low	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.

Question 7	
Have you identified two or more high adverse impacts in the table above?	No

Question 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.

One aspect of the high adverse impacts identified relates to the fact that the majority of private hire and taxi drivers are male and a high proportion are of BAME backgrounds. As the Minimum Licensing Standards proposals may result in increased business costs.

The other aspect of the adverse impacts identified relate to the proposed oral and written English requirements for drivers. Whereas people of White British or Irish background whose first language is English would be less likely to fail these requirements, people born in another country whose first language is not English are more likely to fail these requirements. The background checks on people who have lived outside UK and EU may also have adverse impact in that they may not be able to obtain information from their country of origin easily and may also incur additional expenses to obtain such information.

Question 9

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

Equality Group	Has an equality monitoring system been set up? (Y/N)	Details
Age	N	TfGM will work with local authorities to capture this
Disability	N	TfGM will work with local authorities to capture this
Gender	N	TfGM will work with local authorities to capture this
Race	N	TfGM will work with local authorities to capture this
Religion/Belief	N	TfGM will work with local authorities to capture this
Sexual Orientation	N	TfGM will work with local authorities to capture this
Other		

Question 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 make and is able to put the activity into practice with those improvements?

The success of the Common Minimum Standards will be measured by the licensed Hackney Carriage and Private Hire Trades complying with proposed standards.

One of the measures of success will be:

- through air quality monitoring, specifically NO₂ compliance.
- Accessibility
- Customer feedback and monitoring customer complaints

Question 11

Are there any elements within this activity that require a separate Equality Impact Analysis?

The consultation activity is subject to a separate EQIA.

Question 12

Is a Full Impact Analysis needed?

No

Question 13

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

Greater Manchester Clean Air Plan

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