

Greater Manchester Minimum Licensing Standards

Final Consultation Report

Transport for Greater Manchester
and the 10 Greater Manchester
Local Authorities

15th June 2021

Quality information

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Executive Summary

Introduction

Around 2,000 hackneys and approximately 11,500 private hire vehicles (PHVs) are licensed by the ten Greater Manchester Local Authorities at the time of writing. Currently, each Local Authority in Greater Manchester has a different set of standards for licensing drivers, vehicles and operators in their area.

The ten Greater Manchester Local Authorities, supported by Transport for Greater Manchester (TfGM), have developed proposals for a consistent set of Greater Manchester-wide minimum licensing standards with an aim that anyone using a licensed vehicle must:

- be able to trust its driver;
- be assured the vehicle is safe;
- trust any operator or driver to keep their information safe; and
- understand the vehicle is not contributing to emissions that could harm drivers, passengers and residents of Greater Manchester.

Summary of the proposed Minimum Licensing Standards

The proposed standards cover four main areas:

| Licensed Driver | Licensed Vehicle | Licensed Operators | Local Authorities |
|--|--|---|---|
| Enhanced criminal record checks; Driver medical examinations; Knowledge tests; English language tests; Driving proficiency tests; Driver training; Dress code; Drug and alcohol testing; Private hire driver conditions. | Vehicle emissions; Vehicle age; Different age policy for electric vehicles; Vehicle colour; Accessible hackney carriages; Side/rear loading without the need for swivel seats; Vehicle livery; CCTV; Executive hire; Vehicle design; Vehicle conditions. | Common licence conditions; Criminal record checks for operators and staff. | Timescales for applications to be submitted and received; An agreed common enforcement approach; Councillor training before they head applications; Appropriate delegated powers for Licensing Managers; Excellence in Licensing Award. |

Consultation

A consultation took place between Thursday 8 October and Thursday 3 December 2020 (running for 8 weeks in total). Responses were captured via:

- Online questionnaire (1,552 responses);
- Paper questionnaire (84 responses); and
- Email (47 responses).

The consultation sought views from the public, the taxi industry (hackney drivers, private hire vehicle drivers and operators), businesses (including vehicle leasing companies), organisations and elected representatives, with the latter two combined in analysis under a single heading (representatives).

Overall Agreement with the MLS proposals

Responses were polarised by those agreeing with the standards and those that did not. The next section highlights key aspects of support and areas of concern by different respondent types.

| Agree | Disagree |
|---|--|
| <ul style="list-style-type: none"> • Public (91%) • Business (72%) • Representatives (64%) * | <ul style="list-style-type: none"> • Hackney drivers (67%) • PHV drivers (57%) • Operators (67%) * • Vehicle Leasing companies (70%) * |

*Base is small (<50) use data with caution.

Agreement across districts was high amongst members of the public, however, drivers in Bolton (9%) and Oldham (7%) had particularly low levels of agreement with the proposed standards.

| Members of Public | | | Hackney / PHV driver | | |
|-------------------|----------|---------|----------------------|--------------|---------|
| | Base (n) | % agree | Hackney Base (n) | PHV Base (n) | % agree |
| Bolton | 141 | 95% | 4 | 73 | 9% |
| Bury | 89 | 94% | 2 | 27 | 31%* |
| Oldham | 101 | 94% | 59 | 15 | 7% |
| Rochdale | 73 | 89% | 15 | 53 | 21% |
| Stockport | 119 | 90% | 23 | 38 | 28% |
| Tameside | 61 | 92% | 20 | 23 | 28%* |
| Trafford | 83 | 98% | 13 | 14 | 30%* |
| Manchester | 161 | 89% | 51 | 53 | 49% |
| Salford | 63 | 90% | 3 | 19 | 41%* |
| Wigan | 40 | 85% | 30 | 39 | 26% |

*Base is small (<50) use data with caution.

The main reasons members of the public agreed included:

- Improved passenger safety
- Increased customer experience

The main reasons drivers did not agree included:

- It would put many drivers out of business or cause debt
- Cost of the licence fee
- High cost of vehicles
- Need more time to adapt and recover from Covid-19

Driver Standards

| Members of the Public (n=969) | |
|---|--|
| 94% Agree | 4% Disagree |
| <p>Key areas of support:</p> <ul style="list-style-type: none"> • Knowledge test: will improve feelings of safety and confidence that the driver is taking the best / most cost-effective route. • Enhanced criminal record checks: will increase the feeling of safety and should be mandatory. • English language tests: successful communication gives confidence and promotes a feeling of safety. • Driver training: Suggestions for training were made, such as: <ul style="list-style-type: none"> – Disability awareness – Safety and first aid – Awareness of vulnerable road users e.g. cyclists and pedestrians – Driver behaviour and etiquette. | <p>Key areas of concern:</p> <ul style="list-style-type: none"> • Dress code: generally felt to be unnecessary. • English Language test: has potential to be discriminatory and aspects such as the written test were not thought necessary. |

"One in every three that I have travelled with asks me for directions. When my daughter, with special needs, travels alone and is asked for directions she is unable to do that." (Public, age 75+, Oldham)

"I don't really think dress code is that important. Taxi drivers should be allowed to wear whatever they want as long as it isn't offensive or inflammatory" (Public, 18-24, Bury)

"I feel it is appropriate for drivers to have an enhanced criminal record check - it would make me feel a lot safer allowing my disabled daughter (who also has a learning disability) to travel under their care. After all, all staff currently involved in her care have to have one. It is appropriate I feel." (Public, age 45-54, Bury)

"Really unfair to suggest current taxi drivers can't speak or write English. When has this ever been an issue? Speaking a language and writing it are two very different things. I don't think you need to be able to write to drive taxis. Having this criteria will exclude those who probably already struggle to get work elsewhere e.g. people with learning disabilities, people whose second language is English.... Really disappointed with this criteria." (Public, age 35-44, Rochdale)

Driver Standards cont.

| Hackney Drivers (n=220) / PHV (n=348) | |
|--|--|
| 58% / 57% Agree | 28% / 29% Disagree |
| <p>Key areas of support:</p> <ul style="list-style-type: none"> • English Language test: to improve customer engagement. • Knowledge test: to improve standards and customer confidence. | <p>Key areas of concern:</p> <ul style="list-style-type: none"> • Dress code: unnecessary and potentially uncomfortable for driving. • Knowledge test: unnecessary given the widespread use of Sat Nav. • General disagree: PHV particularly mentioned the cost implications of the proposals. |

"Drivers need to be taught how to drive a Taxi, not just a vehicle. It is a customer service industry. Poor local knowledge and a reliance on technology has severely lowered standards." (Hackney Driver, Wigan)

"I am worried about dress code because we the private hire drive or hackney drivers spend many hours sitting and driving so we wear a dress who we feel comfortable if there is dress code I am afraid it can make us uncomfortable." (PHV Driver, Manchester)

"These proposals will kill the trade. Drivers cannot afford the cost of implementing these changes" (PHV Driver, Bolton)

Vehicle Standards

| Members of the Public (n=972) | |
|--|---|
| 88% Agree | 9% Disagree |
| <p>Key areas of support:</p> <ul style="list-style-type: none"> • CCTV: promotes safety for the driver and passenger. • Accessible vehicles: respondents highlighted current issues experienced in booking accessible taxis and therefore felt this was an important standard. • Vehicle emissions: general support of the timeline but re-iterated the need for financial support to upgrade. | <p>Key areas of concern:</p> <ul style="list-style-type: none"> • Vehicle colour: although some agreed with the proposal, more did not feel it was necessary. • Age of vehicle: if the vehicle was well maintained, age did not matter. |

"CCTV will be essential to ensure safety and crime prevention on both sides". (Public, age 25-34, Rochdale)

"Vehicle colour - Would not improve driving standards but easier for public to identify" (Public, age 45-54, Bolton)

"Accessible Hackney carriages - we have extreme trouble booking a taxi in advance that has wheelchair access as the taxi company do not always know when their wheelchair accessible vehicle will be available. In the past we have been asked to ring at the time an accessible taxi is needed - and in every occasion one was not and our family has had to pick her up instead - not an ideal situation for a young lady who would like some independence." (Public, age 45-54, Bury)

Vehicle Standards cont.

| Hackney Drivers (n=220) / PHV (n=348) | |
|--|---|
| 23% / 24% Agree | 69% / 63% Disagree |
| <p>Key areas of support:</p> <ul style="list-style-type: none"> Maintenance and testing (both): support was given and felt level of testing should be proportionate to the age of vehicle. CCTV (PHV): agreed CCTV would promote safety for drivers and passenger. | <p>Key areas of concern:</p> <ul style="list-style-type: none"> Age of vehicle (both): age was not thought to matter if the vehicle was well serviced and maintained. Replacing vehicles unnecessarily was felt to be wasteful and many cannot afford to replace their vehicles. Vehicle colour (PHV): Many opposed the standard colour and the colour white due to the cost of new vehicles and of re-spraying current ones. Livery (PHV): concerns were raised about the devaluation impacts, security concerns and the conflict when using the vehicle for personal use. Accessible vehicles: several drivers, operators and representatives stressed a mixed fleet was required to meet diverse needs. CCTV (PHV): concerns were raised about the cost of installation and of privacy / data protection issues. |
| <p><i>"Vehicle age shouldn't matter as long as it is in good condition. We have two MOTs in a year, so the vehicles are good for customers". (Private hire Driver, Bolton)</i></p> | <p><i>"I think there is no need to slap stickers on private hire cars. We can't use that car for personal use or social, if I would out with family people would approach my car asking if it is their taxi" (PHV Driver, Bolton)</i></p> |
| <p><i>"Age shouldn't be a problem as long as kept up with maintenance and repairs to a good standard. Personally, I think if a vehicle needs welding, it's past its best for the job, and licenses should be granted for 12 months after repairs to give drivers the time to invest in a replacement. Also, Hackney carriages cost a hell of a lot more money than a private hire car, £30.000 upwards whereas a new Dacia car can be purchased for £8000, so should be given 15 year age limit"</i></p> <p><i>(Hackney Driver, Stockport)</i></p> | <p><i>"Who is going to be responsible for the data? Are we going to have to download the data all the time and provide it? At what cost? I understand why this is being considered but practically I'm not sure how this will work." (Hackney Driver, Manchester)</i></p> |

Representatives:

- The Age Standard:** The Licensed Private Hire Car Association (LPHCA) advocated vehicle testing to assess whether a vehicle was fit for purpose rather than age and Unite Union also raised concerns that the age limit for Hackney does not allow enough time for recovery on investment.
- Standard colours:** The LPHCA were strongly opposed: *"prescribing white only will almost certainly increase prices, reduce model availability and potentially create a shortage of available vehicles"*. Unite the Union were also opposed to a standard colour.
- Mixed Fleet:** The National Private Hire and Taxi Association (NPHTA) argued for a mixed fleet: *"This is totally not acceptable because [it] is not meeting the needs of vulnerable or disabled [people]. Many old [and] disabled people don't use wheelchair vehicles either [because] it's too high or [they] dislike them"*

Operator Standards

| Members of the Public (n=972) | Hackney Drivers (n=211) / PHV (n=347) |
|---|--|
| 94% Agree | 67% / 65% Agree |
| 2% Disagree | 7% / 17% Disagree |
| <p>Key areas of support:</p> <ul style="list-style-type: none"> • General agreement: feeling the standard would improve safety • Prevent the 'selection of jobs': therefore, making it easier for some members of the public to use taxis. Some drivers refusing to take guide dogs in their vehicle was highlighted. | <p>Key areas of concern:</p> <ul style="list-style-type: none"> • Frequency of DBS checks: it wasn't felt it was necessary for office staff to have DBS checks and in any case, not as frequently as the proposal. |

"Licence conditions should include necessity to accept disabled including guide dogs for the blind! Those that refuse should have licence suspended, sent on retraining course, and if all else fails, licence removed from repeat offenders ... drivers and owners of companies!! No excuses acceptable! If they don't like it find another job. Cannot continue to treat blind or other disabled people with contempt! (Public, age 65-74, Bolton)

"I believe that this is a good idea which will help to protect the public and make them feel safe to know and should be their right as a minimum" (Hackney Driver, Tameside)

"Why should staff in the office be required to have DBS checks. It's a private business and by law we are allowed to employ anyone who is hard working and will be good on the phones. Is everyone working in hotels or shops have a DBS check. In our society, if one has served their time, then they are allowed to interact with normal society. Staff in the office have to adhere to strict data protection laws and GDPR so this is again an extra burden on small businesses with extra costs. Why don't you check Uber and see who their directors and staff are. They have been charged with data breaches and you have given them operators licence again and again. So, this is a totally draconian measure in our opinion." (Operator, Rochdale)

Local Authority Standards

| Members of the Public (n=967) | Hackney Drivers (n=218) / PHV (n=346) |
|---|--|
| 90% Agree | 72% / 51% Agree |
| 2% Disagree | 8% / 25% Disagree |
| <p>Key areas of support:</p> <ul style="list-style-type: none"> • Councillor training as it will help drivers resolve issues and / or queries in a timely manner. • Licensing award: Member of the public were more in support of the licensing award than drivers who did not feel they would be beneficial. | <p>Key areas of concern:</p> <ul style="list-style-type: none"> • Timescales: PHV drivers raised concerns about the timescales for applications to be and submitted because of the delays that could occur that are outside their control. • Affordability: Many PHV and Hackney drivers felt the licensing fee should be more affordable. |

“Councillor Training Should be mandatory and also standardised to ensure consistency. Also, useful if Councillors from other areas were involved to avoid any problems with approving or refusing drivers.”

(Councillor / Elected official, Stockport)

“Licensing fees are already high for vehicles to be plated in Manchester...that is why a lot of private hire drivers have gone to different councils and got their vehicles plated”

(Hackney Driver, Manchester)

“The applications are not a problem getting them in to the Licensing department within eight weeks. The problem is the DBS checks coming back in time which is not always the case and if they do not arrive on time the drivers cannot work. This is unacceptable this is our livelihood and cannot sit at home without work and no other income to feed our families. The drivers should be given extensions in these cases.”

(PHV Driver, Oldham)

Timetable

| Members of the Public (n=968) | Hackney Drivers (n=218) / PHV (n=346) |
|--|---|
| 84% Agree | 18% / 24% Agree |
| 9% Disagree | 74% / 60% Disagree |
| <p>Key areas of support:</p> <ul style="list-style-type: none"> • Bring in as soon as possible: members of the public were keen to see the benefits the MLS would bring. <p><i>"I think they should be complying with standards as from April 2021 because we need to be safe and reduce pollution straight away." (Public, age 45-54, Manchester)</i></p> | <p>Key areas of concern:</p> <ul style="list-style-type: none"> • Short timetable: Most drivers expressed their concerns about the timetable, with many stating it is too short and should be delayed, particularly considering Covid-19. • Electric Vehicles: Drivers also expressed their concerns about the availability, cost and infrastructure for zero emission capable vehicles (ZECs). |
| <p><i>"we do not have the infrastructure for all of the charging points required...for example how will houses with no driveways and terraced streets look with charging cables running onto pavements etc etc. The cost of the vehicles are also unsustainable for business use, not to mention the additional fire risk and reliability of the batteries." (Operator, Stockport)</i></p> | <p><i>"It seems unfair to have all this in a short period especially during this Covid crisis, income is at its lowest point and god knows how long it's gonna last. It's either feed your family or save for a new car which I don't know how it's gonna work out for me it seems all good from you're point of view but you need to look at this from a drivers point of view to see the devastating effects". (PHV Driver, Tameside)</i></p> |
| <p><i>"This timetable is completely unjust, these proposed measures are going to many properties out of business, it's completely madness, in these unprecedented times to expect owners of taxis and private hire vehicles, to just be able to adhere to these unrealistic changes not to mention the expense, in such a short period of time, if these unrealistic changes are carried forward as you want, there is going to be a lot of unemployed taxi drivers around in 2021 . These proposals need a lot more thought especially now in this unprecedented times" (Hackney Driver, Wigan)</i></p> | |
| <p>Representatives: The LPHCA also raised concerns about the timetable:</p> <p><i>"We agree with the first part but must point out the ambition for a zero-emission capable fleet by 2028, whilst sensible cannot at this stage form a policy as the supply, charging infrastructure, cost, ability for drivers to charge at home is uncertain, especially post-pandemic. There is also uncertainty on grant funding for drivers, so this aspiration needs to be kept under review as events become clearer."</i></p> | |

Impact of the proposed minimum licensing standards

All respondents were asked about the impact of the proposed minimum standards on them and how Covid-19 had impacted them.

Impact on the general public

Most of the comments from the public agreed with the proposals, with the majority feeling they would improve passenger safety.

The main concern raised by the public was that more funding was required for the taxi industry to implement the standards and some were concerned it would lead to fare increases.

"If these standards are introduced, I will feel much safer & more confident in taking a taxi anywhere in Greater Manchester. Additionally, I will start using taxis in Bolton again. I recently stopped using Bolton taxis due to the awful state of vehicles & poor driver standards. With these new rules in place I would probably start using them again." (Public, age 45-54, Bolton)

"I think the public will be affected by a huge increase in the cost of fares due to the increased cost and outgoings for taxi/private hire drivers. If people do not want to pay the very high cost of taxi's after a night out they will also be less likely to go out and this will also affect the night-time economy." (Public, age 18-24, Rochdale)

Impact on hackney drivers, private hire drivers and operators

Drivers were concerned about the financial impact on them. The highest number of comments (135) received referenced the cost of a new vehicle. 91 drivers commented the standards would put them or other drivers out of business. Similarly, 10 operators commented about the cost of vehicles and 11 commented about concerns of drivers going out of business.

"If we are forced to have these Hackney vehicles we will go out of business because we do not have the work in Rochdale to sustain this type of vehicle"
(Hackney Driver, Rochdale)

"The cost of changing the vehicle to meet the new requirements will be too high compared the money that is made in the trade especially during the time of pandemic." (PHV driver, Manchester)

The national private hire and taxi association (NPHTA) commented:

"Whilst some of the proposals are welcomed, we hear from our members, which is a huge proportion of the Greater Manchester trade including hackney drivers, private hire driver, private hire operators, and local associations which includes the GM coalition, GMDF, and many others, that they are already financially hard hit pre COVID, post COVID....with the closing of taxi ranks for the implementation of cycle lanes, with the narrowing of roads, the feeling is that to even consider the majority of these proposals right now is unfair, disproportionate and unreasonable.

Many regions such as Rochdale and Bury will be hit with the colour changes, and introduction of age limits which will hit them hard enough without the new vehicles having to be euro 6 with no mention of any alternatives being viable (such as euro 5 with aftermarket technology to render them euro 6 or above This push would have been difficult enough before, but even worse right now, in fact it may well be enough to push a huge section of both hackney and private hire out of business completely where they may otherwise have survived."

Impact of Covid-19

Hackney drivers, private hire drivers, operators and businesses were asked for some detail about the financial impact of Covid-19 on them. Of the 77% of respondents who had been financially impacted by Covid-19:

- 88% stated they'd made less profit;
- 86% stated they had a lower turnover;
- 75% stated they now had less savings; and
- 73% stated they had more debt.

"Due to the pandemic as a trade we have been impacted on big scale. The hospitality trade provides taxi with around 50% of our work this due to the restrictions has affected our business"
(Operator, Rochdale)

"I used to go every day, every day I'd go to the airport. So, one of the companies in Bolton that I work for, the airport, bringing all their clients in and out, a massive, huge company, I've done it for years and years. I've had nothing off them, because obviously they're not traveling, you know."
(Operator, Salford)

"Some of my colleagues have left, taken up delivery jobs for delivery of parcels and food" (PHV Driver, Bolton)

"Taxi businesses must have been negatively impacted by coronavirus. I have never been in a taxi since March. I used them at least 2 or 3 times a month"
(Public, age 55-64, Manchester)

"I have used all my savings to put food on the table and pay my rent. Work is dead and what you are proposing is beyond ridiculous.....Covid 19 has destroyed the hackney trade and now you want us to borrow money to pay for newer vehicles yet we won't even be able to pay the monthly's" (Hackney Driver, Rochdale)

However, some members of the public felt the introduction of the minimum standards should not be delayed by Covid-19.

"Yes, the covid-19 crisis will prevent you from implementing these changes before your aspiration date. Personally, I would recommend 2022 as the deployment date"
(Public, age 55-64, Wigan)

"While the impacts of Covid-19 cannot be ignored, it is an important ambition to move to a cleaner, greener taxi trade by the end of the decade to support our long-term environmental targets in Greater Manchester. However, in light of the pandemic, the level of funding to support the trade in upgrading the fleet is even more important than ever" (Public, age 25-34, Bolton)

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1. Introduction

1.1 Background: Overview of Minimum Licensing Standards

Around 2,000 hackneys and approximately 11,500 private hire vehicles (PHVs) are currently licensed by the ten Greater Manchester Local Authorities (at time of writing). At present each Local Authority in Greater Manchester has a different set of standards for licensing drivers, vehicles and operators in their area.

The ten Greater Manchester Local Authorities, supported by Transport for Greater Manchester (TfGM), have developed proposals to establish a consistent set of Greater Manchester-wide minimum licensing standards (GM MLS) to help deliver improved safety, reduce vehicle emissions and improve vehicle accessibility for customers. The proposals include standards for drivers, vehicles, operators, and the 10 Greater Manchester licensing authorities.

Part of the proposals are aimed at ensuring licensed vehicles play a part in helping Greater Manchester become carbon neutral by 2038. Therefore, the proposals have been developed alongside the Clean Air Plan (CAP) which is aimed at tackling illegal levels of nitrogen dioxide (NO_2). The Clean Air Plan proposal includes the introduction of a Clean Air Zone (CAZ) which non-compliant hackney and PHV drivers would be subject to, and funding opportunities and other schemes to help with the upgrade of non-compliant GM-licensed hackneys and PHVs.

1.2 The Consultation

The GM MLS and the CAP consultations were held simultaneously between Thursday 8 October and Thursday 3 December 2020 (running for 8 weeks in total).

The GM MLS consultation sought views about the proposed minimum licensing standards from members of the public, hackney drivers, private hire vehicle drivers, owners and operators and all other stakeholders such as businesses and organisations.

The consultation was based around the four main standards:

- Licensed drivers with nine sub-sections in the proposed standard;
- Licensed vehicles with twelve sub-sections in the proposed standard;
- Licensed operators with two sub-sections in the proposed standard; and
- Local authority standards with six sub-sections to the proposed standard.

Appendix D shows the current licensing standards for each local authority compared to current standards.

Covid-19

The statement below has been provided by the 10 Greater Manchester Licensing Authorities and TfGM.

“Greater Manchester’s (GM) ten local authorities agreed to collectively develop, a common set of minimum licensing standards (MLS) for the Taxi and Private Hire services that they licence.

Due to the close relationship between the proposed MLS and the GM Clean Air Plan (GM CAP) in relation to vehicle age and emission standards, parallel consultations for MLS and GM CAP were undertaken, to ensure that those affected by both sets of proposed policy measures could understand the full impact of them in the round and respond accordingly to the consultations.

GM Local Authorities, following the Government's advice and Ministerial Direction, agreed to undertake a statutory public consultation on the GM CAP, based on proposals developed before the COVID-19 pandemic and, in parallel, the MLS. Both consultations asked about the impact of COVID-19 to help inform decisions on the nature and requirements for additional support for those most vulnerable to the proposals.

The [wider taxi and private hire trade] have reported that they have been significantly impacted by the pandemic, and by Government policies to stem its spread.

The information contained within this report, particularly the impacts of COVID-19 will be used to help inform future decisions on each aspect of the final plan. Before bringing a Final Plan to decision makers GM will:

- *Review all the information gathered through the GM CAP and MLS consultations; and*
- *Fully consider all the information and evidence gathered, so that it can understand and mitigate (where possible) the economic impacts that COVID-19 has had on vehicle owners and trades affected by the GM CAP and MLS".*

1.3 Objectives

The overall objective of the consultation was to inform hackney and private hire owners, drivers and operators, along with the general public, businesses and organisations about the proposed Minimum Licensing Standards and to enable them to have their say on the proposals. The consultation sought to:

- Inform how the CAP proposals and MLS complement each other and benefit Greater Manchester;
- Provide an opportunity for businesses, organisations, residents and visitors to have their say on the detailed MLS proposals;
- Understand in more detail the impact the measures would have on those who respond, identifying differences by demographics and geography; and
- Understand the impacts on groups who are deemed to be most affected.

The feedback collected through the consultation will be used to inform the final design of the Greater Manchester minimum licensing standards.

1.3.1 Response Mechanisms

The primary response mechanism was an online questionnaire, available via the TfGM website. Alternative means of responding were also available including:

- An adapted version of the questionnaire for respondents who required the use of specialist screen reader software;
- Hard copies available via each of the ten districts with a freepost envelope provided;
- Letters and emails via dedicated postal and email addresses; and
- Telephone via a dedicated freephone number with a language facility for non-English speakers.

The number of responses for each response mechanism is shown below.

Table 1:1: Number of responses

| | Online | Hardcopy (paper) | Letter / Email | Total |
|----------------------------|--------|---------------------|----------------|-------|
| Number of responses | 1,552 | 84 | 47 | 1,683 |

In addition, and concurrently, a qualitative phase of four online focus groups with up to 5 respondents per group and 40 one-to-one in-depth interviews took place. Further detail on the qualitative research can be found in Appendix B with the analysis supplementing and supporting the findings in each chapter.

1.4 Format of report

Following this introduction:

- Section 2: describes the methodology with further detail in Appendix A
- Section 3: discusses the profile of respondents with data tables available in Appendix B
- Section 4: discusses the response to the driver standards
- Section 5: discusses the response to the vehicle standards
- Section 6: discusses the response to the operator standards
- Section 7: discusses the response to the local authorities standards
- Section 8: discusses the response to the proposed timetable
- Section 9: discusses the overall effect of the proposals on respondents
- Section 10: details how respondents have been impacted by Covid-19
- Section 11: discusses the overall view of the standards
- Section 12: discusses respondent's suggestions for changing the proposed standards
- Section 13: outlines comments about the draft Equality Impact Assessment
- Appendix A – Provides more details of the methodology used
- Appendix B – Provides more details of the Qualitative element of the project
- Appendix C – Copy of the Questionnaire used
- Appendix D – Summarises the Current licensing standards for reference
- Appendix E – Responses to closed questions for each type of respondent

2. Methodology

2.1 The Questionnaire

The questionnaire was designed by TfGM and the Local Authorities, a copy of which can be found in Appendix C. Prior to the consultation questionnaire going live, it was subject to cognitive and pilot testing, details of which are available in Appendix A.

The final questionnaire included questions to elicit views on:

- The driver standards;
- The vehicle standards;
- The operator standards;
- The local authority standards;
- The timetable for implementation of the standards;
- The effect of the proposals on the respondent;
- The impact of Covid-19;
- Potential improvements to the proposed standards; and
- The draft Equality Impact Assessment (EQIA).

2.2 Focus Groups and In-depth Interviews

The focus groups and in-depth interviews included the general public, hackney and PHV drivers and businesses. The focus groups took place over the same weeks as the consultation. Each group was scheduled for 90 minutes with in-depth interviews for one hour. In each chapter, the findings from the questionnaire are supported and supplemented with the findings from these groups and interviews. Further detail of the groups and the full profile of respondents are shown in Appendix B.

2.3 Data Management

This section explains how the data was processed and coded. Additional detail is available in Appendix A.

2.3.1 Data Processing

Response data was downloaded from the online portal and collated with data from all the letters and emails received.

Data was cleaned to ensure accuracy as follows:

- All questions not answered by a respondent were given the same value as “missing” data to ensure these were not included in the analysis; and
- Where a response was specified in free text which could be attributed to an answer in the list provided in the questionnaire, this was updated.

2.3.2 Coding

All free-text responses and letters and emails were grouped into themes to allow meaningful analysis. Letter and email responses were combined with the free text comments given in the questionnaire for analysis purposes.

Where possible, free text responses have been analysed by topic rather than response to a question to allow meaningful analysis and avoid double counting where respondents have given the same response to several questions.

The themes from each question were created by AECOM using the initial set of responses. These were verified by TfGM before full coding began. Where new themes emerged, these were verified before continuing. A minimum of 10% checks were completed on the coding for each question.

2.3.3 Preparation for analysis

The frequencies for each response per question was calculated, checked and verified to ensure all data had either a response, a no comment or a missing value. This data was prepared for analysis by creating a series of cross-tabs for key criteria such as demographics and vehicle ownership and vehicles impacted, those more vulnerable to air pollution and those impacted by Covid-19. A full list of cross-tabs produced are shown in Appendix E.

2.4 Analysis and Reporting

The consultation was open to all and, therefore, respondents were self-selecting. This, coupled with the fact respondents could choose which of the questions they answered, means the results and responses should be viewed as indicative of the wider population. At a GM level there are enough responses to draw conclusions, however, the number of responses in some sub-groups is small and data should be treated with caution. The profile of respondents is detailed in Chapter 3.

As respondents were not obliged to answer all questions in the questionnaire, the percentages shown only include those that responded to each question.

Where percentages do not sum to 100% in the main body of the report, this is due to rounding. A * denotes less than 0.5%.

Statistical significance testing was completed at the 95% confidence level. Where results are reported as different between sub samples, this means the differences are significant at the 95% confidence level. Only data which is significant has been referenced in the report.

The findings from the in-depth interviews and focus groups has been included alongside the findings from the questionnaire, expanding on the findings to provide deeper insight and examples. The in-depth interviews enabled those who may be specifically impacted to provide additional detail and specific examples, e.g. from a specific business sector.

A large volume of data was received and therefore the following chapters summarise the main findings and highlight pertinent differences between groups. A set of tables are available in Appendix B.

2.4.1 Late responses to the consultation

Two online responses, four hard copies and one email was received shortly after the deadline and have not been included in the final numbers. The responses have been reviewed and the points raised are included in this report. A summary of the verbatim responses can be found in Appendix A. All late responses have been passed to TfGM and the Local Authorities for their consideration.

2.5 Definitions

Unless specified, respondents have been grouped for analysis purposes. Additional details are shown in Appendix A.

Respondent Type: Table 2:1 shows how the main types of respondents were identified and used for analysis in this report.

Table 2:1: Defining Respondents

| Respondent type | Description |
|-------------------------------------|--|
| General public | A personal response by an individual, the report will also refer to the public and members of the public |
| Businesses | A response on behalf of a business including anyone who is self-employed and / or a sole trader |
| Hackney | Hackney owners and drivers |
| Private hire vehicles (PHVs) | Private hire vehicle drivers and owners |
| Operators | Private hire vehicle operators |
| Vehicle leasing companies | Vehicle leasing companies |
| Representatives* | An organisation or a councillor / elected official |

*a list of representatives who provided a response can be found in Appendix A

Financially impacted by Covid-19: In the questionnaire businesses, taxis and organisations were asked specific questions about the effect of Covid-19 and a respondent was defined as financially impacted or not as shown in Table 2:2.

Table 2:2: Defining a financial impact due to Covid-19

| Financial impact | Description |
|---|--|
| Financially impacted by Covid-19 | A business, taxi driver or operator or organisation who has stated they have more debt or less savings or lower turnover or lower profitability as a result of the Covid-19 pandemic |
| Not financially impacted by Covid-19 | A respondent who has either the same or less debt, the same or more savings, the same or higher turnover or the same or higher profitability as a result of Covid-19 |

Hackney and private hire vehicles:

The following definitions are used:

Hackneys are licensed to pick up people who wave for the vehicle to pull over and stop at the roadside or from an authorised taxi rank. Hackneys are often purpose built "black cabs", but don't have to be (depending on local policy) and they may also do pre-booked work.

Private hire vehicles (PHVs) are only permitted to pick people up via a pre-arranged booking. This might be over the phone, on the web or using an app-based booking system.

In this document, if referring to a specific vehicle type, "hackney" or "private hire vehicle (PHV)" will be used. Some respondents used the word 'taxi' to mean either hackney or PHV or both.

3. Respondent Profile

3.1 Types of Respondent

A total of 1,683 responses were received to the consultation.

Table 3:1 shows the response by each type of respondent (by each response mechanism).

Table 3:1: Type of Respondent

| | Questionnaire* | Letter / email | Total | % |
|-------------------------------------|----------------|----------------|-------|------|
| General public | 974 | 25 | 999 | 59% |
| Hackney drivers | 221 | 11 | 232 | 14% |
| Private hire vehicle drivers | 350 | 3 | 353 | 21% |
| Private hire operators | 30 | 2 | 32 | 2% |
| Vehicle leasing companies | 10 | 0 | 10 | 1% |
| Businesses | 18 | 1 | 19 | 1% |
| Representatives | 31 | 5 | 36 | 2% |
| Base | 1,634 | 47 | 1,681 | 100% |

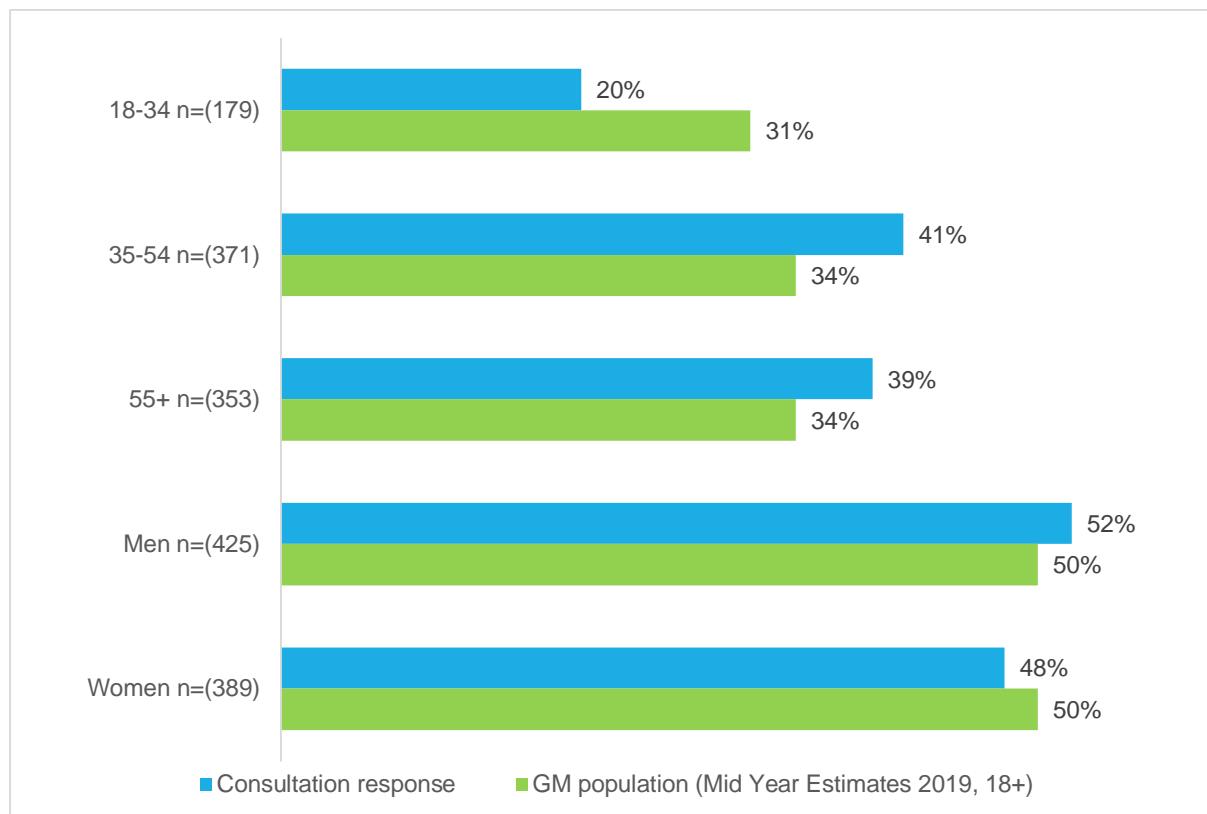
*2 respondents did not provide an answer for their respondent type in the questionnaire

3.2 Representativeness of response

3.2.1 General public

Figure 3:1 shows the demographic profile of the general public compared to Census data for Greater Manchester.

Figure 3:1: Age and gender profile for the general public (%)

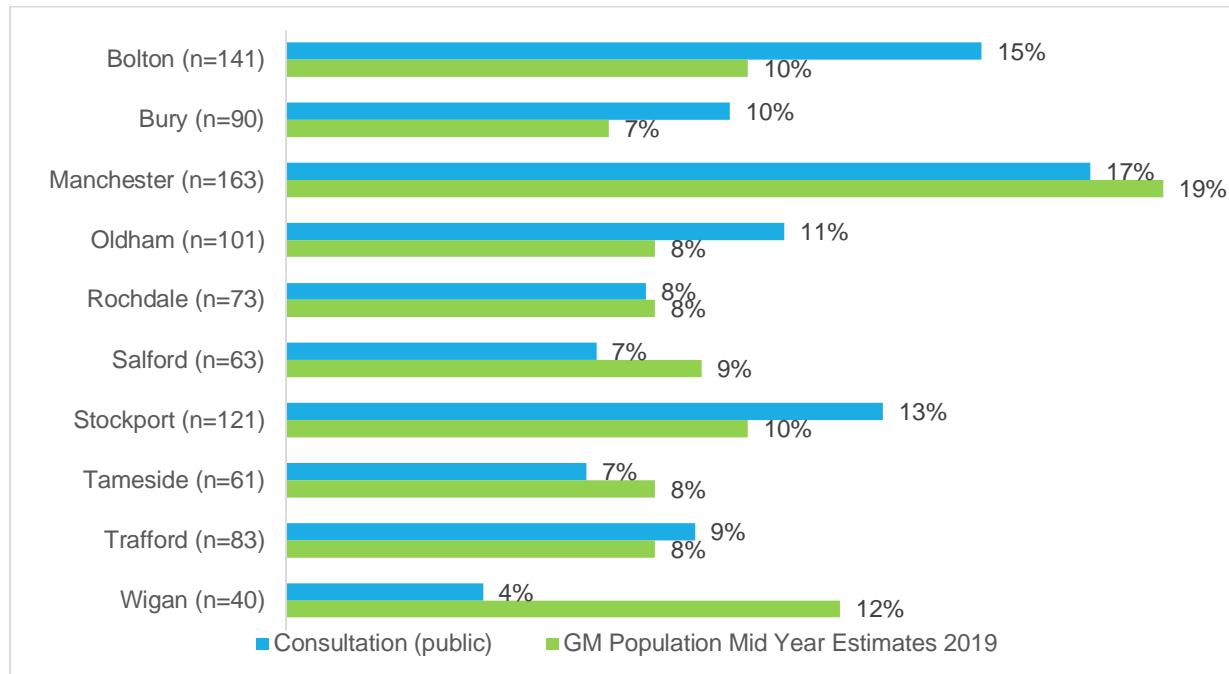


Base: All those who stated they live in Greater Manchester

An additional 30 respondents selected prefer not to say for age and 96 members of the public selected prefer not to say for gender and these have been excluded from the profile comparison to Census data.

Fewer responses than expected were received from the general public aged under 35, particularly those aged under 25, similarly, fewer responses were received from those aged over 75 and women. Conversely, slightly more men and 35-74-year olds responded than expected when compared to population statistics for Greater Manchester.

The response by the general public by district is shown in Figure 3:2. A higher proportion of responses were received from Bolton, Bury, Oldham, Stockport and Trafford than was expected from the mid-year population estimates whereas Manchester, Salford, Tameside and Wigan had a lower response than expected.

Figure 3:2: Local Authority response profile of the general public (%)

Base: all general public

Caution should be used where base is small (n<50)

An additional 19 members of the public who responded are based outside Greater Manchester and 21 members of the public selected prefer not to say, these have been excluded from the profile and comparison.

3.2.2 Hackney / PHV Drivers

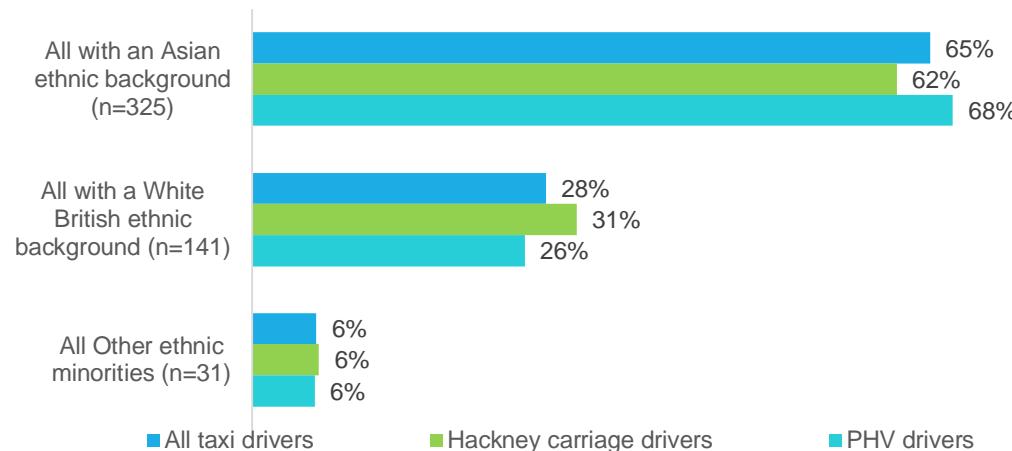
Virtually all hackney drivers (99%) and PHV drivers (97%) were male and most were aged over 35.

Table 3:2: Age profile of hackney / PHV drivers responding to the consultation

| Age | Hackney Drivers | PHV Drivers |
|-------------------|-----------------|-------------|
| 18-24 | 0% | 0% |
| 25-34 | 5% | 18% |
| 35-44 | 13% | 35% |
| 45-54 | 36% | 26% |
| 55-64 | 26% | 17% |
| 65-74 | 10% | 1% |
| 75+ | 0% | 0% |
| Prefer not to say | 10% | 3% |
| Base | 221 | 350 |

Figure 3:3 shows the Ethnic origin of drivers responding to the survey. Close to two thirds of drivers responding were from an Asian background.

There are no statistics available to use as a comparison, however, this is a much higher representation than in the general population.

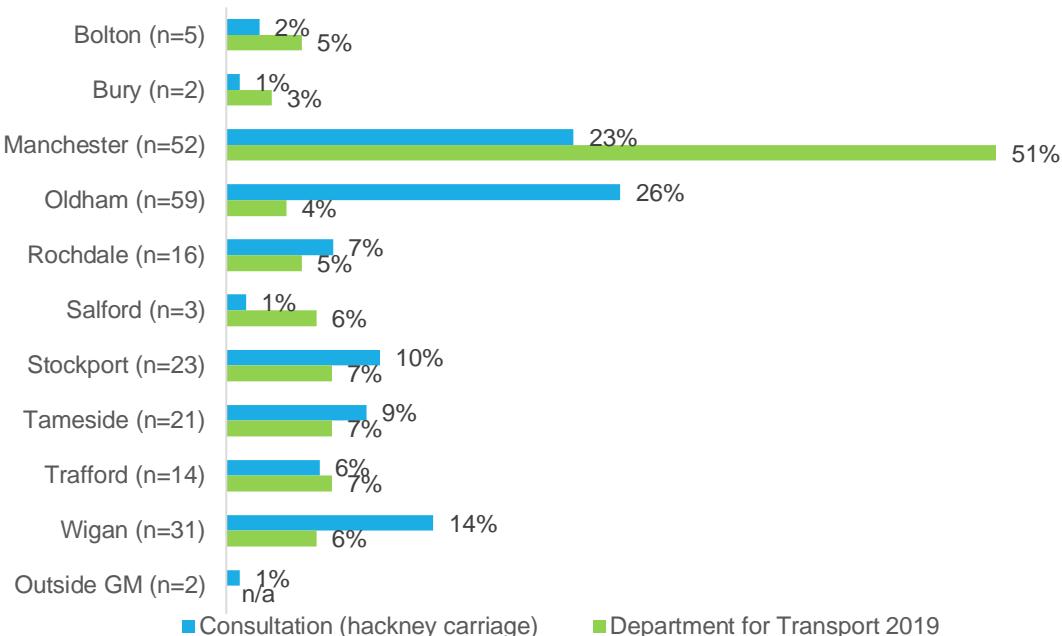
Figure 3:3: Ethnic profile of hackney / PHV drivers responding to the consultation (%)**Base:** all hackney and PHV drivers

Caution should be used where base is small (n<50)

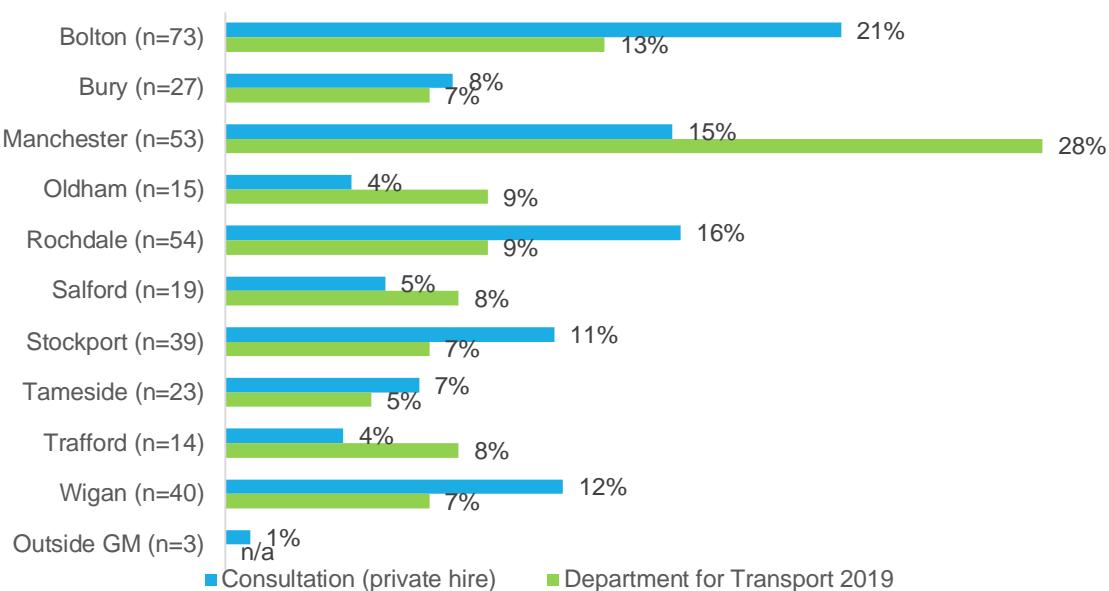
70 hackney / PHV drivers selected prefer not to say (53 private hire and 17 hackney).

The profile of private hire vehicle and hackney drivers is shown by Local Authority in Figure 3:5 and Figure 3:5. Manchester (23%), Oldham (26%) and Wigan (14%) had a higher representation of hackney drivers in the data than other districts. However, when compared to licence data, the proportion of hackney drivers responding in Manchester is much lower than expected (51%). The representation from Salford (1%) is also lower than expected (6%).

PHV drivers from Bolton (21%), Rochdale (16%), Stockport (11%) and Wigan (12%) have a higher representation in the data and drivers from Manchester (15%) and Oldham (4%) representation is lower than expected.

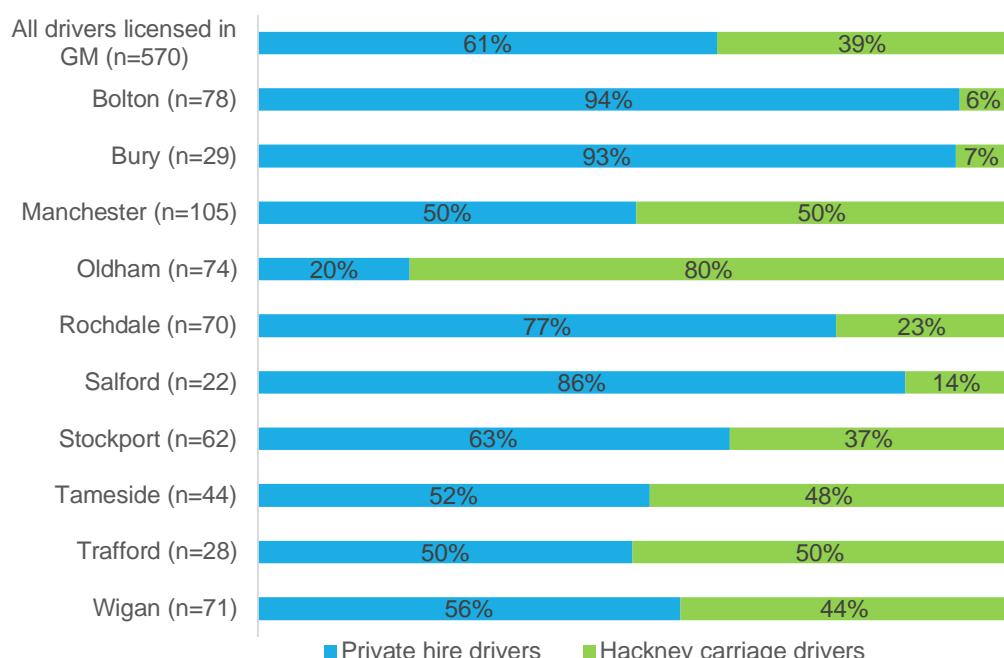
Figure 3:4: Local Authority response profile of hackney drivers (%)**Base:** all hackney drivers

Caution should be used where base is small (n<50)

Figure 3:5: Local Authority response profile of private hire drivers (%)**Base:** all PHV drivers

Caution should be used where base is small (n<50)

The proportion of responses for private hire vehicle drivers and hackney drivers varied for each Local Authority and is shown in Figure 3.6. Bolton, Bury, Rochdale and Salford had a high proportion of private hire vehicle drivers responding compared to Oldham which had the opposite with a large proportion of hackney drivers who responded. The proportion of responses from hackney and private hire vehicle drivers is low for some local authorities and therefore data needs to be treated with caution.

Figure 3:6: Private hire and hackney drivers' response for each Local Authority (%)**Base:** all hackney and PHV drivers

Caution should be used where base is small (n<50)

4. Driver standards

Summary

The table below shows the proposed driver standards and indicates which districts current licensing already largely meets the standard (green), partially meets the standard (orange) or where the MLS proposal represents a step up to what is currently required (red).

- Overall, respondents generally supported the driver standards, particularly members of the public (94% agreeing with them).
- However, 28% of hackney and 29% PHV drivers did not agree with the driver standards, particularly those in; Oldham; Bolton and Rochdale. [please note: the very small number of responses from hackney and PHV drivers licensed in Bury, Salford, Tameside and Trafford so no statistically robust conclusions can be drawn about these districts. The response from other districts is also small and should be treated with caution]

| Proposed Standards | | Bury | Bolton | Manchester | Oldham | Rochdale | Salford | Stockport | Tameside | Trafford | Wigan |
|-------------------------|-----------------------|------|--------|------------|--------|----------|---------|-----------|----------|----------|-------|
| Public | Agree | 96% | 95% | 90% | 98% | 96% | 95% | 92% | 93% | 100% | 97% |
| | Base | 89 | 139 | 160 | 101 | 73 | 63 | 119 | 61 | 83 | 39* |
| Hackney and PHV drivers | Hackney and PHV Agree | 48% | 37% | 72% | 27% | 52% | 73% | 68% | 64% | 64% | 81% |
| | Base Hackney | 2 | 4 | 51 | 59 | 15 | 3 | 22 | 21 | 14 | 30 |
| | Base PHV | 27 | 72 | 53 | 15 | 54 | 19 | 38 | 23 | 14 | 39 |

*the base is low and some extremely low <50 for some districts therefore data should be treated with caution

- Members of the public mainly commented on knowledge tests, criminal records and language tests stating those standards would increase their safety and experience as passengers.
- Drivers and operators also saw the benefit of the proposals in improving the customer experience. However, drivers were concerned there could be cost implications in meeting the standards and the proposed dress code wasn't thought to be necessary.

4.1 Agreement with standard

Respondents were directed to the minimum licensing standards consultation document and the proposed minimum licensing standards for licensed drivers were summarised in the questionnaire as shown below.

Enhanced criminal record checks: It is proposed that all drivers will be required to undertake an enhanced disclosure check through the Disclosure and Barring Service (DBS). The check will include Barred Lists such as details of unprotected spent convictions and police cautions. Drivers must also register to the DBS update service and maintain that registration to enable the licensing authority to routinely check for new information every six months.

Driver medical examinations: It is proposed that medical examinations are used to check drivers are medically fit to drive (the same examinations as applied by the Driver and Vehicle Standards agency (DVSA) to the licensing of lorry and bus drivers).

Knowledge tests: It is proposed that applicants undertake a knowledge test. The test may include local area knowledge, local conditions, licensing law, road safety / highway code / cycle awareness, numeracy, reading & writing and safeguarding.

English language tests: It is proposed that new drivers undertake an assessment to ensure they are able to communicate in spoken English and in writing to a standard that is required to fulfil their duties, including in emergency and challenging situations.

Driving proficiency tests: It is proposed that all new drivers will be required to pass an on-road assessment with a Greater Manchester approved supplier.

Driver training: It is proposed that Licensing Authorities will require all drivers to undertake training in safeguarding and awareness of child sexual exploitation, human trafficking, disability and dementia.

Dress code: It is proposed a dress code is introduced to promote a positive image of the licensed hackney carriage and private hire trade in Greater Manchester. All clothing worn must be in good condition and the driver must keep good standards of personal hygiene.

Drug and alcohol testing: Driving under the influence of drugs and / or alcohol poses a risk to the public and other road users. The proposal is to develop a policy on the testing of drivers based on complaints or intelligence received.

Private hire driver conditions: The private hire driver conditions are set out in detail in Appendix 3 of the consultation document and include matters such as driver conduct, fares, convictions, assistance dogs and lost property.

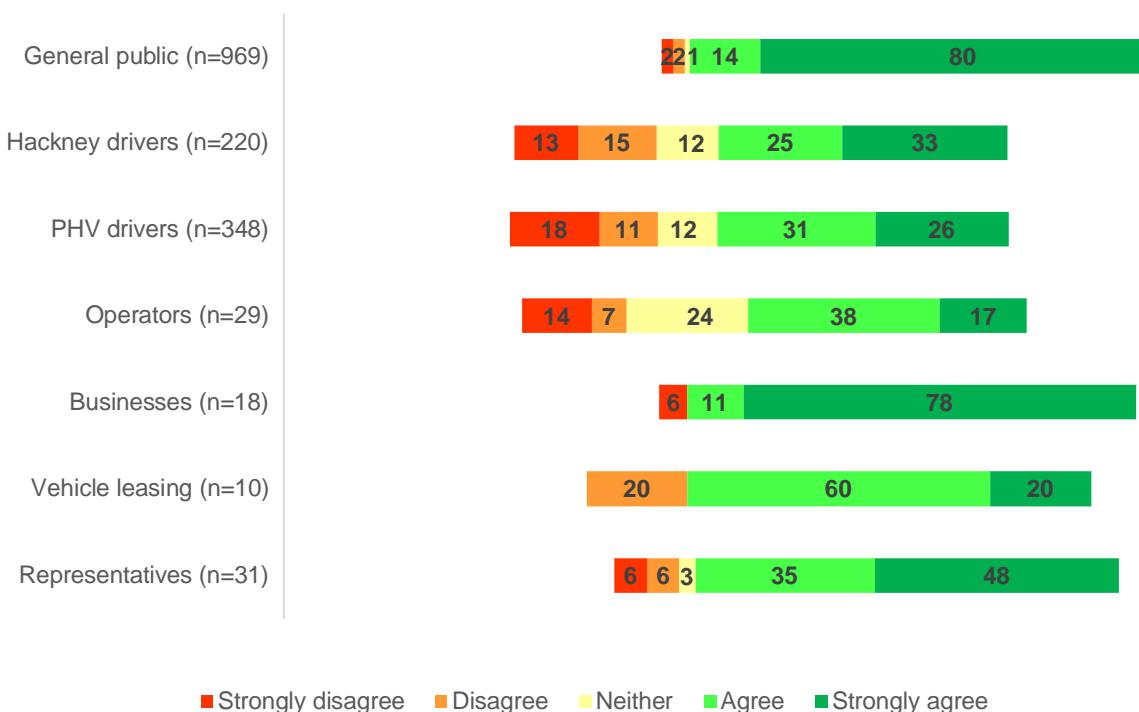
All respondents were asked:

To what extent do you agree or disagree with the proposals for minimum licensing standards for licensed drivers in Greater Manchester?

Overall, there was general agreement with the proposals with at least three fifths of respondents agreeing with the proposed driver standards. There were extremely high levels of support (94%) from members of the public with 80% strongly agreeing and a further 14% agreeing with the proposals.

Although more hackney and PHV drivers supported the proposals than not (58% and 57% respectively), a substantial proportion did not agree with them (28% and 29% respectively).

Figure 4:1: Extent of agreement with proposed driver standards (%)



■ Strongly disagree ■ Disagree ■ Neither ■ Agree ■ Strongly agree

Base: all respondents

Caution should be used where base is small (n<50)

Don't know has been removed from the chart

Given the high levels of agreement amongst members of the public there was no discernible difference in response by demographic profile.

There was some difference in response from drivers. Drivers were more likely to disagree with the standard if they were:

- From an Asian background: 40% of hackney and 36% of PHV drivers from an Asian background disagreed with the standard compared to 8% and 9% of White British drivers respectively.
- Hackney - licensed in Oldham (61%) and PHV – licensed in Bolton (51%); and Rochdale (31%). [please note: the very small number of responses from hackney and PHV drivers licensed in Bury, Salford, Tameside and Trafford so no statistically robust conclusions can be drawn about these districts. The response from other districts is also small and should be treated with caution].

There was no significant difference by age.

4.2 Comments about the proposed driver standards

Respondents were given the opportunity to provide comments about the proposed driver standards.

Table 4:1 shows the number of respondents providing a comment and which standards they commented on.

Most of the 454 members of the public who provided a comment, were concerned about the standards about:

- Knowledge tests (27%);
- Enhanced criminal record checks (21%);
- Dress code (22%); and
- English language tests (21%).

Hackney (n=66) and PHV (n=138) drivers commented mostly on:

- Dress code (41% & 36% respectively);
- English language tests (20% & 13% respectively); and
- Knowledge tests (18% & 16% respectively).

Very few comments were received about the proposed medical examinations or the proposed drug and alcohol tests.

Table 4:1: Comments made for each standard by type of respondent (n)

| | General public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General Comments | 176 | 25 | 63 | 12 | 2 | 1 | 5 |
| Enhanced Criminal Records Check (DBS) | 96 | 6 | 12 | 1 | 0 | 1 | 9 |
| Medical Examinations | 17 | 4 | 5 | 1 | 1 | 0 | 7 |
| Knowledge Test | 123 | 12 | 22 | 4 | 0 | 2 | 7 |
| English Language Test | 94 | 13 | 18 | 2 | 0 | 1 | 5 |
| Driving Proficiency Test | 53 | 10 | 10 | 3 | 0 | 0 | 5 |
| Driver training | 70 | 9 | 7 | 1 | 2 | 0 | 10 |
| Dress Code | 102 | 27 | 49 | 4 | 0 | 1 | 10 |
| Drug and Alcohol Testing | 31 | 7 | 5 | 0 | 0 | 0 | 6 |
| Private Hire driver conditions | 5 | 1 | 2 | 0 | 0 | 0 | 1 |
| Base | 454 | 66 | 138 | 17 | 5 | 3 | 22 |
| Proportion of respondent type | 45% | 28% | 39% | 53% | 26% | 30% | 61% |

Further detail about the most frequently given comments about each vehicle standard and the sentiment and reasons for the comments are described in the next sections.

4.2.1 General comments

Over a third of comments received were not about a specific standard, but about the minimum licensing standards for licensed drivers overall.

Table 4:2: General comments made for the driver standards by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Agree with proposals / they are reasonable | 136 | 16 | 27 | 6 | 1 | 0 | 3 |
| Disagree with the proposals | 11 | 4 | 13 | 4 | 1 | 0 | 0 |
| These proposals will kill an already struggling trade | 8 | 8 | 26 | 4 | 0 | 1 | 2 |
| Concerns regarding driver fraud | 29 | 2 | 1 | 0 | 0 | 0 | 0 |
| Base | 176 | 25 | 63 | 12 | 2 | 1 | 5 |

Over a fifth of comments received from members of the public (n=136), hackney (n=16) and PHV (n=27) drivers suggested a general agreement with the proposed driver standards.

"To be honest it's certainly long overdue for this process and we are extremely behind the rest of Europe. Drivers have a responsibility to maintain a certain standard of safety customer service along with operators." (PHV Driver, Wigan)

An operator highlighted the value in the proposed driver standards:

"The overall experience of a passenger will always be influenced by the first few minutes of contact with a driver and it makes good business sense to represent the area favourably. Each passenger might be a tourist, a potential resident, a potential business investor, or someone simply shopping; all are important contributors to local economic health and growth. Everything and everyone in our areas can have an impact on passengers; first impressions made can be positive, or it could be the last impression they make" (Operator, Manchester)

However, 8 comments from hackney drivers, 26 from PHV drivers and 4 operators reflected fears the proposals will "kill an already struggling trade"

"These proposals will kill the trade. Drivers cannot afford the cost of implementing these changes" (PHV Driver, Bolton)

This was particularly mentioned by those licensed in Bolton (n=15), Tameside (n=5) and Salford (n=3).

4.2.2 Enhanced criminal record checks

The table below shows the most frequently given comments about the enhanced criminal record checks.

Table 4:3: Detailed comments made for the enhanced criminal record checks by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Enhanced DBS should be mandatory | 74 | 6 | 7 | 1 | 0 | 1 | 6 |
| DBS check would make passengers feel safer | 12 | 0 | 0 | 0 | 0 | 0 | 1 |
| All drivers should not have a criminal background / have enhanced DBS check | 5 | 0 | 2 | 0 | 0 | 0 | 1 |
| DBS check every six months is expensive | 1 | 0 | 3 | 0 | 0 | 0 | 0 |
| Concern checks don't cover convictions obtained abroad | 9 | 0 | 1 | 0 | 0 | 0 | 2 |
| Base | 96 | 6 | 12 | 1 | 0 | 1 | 8 |

Of the nine standards, enhanced criminal checks received the second highest number of comments from members of the public (n=96). General public felt:

Enhanced CRB checks should be mandatory (n=74): Agreeing with proposals

"Enhanced criminal record checks as I understand any record has to be declared and decisions are then based on the severity and potential risk which seems fair." (Public, age 65-74, Oldham)

DBS would increase the feeling of safety (n=12): Proposal regarding Criminal Record Check will increase feeling of safety in members of the public

"I feel it is appropriate for drivers to have an enhanced criminal record check - it would make me feel a lot safer allowing my disabled daughter (who also has a learning disability) to travel under their care. After all, all staff currently involved in her care have to have one. It is appropriate I feel." (Public, age 45-54, Bury)

Some members of the public (n=9) raised concerns that crimes committed abroad might not show up in the checks.

Fewer drivers commented on this standard, however, those that did also agreed with the additional checks (6 hackney drivers and 7 PHV drivers)

"Enhanced criminal record checks are def needed, I hear so many taxi drivers talking about past convictions, I can't believe some of them drive the public around." (PHV Driver, Bury)

In the in-depth interviews with users, drivers and operators, all respondents assumed this standard was already in place and if it wasn't mandatory already then it should be.

"I would have expected it anyway, but obviously that's not a minimum, then, but yeah, that's definitely a very important proposal, I think." (User, Group 1)

"Is that not already standard though? As a girl who travels round on her own quite a lot, it is quite scary to think this might not already be mandatory for all drivers." (User, Group 2)

All drivers in the qualitative research felt this is a positive standard which will encourage trust in the drivers from users, especially if it is explicit to all users this is a mandatory standard. All drivers and operators involved said they already met the requirement and felt the standards were more about reassuring users these checks have taken place.

"When the customer comes in to use our taxis, they should be able to be confident that all checks such as the DBS check, is undertaken as standard and be reassured that those checks are being completed." (Operator, Salford)

4.2.3 Driver medical examinations

The table below shows the most frequently given comments about the driver medical examinations.

Table 4:4: Detailed comments made for the driver medical examinations by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| The cost of the medical is expensive | 0 | 0 | 2 | 0 | 0 | 0 | 0 |
| Health check should include being able to handle wheelchair users | 1 | 0 | 0 | 0 | 1 | 0 | 0 |
| Driver medical examinations are not necessary | 5 | 0 | 2 | 0 | 0 | 0 | 0 |
| Agree with medical examination | 11 | 4 | 1 | 1 | 0 | 0 | 7 |
| Non-NHS organisations should be allowed to issue medical certification | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| Base | 17 | 4 | 5 | 1 | 1 | 0 | 7 |

Very few comments were received about the driver medical examinations. Of those that did, most agreed with this standard. A representative suggested the medical be brought into line with other transport related industries:

"Something that is problematic however is the fact that individual licensing authorities have differing standards requirements for DVSA Group 2 medicals. Many 'forward thinking' licensing authorities are currently using DVSA medical providers that are approved by the Road Haulage Association (RHA)..... we implore the 10 Unifying TfGM Authorities to immediately utilise these service providers like the RHA does" (Organisation, LPHCA)

Two respondents mentioned medical examination should include testing driver's physical strength to assist disabled people.

"As a wheelchair user I have often been unable to travel as the taxi driver will complain that my chair is heavy, or he has a "bad back" leaving me stranded. If workers had undergone health checks, I would be able to know they were able bodied enough to be helping me properly and trained to do it safely" (Public, age 35-44, Bolton)

Two PHV drivers were concerned about the cost of the tests:

"Driver medical examinations. my concern is not of examination but the cost. Doctors and dentist charge lot of money for examinations, forms, letters. there should be reasonable set fee for this." (PHV Driver, Bolton)

Similarly, in the in-depth interviews, respondents did not make many comments on the driver medical examinations as they felt this should be, if it is not already, a mandatory standard. A couple of users did acknowledge health changes can occur at any time and health problems could occur between check-ups but felt if all parties involved are monitoring the situation then it reduces the chance of any drivers or passengers being put at risk.

"Yeah and while they're driving your life is in their hands, so if they're not medically fit to drive, like for example if they have epilepsy or heart conditions it could cause a heart attack or something, you don't want to be in the car." (User, Group 15)

One driver highlighted different standards in areas outside of GM could put passengers at risk as drivers can become licensed outside of GM but still work in the region.

"I know one driver, [location with a medical problem], lost his badge, because of his medical problem, but he's now got a Wolverhampton badge and he's now in a Wolverhampton plated private hire car for a local private hire company but still works in the [GM] area. It's all wrong, there are no checks on them, but they are putting people at risk in the same way." (Hackney Driver, Stockport)

4.2.4 Knowledge test

The knowledge test standard had the highest comments from members of the public (n=123) and the second highest of PHV drivers (n=22) and hackney drivers (n=12).

Table 4:5: Detailed comments made for knowledge test by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| The local knowledge test is not needed as most people use sat nav | 15 | 5 | 8 | 1 | 0 | 2 | 3 |
| The local knowledge test is needed - issue with drivers' poor local knowledge | 108 | 7 | 9 | 3 | 0 | 0 | 4 |
| Knowledge test is only required for new drivers | 0 | 0 | 6 | 0 | 0 | 0 | 0 |
| Base | 123 | 12 | 22 | 4 | 0 | 2 | 7 |

The general public felt the test is needed (n=108) with the following reasons often cited:

Cost of travel: Knowledge of local areas enable drivers to take the shortest and the best path, leading to reduced fares.

"Knowledge tests in terms of knowing the best route to take to keep the fare to a minimum, rather than taking longer routes to increase the cost. From my own experiences I have on occasion challenged the taxi / cab driver on their choice of route, and received the response "Which way do you want me to go?" I think the public and certainly myself expect these minimum standards from a service that is for the public." (Public, age 45-54, Bury)

Feeling of safety: Some respondents mentioned when they are asked to give directions to the drivers, this is difficult for people who are new to the area, while others referenced how concerned they are, for their own or family's well-being.

"I have pre-booked taxis within the borough I live in (Oldham) and in Manchester and have found that the driver does not have local knowledge of the borough. As I often travel alone, I find this disconcerting and have found myself anxious on many a journey." (Public, age 35-44, Oldham)

"Knowledge Test: This is very important. One in every three that I have travelled with asks me for directions. When my daughter, with special needs, travels alone and is asked for directions she is unable to do that. This has caused a long unnecessary journey." (Public, age 75+, Oldham)

"Knowledge tests- too often we are asked to provide directions to the location we are travelling or spend minutes at the start of each journey trying to explain. I think a basic understanding of the areas in Greater Manchester is a must." (Public age 25-34, Stockport)

Understand the road rules: Some passengers felt the knowledge test is necessary to ensure drivers have good knowledge of highway code and road rules.

"Should be done in a face to face environment to ensure the person before the standards committee is the person who will be operating/ driving the taxi. Too many taxis create problems in the roads because they don't adhere to the acknowledged rules of the road - U-turns in the middle of main roads, no indication and stopping in inappropriate places." (Public, age not provided, Bolton)

"Knowledge tests should be required every five years to ensure drivers are aware of changes in the Highway Code and reminded of best practice. They should also be required after a driver is convicted/fined or reported for any breach of the Highway Code or other offence." (Public, age 65-74, Manchester)

Hackney (n=7) and PHV (n=9) drivers and operators (n=3) felt having local knowledge will lead to increased standards.

"Drivers need to be taught how to drive a Taxi, not just a vehicle. It is a customer service industry. Poor local knowledge and a reliance on technology has severely lowered standards." (Hackney Driver, Wigan)

This was also raised in the in-depth interviews. Respondents reported drivers not familiar with the area asking other drivers for advice and felt this was not providing good customer service, particularly when heading to prominent landmarks that should be well known.

"I once had one driver pull up and ask me where Old Trafford was, when working in Trafford. I get you might not know little places, hard to reach, but Old Trafford stands out and is well signposted and this driver was clueless. Had no idea. That's not good enough in my eyes." (Hackney Driver, Trafford)

Some drivers highlighted using google maps on their phones is sometimes a disservice to the customer, as Google generally will set their routes by 'fastest route' rather than shortest route, so this can sometimes lead to passengers feeling they are being taken the longer way to push up the fare.

"Now, part of the stipulation for your badge, hackney badge employees, you take the shortest direct route. Unless instructed by the customer. They've got Google maps, everything they do is app based, Uber is app based and its app based on Google maps. Google maps is not the shortest, it's the fastest. If there's a motorway anywhere near where you're going or you're coming from, he'll jump on it and the customer has to pay, because it's all done on distance. That is going against the bylaws of the town. The bylaws state that if you're an operating service it's got to be shortest, most direct route." (Hackney Driver, Stockport)

However, several drivers (5 hackney and 8 PHV) did not feel the knowledge test was necessary particularly with the widespread use of Sat Nav.

"Knowledge test not essential since today technology can find and direct driver to any destination" (Hackney Driver, Manchester)

"Knowledge tests are not as needed as it once was. Most jobs undertaken via some sort of Sat Nav and many with the journey already mapped out before the customer even enters the vehicle." (Vehicle lease company, Stockport)

Conversely, one user in the Focus Groups mentioned how a PHV driver stopped him as he didn't know where to drop his passenger off. The respondent reported getting in the vehicle with them to show them where to go as it was clear the driver was struggling to understand the directions.

"Driver pulls up at the side of the road to ask me where a certain place was. It wasn't far away but because of the diversions in place due to roadworks, his sat nav was useless as it wasn't picking it up or giving him an alternative route. So, I ended up getting in with him and showing him the way as he was struggling, didn't know the area and his passenger was getting quite irate. I shouldn't need to do that though. (User, Group 16).

4.2.5 English Language Test

The table below shows the most frequently given comments about English language test.

Table 4:6: Detailed comments made for English language test by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Agree with language requirements | 72 | 10 | 14 | 1 | 0 | 0 | 4 |
| The enforcement of language tests will be controversial | 3 | 0 | 1 | 0 | 0 | 0 | 0 |
| Only a speaking / listening test is required, writing is not important | 11 | 0 | 0 | 0 | 0 | 1 | 2 |
| English and maths test are discriminating people with disabilities who are already a hackney / PHV driver | 3 | 1 | 0 | 1 | 0 | 0 | 0 |
| Language requirement is not necessary | 7 | 2 | 4 | 0 | 0 | 0 | 0 |
| Base | 94 | 13 | 18 | 2 | 0 | 1 | 5 |

This standard received the third highest number of comments amongst hackney (n=13) and PHV (n=18) drivers and the fourth from members of the public (n=94). Most comments expressed general agreement with this standard (n=10, 14 and 72 respectively)

"I believe that an English test is crucial as many passengers have told me they've had drivers who are unable to speak a word of English. Just imagine you're in a private hire and you tell the driver you have cut yourself. You need a plaster. And the driver tells you he doesn't understand. There's many other scenarios I could give you." (PHV Driver, Manchester)

"Having good communication skills is essential so that the passenger can feel confident and secure, knowing that they have been understood and can understand what the driver is saying to them. I know this because I work with people who have dementia and need this extra care" (Public, age 55-64, Manchester)

However, concerns were raised by operators, members of the public and hackney drivers that the test could be discriminatory.

"The English language tests. I feel like this will alienate a lot of drivers and tests like these are biased against immigrant taxi drivers. Most councils have these enhanced checks" (Public, age 25-34, Manchester)

"All of the above already exist in my council but it is stupid that someone with a PHD who is of an age where they cannot find their O levels from 50 years ago still has to take an English/Math test because councils currently say if you don't have GCSE, GCE or equivalent O level you have to take an English test even though English is first language and far superior qualifications have been gained over a career." (Operator, Bury)

A few suggested the test should only include speaking / listening skills and not writing.

"English language test- since when has this ever been a problem before? I think there are unconscious biases at play here you need to address. Really unfair to suggest current taxi drivers can't speak or write English. When has this ever been an issue? Speaking a language and writing it are two very different things. I don't think you need to be able to write to drive taxis. Having these criteria will exclude those who probably already struggle to get work elsewhere e.g. people with learning disabilities, people whose second language is English. They can speak English but can't write. Really disappointed with these criteria." (Public, age 35-44, Rochdale)

The introduction of face masks due to Covid-19 was felt to further hamper communication between passenger and driver. This was raised with reference to customers who may be hard of hearing or struggle without the body language element of communication.

"Actually now, when you've got masks on, the driver may wear a mask, you may wear a mask and if you've got any problems with hearing, then you know, you don't need an added thing thrown in that it's difficult to understand the language as well." (User, Group 1)

There was no significant difference in the number of comments received by district or ethnic origin.

4.2.6 Driving Proficiency Test

The table below shows the most frequently given comments about driving proficiency test.

Table 4:7: Detailed comments made for driving proficiency test by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Support proficiency tests proposals | 39 | 7 | 3 | 1 | 0 | 0 | 5 |
| Proficiency training / test should be live not virtual | 3 | 0 | 0 | 1 | 0 | 0 | 0 |
| A driver proficiency test would not serve any purpose for experienced drivers. | 6 | 3 | 7 | 1 | 0 | 0 | 0 |
| Driving proficiency should be constantly tested | 6 | 0 | 0 | 0 | 0 | 0 | 0 |
| Base | 53 | 10 | 10 | 3 | 0 | 0 | 5 |

Of the comments provided, less than 80 referred to the proposed driving proficiency test (53 from members of the public; 10 from hackney drivers, 10 from PHV drivers and 4 from representatives). Most comments gave general support to the proposed standard and felt a driving proficiency test should be compulsory, and on a par with the national driving test in terms of quality.

"Driving proficiency tests should be conducted by an approved driving institution, not one of many who will be lax just to get numbers and therefore money. Test should be

AT LEAST the same as Driving Test if not more intense/stringent as public are being carried and safety is paramount." (Hackney Driver, Manchester)

"Driving proficiency tests - most drivers are ok, but I have come across several that I wonder how they ever passed a driving test. Some have total ignorance e.g. doing a 3 point turn on a busy main road at a blind junction is stupid, this happened to us in a taxi - nearly caused an accident -the taxi driver started shouting at the other innocent drivers calling them stupid." (Public, age 65-74, Trafford)

"Driver proficiency test. Driving standards need to be improved, there are currently many private hire vehicles driven badly, with seemingly little awareness of traffic laws, and a lack of consideration for other road users." (Public, age 35-44, Bury)

A few respondents felt the proficiency test should be conducted live and not virtually. Some also felt driver proficiency should be regularly tested.

"Driving proficiency should be constantly tested. Perhaps every 3 years or after complaints on their driving conduct." (Public, age 25-34, Stockport)

"Driving proficiency tests. Applicants must have held a UK licence for a minimum of two years. Foreign and EU countries licences not acceptable to drive a PHV or taxi in the UK. A minimum of 45 minutes' drive on a variety of road types plus several stops to alight as if requested by passengers. A safe reversing manoeuvre and three-point turn. Questions on the highway code, and some road signs. Must demonstrate ability to remain calm and focused whilst being questioned en route. No serious or dangerous faults allowable." (Operator, Manchester)

However, some Hackney (n=3) and PHV (n=7) drivers did not feel the test would serve any purpose for experienced drivers or the test is not necessary at all.

"With the use of Sat Nav is the knowledge test a necessity, especially considering most drivers reside within the vicinity. Driver proficiency is just unnecessary especially if a driver has more than 5+ years of driving experience" (PHV Driver, Trafford and outside Greater Manchester)

"Driving proficiency tests not ness just another pain in neck current driving licence enough." (Hackney Driver, Wigan)

During the in-depth interviews, users were surprised to see this as a standard and felt this should be mandatory for every driver as they should be able to feel safe the driver is capable of being behind the wheel.

"I agree with the driving proficiency test, because like the other person said, I've been in taxis before where they've tried racing other taxis, while I'm in the taxi and ..., you looked shocked." (User, Group 15)

Some drivers felt this was not monitored enough and believed there are some drivers on the network who are poor drivers.

"I use taxis and so does my wife. The amount of times she's had a black cab and the driver's been on his mobile phone to his ear, while he's been driving, photographed it and he was one of our, when I worked for the firm, he was one of our drivers. So, we had to be careful, because it comes back on you then." (PHV Driver, Group anonymised)

Some drivers felt more policing and monitoring needs to take place to ensure drivers are driving safely.

"It's a very good idea, because it's the public that we're working with, it's the safety and the drivers, if they haven't got the safety and they don't abide by the rules or by the law, then they're in the wrong industry. Everything that you've just told me about all

the standards and all the checking and everything, I think it's good, I think it's brilliant. It's a good idea, they should do that. There's a lot of drivers out there that don't give a damn and like shortcut really and shortcuts, it's not feasible, it just gives us a bad name." (PHV Driver, Rochdale)

4.2.7 Driver Training

The table below shows the most frequently given comments about driver training.

Table 4:8: Detailed comments made for driver training by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Additional training subjects should be included | 26 | 2 | 2 | 0 | 1 | 0 | 5 |
| Any Driver Training should be optional | 5 | 5 | 4 | 1 | 0 | 0 | 1 |
| Safety needs improving for vulnerable groups | 23 | 0 | 1 | 0 | 0 | 0 | 2 |
| Driver behaviour needs improvement | 13 | 0 | 0 | 0 | 1 | 0 | 0 |
| Agree with driver training | 11 | 3 | 0 | 0 | 0 | 0 | 4 |
| Base | 70 | 9 | 7 | 1 | 2 | 0 | 10 |

Almost a fifth (n=70) of comments received from members of the public and 16 drivers referred to aspects of the Driver Training standards including:

Suggestions for additional subjects to be included (public, n=26):

- **Disability Awareness:** Some respondents suggested training on how to help disabled board (including autism, ADHD, and learning disabilities), assisting with wheelchairs (different designs of chair and equipment disabled people use) and accept guide dogs, etc.

"Driver training to make drivers aware of peoples disabilities that should be obvious and treated as such. Basic driver courtesy of exiting the vehicle and assisting passenger with alighting the vehicle and also to any baggage that may be carried." (Public, age 55-64, Tameside)

"Knowledge tests should also include the use of facilities and technology within vehicles as they relate to disabled people. This is absolutely crucial and should include the use of ramps and the level of gradient which should be as shallow as possible, how to provide assistance to disabled passengers to access the vehicle, how to secure passengers within the vehicle, including all types of wheelchairs and scooters and non-standards cycles, sometimes used by disabled people and provision of information to passengers about the licensing information of the drivers and vehicle." (Organisation, Manchester Disabled People's Access Group)

- **Safety Training / First Aid:** Some suggested drivers should be trained in basic first aid.

"Strongly support the provisions around DBS and training on Child Sexual Exploitation ... Can I also recommend you require drivers to do emergency First Aid and also

Disability Awareness training (as some drivers refuse or belittle disabled passengers)?” (Public, age 45-54, Oldham)

- **Safety needs improving for Vulnerable Road Users** (public n=23): Drivers should be aware of cyclists and pedestrians and drive carefully when they are around.

“In terms of cycle training there should be an element to this where taxi drivers experience first-hand a ‘close pass’ and/or a cycle on an unsegregated city centre street so they can experience the road from a vulnerable user. On-screen or verbal training is not enough.” (Public, age 25-34, Manchester)

“In driver training it should include training regarding impact on pedestrians of pavement parking.” (Public, age 35-44, Stockport)

“Driver training regarding vulnerable road users such as cyclists. I’m nearly hit daily by taxi drivers in Manchester while commuting.” (Public, age 25-34, Manchester)

- **Driver behaviour** (public, n=13): Other comments were made suggesting some drivers' behaviour and manners need improving.

“I’ve been in numerous taxi’s where inappropriate suggestions have been made by drivers. I think etiquette needs to be addressed.” (Public, age 35-44, Trafford)

The most commonly given comments from drivers were that driving training should be optional (5 Hackney Drivers and 4 PHV Drivers).

“I really don’t think there is any need for existing drivers to have driver training, when you have been driving a taxi for a number of years, and dealing with challenging road users, and the safety of your passengers, as you do as a professional driver, and the longer you have done this profession, I really don’t think there is any need for any other driver training, it would be a waste of resources.” (Hackney Driver, Wigan)

“It is waste of time to do all this on regular basis, people have been driving for years and they do not need any more training for driving a taxi, all they need is a driving licence and good record as a citizen.” (Hackney Driver, Oldham)

“Driver training should include pedestrian cyclist and vulnerable road user training. Take them out on a bike around the city Centre to show them what it’s like to be bullied by cars” (Public, age 35-44, Stockport)

“All taxi drivers should not be allowed to use the baby locking mechanism in the rear of the vehicle. This is worrying for female passengers.” (Public, age 55-64, Oldham)

All users in the in-depth interviews felt this standard was a good idea and should be mandatory and refreshed over time. A couple of users highlighted perhaps the standard does not currently go far enough and needs to identify more than just disability.

“I was just going to say that disability covers so many different impairments and people can have multiple impairments, some of which are not obvious, as well as mental health and all these may be challenging for the driver. The driver’s mental health should also be identified in there. It is also important to do training around speech impediments as a lot of drivers could identify somebody as drunk so yes, I think driver training is very important.” (User, Group 1)

Many drivers mentioned they had already undertaken training like this and felt it was useful but after the training drivers can forget their training.

“Yeah, we’ve done all this in the past, we had to go and do an NVQ in this five years ago and we were told that you need this, reapply for your licence, but nothing’s ever come of it, it’s just a useful certificate they gave us.” (Hackney Driver, Salford)

"Pretty much, yeah, I think they do like a day's training when you apply for a new badge, but they didn't apply it to existing badge holders, so I think now if you were applying you have to do like a half a day course of some kind. But when they brought it in, they didn't apply it to existing badge holders who have never done it. (PHV Driver, Rochdale)

It was apparent with one or two respondents this was not the case and training has not been provided or insisted on.

"We've never heard of it. So, none of my drivers have had child safeguarding training. I've never had it. Yet in the new minimum standards proposals I'm supposed to be doing a DBS every single year, because I'm an operator." (Operator, Trafford)

A councillor highlighted how driver training could benefit the driver as much as the customer.

"The whole strategy for driver training should be centred around motivation to do well at the job and each training experience should leave a driver feeling positive and valued. Spending that bit extra finance if needed will be well worth it if these outcomes can be achieved. To raise standards in private hire in Greater Manchester I implore you to use the carrot as well as the stick. If drivers are attending training, whatever the subject, it can be made an enjoyable and attractive experience." (Councillor, area not provided)

4.2.8 Dress Code

The table below shows the most frequently given comments about dress code.

Table 4:9: Detailed comments made for dress code by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Agree with dress code | 21 | 2 | 2 | 1 | 0 | 0 | 2 |
| A designated uniform is uncomfortable to drive in all day | 9 | 9 | 8 | 0 | 0 | 0 | 3 |
| Disagree with a uniform (dress code) | 70 | 17 | 39 | 2 | 0 | 1 | 5 |
| Cultural / religious attire should be permitted | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Dress code should be decided by the firm | 1 | 0 | 0 | 1 | 0 | 0 | 0 |
| Base | 102 | 27 | 49 | 4 | 0 | 1 | 10 |

The proposal of a dress code received a relatively large number of comments from drivers (27 Hackney and 49 PHV) the majority of which disagreed with the proposal:

"Dress code as we are self-employed it is up to us what we wear as long as it is appropriate and not offensive" (PHV Driver, Tameside)

"I don't think there is need to change the dress code as long as the driver is dressed appropriately." (Hackney Driver, Manchester)

Drivers from an Asian background and younger drivers disagreed with the dress code (n=38).

A further 9 comments received from Hackney drivers and 8 from PHV drivers referred to how uncomfortable a uniform is.

"I am worried about dress code because we the private hire or hackney drivers spend many hours sitting and driving so we wear a dress who we feel comfortable if there is dress code, I am afraid it can make us uncomfortable." (PHV Driver, Manchester)

Most of the comments given by members of the public about the dress code reflected the driver comments that a uniform wasn't necessary:

"Dress code is very subjective and could put pressure on drivers who are already scrutinised and looked down on by the general public." (Public, age 25-34, Bolton)

"I don't really think dress code is that important. Taxi drivers should be allowed to wear whatever they want as long as it isn't offensive or inflammatory." (Public, age 18-24, Bury)

"Agree with all proposal except for Dress Code, which will have little benefit to the public." (Organisation, Brindlesholme Community Centre)

Those that did provide a comment supporting the dress code (2 Hackney Drivers, 2 PHV Drivers and 21 members of the public) felt it could help promote the industry.

"Dress code; would make drivers look professional to visitors to the area plus I would be more confident in the driver." (Public, age 55-64, Manchester)

"Dress Code - if the vehicles are being standardised then a uniform should be brought in, nothing too elaborate possibly a badged polo shirt and jumper." (Hackney Driver, Wigan)

Focus group respondents were less interested in this standard as they felt it impacts on them the least.

"I couldn't care less what my driver wears, if I'm honest. as long as it's not kind of, they look like they've just rolled out of bed, kind of thing." (User, Group 15)

"Well, I support the dress code. I think it's broad enough, so if somebody's wearing jeans it's not a big issue, but if their personal hygiene is not good, then it would be an issue, so yeah." (User, Group 1)

There was a consensus this should not mean a uniform, even though some of the drivers, working for an operator, stated they have an element of a uniform already. Most respondents felt a full uniform was not necessary, but an outline of acceptable attire would be useful.

"It's illegal to drive a private hire vehicle wearing shorts which are not below the knee. So, they've got to be knee length shorts. I know the licensing laws, it's illegal to drive a taxi in flipflops. Yeah, half these drivers wouldn't know, I've told drivers that in the past, being a manager, I've pulled people in saying you can't wear that. You're not meant to wear a football shirt when you're driving a private hire vehicle either." (Operator, Trafford)

Drivers highlighted if a uniform was introduced, it needs to be comfortable as drivers are in their cabs for many hours.

"It is our office for the day, so I need to be comfortable whilst I'm working. That's all I'm meaning. We could be in there for 12+ hours across the day." (PHV Driver, Wigan)

4.2.9 Drug and Alcohol Testing

The table below shows the most frequently given comments about drug and alcohol testing.

Table 4:10: Detailed comments made for drug and alcohol testing by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Agree Drivers should be regularly tested for drugs and alcohol | 29 | 6 | 3 | 0 | 0 | 0 | 5 |
| Disagree with drug and alcohol testing | 0 | 1 | 1 | 0 | 0 | 0 | 1 |
| Concern about abuse of the system | 2 | 0 | 1 | 0 | 0 | 0 | 0 |
| Base | 31 | 7 | 5 | 0 | 0 | 0 | 6 |

Very few comments were received about this standard (31 members of the public, 7 hackney and 5 PHV drivers). Most comments received from all were in favour of the proposal.

"These are all good subjects. The drivers already go through these checks. The only one that is new is drink and drugs test which should be necessary and a must. A very good and positive step." (PHV Driver, Bury)

"I agree with all these points. For a woman getting into a vehicle with someone she does not know is very risky and some people have taken advantage of women when they could perhaps be travelling home late at night. Taxi drivers should not have a criminal background and should be regularly tested for drugs and alcohol as they are providing a public service." (Public, age 55-64, Trafford)

There were a few concerns raised about this standard including the view testing already takes place and therefore the standard was a duplication:

"Drivers are already subject to drug and alcohol testing by the police. It is not acceptable for the trades to be subject to LA roadside drug and alcohol checks." (Hackney Driver, Manchester)

"Drug and alcohol testing- DISAGREE the GM hackney trade is already subject to such testing by GMP." (Unite the Union - Manchester Hackney Carriage)

Three people were concerned about the abuse of the system.

"Drug and alcohol testing - what are the circumstances when this will be enforced? I hope it will not be just at the whim of a customer that makes a complaint, there would need to be clear guidance or policy." (Public, age 35-44, Manchester)

"Drugs and alcohol testing for drivers, it's a good idea but can be open to abuse if only on complaint or anonymous report by people and passengers who have a personal issue with a driver due to other reasons can use this as a tool to abuse and cause unnecessary problem for that driver so I don't agree with this proposal as bus drivers/tram drivers don't get tested." (PHV Driver, Manchester)

During the in-depth interviews, a handful of users were surprised by this proposed standard as they felt this should already be in place for everyone's safety.

"I'm quite shocked that the drug and alcohol one isn't in place. Because that makes you kind of question whether or not, well should I be questioning now (the driver's behaviour) when I get in the taxi." (User, Group 2)

Users felt a consistent policy and process would be advantageous to drivers, operators, users and licensing authorities, as everyone would know the process is to follow.

"It seems sensible to have a consistent policy in place for all involved, know what the process is for complaining etc." (User, Group 2)

Some users felt it might be quite difficult to enforce, particularly when it comes to drugs rather than alcohol.

"I think it's more problematic around drug testing. because, you know, it's difficult enough to know whether somebody's been taking certain kinds of drugs and you know, I mean there's so many different effects of different kinds of drugs that can produce inappropriate behaviour or dangerous behaviour, but I think the police have difficulty in themselves, you know, if you're on amphetamines, you know, that could have a bad effect, not just cannabis. It's not just cannabis these days, is it, it's other things." (User, Group 1)

Some drivers were open to increased monitoring and policing of this amongst drivers, but felt it was difficult when there are drivers from outside of the region.

"If they brought back spot checks and just did, you know, I'd imagine drug and alcohol might be police rather than council, but if they just did a pull over at the side of the road, breathalysed you and did whatever you have to do for a drugs test, I think it'd be quite, you know, if they do it random or like you said, if the customer reports a driver thinking they smell alcohol and followed it up. Yeah, but I think the only problem is, a lady was once saying to me she wanted to make a complaint and I said, it was an out of area town, you know, I'll use the example of Wolverhampton again, this lady, you know, they're working in Trafford, so she contacted Trafford Council only to find that it was Wolverhampton she had to contact." (PHV Driver, Trafford)

Most drivers and operators felt this was a positive step and would encourage it to be monitored whilst a fair and clear process could be introduced. Some drivers felt there is a risk some drivers drink in the evening, not allowing for the alcohol to be out of their system before starting an early shift the next morning on the roads.

"I'm all in favour of that, I mean I'm not a drunkard, but I like a drink as much as anybody. I don't touch spirits, I like the odd beer and I very definitely like one or four glasses of wine when it's available, but I always make it a policy if I'm driving the next day, I don't drink alcohol, simple as that." (Hackney Driver, Manchester)

4.2.10 Private Hire Driver Conditions

The table below shows the most frequently given comments about Private hire driver conditions.

Table 4:11: Detailed comments made for private hire driver conditions by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Agree with PHV conditions | 3 | 1 | 0 | 0 | 0 | 0 | 1 |
| It is unfair to standardise hackney and PHV drivers but have their work classified differently | 2 | 0 | 2 | 0 | 0 | 0 | 0 |
| Other | 25 | 2 | 4 | 1 | 1 | 0 | 1 |
| Comments about CAP | 1 | 1 | 2 | 0 | 0 | 0 | 1 |
| Base | 31 | 4 | 8 | 1 | 1 | 0 | 3 |

Very few comments were made about Private Hire Driver Conditions. One organisation feared if conditions were too onerous drivers would leave Greater Manchester, whilst another looked to ensure conditions are equal for both hackney and PHV drivers.

"Private hire driver conditions - AGREE but fear that if PHV driver standards are too restrictive they will shop elsewhere under cross-border legislation." (Unite the Union - Manchester Hackney Carriage)

"All of these changes are welcome, however there needs to be parity between taxis and private hire vehicles. It is unfair to standardise them but have their work be classified differently. I pay more in a Hackney cab and they can use the bus lane, however whilst in a private hire they cannot charge waiting time but cannot use the bus lane. There needs to be standardisation across the travel industry. Private hire taxi drivers should be allowed to use bus lanes in the same way as in other cities such as Sheffield." (Public, age 25-34, Salford)

In a similar way to the consultation comments, very few respondents in the in-depth interviews had much to say on the PHV driver conditions other than they already knew they have their own conditions and must abide by those rules.

"There needs to be a minimum tariff for every company. That includes private hire, hackney cannot charge below what the Government say. Greater Manchester they're going to come into a ten-borough group, they've got the opportunity to turn round and say no private hire company can charge less than this amount." (Operator, Tameside)

5. Vehicle standards

Summary

The figure below shows the proposed vehicle standards and indicates which districts current licensing already largely meets the standard (green), partially meets the standard (orange) or where the MLS proposal represents a step up to what is currently required (red).

- Overall, members of the public (88%) agreed with the vehicle standards whereas hackney and PHV drivers disagreed (69% and 63% respectively).
- Drivers in Bolton and Rochdale had the lowest level with just 5% and 16% agreeing with the proposals. [please note: the very small number of responses from hackney and PHV drivers licensed in Bury, Salford, Tameside and Trafford so no statistically robust conclusions can be drawn about these districts. The response from other districts is also small and should be treated with caution]

| Proposed Standards | | Bury | Bolton | Manchester | Oldham | Rochdale | Salford | Stockport | Tameside | Trafford | Wigan |
|-------------------------------------|------------------------------|--------|--------|------------|--------|----------|---------|-----------|----------|----------|--------|
| Vehicle emissions | | Red | Red | Yellow | Red | Red | Green | Red | Red | Red | Red |
| Vehicle age | | Red | Red | Green | Yellow | Red | Green | Red | Yellow | Yellow | Yellow |
| Vehicle colour | | Red | Red | Yellow | Red | Red | Red | Red | Red | Red | Red |
| Vehicle livery | | Green | Yellow | Green | Green | Green | Yellow | Green | Green | Yellow | Yellow |
| Accessible hackney carriages | | Green | Green | Red | Red | Red | Green | Green | Green | Red | Red |
| Vehicle testing | | Green | Green | Green | Green | Red | Green | Green | Green | Yellow | Yellow |
| Vehicle Design | | Yellow | Green | Green | Green | Yellow | Green | Green | Green | Yellow | Yellow |
| CCTV Standards | | Red | Red | Red | Red | Red | Red | Red | Red | Red | Red |
| Public | Agree | 88% | 88% | 88% | 94% | 88% | 87% | 84% | 90% | 96% | 83% |
| | Base | 78 | 123 | 143 | 95 | 64 | 54 | 100 | 55 | 80 | 33 |
| Hackney and PHV drivers | Hackney and PHV Agree | 24% | 5% | 43% | 5% | 16% | 36% | 30% | 23% | 32% | 29% |
| | Base Hackney | 2 | 4 | 51 | 59 | 15 | 3 | 23 | 21 | 14 | 30 |
| | Base PHV | 27 | 73 | 53 | 15 | 53 | 19 | 38 | 23 | 14 | 39 |

*the base is low and some extremely low <50 for some districts therefore data should be treated with caution

- Both members of the public and drivers did not like the idea of a standard colour and particularly the colour white due to expense and the maintenance of keeping it clean.
- The public mainly commented positively on the CCTV standards stating it will make them feel safer when using taxis. However, drivers and operators raised concerns around data privacy.
- Hackney and PHV drivers commented mostly on the age of the vehicle stating if the vehicle is in good condition the age shouldn't matter.
- Hackney drivers expressed their concern about the suitability of electric vehicles and the available charging infrastructure.

5.1 Agreement with standard

Respondents were directed to the minimum licensing standards consultation document, and the proposed minimum licensing standards for licensed vehicles were summarised in the questionnaire as shown below.

Vehicle emissions: It is proposed that all licensed vehicles must comply with the current Euro standard (Petrol: Euro IV 2005 onwards manufacture, Diesel: Euro V1 2015 onwards manufacture) when they are first licensed, with an ambition for a zero-emission capable fleet by 2028.

Vehicle age: It is proposed that all licensed vehicles are under 5 years old at first licensing and no more than 10 years old.

Different age policy for electric vehicles: A different age policy is being considered for electric vehicles so that they can be licensed for more than 10 years.

Vehicle colour: It is proposed that all private hire vehicles should be white in colour and hackney carriages should be black (exceptions for advertising on some hackney carriages and executive hire (for example chauffeur services)).

Accessible hackney carriages: It is proposed that all hackney carriages should be wheelchair accessible.

Side and / or rear loading without the need for swivel seats: A policy as to whether purpose-built accessible vehicles should be side and/or rear loading without the need for swivel seats is being considered.

Vehicle livery (special design): It is proposed all vehicles will display licence plates on the front and back of the vehicle, a 'GM Approved' sticker on its bonnet and that private hire vehicles will display stickers on both rear side doors which will include operator name, 'advanced bookings only' and 'not insured unless pre-booked', and a sticker containing the operator name in the back window.

Vehicle testing: It is proposed that all vehicles more than three years old will be tested for safety, road worthiness and exhaust emissions at least twice a year. It is also proposed that all vehicles will be tested against the standard DVSA MOT Standard as a minimum.

CCTV standards: It is proposed that all licensed vehicles are fitted with mandatory CCTV. Cameras can act as a deterrent to the occurrence of a crime and can protect both drivers and passengers. Audio as well as visual recording is proposed, triggered by a panic button system.

Executive hire: It is proposed that the following standards apply to executive hire vehicles (e.g. chauffeur driven) - bookings to be confirmed by written contract, payments made in advance of the journey or by invoice afterwards, the types of vehicles to be licensed, dress code, business plan shared with licensing authority, vehicles not to be fitted with radios or data heads or meters, exemptions from plates and door signs and must be used exclusively for executive hire.

Vehicle design: It is proposed that all vehicles conform to M1 vehicle standard (DVLA vehicle classification), no retrofitting of engines into older vehicles (Liquid Petroleum Gas (LPG) conversions will be accepted), any retrofit emissions technology must have been approved as part of the Clean Vehicle Retrofit Accreditation Scheme (CVRAS), manufacturer window tints only, no vehicles will have been written off in any category, no roof signs on private hire vehicles, no advertising other than Local Authority issued signage on private hire vehicles.

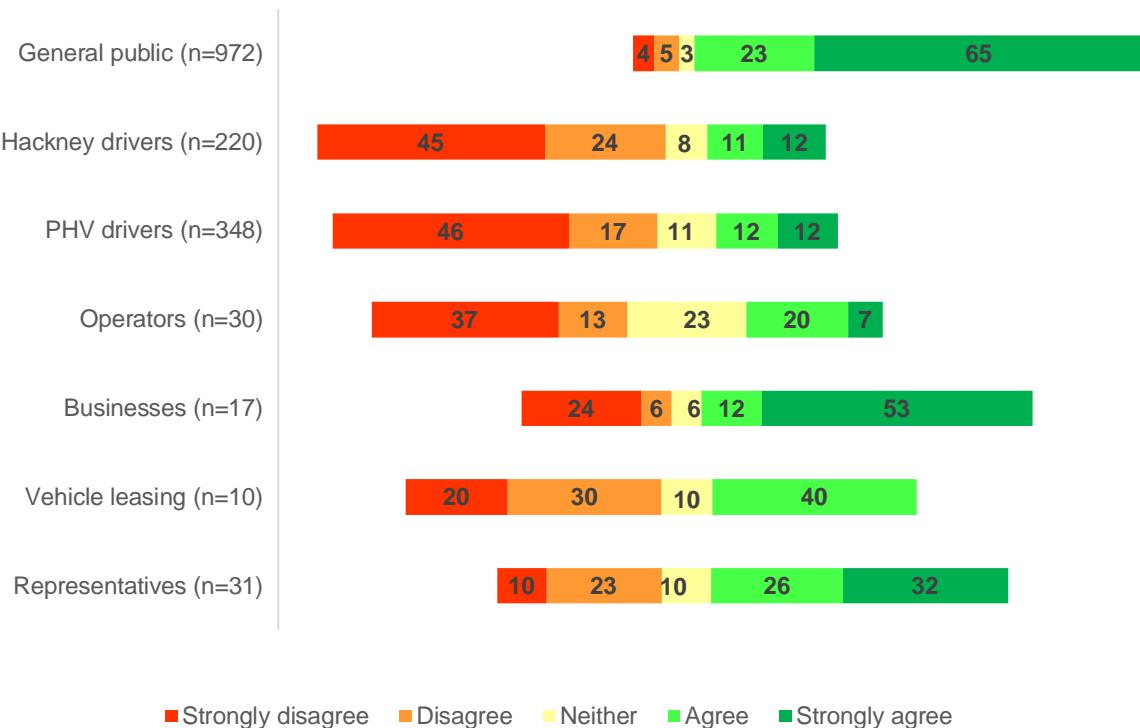
Vehicle conditions: Details of proposed Greater Manchester private hire and hackney carriage vehicle conditions can be found in Appendices 4 and 5 respectively and include matters such as identification plates, accidents, meters, fare tables and CCTV.

All respondents were asked:

To what extent do you agree or disagree with the proposals for minimum licensing standards for licensed vehicles in Greater Manchester?

Most members of the public who responded to the consultation agreed with the proposed vehicle standards (88%) and were more likely to agree with the proposed standards than hackney and private hire vehicle drivers. Drivers were more likely to disagree with the proposed vehicle standards than members of the public; 69% hackney and 63% private hire drivers disagreed with proposed vehicle standards.

Figure 5:1: Extent of agreement with proposed vehicle standards (%)



■ Strongly disagree ■ Disagree ■ Neither ■ Agree ■ Strongly agree

Base: all respondents

Caution should be used where base is small (n<50)

Don't know has been removed from the chart

General public

Most (88%) members of the public agreed with the proposed vehicle standards including a third who strongly agreed.

Hackney / PHV drivers

There was less support amongst Hackney / PHV drivers with 69% and 63% respectively stating they disagreed with the proposal.

Drivers from an Asian background were more likely to disagree with the vehicle standards than hackney / PHV drivers from a White British background (70% compared to 58%). Drivers in Bolton (88%), Oldham (91%) and Rochdale (71%) did not agree with the proposals. [please note: the very small number of responses from hackney and PHV drivers licensed in Bury, Salford, Tameside and Trafford so no statistically robust conclusions can be drawn about these districts. The response from other districts is also small and should be treated with caution].

Drivers who rent or lease their vehicle were more likely to agree with the proposed vehicle standards compared to those who own their vehicle (37% and 22% respectively), however in both cases more drivers disagree than agree with the proposed vehicle standards.

5.2 Comments about Vehicle Licensing Standards

Respondents were given the opportunity to provide comments about the proposed vehicle standards. Table 5:1 shows the number of respondents providing a comment and which standards they commented on.

The public commented mostly on:

- Vehicle Colour (48%);
- CCTV (18%); and
- Age of Vehicle (18%).

Hackney and PHV drivers commented mostly on:

- Age of Vehicle (68% & 45% respectively);
- Vehicle Colour (20% & 51% respectively); and
- Vehicle Maintenance and Testing (18% & 17% respectively).

A relatively high proportion of hackney drivers also commented on Accessible vehicles (33%) and PHV drivers CCTV (27%) and Livery (25%).

There was no statistical difference in response by where a driver is licensed or age but there were some by ethnic origin and these are highlighted in the relevant sections.

Table 5:1: Comments made for each standard by type of respondent (n)

| | General public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General Comments | 95 | 11 | 32 | 6 | 3 | 1 | 3 |
| Vehicle Emissions | 39 | 20 | 10 | 5 | 1 | 2 | 4 |
| Age of Vehicle | 82 | 78 | 84 | 8 | 1 | 1 | 10 |
| Vehicle Colour | 214 | 23 | 95 | 12 | 2 | 1 | 13 |
| Accessible vehicles | 54 | 38 | 1 | 1 | 1 | 0 | 4 |
| Vehicle Livery | 62 | 7 | 47 | 6 | 1 | 3 | 11 |
| Vehicle Maintenance and Testing | 44 | 20 | 31 | 4 | 0 | 0 | 2 |
| CCTV | 83 | 16 | 51 | 6 | 1 | 3 | 8 |
| Executive Hire and specialist vehicles | 8 | 0 | 5 | 2 | 0 | 0 | 1 |
| Vehicle Design | 9 | 4 | 0 | 0 | 0 | 0 | 1 |
| Vehicle Conditions | 24 | 1 | 3 | 2 | 0 | 0 | 0 |
| Base | 449 | 114 | 187 | 24 | 7 | 6 | 20 |
| Proportion of respondent type | 45% | 49% | 53% | 75% | 37% | 60% | 56% |

Further detail about the most frequently given comments about each vehicle standard and the sentiment and reasons for the comments are described in the next sections.

5.2.1 General Comments

The table below shows the general comments about vehicle age.

Table 5:2: General comments by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Welcome all changes / General agree | 68 | 1 | 3 | 2 | 1 | 1 | 2 |
| General comment on state of vehicles / support the case for change | 8 | 0 | 1 | 0 | 0 | 0 | 0 |
| Don't change anything / not needed / don't support | 9 | 9 | 26 | 4 | 2 | 0 | 0 |
| Proposals would not increase safety | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Proposals would not improve driving standards | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Concerns regarding vehicle fraud | 10 | 1 | 0 | 0 | 0 | 0 | 1 |
| PHV should follow same rules as Hackney | 4 | 1 | 2 | 0 | 0 | 0 | 0 |
| Base | 95 | 11 | 32 | 6 | 3 | 1 | 3 |

Of members of the public who completed the question, 68 provided a comment about generally agreeing and welcoming the proposed changes to vehicle standards.

"Really impressed with the standards I hope it is brought in sooner rather than later."
(Public, age 35-44, Trafford)

"All of these are important" (Public, age 55-64, Bury)

"These measures will make all passengers safer." (Public, age 35-44, Tameside)

However, 9 comments from hackney drivers, 26 from PHV drivers and 4 operators disagreed with the proposal or felt they were not needed.

"I feel this is a policy that is being rushed through without full thought of the cost and consequences to the self-employed sole trader who has been badly affected by Covid 19." (Hackney Driver, Tameside)

"Standardising of vehicles leads to a higher demand for a smaller range of vehicles which, in turn, increases initial purchase cost and ongoing maintenance costs (due to high parts demand). The vast majority of private hire drivers are living close to minimum wage and any increasing in their running cost will be pushed directly onto the customers. Resulting in the continuing demise of the industry and customers turning to subsidised transport systems." (Public, age 25-34, Wigan)

"I believe that wanting completely emission-free taxis by 2028 is a goal that should be circumstantial. Most drivers use these vehicles for their private life too and electric vehicles must have the range and practicality to serve both needs before making it mandatory to have an emission-free vehicle." (PHV Driver, Stockport)

5.2.2 Vehicle Emissions

The table below shows the general comments about vehicle emissions.

Table 5:3: Detailed comments made for vehicle emission by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Agree with timeline for a transition to a fully electric fleet | 23 | 3 | 4 | 0 | 1 | 0 | 0 |
| Should have a fully electric fleet earlier than proposed | 8 | 1 | 0 | 0 | 0 | 0 | 0 |
| Should give more time to switch to a fully electric fleet | 3 | 3 | 5 | 2 | 0 | 2 | 1 |
| Comment / concerns about suitability of some electric vehicles | 2 | 7 | 3 | 1 | 0 | 0 | 3 |
| Electric vehicles too new to understand suitability | 1 | 1 | 0 | 1 | 0 | 0 | 0 |
| Charging infrastructure needs improving / not yet ready | 5 | 7 | 2 | 3 | 0 | 0 | 1 |
| General Disagreement with Age | 1 | 2 | 0 | 0 | 0 | 0 | 0 |
| Base | 39 | 20 | 10 | 5 | 1 | 2 | 4 |

Support for the timings: 23 members of the public, 3 hackney drivers, and 4 PHV drivers stated they agreed with the proposed timeline for the transition to a fully electric fleet. Some emphasised the need for financial support and grants to drivers to encourage the shift to electric vehicles.

"Good to aim for fully electric fleet by 2028, but I feel taxi drivers should be offered grants and financial incentives to encourage early take up, therefore creating demand and bringing down the price." (Public, age 35-44, Manchester)

"Agree with emission requirements given ample support is provided to upgrade vehicles." (PHV Driver, Stockport)

Eight members of the public felt the transition to a fully electric fleet should happen earlier than proposed.

"Vehicle emissions: what will it take to move to electric vehicles at a faster pace than proposed? I think the [proposal] is too loose around what's going to be expected of taxi operators so surely we should be looking for their commitment to move to electric as early as possible." (Public, age 65-74, Stockport)

Concern about the timings: In contrast, 5 PHV and 3 hackney Drivers and 2 operators felt the timeline should be extended.

"Vehicle Emissions. This is a very big step, and I think the GM Councils should allow more time to help operators safely and economically phase out old cars." (Operator, Trafford)

"(Vehicle emissions) Emissions should be allowed to come in as and when the vehicles are replaced so that over the coming years the fleet would naturally be replaced with zero emission vehicles. Retrofitting of emission kits on older vehicles should be allowed, as the money is not being earned by the drivers to be able to afford an electric taxi." (Hackney Driver, Trafford / Manchester and Salford)

More detail was provided in the in-depth interviews where drivers and operators describe purchasing a vehicle as an investment, budgeted for the expected lifespan of a vehicle. Therefore, drivers who have already invested in vehicles that haven't reached their expected lifespan cannot afford to replace them within the proposed timescale.

"I think it's going to be unfair to say to someone your vehicle's not fit for purpose, you need to go and buy this vehicle now and it's just going to be really really difficult to do that to people who've been doing it thirty, forty years, they're struggling to make ends meet and it's hard work." (Operator, Bury)

The Licensed Private Hire Car Association (LPHCA) raised concerns about the timings and felt they should be kept under review:

"We agree with the first part but must point out the ambition for a zero-emission capable fleet by 2028, whilst sensible cannot at this stage form a policy as the supply, charging infrastructure, cost, ability for drivers to charge at home is uncertain, especially post-pandemic. There is also uncertainty on grant funding for drivers, so this aspiration needs to be kept under review as events become clearer." (Organisation, LPHCA)

Concern about electric vehicles and charging infrastructure: Hackney drivers were particularly concerned about the suitability of some electric vehicles (n=7) and felt the charging infrastructure needs improvement and / or is not yet ready to support the transition to electric vehicles (n=7).

"The effect on me in terms of additional crippling costs to comply with some of the proposals in terms of going electric will be detrimental, and restrictions on vehicle colour and age limit is questionable. If TfGM are willing to supply all the taxi industry with all new electric vehicles and guarantee a lifetime service and warranty, then we, the taxi industry, can consider the proposals. The support funding for drivers to switch to electric is nowhere near enough to cover the cost of these vehicles, and limited charging points which you can never match the fuelling stations accessibility and coverage for petroleum fueling." (PHV Driver, Manchester, 2047, Q6a Comments section)

The in-depth interviews provided more detail of the industry's concerns with electric vehicles; the lack of electric charging points infrastructure and the lack of technological advancements in battery life, parts maintenance and overall servicing and trust in the lifespan of the vehicle.

"A brand new electric cab, the bottom end is £55,000. So even if they gave you £17,500 towards one of those vehicles you're saddling somebody with a debt of almost £30,000." (Hackney Driver, Salford)

"70,000 miles he said he'd done, and his batteries are goosed and he didn't realise how much the batteries were. It's all right for 180 miles, then you get 160 miles and as the batteries start to die and get weaker and weaker you start getting electrical problems, you're getting forty miles, fifty miles, you've got to replace them for new ones then. So that's the problem with having electric vehicles on, good for the environment, but rubbish for the job, unless Tesla with their million-mile battery come along with a decent priced vehicle." (Operator, Tameside)

Euro 5: In the in-depth interviews, some drivers felt early information from licensing authorities or governing bodies indicated Euro 5 would be acceptable as a lower emission vehicle. One respondent reported purchasing a Euro 5 vehicle and now felt stuck with it because the resale value of it has greatly reduced due to the proposed Clean Air Plan.

"Right, because they've now set the standards of Euro 6, Euro 5 vehicles are not wanted, they're not worth the trade-in. I've enquired about this. The best they would offer me is three grand." (Hackney Driver, Stockport)

"I bought a very very clean 11 plate cab in February (right before COVID) and I paid £5,000 for it. I won't get £1,000 for that now, purely because of this." (Operator, Stockport)

"That's one of their standards, they've raised it to thirteen years now, but at the time, my vehicle was too old, so I asked specifically what vehicle I needed to get, they told me a Euro 5, I've gone out and got it and now they've moved the goalpost, Euro 6 or you pay this emissions charge." (Hackney Driver, Manchester)

5.2.3 Age of Vehicle

The table below shows the most frequently given comments about vehicle age.

Table 5:4: Detailed comments made for vehicle age by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Agree with Age Limit proposals | 18 | 1 | 7 | 1 | 1 | 0 | 0 |
| Age limit should be higher than 10 years | 4 | 37 | 16 | 1 | 0 | 0 | 2 |
| Age limit should be less than 10 years | 11 | 1 | 4 | 0 | 0 | 0 | 0 |
| Electric cars should have same age limit as non-electric | 7 | 4 | 0 | 1 | 0 | 0 | 3 |
| No age limit or higher for electric vehicles | 1 | 5 | 5 | 0 | 0 | 0 | 1 |
| Minibus maximum age should be 15years | 0 | 0 | 2 | 0 | 0 | 0 | 0 |
| Age is not important | 45 | 33 | 47 | 6 | 0 | 1 | 6 |
| 10 years isn't enough time to return investment | 0 | 8 | 2 | 2 | 0 | 0 | 2 |
| Suggestion of different Minimum age | 2 | 4 | 13 | 2 | 0 | 0 | 0 |
| Base | 82 | 78 | 84 | 8 | 1 | 1 | 10 |

General support: Only a few comments were made generally supporting the vehicle age standard. 18 members of the public and a further 11 feeling the age limit should be reduced. Comments were received around the poor condition of vehicles as the following quote illustrates:

"I live in Bolton, and the current standard of taxis is appalling - it's like a rolling scrap yard. Other parts of Greater Manchester seem to have much nicer, newer taxis, but Bolton is full of decrepit, shonky old rust boxes, limping around the town, pumping out clouds of smoke and regularly breaking down. I saw an "S" reg taxi not long ago - registered in 1997! The car was older than its driver! We pay good money to be driven around in these awful heaps, and it's about time something was done about it" (Public, age 45-54, Bolton)

Age is not important: A high number of comments were received expressing the age of a vehicle should not matter if the vehicle is well-serviced and maintained, with this being expressed by 33 hackney drivers, 47 PHV drivers, 6 PHV operators, and 45 of members of the public.

"Vehicle age shouldn't matter as long as it is in good condition. We have two MOTs in a year, so the vehicles are good for customers". (PHV Driver, Bolton)

Some respondents commented about hackneys being more expensive to replace and upgrade, with some comparing the costs to PHVs. Therefore, 37 hackney drivers and 16 of PHV drivers felt the age limit should be higher. Drivers licensed in Manchester (n=24) raised this more than any other area.

"Age shouldn't be a problem as long as kept up with maintenance and repairs to a good standard. Personally, I think if a vehicle needs welding, it's past its best for the job, and licenses should be granted for 12 months after repairs to give drivers the time to invest in a replacement. Also, Hackney carriages cost a hell of a lot more money than a private hire car, £30.000 upwards whereas a new Dacia car can be purchased for £8000, so should be given 15-year age limit" (Hackney Driver, Stockport)

Both the LPHCA and Unite Union did not feel the age standard was appropriate:

"As a former qualified engineer and operator that had over 2,000 vehicles used, leased or owned by my business for Private Hire usage and as many experienced operators, taxi & PHV hirers will tell you – it is the condition of, not the age of a vehicle that is critical. A combination of condition and vehicle emissions requirements (as you have set out above) is a far better way to determine the fitness for a taxi or PHV to be licensed. It is reasonable to subject older PHVs to more frequent MOTs and other inspections whilst meeting established Euro Standards and Air Quality requirements, rather than the outdated and inappropriate use of age policies." (Organisation, LPHCA)

Setting the hackney vehicle age limit at 10 years is a nonsense. It provides insufficient time for recovery on investment. And these vehicles will become scrap at end of arbitrary lifespans as numbers of charging CAZs increase and residual values disappear, accordingly. The upper age limit for hackneys should be 15 years". (Organisation, Unite the Union- Manchester Hackney Carriage)

The same argument was strongly raised in the in-depth interviews with both users, drivers and operators arguing a vehicle should be able to be used regardless of age if it was fit for purpose and passed all the relevant tests.

"And most people get cars maybe like every five or six years, so ten is quite old for a car. The more modern the car is, the less likely it is to have bad emissions and a lot of them have things put in place when they're being built to not release as many". (User, Group 15)

The in-depth interviews with hackney and private hire drivers highlighted concerns about removing vehicles considered roadworthy and are of a good standard to continue working. This was felt to be not only wasteful but forced drivers to replace their vehicles earlier than envisaged. This was particularly mentioned by drivers in Rochdale and Oldham as they currently have a longer age limit on their vehicles.

"This will hit drivers hard in this area. You only need to look at the cars on the road currently to see that a lot of them will not meet this age criteria. No one has the money to update these cars, we are all still paying money off on them and getting no money in at the moment. Here is one of the most deprived parts of Manchester." (PHV Driver, Rochdale)

Drivers and operators currently trading in the regions that are currently under standards of between 7 and 12 years for the age limit of their vehicle understood why ten had been suggested and felt it fell in line with their own district.

A couple of drivers / operators highlighted specialist vehicles, i.e. adapted for wheelchair transportation should be given an exemption to the age standard due to the need for their type of vehicles.

"Number one, the most important thing for me in my business, I need vehicles to be able to drive, okay, to be able to bring people. The maximum age of ten years for a

vehicle in my opinion is going to wipe out, number one my company completely and 80% of the hackney carriage trade.” (Operator, Trafford)

Two operators mentioned the impact the standard would have on their operations as currently they are able to manage their fleet by moving older vehicles to other areas where the current age standards are lower for example, Manchester to Trafford, enabling them to stagger the replacement of their vehicles and therefore the finance needed to do this.

“I usually move the vehicles from Manchester to Trafford once they hit their age limit in Manchester. I now will be able to keep them longer in Manchester but will get less out of them overall and won’t be able to move them on to Trafford so I will now need to update more vehicles in a smaller timescale.” (Operator, Trafford / Manchester).

5.2.4 Vehicle Colour

The table below shows the most frequently given comments about vehicle colour.

Table 5:5: Detailed comments made for vehicle colour by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Agree with white colour proposals | 46 | 2 | 3 | 0 | 1 | 0 | 2 |
| Support one colour but not white | 27 | 0 | 11 | 1 | 0 | 0 | 3 |
| Don't think standard colours are necessary | 138 | 20 | 68 | 10 | 1 | 1 | 8 |
| Vinyl wraps should be allowed as well as full resprays | 1 | 0 | 1 | 0 | 0 | 0 | 0 |
| Driver should have a choice of colour | 8 | 1 | 14 | 2 | 0 | 0 | 0 |
| Base | 214 | 23 | 95 | 12 | 2 | 1 | 13 |

Many comments were made opposing the proposal of a standard colour; 68 PHV and 20 hackney drivers and 138 members of the public commented standard colours were unnecessary. The main reasons they gave for feeling this way included:

Expense: white cars were considered more expensive than others due to their current popularity amongst the general public. For those who already owned compliant vehicles, the cost of re-spraying was felt to be unnecessary.

“There will be a massive shortage in available white vehicles suitable for private hire use, and the few that are available (New or used) will be at premium cost. Will the licensing district be assisting in paying this extra cost or assisting to resolve the lack of supply.” (Organisation, Anonymous)

This was also raised in the in-depth interviews as the following quotes illustrate:

“Yeah, I just don't understand that possibly spraying up to fifty thousand cars white is good for the environment.” (PHV driver, Wigan)

“What about the likes of like me who bought this two years ago, a couple of drivers have just bought new vehicles that are blue, there's one company that's bought twenty

odd, dark blue and red minibus wheelchair vehicles, so have they got to spray all their vehicles white?" (Hackney Driver, Tameside)

Dirty / cleaning: many of the comments related to how quickly white cars become dirty. Not all PHV drivers were opposed to the idea of a common colour, but they were opposed to the colour white as the following quote illustrates:

"With white cars, we struggle to keep them looking clean. There have been times where I've taken my white car for a wash in the morning, and by the evening, the car is dirty from outside. I'm not saying that my silver car remains clean. However, I'd like to point out the fact that dirt stands out significant on white cars than it does on silver cars." (PHV driver, Manchester)

Members of the public (n=138) were also less concerned about the colour of the vehicle.

"I'm not concerned on the colour of the vehicles as long as they display the correct approval information (decals) on the bodywork" (Public, age 45-54, Bolton)

"Vehicle colour - I don't agree with. I don't understand why having a white car for private hire will improve the service and standards. What will be put on place to support drivers in replacing brand new vehicles?" (Public, age not provided, Bolton)

However, a few members of the public (n=46) did feel a consistent colour would make it easier to identify a PHV.

"Vehicle colour - Would not improve driving standards but easier for public to identify" (Public, age 45-54, Bolton)

Representatives also argued against the proposed standard colours:

"With respect this is an extremely poor proposal, the few people within the PHV industry that I have spoken to that would accept this as being rational, either run or own white vehicles and even they accept that prescribing white only will almost certainly increase prices, reduce model availability and potentially create a shortage of available vehicles. Here are just some of the other reasons not to do this:

- *Private Hire Vehicles are Privately booked not taxis*
- *A uniform colour will make PHVs look more like taxis*
- *Modern technology and the number plate identifies vehicles to customers*
- *Passengers will start approaching white vehicles (this is dangerous)*
- *Bogus drivers will use a white vehicle (this is dangerous)*
- *Passengers from neighbouring authorities will be confused*
- *Tourists travelling to multiple destinations will be confused*
- *Drivers who move into TfGM with a vehicle they used elsewhere won't be able to get licensed*
- *Electric and Hybrid vehicles are not predominantly white*
- *Colour schemes are unwelcomed by vehicle hirers, replacement vehicle suppliers and major trade suppliers*
- *Colour schemes for PHVs have been successfully challenged in the courts*
- *Some excellent PH industry vehicles are not available in white" (Organisation LPHCA)*

"This approach actually promotes, encourages and support the issue of cross border hiring, since all 10 districts (and indeed further afield such as Rossendale and others.) will look identical, and therefore there will be very little to demonstrate to passengers whether the vehicle is correctly licensed or not" (Organisation, NPHTA)

"Making all the vehicles uniform in colour could result in some negative unintended consequences. Suddenly, a fleet of white GM private hire vehicles become taxis and many will exploit this by plying for hire without a relevant licence". (Unite the Union - Manchester Hackney Carriage)

5.2.5 Accessible Vehicles

The table below shows the most frequently given comments about accessible vehicles.

Table 5:6: Detailed comments made for accessible vehicles by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| A mixed fleet (types of vehicles) is important | 13 | 23 | 0 | 1 | 0 | 0 | 2 |
| Accessible vehicles are expensive / need to be subsidised | 3 | 6 | 1 | 0 | 0 | 0 | 0 |
| PHV should have to have same rules about accessibility | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| More accessible vehicles are needed | 34 | 6 | 0 | 0 | 1 | 0 | 3 |
| More consultation with disabled people required | 5 | 0 | 0 | 0 | 0 | 0 | 0 |
| Problem with design of accessible vehicles | 3 | 5 | 0 | 0 | 0 | 0 | 2 |
| Base | 54 | 38 | 1 | 1 | 1 | 0 | 4 |

More accessible are vehicles needed: Members of the public (n=34) commented more accessible vehicles were needed as did 6 hackney drivers. Some members of the public shared how they often encounter difficulty booking wheelchair accessible vehicles due to their lack of availability, and those hackney drivers who have accessible vehicles shared how they are relied upon by many who do not have many other options for transport.

"Accessible Hackney carriages - we have extreme trouble booking a taxi in advance that has wheelchair access as the taxi company do not always know when their wheelchair accessible vehicle will be available. In the past we have been asked to ring at the time an accessible taxi is needed - and in every occasion one was not and our family has had to pick her up instead - not an ideal situation for a young lady who would like some independence." (Public, age 45-54, Bury)

"Make it all wheelchair accessible vehicles, known as a level playing field." (Hackney Driver, Wigan)

A mixed fleet is needed: In contrast, 23 hackney drivers felt having a mixed fleet was more important, with some sharing how they feel some passengers are deterred by larger vehicles.

"As a Hackney driver, I don't agree for all Hackney carriage vehicles to be wheelchair accessible. Reason is for that we do, need mixed fleet for elderly people who do not like getting into bigger vehicles. I believe it will make them go to private hire offices and that will affect our business. Also, it's more affordable to buy a normal electric car." (Hackney Driver)

One operator who took part in the focus groups specialises in the transportation of customers who need wheelchair accessible vehicles. He stated hackneys were not suitable for all.

"On the black cabs and I've got two of them, okay. The ramps that come down, they come down on an angle and, you know, that ramp the wheelchairs cannot actually get up on them and also the people, when they're sat in them, they'll bang their head against the roof. So for some reason licensing seemed to think that anybody who's in a wheelchair would fit in a black cab. It's not the case, so you might have two thousand black cabs out there and they could say, oh, they're all wheelchair accessible. They are for full manual wheelchairs. Electric ones they can't fit. (Operator, Trafford).

Representatives also argued for a mixed fleet:

"This is totally not acceptable because [it] is not meeting the needs of vulnerable or disabled [people]. Many old [and] disabled don't use wheelchair vehicles either [because] it's too high or [they] dislike it them". (Organisation, NPHTA)

"There is very little evidence to support the need for an entire trade to cater for wheelchair bound passengers, potentially at the cost of the majority of disabled passengers who are not confined to a wheelchair and therefore find it far more difficult to access the higher vehicles that are WAV, so a mixed fleet is a better approach". (Organisation, NPHTA)

Vehicle design: Some hackney drivers and operators expressed concerns with the design of wheelchair accessible vehicles, with 5 explaining their preference is for side loading accessible vehicles rather than rear loading and expressing their safety concerns.

"All Hackney carriages should be side loading wheelchair accessible, rear loading takes up too much space on ranks, they are also dangerous when unloading passengers in the middle of the road." (Hackney Driver, Wigan)

"Accessible Hackney carriages: It is proposed that all hackney carriages should be wheelchair accessible. Agreed. Particularly important condition which will help to prevent the influx of out-of-town licensed saloon cars plated as Hackney carriages from working within the GMC area. Side and / or rear loading without the need for swivel seats: A policy as to whether purpose-built accessible vehicles should be side and/or rear loading without the need for swivel seats is being considered. The choice of entry location generally determines the floor plan available. Rear entry vehicles offer two floor plans for up to four or six passengers. A side entry van has more options when it comes to the floor plan. Side entry vehicles will lower the available space inside, as the maximum number of ambulatory passengers in this option is four including three in the rear bench seat. Swivel seats in taxis where fitted should remain as they are an additional feature making it easier to enter or exit the car without undue discomfort. For those who have conditions such as arthritis, multiple sclerosis, or osteoarthritis, which can limit their mobility will benefit as they reduce strain otherwise placed on the hips and back." (Operator, Manchester)

Financial implications: A further 6 hackney drivers felt wheelchair accessible vehicles were expensive or need to be subsidised if they are all required to be wheelchair accessible.

"Vehicle emissions. what I can gather from the information available is that driver is responsible for all the costs involved. Accessible Hackney is very expensive it will put almost every Hackney driver out of business in Rochdale for sure even Euro six diesel is unaffordable." (Hackney Driver, Rochdale)

Concerns were raised by members of the public about the impact on the cost of using a hackney / PHV.

"Wheelchair accessible vehicles are more expensive than normal cars. And that's tough for people who need them. One solution would be to provide a subsidy to anyone buying an accessible vehicle to use as a taxi. But what makes absolutely zero sense is to make the non-wheelchair-using public (the VAST majority of people) pay for accessibility features they do not need." (Public, age 35-44, Manchester)

Driver training and awareness: Some users and drivers felt a few drivers use the fact they are transporting someone who needs an accessible vehicle to their advantage:

"But a lot of the time they do treat you, you know, what they do is they charge, they put the timer on and if it takes you ages to get into the cab and put your belt on and everything, they charge you for all that, you know and getting out the cab, they don't always put seatbelts on properly and things like that, but then the private hire companies don't usually have accessible vehicles." (User, Group 1)

Others highlighted not all disabilities are visible:

"More accessible vehicle design for disabled people. Not everyone with a disability you see looks disabled very important not to forget for drivers." (Public, age 45-54, Oldham)

5.2.6 Vehicle Livery

The table below shows the most frequently given comments about vehicle livery.

Table 5:7: Detailed comments made for vehicle livery by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Vehicle liveries should still be regulated | 9 | 3 | 9 | 2 | 0 | 0 | 3 |
| Problems with liveries e.g. distracting | 3 | 1 | 27 | 1 | 0 | 2 | 0 |
| Liveries cause devaluation | 0 | 0 | 6 | 0 | 0 | 0 | 1 |
| Use stickers / livery to make cabs identifiable | 27 | 1 | 1 | 1 | 0 | 0 | 4 |
| Large fines for improper use of liveries | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Include GM branding e.g. bee / variation by district | 9 | 0 | 0 | 0 | 0 | 0 | 2 |
| Liveries can hinder driver ability to use vehicle for personal use | 2 | 0 | 3 | 0 | 1 | 1 | 0 |
| Disagree with livery - unspecified | 12 | 2 | 7 | 3 | 0 | 0 | 2 |
| Advertisement is a source of income | 6 | 1 | 0 | 0 | 0 | 0 | 2 |
| Base | 62 | 7 | 47 | 6 | 1 | 3 | 11 |

Members of the public (n=27) and PHV operators (n=1) agreed with use of stickers/livery to make vehicles more identifiable for customers and authorities equally, on the road and on CCTV. Some feel it will increase safety, such as making it easier for customers to hail hackney in the evening / when visibility is poor.

"Vehicle livery - operator logo should also be displayed on bonnet to assist authorities in identifying taxi via CCTV when required." (Public, age 35-44, Bury)

"I think it's very important that taxis still have their company logo on the side. When I personally order a taxi that's the first thing I look for before checking with the driver." (Public, age 25-34, Stockport)

There were some suggestions to include Manchester branding like "The Bee" symbol or have colour on bonnet based on the licensing authority.

"Livery: I think it's important to recognise each vehicle especially at night-time and have Manchester Theme e.g. "the Bee" symbol. Name of operator or driver again may not be too visible at night" (Public, age 75+, Bolton)

"All private hire vehicle should be white with an identifiable stripe on the side/bonnet depicting a colour coordinating with the issuing authority. ie Stockport Mauve. Tameside

Yellow, Bolton blue etc. This would identify the vehicle to that particular issuing authority, ensuring an easily identifiable vehicle correct to the area." (Public, age 55-64, Tameside)

Eight respondents commented about how they felt livery could be a means of additional income to drivers, with some feeling advertisements can interesting to watch and supporting their use.

"The advertisements that sometimes cover Hackney cabs can be interesting and eye catching to passengers. They make the city more colourful and interesting." (Public, age 25-34, Manchester)

"As regard to advertising on cabs this is a second source of income and a big part of diversity of generating revenue." (Hackney Driver, Tameside)

However, PHV drivers raised issues with the use of livery including:

- **Use of vehicle for personal use:** PHV owners were concerned they will not be able to use their vehicle for personal use.

"I think there is no need to slap stickers on private hire cars. We can't use that car for personal use or social, if I would out with family people would approach my car asking if it is their taxi. That's mean I have to buy another car for personal use causing more pollution and traffic on the road. I hope this makes sense. Greater London has no stickers on PHVs, which is much bigger in size and population. Thanks." (PHV Driver, Bolton)

- **Lead to distraction:** liveries on vehicles may lead to distraction and take the essence of the hackney.

"Another thing I don't agree with is that purpose-built black cabs e.g. London style only taxis would lose their prestige if stickers were put all over them and could cause a distraction if they are on the bonnet, as well as they don't slope away like in other vehicles." (Hackney Driver, Wigan)

- **Vehicles become targeted:** liveries lead to vehicles being targeted for vandals, with some respondents expressing concerns about their vehicles being damaged deliberately.

"Vehicle Livery - this is already an issue for Manchester licensed vehicles that become a target for vandals as they are easily recognisable. Stone throwing, egg throwing is commonplace on the streets of Manchester. I would like to see an alternative to the visible livery." (Vehicle leasing company, Manchester)

- **Devaluation of Vehicles:** stickers affect the paintwork leading to devaluation of the taxis.

"Vehicle livery I agree with this but NOT the placement of the bonnet sticker as a Manchester licence vehicle this has always been and caused issues with paintwork damage as any stickers on the bonnet and wings of a vehicle are the worst place you could choose to put them as the heat from the engine causes paint damage and discolouration when they are on for many years and cause vehicle depreciation value due to the paintwork damage and in my honest opinion make the vehicles look horrible just stickers on the rear doors is good placement even the sticker in the rear window is sometimes now not suitable as with the shape and style of some vehicles rear window the sticker placement can cause issues with rear view through the rear view mirror when reversing a vehicle." (PHV Driver, Manchester)

"Why is there a need to have a sticker on the bonnet? With licence plates front and back plus side stickers. The stickers cause damage to paint work plus discolouration." (PHV Driver, outside Greater Manchester)

Two representatives suggested including livery **advertisement as a source of income** within the current restrictions.

"The restriction on livery has been long established, but there is merit in considering an exemption for public health or public interest livery pre-approved by the licensing authority. This could provide additional income to drivers who are faced with escalating costs and increased competition, and assist with public health campaigns; for instance, on Covid-19, smoking cessation or other important campaigns."
 (Councillor / Elected official, Oldham West)

5.2.7 Vehicle Maintenance and Testing

The table below shows the most frequently given comments about vehicle maintenance and testing.

Table 5:8: Detailed comments made for vehicle maintenance and testing by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Agree with proposed plan for vehicle testing | 20 | 7 | 8 | 1 | 0 | 0 | 1 |
| More vehicle testing required than proposed | 3 | 1 | 0 | 1 | 0 | 0 | 0 |
| Less vehicle testing required than proposed | 10 | 4 | 16 | 2 | 0 | 0 | 1 |
| Reporting unroadworthy vehicles should be simple | 4 | 0 | 0 | 0 | 0 | 0 | 0 |
| Maintenance spot checks should be performed | 3 | 0 | 0 | 0 | 0 | 0 | 0 |
| Stricter checks on testing centres | 2 | 3 | 0 | 0 | 0 | 0 | 0 |
| Need more places to be able to conduct tests | 0 | 6 | 5 | 0 | 0 | 0 | 0 |
| Cars that have been written off and repaired should be allowed to be licensed again | 0 | 1 | 4 | 0 | 0 | 0 | 1 |
| Testing frequency should be based on the vehicle mileage | 5 | 1 | 0 | 0 | 0 | 0 | 0 |
| Base | 44 | 20 | 31 | 4 | 0 | 0 | 2 |

Support: Seven hackney drivers, eight PHV drivers and twenty members of the public provided a general comment of support for the proposed standard.

"Vehicle testing should be twice a year, main renewal and a 6-month inspection throughout the 10 years of licence as Manchester have 4 tests for vehicles over 5 years old which is ridiculous as the standard DVSA MOT test is valid for all road vehicles for

12 months by general public, so for taxis, twice a year is acceptable." (PHV Driver, Manchester)

"Also, important that if we're mandating twice-yearly safety checks these are not prohibitively expensive or driver's may be priced out of operation." (Public, age 25-34, Rochdale)

Five respondents suggested more testing is needed than what is proposed, feeling the additional checks are needed due to the high mileage such vehicles generally do.

"Vehicle testing should be more frequent; these vehicles are higher than average mileage vehicles so need more testing." (Public, age 45-54, Oldham)

Too much testing: Four hackney drivers, 16 PHV drivers and 10 members of the public felt less testing was needed. Drivers from an Asian background (n=14) were more likely to give this comment.

"Testing - Tests should not be conducted twice per year. This is overkill." (Public, age 18-24, location not provided)

"Annual mot test seems adequate to me. As I have a 14-year-old car, I would be ok with a taxi over 10 years old." (Public, age 65-74, Stockport)

Some respondents suggested the amount of vehicle testing should depend on the age of the vehicle, with newer vehicles requiring less testing.

"Vehicle age: having bought many vehicles for private hire. Usually around 3-4 years old, and financing over three years. Doesn't leave me with a finance free private hire vehicle for very long. So I would welcome the 10 years. The vehicle is being tested twice a year. Maybe the final one or two years could be three times a year." (PHV Driver, Manchester)

"On vehicle testing, I think vehicles under three years old should have one test a year, and vehicles three years and over should have two." (Hackney Driver, Stockport)

"Vehicle testing instead of making a car redundant at 10 years old. Why not change and at eight years old and put the cars on three tests per year at least then the vehicle stays in maintained condition and keeps the driver in work as there are enough taking taxpayers money without the councils making more unemployed." (Public, age 55-64, Wigan)

A small number of respondents, both members of the public and drivers, suggested testing frequency should be based on vehicle mileage.

"Vehicle testing should be linked to the amount of mileage a taxi covers." (Public, age 55-64, Rochdale)

"Vehicle testing - I believe a more onerous testing regime should be avoided. Speaking personally, I have seen the number of miles that I cover in a year reduce to a level that is less than most private cars, yet I have to produce my vehicle for two enhanced tests every year. Obviously, vehicles must be safe as a priority but so should every vehicle that is on the road." (Hackney Driver, Stockport)

Testing centres: Six hackney drivers and five PHV drivers felt more testing places were needed, and three Hackney drivers also felt stricter checks should be required at testing centres to ensure vehicles are roadworthy and safe.

"Vehicle Testing Vehicles should be tested twice a year to a more rigorous test at a local authority test centre and not at a for profit MOT station. There should be less chance of favouritism and corruption." (Hackney Driver, Wigan)

"Private hire should not look like a Hackney Hackneys should be the most versatile vehicle Testing Vehicles should be tested at least twice a year at the local authority testing facilities. At a higher standard than the MOT standard. And not at any MOT station or not for profit." (Hackney Driver, Wigan)

"Vehicle testing should be allowed at any government approved testing station and not just be tested by local authorities so they can take advantage." (Hackney Driver, Manchester)

Three respondents suggested maintenance spot checks should be performed.

"Vehicle conditions should be subject to an annual check to ensure fit for purpose and that spot checks should be made around the Borough to ensure these standards are maintained." (Public, age 45-54, Rochdale)

Four respondents felt the process for reporting unroadworthy vehicles should be simple.

"Members of the public should have the ease of reporting the poor condition of a vehicle to the issuing authority easily through a call centre or web address instead of going through the hoops and jumps that occurs today." (Public, age 55-64, Tameside)

5.2.8 CCTV

The table below shows the most frequently given comments about CCTVs.

Table 5:9: Detailed comments made for CCTVs by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Agree CCTV should be mandatory | 46 | 6 | 12 | 2 | 0 | 0 | 3 |
| CCTV should not be necessary it's should be optional / no need for CCTV | 10 | 1 | 11 | 0 | 0 | 0 | 3 |
| CCTV is expensive / Council should help fund | 5 | 5 | 21 | 2 | 0 | 2 | 2 |
| All vehicles should also have a dash-cam filming outside of the car | 7 | 1 | 2 | 0 | 0 | 0 | 0 |
| CCTV should be used to assess driving standards too | 4 | 0 | 0 | 0 | 0 | 0 | 0 |
| Concern about privacy / data protection worries | 20 | 4 | 11 | 3 | 0 | 0 | 2 |
| Both drivers and passenger should have panic button | 5 | 0 | 0 | 1 | 1 | 1 | 1 |
| Base | 83 | 16 | 51 | 6 | 1 | 3 | 8 |

The proposed CCTV standards were commented about positively by 46 members of the public, 6 hackney drivers and 12 PHV drivers. It was felt CCTV promotes safety for both drivers and passengers.

"CCTV if used in a way that doesn't cause an invasion of privacy to the driver, is very important for the safety of the public. Any livery should be suitably visible for people with limited vision" (Organisation, Braddleholme Community Centre)

"CCTV will be essential to ensure safety and crime prevention on both sides" (Public, age 25-34, Rochdale)

"I like the CCTV has this will help the trade in lots of ways including Panel Hearings" (Organisation, The Hackney Drivers Association Ltd)

However, some drivers were concerned about:

- **The cost:** 5 hackney drivers and 21 PHV drivers expressed concerns about the cost of CCTV and felt funding should be provided via the council for this purpose. This was also raised in the in-depth interviews where drivers questioned the cost implications of the installation and maintenance of CCTV and what expense would be incurred to download and submit data when there was a problem.

"It's a very good idea having CCTV in the vehicle, because at the end of the day it's safety for yourself and safety for your passengers, but you know, who's going to pay for it, it's about £1,500 for a CCTV in a vehicle, especially for licensed." (PHV Driver, Rochdale)

- **Privacy:** there were several concerns raised about privacy, GDPR, and the use and storage of recordings, with 4 hackney drivers and 11 PHV drivers raising concerns related to this, compared with 3 PHV operators and 20 members of the public.

"CCTV is an invasion of the public privacy and I'm sure will be challenged in Court. whose paying for this, who under the GDPR is retaining the recordings? How long are those recording retained? Who gets to see them? (Operator, Trafford)"

Two vehicle leasing companies suggested a panic button would be more effective.

"More than CCTV a panic button is a more effective tool. Panic buttons which are connected directly to the police are important CCTV is not very clear when these incidents happen the perpetrators are always wearing caps and hoodies which makes them hard to identify. Therefore, panic buttons alone are more effective." (Vehicle leasing company, Salford)

In the in-depth interviews further concerns were raised by drivers about the responsibility for data storage and management. Queries were raised about whether drivers would be required to upload data to the authority and how will the data recorded be secure and managed by the drivers.

"Who is going to be responsible for the data? Are we going to have to download the data all the time and provide it? At what cost? I understand why this is being considered but practically I'm not sure how this will work." (Hackney Driver Manchester)

Some drivers already had dashcams, which offered the additional benefit of lowering their insurance however, there are strict rules on ensuring the camera only points outwards of the vehicle and not into the car therefore protecting the privacy of the occupants. Questions were raised about the impact of CCTV on their insurance.

"You see I have a dashcam as it is cheaper for my insurance, but it has to point outwards, my insurance is very clear on that. Will my insurance now accept this CCTV inside the car? (PHV Driver, Tameside)

5.2.9 Executive Hire and specialist vehicles

The table below shows the most frequently given comments about executive hire and specialist vehicles.

Table 5:10: Detailed comments made for executive hire and specialist vehicles by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Executive hire should be exempt from colour regulations | 0 | 0 | 1 | 2 | 0 | 0 | 0 |
| Executive hire operators should have more duties of care | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Executive hire should be exempt from CCTV | 0 | 0 | 0 | 2 | 0 | 0 | 0 |
| Should be exclusions for specialist vehicles | 3 | 0 | 1 | 1 | 0 | 0 | 1 |
| The exclusive use clause for executive hire vehicles may be unfair on owner drivers | 1 | 0 | 1 | 0 | 0 | 0 | 0 |
| Executive hire shouldn't have different rules | 3 | 0 | 4 | 0 | 0 | 0 | 0 |
| Base | 8 | 0 | 5 | 2 | 0 | 0 | 1 |

Very few comments were received regarding executive hire. Those that were received were mainly about exemptions for:

CCTV: Two operators provided comments citing executive hire vehicles should be exempt from CCTV:

"Executive Fleet. This will raise a lot of issue with the high-end customers we pick up on daily basis. Celebrities, Corporate Staff and others who will surely object to being recorded in the vehicle. Privacy is very important to these individuals." (Operator, Trafford)

"CCTV will break NDA's and client confidentiality and would be strongly opposed by clients who use executive hire services. Colour creates issues within Chauffeur/Executive hire and would destroy industry if it resulted in having to have white cars." (Operator, Bury)

Colour: The two operators and respondents who took part in the focus groups gave the following arguments for why the colour standard should not be applied.

"We believe there should be at least 2 vehicle choices. Executive Fleet. We work with lots of Global Travel agents and Executive Chauffeur companies and the most preferred colour for executive work is BLACK / SILVER. White colour for corporate Executive Fleet is a NO NO. Majority of such firms specifically ask that the vehicle be strictly Black or Silver in colour. White Executive cars are mostly in demand for

“Weddings etc but DEFINITELY NOT FOR CORPORATE SECTOR.” (Private hire operator)

Two respondents felt executive hire operators should have more duties of care and they must maintain their high standards.

“Executive hire operator should have greater operating duties as to drivers' hours records vehicle usage.” (Public, age 55-64, Tameside)

“Executive taxi operators must use latest technologies and way of communication with the customers and drivers to maintain the highest standards in the business, bringing in line with the European, American or Australian counterparts' standards.” (PHV Driver, Bury)

However, five respondents (4 PHV drivers and 3 members of the public) felt executive hire should not have different rules, explaining the same rules should apply to all.

“Why does “executive” hire get lower restrictions and some exemptions? It's elitist. Manchester is a city of Marx and Engels. All should adhere to the same standards. People with money should not be exempt from ANY rules or regulations. Why should their cars not have plates? But the working classes have? Zero justification.” (Public, age 35-44, Manchester)

“As for executive hire as far as I am concerned they should be treated in the same way as private hire as they are just a glorified taxi for people with a bit more money to waste such as councillors etc.” (Public, age 55-64, Wigan)

“It is also discriminatory as you have allowed executive vehicles to drive with door stickers, yet you have discriminated us normal PHVs. Why are executive taxis allowed to drive without signage and not us? They are pre booked so are we. We take care of our customers as much as them, by creating a separate rule for executive taxis, you have inadvertently discriminated against normal taxis and it promotes classism and shows that you have 2 different standards in your dealings with us. One for the rich and one for the poor. We should be allowed to drive without any livery at all.” (PHV Driver, Rochdale)

5.2.10 Vehicle Design

The table below shows the most frequently given comments about vehicle design.

Table 5:11: Detailed comments made for vehicle design by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General Disagreement | 6 | 1 | 0 | 0 | 0 | 0 | 1 |
| Issue with the accessible vehicle | 1 | 3 | 0 | 0 | 0 | 0 | 0 |
| Roof top signs that light up to identify a PHV | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Base | 9 | 4 | 0 | 0 | 0 | 0 | 1 |

As with the executive hire aspect of the proposals, very few comments were received about the vehicle design standards proposed.

Those 12 respondents who disagreed with the vehicle design standards and elaborated explained they felt the required standards were “too severe”, need “further consideration”, and

the swivel seat requirement “restricts vehicle availability” and is not necessary or asked for by passengers.

“I feel that the vehicle design propositions are too severe.” (Public, age 55-64, Manchester)

“I think the seats and loading rules appear to exclude virtually all private hire vehicles. This needs further consideration.” (Public, age 75+, Trafford)

“The swivel seat requirement needs to go. It restricts vehicle availability and is almost never requested out on the streets.” (Hackney Driver, Manchester)

5.2.11 Vehicle Conditions

The table below shows the most frequently given comments about vehicle conditions.

Table 5:12: Detailed comments made for vehicle conditions by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Vehicle cleanliness is important | 24 | 1 | 3 | 2 | 0 | 0 | 0 |
| Base | 24 | 1 | 3 | 2 | 0 | 0 | 0 |

Many respondents agreed vehicle cleanliness is important, with 24 of members of the public agreeing with this, 3 PHV drivers and 2 PHV operators. Respondents discussed how vehicle condition is important, including interiors, condition of current vehicles, hygiene, smell, and general road worthiness.

“Vehicle Conditions: in our geographical area, the condition of some of the vehicles are a disgrace - just by looking at them you can see they are not fit for purpose ie battered, worn tyres, rust, filthy and disgusting with drivers smoking in them and not maintaining them inside or out; some are totally unhygienic which, at the best of times is unhealthy but particularly now during the Covid-19 pandemic. Our suggestion would be that testing standards are raised and adhered to, to ensure, that only roadworthy and clean cars are licensed i.e. only the very best cars are licensed.” (Operator, Wigan)

“People should feel safe in the vehicle they are travelling in. Regular testing should be compulsory as well as a standard of cleanliness.” (Public, age 45-54, Oldham)

“Our suggestion would be that testing standards are raised and adhered to, to ensure, that only roadworthy and clean cars are licensed i.e. only the very best cars are licensed.” (Operator, Wigan)

“Vehicle colour is not particularly important. Emphasis should be on condition of vehicle both mechanically and inside.” (Public, age 55-64, Salford)

6. Operator standards

Summary

The table below shows the proposed operator standards and indicates which districts current licensing already largely meets the standard (green), partially meets the standard (orange) or where the MLS proposal represents a step up to what is currently required (red).

- Almost all members of the public (94%) agreed with the operator standards as well two thirds of hackney (67%) and PHV (65%) drivers.
- Drivers in Bolton and Oldham had the lowest levels of agreement with just 39% and 27% respectively agreeing with the proposals. [please note: the very small number of responses from hackney and PHV drivers licensed in Bury, Salford, Tameside and Trafford so no statistically robust conclusions can be drawn about these districts. The response from other districts is also small and should be treated with caution]

| Proposed Standards | | Bury | Bolton | Manchester | Oldham | Rochdale | Salford | Stockport | Tameside | Trafford | Wigan |
|---|------------------------------|------|--------|------------|--------|----------|---------|-----------|----------|----------|--------|
| Common Licence conditions | | Red | Yellow | Yellow | Green | Yellow | Yellow | Yellow | Red | Yellow | Green |
| Criminal record checks for operators and staff | | Red | Red | Yellow | Green | Yellow | Red | Yellow | Red | Red | Yellow |
| Public | Agree | 96% | 96% | 92% | 97% | 95% | 92% | 96% | 93% | 99% | 98% |
| | Base | 89 | 139 | 161 | 101 | 73 | 63 | 120 | 61 | 83 | 40 |
| Hackney and PHV drivers | Hackney and PHV Agree | 66% | 39% | 86% | 27% | 68% | 68% | 84% | 66% | 86% | 79% |
| | Base Hackney | 2 | 4 | 50 | 52 | 15 | 3 | 23 | 21 | 14 | 29 |
| | Base PHV | 27 | 73 | 51 | 15 | 54 | 19 | 38 | 23 | 14 | 39 |

- The majority of those who made a comment on the operator standards gave mainly supportive comments about the criminal record check.
- Concerns were raised regarding DBS checks particularly about the frequency and the financial impact it will have.
- Concerns were raised by members of the public about drivers being selective of the fares they take, suggesting this standard could help to prevent this from happening.
- Members of the public felt the standards could help to improve customer service.

6.1 Agreement with standard

Respondents were directed to the minimum licensing standards consultation document and the proposed minimum licensing standards for licensed operators were summarised in the questionnaire as shown below.

Common licence conditions: It is proposed that common conditions are attached to each private hire operator licence setting out their responsibilities and how records should be kept with regards to bookings, vehicles and drivers working from and for their company.

Criminal record checks for operators and staff: It is proposed that each private hire operator licence requiring operators and their staff (paid or unpaid) are DBS checked every year to ensure that only safe and suitable people have access to operator records.

Vehicle owners who are not licensed drivers, including Directors of companies or partners, are to have a basic DBS check as a part of their application process.

All respondents were asked the following question:

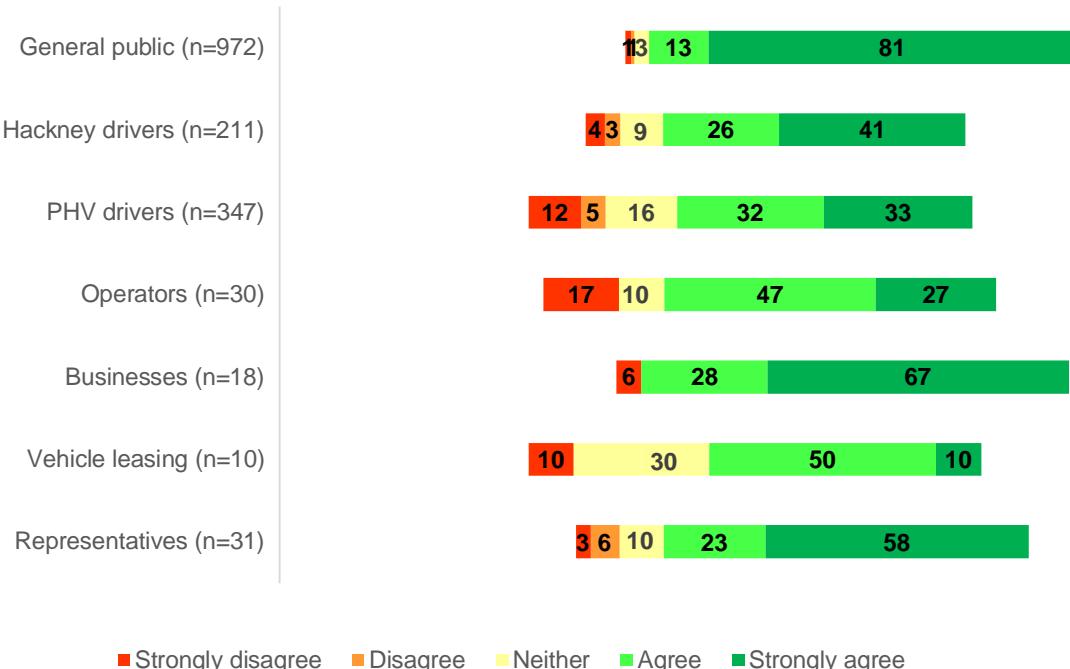
To what extent do you agree or disagree with the proposals for minimum licensing standards for licensed operators in Greater Manchester?

Most members of the public agreed (94%) with the proposed operator standards.

Two thirds of hackney (67%) and private hire vehicle drivers (65%) agreed with the proposed operator standards. Almost a fifth (17%) of private hire vehicles and disagreed with proposals while 7% of hackney drivers disagreed.

Twenty-two of the 30 operators agreed with the proposal.

Figure 6:1: Extent of agreement with proposed operator standards (%)



Base: all respondents

Caution should be used where base is small (n<50)

Don't know has been removed from the chart

6.2 Comments about the proposed operator standards

Respondents were given the opportunity to provide comments about the proposed operator standards. Less than a fifth of respondents chose to comment (19% of members of the public, 12% of hackney and 11% of PHV drivers). Table 6:1 shows the number of respondents providing a comment and which standards they commented on. Both the general public and hackney and private hire drivers commented mostly about the criminal record checks.

Table 6:1: Comments made for each standard by type of respondent (n)

| | General public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General Comments | 80 | 13 | 17 | 6 | 0 | 1 | 4 |
| Common licence conditions | 39 | 1 | 7 | 1 | 0 | 0 | 0 |
| Criminal record checks for operators and staff | 76 | 13 | 16 | 6 | 0 | 2 | 3 |
| Base | 191 | 28 | 39 | 11 | 2 | 3 | 8 |
| Proportion of respondent type | 19% | 12% | 11% | 34% | 11% | 30% | 22% |

Further detail about the most frequently given comments about each operator standard and the sentiment and reasons for the comments are described in the next sections.

6.2.1 General Comments

The table below shows the general comments about vehicle age.

Table 6:2: General comments by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Agree with the proposals (general) | 67 | 8 | 6 | 3 | 0 | 1 | 4 |
| Disagree with the proposals (general) | 3 | 3 | 6 | 0 | 0 | 0 | 0 |
| Concerns of illegal activities | 8 | 2 | 0 | 2 | 0 | 0 | 0 |
| Proposals are already in place | 3 | 1 | 5 | 1 | 0 | 0 | 0 |
| Base | 80 | 13 | 17 | 6 | 0 | 1 | 4 |

Almost half of all comments received gave a general comment about proposal and the response was varied:

General public: generally expressed agreement with the proposed standard (n=67).

"These are important measures to make sure every journey is safer for everyone."
(Public, age 25-34, Bolton)

Hackney drivers: generally expressed agreement with the proposed standard (n=8). However, three disagreed.

"I believe that this is a good idea which will help to protect the public and make them feel safe to know and should be their right as a minimum" (Hackney Driver, Tameside)

PHV drivers: expressed a very mixed view with six giving a positive comment and six a negative one about the proposed standard.

"Because either a driver or operator we all are providing public service and we all should go through same procedure." (PHV Driver, Oldham)

"They already keep records of bookings, driver and vehicles details." (PHV Driver, Oldham)

Concern about illegal activities: There was some concerns raised by hackney drivers (n=2) and members of the public (n=8) with the current enforcement and emphasised the need for this to be addressed.

"A severe crackdown on non-complying drivers/operators will need to be carried out as I think the requirements will be extremely onerous to them and illegal companies will be set up" (Public, age 55-64, Bolton)

"Too many stories of taxi drivers getting a licence then 3 drivers driving the vehicle on same licence. It's not fair or safe" (Hackney Driver, Wigan)

Proposals already in place: Private hire drivers (n=5) felt the standards were already in place.

"We already have minimum standards in place." (Operator, Manchester)

"Agree to the standards! Manchester City Council have very strict/and high standards. Can you tell me who can match this Council's standards in 2020?" (Operator, Manchester)

6.2.2 Common licence conditions

The table below shows the most frequently given comments about common licence conditions.

Table 6:3: Detailed comments made for common licence conditions by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Common licence conditions should include prevent the selecting jobs | 21 | 0 | 2 | 0 | 0 | 0 | 0 |
| Common licence conditions should include providing clear information about fares and timeframe | 7 | 0 | 0 | 1 | 0 | 0 | 0 |
| Operators should only be licensed if their drivers are considered employees and given appropriate workers' rights. | 0 | 0 | 3 | 0 | 0 | 0 | 0 |
| Records of operators should be publicly accessible and regularly updated. | 3 | 1 | 0 | 0 | 0 | 0 | 0 |
| Operators need more accountability for their drivers | 11 | 0 | 4 | 1 | 0 | 0 | 0 |
| App based companies haven't been considered | 0 | 0 | 0 | 1 | 0 | 0 | 0 |
| Operators should be allowed to operate cross borders | 0 | 0 | 0 | 1 | 0 | 0 | 0 |
| Base | 39 | 1 | 7 | 1 | 0 | 0 | 0 |

Those that provided a comment about the common licence conditions raised the following points:

Prevent the selection jobs: 23 respondents felt some drivers are sometimes selective of the fares they take and would like this standard to prevent this happening. For example, to allow guide dogs.

"Licence conditions should include necessity to accept disabled including guide dogs for the blind! Those that refuse should have licence suspended, sent on retraining course, and if all else fails, licence removed from repeat offenders ... drivers and owners of companies!! No excuses acceptable! If they don't like it find another job. Cannot continue to treat blind or other disabled people with contempt! In some towns it's nearly impossible for ordinary dog owner to get their animal to a vet or another venue by taxi!" (Public, age 65-74, Bolton)

"Please can it be considered to make it compulsory to allow guide dogs and other assistance dogs in all vehicles and that a text or similar system should be installed to help deaf or hearing-impaired people communicate." (Public, age 45-54, Salford)

"The drivers cancelling jobs should be controlled, I've been stranded at work a number of times when taxi companies cancel the jobs after accepting it!" (Public, age 35-44, Manchester)

Provide clear information about fares and timeframe / Improve customer service: One operator and seven members of the public commented they hoped the operator standards would help improve customer service.

"Common licence conditions: Answering phone calls courteously, clearly, providing relevant information asked for by the user. Providing taxi when called for, not absconding/avoiding a call/not having a taxi that does not show up. Clear information about fares and timeframe - time of arrival, approximate time to destination. Criminal record checks: same as before, further protection of female passengers, especially in Rochdale area." (Public, age 25-34, Rochdale)

"With the advent of technology, it should be simple of the driver to be able to give a cost of the journey before it begins. This creates transparency for all and stops differing fares for the same journey." (Public, age 35-44, Bolton)

Operators should only be licensed if their drivers are considered employees and given appropriate workers' rights: Some private hire drivers (n=3) felt this was an opportunity to support them to be treated as employees and treated fairly.

"Please bring some kind of checks where all local authorities should be able to check/monitor the way work gets distributed as many drivers don't get same work but when it comes to radio money everyone pays same but some get more work in terms of favouritism." (PHV Driver, Bury)

"Operators should not be picking and choosing which driver they give jobs to. It should be equal and fair and they should lower their weekly fare which is basically daylight robbery. Drivers who are not friends with the operators or on a "level" with them get more smaller and less money jobs to those who know them personally which is wrong. IT SHOULD BE EQUAL" (PHV Driver, Rochdale)

"It will improve safety for the general public and make an improvement to environmental conditions. It may also decrease the number of cab companies paying poor rates to drivers." (Public, age 65-74, Stockport)

Operators need more accountability for their drivers: Members of the public (n=11) commented operators should take complaints seriously and take accountability for driver's behaviour. Four private hire drivers also commented operators should take responsibility for the safety of drivers and help drivers with any grievances.

"I've had a few racist remarks made to me by taxi drivers in Manchester, the operators don't take complaints seriously. Drivers should have to have ID visible at all times and operators should be required to have some complaints process which can be reviewed by Greater Manchester councils." (Public, age 25-34, Salford)

"Make operators liable for injury or death if caused by customers actions or attack. Make operators legally responsible to provide each driver with minimum wage guarantee per day. maximum radio rent or commission should be set no more than 10% per day of total gross driver income. Operators legally bounded to cater for driver grievances and if operators fail to mitigate than council should step in to moderate dispute between driver and operators." (PHV Driver, Manchester)

6.2.3 Criminal record checks for operators and staff

The table below shows the most frequently given comments about criminal record checks.

Table 6:4: Detailed comments made for criminal record checks by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Agree with all operators and staff having criminal record checks | 59 | 9 | 8 | 1 | 0 | 0 | 1 |
| Agree because operators hold a lot of private information | 3 | 0 | 0 | 0 | 0 | 0 | 1 |
| The operator should not need DBS check | 8 | 2 | 2 | 3 | 0 | 1 | 0 |
| Concerns about data protection with DBS checks / amount of details operators keep | 3 | 0 | 3 | 0 | 0 | 1 | 0 |
| DBS checks should be less frequent / less than annually | 2 | 2 | 3 | 2 | 0 | 0 | 1 |
| DBS checks should be more frequent / every 6 months | 2 | 0 | 1 | 0 | 0 | 0 | 0 |
| Base | 76 | 13 | 16 | 6 | 0 | 2 | 3 |

Most comments from the public (n=59), drivers (9 hackney and 8 private hire) and operators (n=1) expressed agreement with the proposed checks. Comments mentioned anyone who is in public service directly or indirectly should go through DBS checks.

“Don’t have an issue with operators having CRB checks done.” (Operator, Rochdale)

“Anyone who has close dealings from the public should have a criminal record check, including the people mentioned here. Also, checks must be made to make sure the person who is the driving licence holder is actually the person who took the test.” (Public, age 65-74, Salford)

During the in-depth interviews, operators felt the proposed standards were reasonable. They also felt they were already undertaking many of them in their day-to-day management. However, they expressed frustration that they are held to these standards when others are not (i.e. coming in from outside of the region).

“I’m a Trafford licence operator, so I can only take on Trafford licensed drivers. I don’t want to go down the Wolverhampton route, but I’m being forced into it, yeah. We have a load of daft rules within Trafford Council, one of them being all vehicles have to have clear glass, they’re not allowed to have factory fitted tinted windows.” (Operator, Trafford)

Some concerns were raised including:

Staff (e.g. switchboard operators) who are not public facing should not need DBS checks: While there was some agreement with DBS checks some members of the public (n=8), drivers (2 hackney and 2 private hire) and 3 operators commented they felt DBS checks were not relevant for staff who are not customer facing and adding these checks might make it difficult for people with prior convictions get a job.

"I see no reason for a DBS check to be mandatory for call handlers. Only drivers need any sort of check." (Public, age 18-24, location not provided)

"Why should staff in the office be required to have DBS checks. It's a private business and by law we are allowed to employ anyone who is hard working and will be good on the phones. Is everyone working in hotels or shops have a DBS check. In our society, if one has served their time, then they are allowed to interact with normal society Staff in the office have to adhere to strict data protection laws and GDPR so this is again an extra burden on small businesses with extra costs. Why don't you check Uber and see who their directors and staff are. They have been charged with data breaches and you have given them operators licence again and again. So, this is a totally draconian measure in our opinion." (Operator, Rochdale)

"Criminal record checks for staff working in a taxi base, so if there was conviction a long time ago for fighting or ex ex etc. is it fair for them not to get a job as a phone staff." (Hackney Driver, Bolton)

Frequency of DBS checks: Most comments, whether from the public, drivers or operators felt the DBS checks should be less frequent (n=10), however a small number (n=3) felt they should be more frequent.

"DBS checks every year would be impossible to monitor and control for large firms, no other industry does this." (Public, age 55-64, Bolton)

"DBS checks every year? This is ridiculous. Even teachers only have 1 DBS throughout their professional career, providing they do not have a break for longer than 3 months. Some schools actually do a 3 yearly DBS, but it is not needed by law or a requirement. Why do you think it's a good idea for operators to require a yearly DBS?" (Operator, Trafford)

"Criminal record check for all operators and their staff should be mandatory every six months, and enforcement checking conducting frequently" (Public, age 55-64, Bolton)

"Ensures a level playing field across private hire drivers and operators as there are many who currently don't have to go through the same processes as drivers yet they play an equally as important role especially with regards to having DBS checks. It would also be better for the authority to implement annual enhanced DBS checks, similar to what is used by healthcare professionals - this will help maintain the integrity of drivers and whittle out any drivers who don't conform to their licence conditions." (PHV Driver, Bolton)

Concerns about data protection: There were concerns raised about data protection and the amount of details operators would need to keep; 7 comments mentioned this and were provided by all types of respondents.

"Operators taking anyone in the book and there is no guarantee for passing information to the third-party so should be data protection rules apply to the operator very strictly to protect drivers and Driver property." (PHV Driver, Bolton)

"Criminal record checks for operators and staff - The customer records can be held securely so that the staff cannot get free access to this." (Vehicle lease company (or owner of licensed vehicles used by others), Wigan)

"Criminal records checks for operators are crucial and should be taken more seriously. Operators have access to sensitive information and making sure that information doesn't fall in the wrong hands is paramount for the safety of the public." (Public, age 25-34, Bolton)

7. Local Authority standards

Summary

- Most members of the public (90%), businesses (84%) and hackney drivers (72%) agreed with the local authority standards.
- However, 25% of PHV drivers and 20% of operators disagreed with the proposed standards.
- Many respondents raised concerns about the timescales for applications to be processed because of the delays that could occur that are outside their control such as DBS checks.
- Many PHV and Hackney drivers felt the licensing fee should be more affordable.
- Several comments were received supporting the councillor training as it will help drivers resolve issues and/or queries in a timely manner.
- Members of the public were more in support of the licensing award than drivers who did not feel that they would be beneficial.

7.1 Agreement with standard

Respondents were directed to the minimum licensing standards consultation document and the proposed minimum licensing standards for Local Authorities were summarised in the questionnaire as shown below.

Timescales for applications to be submitted and received: It is proposed that applications may be submitted up to eight weeks in advance of licence expiry. Once an application has been determined a driver/vehicle or operator licence will be issued within five working days.

An agreed common enforcement approach: It is proposed an agreed common enforcement approach across Greater Manchester is developed so that the standards will be adhered to in practice and drivers will comply with them.

An agreed framework to which licensing fees are set: It is proposed that a framework governing levels of licensing fees (including enforcement and compliance costs) will be agreed.

Councillor training (relevant to their role) before they hear applications: Councillors already receive training, but this proposal confirms that councillors with responsibility for licensing will receive training each year and new councillors will receive training before they hear licensing applications.

Appropriate delegated powers for Licensing Managers: It is proposed that appropriate delegated powers (trusting others to make decisions) will be in place for Licensing Managers and Heads of Service to suspend or revoke licences on the grounds of public safety when an urgent need arises.

Excellence in Licensing Award: Local Authorities are also considering a scheme where members of the public can nominate drivers and companies who they wish to be considered for an 'Excellence in Licensing Award'.

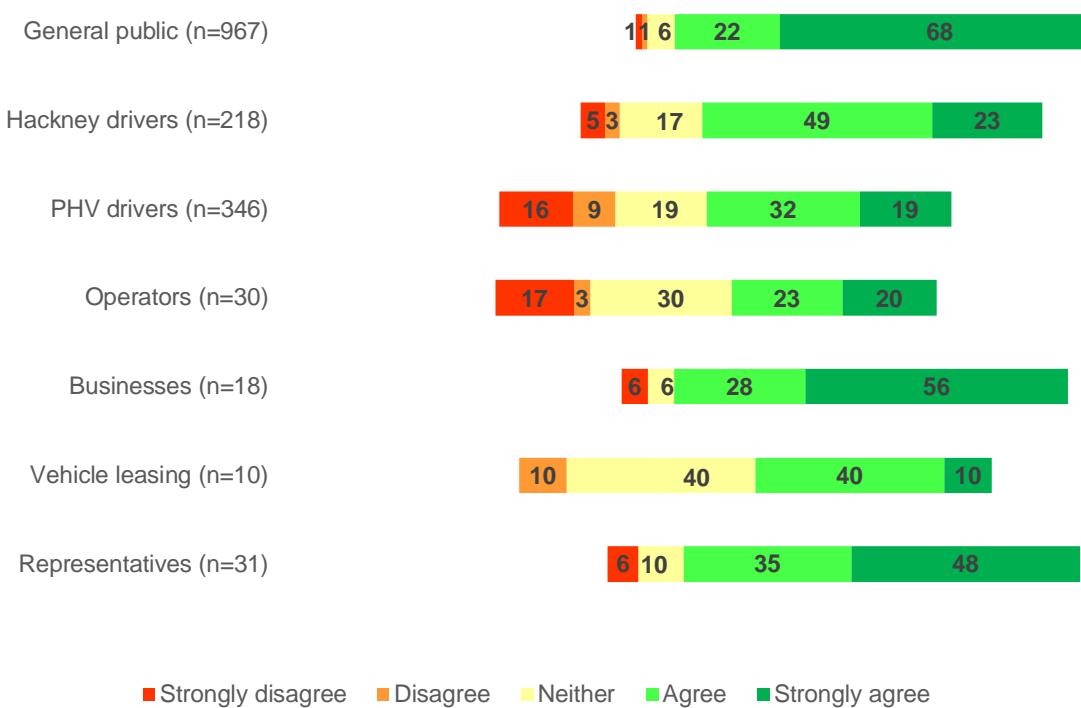
All respondents were asked:

To what extent do you agree or disagree with the proposals for minimum licensing standards for Local Authorities in Greater Manchester?

Most (90%) of the public agreed with the proposed Local Authority standards.

Almost three quarters (72%) of hackney drivers agreed with the proposed Local Authority standards. However, only half (51%) of private hire vehicle drivers agreed, with a quarter (25%) disagreeing and a fifth (20%) neither agreeing nor disagreeing.

Figure 7:1: Extent of agreement with Local Authority standards (%)



■ Strongly disagree ■ Disagree ■ Neither ■ Agree ■ Strongly agree

Base: all respondents

Caution should be used where base is small (n<50)

Don't know has been removed from the chart

PHV drivers from an Asian background were more likely to disagree (32%) than PHV drivers from a White background 10%.

Drivers in Bolton were more likely to disagree (48%) than drivers in Manchester or Wigan (11% and 10% respectively).

*Comparisons by district are reported for districts with 50 or more responses.

7.2 Comments about the proposed Local Authority standards

As well as being asked to agree or disagree with the proposed local authority standards, respondents were given the opportunity to provide comments.

206 respondents provided a comment about the minimum licensing standards for Local Authorities in Greater Manchester. Very few comments were received from hackney drivers (n=22). Overall, 11% of the general public and 14% of PHV drivers commented. Many comments, particularly from drivers were around the licensing fees and timescale.

Table 7:1: Comments made for each standard by type of respondent (n)

| | General public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General | 57 | 6 | 16 | 2 | 0 | 1 | 2 |
| Timescales for applications to be submitted and Received | 5 | 0 | 13 | 0 | 0 | 0 | 3 |
| Common Enforcement Approach | 6 | 2 | 2 | 0 | 0 | 0 | 3 |
| Licensing Fees | 5 | 7 | 12 | 1 | 1 | 0 | 3 |
| Councillor Training | 19 | 1 | 5 | 2 | 0 | 0 | 6 |
| Appropriate delegated power for Licensing Managers | 3 | 3 | 7 | 3 | 0 | 0 | 2 |
| Excellence in Licensing Award | 27 | 4 | 3 | 0 | 0 | 0 | 1 |
| Base | 112 | 22 | 51 | 8 | 1 | 1 | 12 |
| Proportion of all respondents | 11% | 9% | 14% | 25% | 5% | 10% | 33% |

7.2.1 General comments

The table below shows the general comments about vehicle age.

Table 7:2: General comments by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General Agreement | 40 | 5 | 8 | 1 | 0 | 1 | 2 |
| No change required | 10 | 1 | 7 | 0 | 0 | 0 | 0 |
| Centralise licensing at TfGM in GM rather than undertaking the same task 10 times | 4 | 0 | 0 | 0 | 0 | 0 | 0 |
| Rules to ensure that there is no conflict of interest while hearing the applications | 2 | 0 | 1 | 1 | 0 | 0 | 0 |
| Concerns about Local Authorities ability to work together | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Base | 57 | 6 | 16 | 2 | 0 | 1 | 2 |

40 comments given by the general public, five comments given by hackney drivers and eight of PHV drives described general support for proposed standard.

“The harder it is to get a licence the better it will be for the public knowing they are safe.” (Public, age 55-64, Oldham)

“About time the council are accountable” (PHV Driver, Rochdale)

“Anything which improves this service, assures passenger safety and regulates the industry, holding it more accountable is a positive move for Manchester” (Public, age 55-64, Trafford)

A handful did not feel any changes were required (7 PHV Drivers, 1 hackney Driver and 10 Members of the public.)

“Please learn about co-production and working collaboratively. Please don't make decisions and then enforce them on companies and individuals. Seems like you have a romanticized notion of how you'd like things to be and haven't given consideration to those who will be affected the most. The taxi drivers.” (Public, age 35-44, Rochdale)

“All of the 10 Greater Manchester boroughs are different with different clientele and therefore different needs. Having one set of rules for all 10 boroughs cannot possibly work and it should remain that each local authority be allowed to make their own decisions based on their own local needs. How can Manchester with all its bars, clubs, big hotels, bus and train stations, music venues, Arndale Centre, big departments stores, big businesses and tourists be treated the same as Tameside which has a few supermarkets, restaurants and pubs and no night-time economy.” (PHV Driver, Tameside)

7.2.2 Timescales for applications to be submitted and received

The table below shows the most frequently given comments about timescales.

Table 7:3: Detailed comments made for timescales by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Timescale for application should be less than 8 weeks | 3 | 0 | 4 | 0 | 0 | 0 | 3 |
| More or no time restrictions for application | 0 | 0 | 6 | 0 | 0 | 0 | 0 |
| Time scale needs improvement | 2 | 0 | 3 | 0 | 0 | 0 | 0 |
| Base | 5 | 0 | 13 | 0 | 0 | 0 | 3 |

Very few comments were made about the proposed timescales for applications with just 13 PHV drivers, 5 members of the public and no hackney drivers or operators providing a comment. The comments received primarily concerned:

More or no time restrictions were required: 6 PHV drivers felt extra time should be allowed due to potential delays outside of their control such as DBS checks.

"Things take an age when waiting for things like DBS checks, medicals etc at no fault of the applicant, I think licences should be granted on long term renewal applicants of good character and in no way should he be suspended from earning a living. But if an applicant has lied about convictions etc his badge should be revoked and the driver be deemed untrustworthy to be a license [sic] holder." (PHV Driver, Wigan)

Timescales need improvement: 3 PHV drivers and 2 members of the public felt there were issues outside their control that affected the time taken to approve their application which negatively impacted their ability to work.

"The applications are not a problem getting them in to the Licensing department within eight weeks. The problem is the DBS checks coming back in time which is not always the case and if they do not arrive on time the drivers cannot work. This is unacceptable this is our livelihood and cannot sit at home without work and no other income to feed our families. The drivers should be given extensions in these cases." (PHV Driver, Oldham)

"Timescales got applications is definitely one that needs overhauling. Covid has delayed applications which should never happen as plans should be in place for all eventualities of this stops a drivers from providing for his/her family." (Public, age not provided, Bolton)

7.2.3 Common Enforcement Approach

The table below shows the most frequently given comments about common enforcement.

Table 7:4: Detailed comments made for common enforcement by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General Agreement to common enforcement | 5 | 2 | 2 | 0 | 0 | 0 | 2 |
| General Disagreement to common enforcement | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| Base | 6 | 2 | 2 | 0 | 0 | 0 | 3 |

Very few comments were received about the common enforcement approach. However, those that did noted the benefits of a standard approach across Greater Manchester:

"Strongly agree. The need for common enforcement is of paramount importance given taxi drivers will operate across the GM boroughs. Councillors of course need training for this, though I would have thought these kind of approvals would be better suited to council officers than political members." (Public, age 25-34, Salford)

Just one representative and one member of the public expressed concern:

"Enforcement Approach Each district has its own demands and as such some districts have little or no 'out of office enforcement'. How will this be addressed to ensure Manchester drivers are not the only drivers being subjected to full compliance." (Organisation, Anonymous)

7.2.4 Licensing Fees

The table below shows the most frequently given comments about licensing fees.

Table 7:5: Detailed comments made for licensing fees by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Different licensing fee for different Local Authorities | 3 | 2 | 0 | 0 | 0 | 0 | 0 |
| One fee across the county / General Agreement | 0 | 0 | 3 | 1 | 0 | 0 | 2 |
| Licensing fee is very costly, and it should be affordable | 2 | 6 | 9 | 0 | 1 | 0 | 1 |
| Base | 5 | 7 | 12 | 1 | 1 | 0 | 3 |

A few hackney (n=6) and PHV (n=9) drivers felt the licensing fee is very costly and needed to be made more affordable for drivers.

"Licensing fees should be reduced because mostly all forms are online so less manpower needed to process applications." (PHV Driver, Bolton)

"Licensing fees are already high for vehicles to be plated in Manchester...that is why a lot of private hire drivers have gone to different councils and got their vehicles plated" (Hackney Driver, Manchester)

A handful of conflicting comments were received with some suggesting licensing fees should be different for different local authorities (2 hackney drivers).

"I don't agree with licensing fees being the same across Greater Manchester as different areas will have different costs to run these departments but I think the discount we receive in Wigan for compliant vehicles should stay in place and also the fees should come down as admin is cut through doing more online." (Hackney Driver, Wigan)

Whereas 3 PHV drivers and 2 representatives thought licensing fees should be same across the country.

"Licensing fees should be same as they are all over the country, why there is such a big difference! hope someone can bother to look that massive difference!" (PHV Driver, Oldham)

7.2.5 Councillor Training

The table below shows the most frequently given comments about councillor training.

Table 7:6: Detailed comments made for councillor training by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General Agreement regarding councillor training | 15 | 1 | 3 | 1 | 0 | 0 | 4 |
| Additional subject suggestions for councillor training | 2 | 0 | 0 | 1 | 0 | 0 | 1 |
| Customer service provided by the councils needs improvement | 3 | 0 | 3 | 2 | 0 | 0 | 1 |
| Base | 19 | 1 | 5 | 2 | 0 | 0 | 6 |

A few comments were received about councillor training including:

General support (15 members of the public, 1 hackney and 5 PHV drivers) expressed general agreement with this standard.

"Councillor Training Should be mandatory and also standardised to ensure consistency. Also, useful if Councillors from other areas were involved to avoid any problems with approving or refusing drivers." (Councillor / Elected official, Stockport)

"Councillor training: having contacted taxi licensing on a few occasions. It can be frustrating. When the councillor doesn't have the answers or advice you need. Being

able to get through to the correct adviser with the necessary information would help immensely." (PHV Driver, Manchester)

A comment was received suggesting how the training could be made more useful for councillors.

"The training councillors receive should include training in 'what would a fair hearing look like', 'what would an unfair hearing look like'. Training should not just be focussed on 'we will train councillors in licensing policy matters they will likely not know about'. Process is important as it is people attending who may need to lose their licence." (Councillor / Elected official, area not known)

Suggestions for additional training: one representative and one organisation suggested subjects included hate crimes, disability awareness, child safeguarding training; and wheelchair access training, etc.

"Councillor training? great idea. Could we also have child safeguard training and wheelchair access training? I'm fed up of seeing manual wheelchairs, pushed in sideways and not restrained in black cabs. If we had Enforcement, this bad practise may of been reduced." (Operator, Trafford)

"Councillor training should also include hate crime awareness." (Organisation, Salford City Council)

Customer service training: (3 PHV drivers and 3 members of the public) mentioned issues with poor behaviour, time taken to process application and abuse of power within Local Authorities.

"Training the councillors is a good idea but they should have the right attitude and must treat drivers with respect and value the taxi trade." (PHV Driver, Oldham)

"You need make them work. These things you mentioned they already have in system. They abuse their powers and there must be reversed checks on them for quality work within the framework." (Public, age 35-44, Bolton)

In the in-depth interviews a couple of drivers stated their experience of dealing with local authorities in licensing purchasing or renewing, stating it was difficult to communicate with the authorities when they had queries to deal with.

"For me the service is, it's poor, and you can't even phone them, you can't call them, everything's by email now. So, what are all these fees about, everything that we do regarding licensing tests and everything else, we have to do it all ourselves, the same with your badge, same with doing your licence, your badge, you've got to do it all online yourself." (Hackney Driver, Manchester)

7.2.6 Appropriate delegated powers for Licensing Managers

The table below shows the most frequently given comments about delegated powers.

Table 7:7: Detailed comments made for delegated powers by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Disagreement with appropriate delegated powers for Licensing Managers. | 1 | 3 | 7 | 2 | 0 | 0 | 0 |
| General Agreement - delegated powers | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| Concern Regarding the abuse of delegated power | 1 | 0 | 0 | 2 | 0 | 0 | 1 |
| Base | 3 | 3 | 7 | 3 | 0 | 0 | 2 |

Many comments received to this standard expressed concern (3 hackney and 7 PHV drivers).

"Revoke licence power must be in hand of committee or licensing cabinet member. At least drivers should have properly investigated before his licence revoked." (PHV Driver, Rochdale)

"Appropriate delegated powers for Licensing Managers: thorough training and monitoring needed for this to ensure this is not open to abuse." (Operator, Wigan)

7.2.7 Excellence in Licensing Award

The table below shows the most frequently given comments about licensing awards.

Table 7:8: Detailed comments made for licensing awards by type of respondent

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Concern about the authenticity of the award | 8 | 0 | 1 | 0 | 0 | 0 | 0 |
| It is a good Idea to appreciate drivers | 14 | 1 | 0 | 0 | 0 | 0 | 1 |
| Doesn't think as a good idea, i.e. waste of time and money | 6 | 3 | 3 | 0 | 0 | 0 | 0 |
| Base | 27 | 4 | 3 | 0 | 0 | 0 | 1 |

Of the few comments received about the licensing award, members of the public were keen to show appreciation of drivers (n=14).

"An excellent approach, and one we very much welcome, it is about time there was some way to publicly reward the drivers or indeed operators for the service they

provide, so anything that encourages such approaches is very highly encouraged and supported.” (Organisation, National Private Hire and Taxi Organisation)

“I think the Excellence in Licensing Award is a really good incentive for hard working and compliment drivers / operators, much like the Best Bar None awards for licensed premises.” (Public, age 35-44, Trafford)

However, the few comments received from hackney (n=3) and PHV (n=3) drivers did not feel they would be beneficial.

“The award is a good idea but larger firms such as metro in Bolton only need to ask all their passengers to put them forward and would win every time.” (Public, age 55-64, Bolton)

“An excellence award seems to be one that can so easily be abused, even down to the point where a driver may say, “Vote for me and you get £1.00 off the fare.” Disagree strongly with this suggestion.” (Public, age 65-74, location not provided)

“Excellence in Licensing award. I think this is a BAD idea! A recent innovation at the firm I work for is a star rating and comment from the passenger about the driver. Passengers are leaving 1-star ratings and making crappy comments out of spite for any perceived slight. (differing opinions on Brexit between driver and passenger? This may result in a 1-star rating and “a racist” in the comments option). At the 5-star end of the ratings, drivers may pick up a passenger who happens to be a mate of his or her. The passenger will then leave a comment about what a wonderful experience was. If drivers wish to go above and beyond what is expected of them - great, just be humble about it.” (PHV Driver, Wigan)

“I always give good customer service I don’t need a meaningless award to make me do it.” (Hackney Driver, Trafford)

8. Timetable

Summary

- 84% of individuals agreed with the proposed timetable, however, both hackney (74%) and PHV (60%) drivers disagreed.
- Most drivers expressed their concerns about the timetable, with many stating it is too short and should be delayed, particularly in light of COVID-19.
- Drivers also expressed their concerns about the availability, cost and infrastructure for zero emission capable vehicles (ZECs).

8.1 Proposed Timetable

Respondents had been directed to the minimum licensing standards consultation document and the proposed timetable was summarised in the questionnaire as shown below.

A timetable has been set out which proposes:

New vehicles being licensed from 1 April 2021 will be required to meet the standards that are approved following this consultation.

Most of the other policy areas that are approved will start to come into force from April 2021, for example relating to driver and operator standards.

From April 1, 2021 it is proposed that all existing licensed vehicles will commence transitioning to meet the standards that are approved following this consultation. This will include the stated emissions requirements and age of vehicles.

The transition period will be determined by each individual Licensing Authority having considered current and revised policies and the likely effect on the trade, but it is expected that all vehicles would have to be compliant with the proposed emissions standards by April 1, 2024 (non-compliant vehicles will still be liable to pay the Clean Air Zone charge from Spring 2022). This will mean that from April 2023, hackney and private hire vehicles will need to meet Minimum Licensing Standards to secure a vehicle licence.

From 2025, all new-to-licence vehicles would need to be Zero Emission Capable (ZEC) (a vehicle which emits no more than 75g/km CO₂ exhaust emissions and be capable of being operated with no emissions for a minimum range of 20 miles).

From April 2028, all who submit their vehicle for a licence would need to be ZEC.

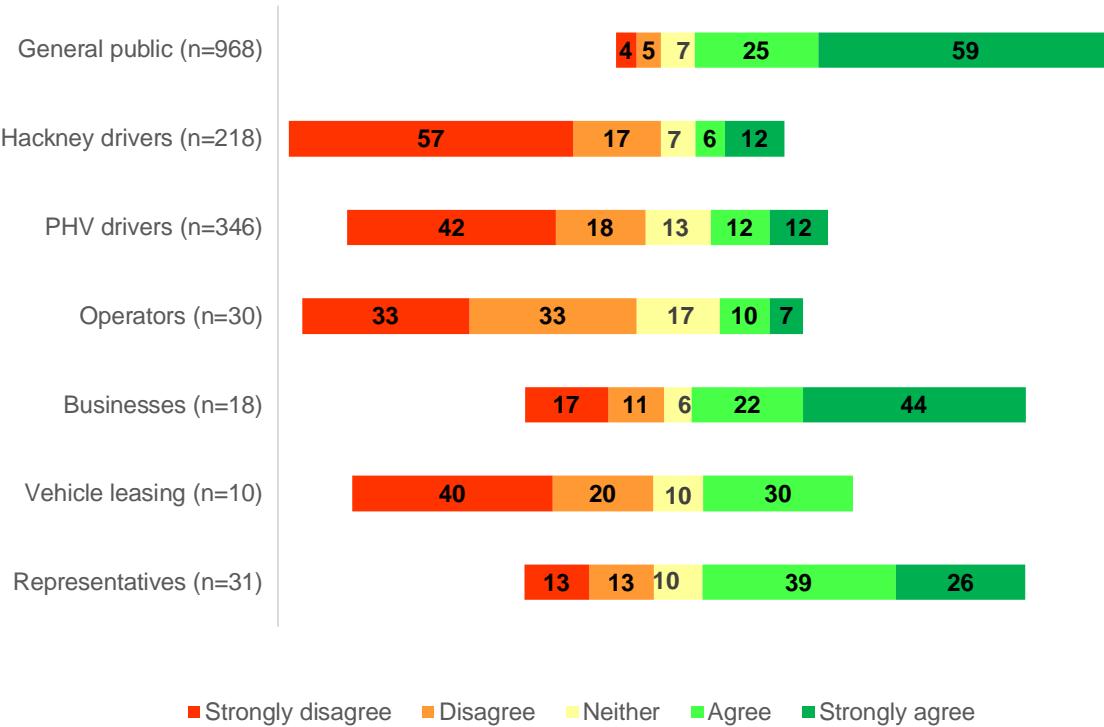
All respondents were asked:

To what extent do you agree or disagree with the proposed timetable for minimum licensing standards in Greater Manchester?

Most of the general public agreed with the proposed timetable (84%).

However, there was strong disagreement with the proposed timetable from both hackney (74%) and private hire vehicle drivers (60%).

Figure 8:1: Extent of agreement with the proposed timetable (%)



■ Strongly disagree ■ Disagree ■ Neither ■ Agree ■ Strongly agree

Base: all respondents

Caution should be used where base is small (n<50)

Don't know has been removed from the chart

There was some notable difference in response:

- More drivers who own their own vehicles disagreed with the timetable (76%) than those who rent or lease their vehicles (56%).
- Those who had been impacted financially by Covid-19 were more likely to disagree with the proposed timetable than those who had not been impacted by Covid-19 (64% and 42% respectively), although in both cases a higher proportion disagreed than agreed with the proposed timetable.
- Drivers licensed in Bolton (82%), Oldham (85%), Rochdale (68%) and Stockport (67%) disagreed with the timetable more than those in Manchester (41%) and Wigan (57%) *.

*Comparisons by district are reported for districts with 50 or more responses.

8.2 Comments about the proposed timetable

As well as being asked to agree or disagree with the proposed timetable, respondents were given the opportunity to provide comments. More comments received came from the drivers and operators rather than the general public.

Figure 8:2: Comments made about the timetable by type of respondent (n)

| | General public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--------------------------------------|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General | 52 | 22 | 34 | 5 | 1 | 1 | 4 |
| Timetable | 110 | 56 | 55 | 15 | 2 | 1 | 13 |
| Base | 172 | 76 | 91 | 20 | 3 | 2 | 15 |
| Proportion of all respondents | 17% | 33% | 26% | 63% | 16% | 20% | 42% |

8.2.1 General comments

The table below shows the general comments about the proposed timetable.

Table 8:1: General comments by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Agree with the proposals / agree it needs to be done | 35 | 2 | 2 | 0 | 1 | 1 | 2 |
| Disagree with the proposal | 17 | 20 | 32 | 5 | 0 | 0 | 2 |
| Base | 52 | 22 | 34 | 5 | 1 | 1 | 4 |

The comments were polarised with drivers generally disagreeing with the proposals (hackney drivers n=20 and PHV drivers n=32) and over two thirds of the public agreeing (n=35).

8.2.2 Comments on the timetable

The table below shows the most mentioned comments about the proposed timetable.

Table 8:2: Detailed comments made for the proposed timetable by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| The deadlines are very ambitious / too aggressive / unfair/ short / unreasonable | 17 | 13 | 8 | 4 | 1 | 1 | 1 |
| The deadline should be extended / delayed | 22 | 28 | 21 | 5 | 1 | 0 | 6 |
| Should be put into effect ASAP, people have been given enough notice | 46 | 2 | 2 | 0 | 0 | 0 | 0 |
| Many drivers have just bought a new, cleaner car and will be forced to replace them at a great expense | 3 | 2 | 7 | 2 | 0 | 1 | 0 |
| Proposals shouldn't be brought in during Covid-19 | 21 | 22 | 19 | 5 | 0 | 0 | 2 |
| Supply of vehicles isn't available currently | 1 | 3 | 0 | 0 | 0 | 0 | 2 |
| A phased implementation of colour vehicle should be considered | 5 | 0 | 1 | 0 | 0 | 0 | 2 |
| GM doesn't have the infrastructure for all of the charging points required | 2 | 3 | 3 | 2 | 0 | 0 | 2 |
| Timeline should match CAP | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| Base | 110 | 56 | 55 | 15 | 2 | 1 | 13 |

Most of the comments from drivers and operators were:

Deadlines are short and very ambitious, unfair or unreasonable (hackney; n=13, PHV drivers; n=8)

"This timetable is completely unjust, these proposed measures are going to many properties out of business, it's completely madness, in these unprecedented times to expect owners of taxis and private hire vehicles, to just be able to adhere to these unrealistic changes not to mention the expense, in such a short period of time, if these unrealistic changes are carried forward as you want, there is going to be a lot of unemployed taxi drivers around in 2021 . These proposals need a lot more thought especially now in this unprecedented times" (Hackney Driver, Wigan)

The deadline should be extended/delayed (hackney n=28, PHV drivers n=2, General public n=22). Half of the hackney drivers who commented on the timetable felt it should be delayed.

"The deadlines are very ambitious. Due to current financial situation, and no improvement in sight due to second and possibly third wave, this industry is at all-time low. I have been in the industry for 15 years and majority of drivers i know now drive for Delivery services e.g. Amazon / UberEATS, Deliveroo, DPD etc. Some of these restrictions will force a lot of drivers to leave this industry and look elsewhere. We operate Executive fleet. There are very options we have in First class executive saloon which can be Zero emissions capable. Mercedes S Class (few model) BMW 7 Series (One model) Audi A8 (No reliable option yet) Very few options and a good vehicle will cost in excess of £65,000. Executive companies working from Greater Manchester area will have no option but to move out of the area and operate out of other surrounding areas to keep the cost down. These are very hard times for lots of industries, and taxi industry is already on its knees." (Operator, Trafford)

Proposals should be delayed due to Covid-19 (Hackney n=22, PHV drivers n=19, Operators n=5). Over a third of hackney drivers and PHV drivers who commented about the timetable mentioned the proposals should be delayed as a result of Covid-19, as well as a third of Operators.

"I don't agree because this year covid pandemic has caused every cab owner private hire owner severe financial problems Off which some may never recover from and implementing new rule a within months and who knows this pandemic could still go on till April 2021 So I urge all Licencing councils need to bear in mind that and defer their decision to another year at least I understand we need to make taxi and private hire safer and better and uniform but financial practical for each town" (Hackney Driver, Wigan)

"It seems unfair to have all this in a short period especially during this Covid crisis, income is at its lowest point and god knows how long it's gonna last. It's either feed your family or save for a new car which I don't know how it's gonna work out for me it seems all good from you're point of view but you need to look at this from a drivers point of view to see the devastating effects". (PHV Driver, Tameside)

"Taxis business are significantly poor in this critical time therefore AGMA should increase period until 2029/2030 its not possible to meet any conditions under stated time 2022." (Organisation, NPHTA)

This was echoed in the in-depth interviews with many of the drivers and operators expressing concern about the proposed timetable and advocating a natural transition over a longer period, especially given the current circumstances.

"Natural transition, let everybody get back on their feet before you try and hammer them again, because if you're going to hammer people, they're just not going to use that service. They're going to say, no, I'm not doing that school contract anymore, they're going to hand them back into the councils and then on the first day of September in 2022, whatever it is and the council's come begging, please, please help me out. Why force it? (Operator, Stockport)

"So they can't go changing things, it's going to need a long time after this has finished, it's going to be next year before we start getting back to a normality, I reckon, at least April, May, like if they've brought in any new standards for the year after, it's just a continuous loss of money for all the drivers." (PHV Driver, Tameside)

Some members of the public also expressed concern with the timetable and worried it could affect the cost of travelling by hackney / PHV.

"Timetable is too aggressive and will seriously affect fares and viability of taxi ranks"
(Public, age 55-64, Rochdale)

"I think the timescales are too short - there's too much cost to the drivers involved and this consultation ends in December 2020, you want to start the new rules just four months later - that leaves very little time between the standards being finalised and coming into force, and no chance for drivers to plan, apply for and receive grants, and make changes to vehicles, equipment and licensing." (Public, age 35-44, Oldham)

Much of the support for the timetable came from members of the public, with 46 respondents stating in their comments the proposals should be brought in as soon as possible.

"The start date seems fair, but I'd like to see these timelines compressed. 2025 is just another five years of bad experiences and possibly dangerous situations for passengers. Taxi vehicles could easily cover hundreds of thousands of miles in this time." (Public, age 25-34, Salford)

"I think they should be complying with standards as from April 2021 because we need to be safe and reduce pollution straight away. Taxi firms and drivers have exploited loopholes at our expense and risking safety and increasing pollution. They should not be given lots of time to continue to exploit these loopholes. They have cut corners and should be forced to stop now." (Public, age 45-54, Manchester)

Some drivers also agreed with the timetable. Many comments referenced the need to improve vehicle emissions.

"I am one what agrees with this as I can be behind some private hire cars and the smoke they kick out is unacceptable" (PHV Driver, Rochdale)

"No more delays. However, electric charging points for PH/Taxi should be rolled out urgently by councils specifically for PH/Taxi at a subsidised rate to help the fleet be changed." (Hackney Driver, Manchester)

8.2.3 Investment in vehicles

There was a concern about drivers who have recently bought new cars being forced to replace them before they anticipated at considerable expense (PHV drivers n=7, Hackney drivers n=2).

"Timetable is far too short and I believe that after buying a vehicle that met all the requirements of my local borough licensing office last year the goal posts are now being moved." (Hackney Driver, Tameside)

"Any vehicles that meet current criteria and conditions need to be able to run their vehicles without penalty until 10 years old. A fundamental part of owning your own vehicle is that you know how long you can use it and how much you need to save towards replacing etc. This decision is made at the time of purchasing the vehicle. It is not fair at all to move the goal posts. A late 2013 to 2015 (pre euro 6) would fall foul of the proposed changes and this once again is completely unfair and will put drivers and operators into real hardship. Our industry is very low profit and has been for many years. Vehicles are bought with their whole life cycle accounted for in our financial calculations." (Operator, Salford)

"I agree that there needs to be a timetable for the proposed changes but it feels unfair for drivers/ owners to need to change their vehicles sooner than the 5 year necessity because of incorrect colour. New vehicles must meet the standards but there has to be some documented leeway for existing vehicles where safety is not compromised." (Public, age 45-54, Trafford)

8.2.4 Electric Vehicles

The availability, cost and infrastructure for zero emission capable vehicles (ZECs) was raised both in the response to the consultation and the qualitative discussions. With drivers citing:

Greater Manchester doesn't currently have the infrastructure for the number of electric charging points that will be required (Hackney drivers n=3, PHV drivers n=3).

"Furthermore, we do not have the infrastructure for all of the charging points required...for example how will houses with no driveways and terraced streets look with charging cables running onto pavements etc etc. The cost of the vehicles are also unsustainable for business use, not to mention the additional fire risk and reliability of the batteries." (Operator, Stockport)

"I like many hackney owner drivers have invested in brand new levc tx costing almost 60k but so far we have not received any help from council like other councils in UK and the charging infrastructure is so poor that there is only 1/2 rapid chargers in city of Manchester, none in city centre, Most of the chargers are 7.5kw which can take good few hours to charge At the moment they are free and council is planning to start charging at 35p per kw, Which will work out too expensive taking into account the time off the road Some of the pvt company like pod point are only charging 15p per kw So the owner driver is going to ask himself if it's worth spending 60k and pay 35p per kw plus membership fee" (Hackney Driver, Manchester)

Logistic challenges: Drivers and operators in the in-depth interviews acknowledged if a vehicle is currently being shared (i.e. between two drivers on a 24-hour basis) there is no time to charge the vehicle.

"I mean I'd more than look at hybrids to start off. I wouldn't go all electric, because the facilities to charge for a taxi, whether you like it or not you do twelve hour shifts and then it jumps to someone else to do another twelve hour shift, so the car's doing a twenty four hour shift every day, but it needs to be maintained, looked after and charged and at the moment there's no places to charge, not enough places to charge them." (Hackney Driver, Salford)

Reputation of electric vehicles: Drivers in the in-depth interviews raised concerns about the viability of electric vehicles and described issues or problems they had heard from fellow drivers which made them reluctant to purchase an electric vehicle.

"I know a two year old electric car, it needs batteries already and it's costing him £1200 and he wished he's never bought it now." (Hackney Driver, Stockport)

On the other hand, there was some support for ZECs from hackney drivers.

"This can't happen soon enough for me. Get rid of old polluting vehicles for zecs. As a zec owner I can vouch for these vehicles as expensive but truly amazing cabs" (Hackney Driver, Manchester)

"As a taxi Driver yes I totally agree we should be heading that way for a cleaner air but also need government help to upgrade vehicles and more charger points should be provided in the city centre and for free for the first couple of years .. till we all Get back on our feet from this covid 19 ..." (Hackney Driver, Manchester)

9. Impact of proposals

Summary

- Members of the public who commented were more likely give a supportive comment feeling the MLS will improve safety, encourage more taxi use and have environmental benefits.
- However, they also raised concerns about the possible impact of the proposals on fares.
- Drivers mainly highlighted the negative financial impact the proposals will have on them such as cost of new vehicle and licensing cost.

9.1 Comments about impact of proposals

Respondents were asked to describe how they / their business will be affected by the proposals if they are implemented. Overall, 570 respondents gave a comment. Almost half of PHV (44%) and hackney (46%) drivers opted to comment here compared to just a quarter (26%) of the general public.

Comments received by the general public were mostly (54%) concerned with the impact to them as a passenger whereas drivers were concerned about the financial impact (90% of hackney and 88% of PHV drivers).

Table 9:1: Comments made about the impact by type of respondent (n)

| | General public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--------------------------------------|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General | 98 | 31 | 41 | 11 | 3 | 0 | 7 |
| Financial impact | 76 | 96 | 137 | 19 | 4 | 2 | 11 |
| Environmental impact | 16 | 1 | 1 | 0 | 1 | 0 | 0 |
| Passenger impact | 138 | 3 | 10 | 2 | 0 | 0 | 2 |
| Base | 257 | 107 | 155 | 24 | 8 | 2 | 17 |
| Proportion of respondent type | 26% | 46% | 44% | 75% | 42% | 20% | 47% |

Base: Number of respondents providing a comment

9.1.1 General comments

The table below shows the general comments about the impact of the proposals.

Table 9:2: General comments by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General oppose / negative view of proposals | 16 | 21 | 23 | 4 | 0 | 0 | 3 |
| Negative impact on business (general) | 7 | 11 | 10 | 5 | 0 | 0 | 1 |
| Agree with proposals (general) | 69 | 0 | 5 | 1 | 3 | 0 | 2 |
| No impact on me / my business | 9 | 2 | 3 | 1 | 0 | 0 | 1 |
| Base | 98 | 31 | 41 | 11 | 3 | 0 | 7 |

The comments received from drivers were mostly negative with 21 hackney drivers and 23 PHV drivers giving a generally negative comment. A further 11 hackney and 10 PHV drivers respectively felt the proposals would have a negative impact on business.

“It will affect my taxi business very badly. Footprints of Covid 19 are too deep on taxis to date” (Hackney Driver, Oldham)

The National Private Hire and Taxi Association (NPHTA) highlighted the impact of the proposals on drivers:

“Whilst some of the proposals are welcomed, we hear from our members, which is a huge proportion of the Greater Manchester trade including hackney drivers, private hire driver, private hire operators, and local associations which includes the GM coalition, GMDF, and many others, that they are already financially hard hit pre COVID, post COVID.....with the closing of taxi ranks for the implementation of cycle lanes, with the narrowing of roads, the feeling is that to even consider the majority of these proposals right now is unfair, disproportionate and unreasonable.

Many regions such as Rochdale and Bury will be hit with the colour changes, and introduction of age limits which will hit them hard enough without the new vehicles having to be euro 6 with no mention of any alternatives being viable (such as euro 5 with aftermarket technology to render them euro 6 or above. This push would have been difficult enough before, but even worse right now, in fact it may well be enough to push a huge section of both hackney and private hire out of business completely where they may otherwise have survived.” (Organisation, National Private Hire and Taxi Association)

9.1.2 Impact on the general public

The table below shows the most mentioned comments about the impact of the proposals on the general public.

Table 9:3: Detailed comments made for the impact on the general public by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Will improve passenger safety | 99 | 1 | 3 | 1 | 0 | 0 | 2 |
| Will lead to fare increases – Negative / unspecified | 29 | 1 | 6 | 1 | 0 | 0 | 0 |
| Will Improve facilities for disabled passengers | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Will encourage use of hackney / PHV | 22 | 1 | 0 | 0 | 0 | 0 | 0 |
| Will lead to fare increases - Happy to pay, worth it. | 2 | 0 | 1 | 0 | 0 | 0 | 0 |
| Base | 138 | 3 | 10 | 2 | 0 | 0 | 2 |

In general, the general public gave positive comments about the impact of the proposals feeling they would:

Improve passenger safety both as a passenger and a road user (n=99).

“Very simple- I would feel much safer getting in a taxi. I would feel more confident in regulations and uniformity” (Public, age 35-44, Salford)

“I would feel safer travelling in taxis under these proposals - I would also be happy to pay more as a result” (Public, age 45-54, Bolton)

Encourage use of hackney / PHVs (n=22): Several mentions were made referring to increased use should the proposals be introduced.

“I would feel safer sharing the streets with private hire vehicles and the air I breath would be improved. I would also be more inclined to use taxis and private hire vehicles as I would know what standards of service to expect” (Public, age 35-44, outside Greater Manchester)

“If these standards are introduced, I will feel much safer & more confident in taking a taxi anywhere in Greater Manchester. Additionally, I will start using taxis in [location] again. I recently stopped using [location] taxis due to the awful state of vehicles & poor driver standards. With these new rules in place I would probably start using them again.” (Public, age 45-54, Bolton)

However, there was some concern the proposals would lead to fare increases (n=29) and some raised concern for the impact on drivers.

“I think the public will be affected by a huge increase in the cost of fares due to the increased cost and outgoings for taxi/private hire drivers. If people do not want to pay

the very high cost of taxi's after a night out they will also be less likely to go out and this will also affect the night-time economy." (Public, age 18-24, Rochdale)

In the longer term, users felt it would encourage more use and trust in hackney and private hire vehicles, and it would raise the standards across the region, so the same service was provided across the wider area, not just in specific districts.

However, some users acknowledged the added costs of meeting these standards could be passed on to the customers, in a similar fashion to the drop off charge at the airport.

"Well, the taxi firms who run it, the bosses that run it say well, we're going to have to put the fares up for doing that and we're going to put fares up for doing that and then everything's just going to snowball and the private hire firms are going to end up dearer than the black cabs, that's what will happen." (User, Group 1)

9.1.3 Environmental impact

The table below shows the most mentioned comments about the impact of the proposals on the environment.

Table 9:4: Detailed comments made for the environmental impact by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| MLS proposals will improve environment | 14 | 1 | 1 | 0 | 1 | 0 | 0 |
| Include cleaning standard (based on Covid-19) | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Base | 16 | 1 | 1 | 0 | 1 | 0 | 0 |

Improve the environment: 14 members of the public mentioned in their comments the additional impact of cleaner air and environmental impacts of the proposals.

"As a private individual, mostly getting around by bicycle, I believe these changes would improve the experience of being on the roads, improve safety and air quality, and lead to a generally better quality of life" (Public, age 18-24, outside Greater Manchester)

9.1.4 Impact on drivers

The table below shows the most frequently mentioned comments about the impact of the proposals on drivers.

Table 9:5: Detailed comments made for the proposed timetable by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Put drivers into debt | 6 | 11 | 22 | 1 | 0 | 0 | 0 |
| Put drivers out of business / bankrupt | 19 | 44 | 47 | 11 | 0 | 1 | 2 |
| Grants are not enough support / Funding is needed | 50 | 43 | 55 | 6 | 2 | 1 | 8 |
| High costs of new vehicle / electric vehicle | 17 | 55 | 80 | 10 | 2 | 0 | 2 |
| High maintenance costs of electric vehicles | 1 | 2 | 1 | 2 | 0 | 0 | 0 |
| Electric vehicles impractical (no access to EV points) | 2 | 0 | 2 | 0 | 0 | 0 | 1 |
| Licensing cost will be expensive | 4 | 14 | 15 | 1 | 1 | 0 | 2 |
| Base | 76 | 96 | 137 | 19 | 4 | 2 | 11 |

Most comments received from drivers were about the potential financial impact of the proposals:

High costs of new vehicle / electric vehicle: Half of comments received from hackney (n=55) and PHV drivers (n=80) referred to the high cost of new vehicles especially ZEC vehicles.

“It will definitely affect me, with this Covid-19 I am already in big debt, with this new car replacing scheme, it will definitely push me out off job, there is no way I can afford a replacement vehicle” (PHV Driver, Oldham)

“The cost of changing the vehicle to meet the new requirements will be too high compared the money that is made in the trade especially during the time of pandemic. Unless the trade would guarantee a driver can make a net income of over £40,000 which would make the change a little feasible which is not the case the taxi trade is so unpredictable at the moment given the circumstances I don’t think it is a good idea to move forward with the given proposals.” (PHV Driver, Manchester)

“We own around 80 vehicles. These standards if put in place with mean we have to invest £1m plus to bring in new cars. This is simply not possible and we will go out of business” (PHV Driver, Rochdale)

Put drivers out of business / bankrupt: There was a high level of concern the proposals will result in increased debt for drivers (Hackney n=11 and PHV drivers n=22). A further 44 of comments from Hackney and over a third (n=47) from PHV drivers stated the increased potential increase debt will prevent them from carrying on in the industry.

"The proposals as they are defined at the moment will put many drivers out of business because they are far too expensive to meet for a trade significantly impacted by the coronavirus pandemic. (Unite the Union -Manchester Hackney Carriage)

"If we are forced to have these Hackney vehicles we will go out of business because we do not have the work in Rochdale to sustain this type of vehicle" (Hackney Driver, Rochdale)

Grants are not enough support / Funding is needed (Hackney n=43, PHV drivers n=55). Drivers also stated grants and funds were needed to help pay for these changes. Not all were aware of the proposed funding provision in the Clean Air Plan but many of those that were, did not feel the funding went far enough.

"The current work situation affects drivers' income and, being required to replace their cabs to meet MLS, places added burden on the drivers. Drivers need to be assisted financially towards the cost of higher standards vehicles and licensing costs" (Hackney Driver, Manchester)

"All these are just further costs to drivers with no help funding these changes. This is ridiculous. You want to enforce no emission zone but expect us to pay for it with no help. You want to increase the amount of times we get DBS check, again with no help of funding. You want to change the colour of all private hire vehicles to white!! - I have only just bought my HYBRID car in silver / grey" (PHV Driver, Bolton)

"I'm not in position of buying electric vehicle unless government gives me subsidy as the price is far too high and does not match the revenue gets generated from taxi business" (Hackney Driver, Manchester)

Licensing cost will be expensive (Hackney n=14, PHV drivers n=15): Some perceived there would be an increased licensing cost and worried about the impact it would have on them.

"Plain and simple this is going to make it unaffordable to work. The taxi vehicle is going to be unaffordable to buy, [to] test twice a year so many classes attended laws to learn. Written and spoken English test so many times" (Hackney Driver, Rochdale)

Representatives also raised concerns about the impact of the MLS on drivers and the industry as a whole.

"Taxi business is completely ruined they left no capacity to spend a penny on vehicles and their heads are under hot water". (Organisation, NPHTA)

"Any increase in cost to the trade to harmonise at a standard where the majority do not currently meet the criteria is too ambitious on behalf of the 10 LAs and is a prime example of overly-burdensome regulatory proposals in the middle of what will be one of the biggest depressions this country has ever witnessed. The very notion of a GM approach to driving up standards is also futile as many PHV will use out-of-town LAs to licence their vehicles and many saloon hackneys will become PHV plated rather than face the hackney proposals." (Unite the Union - Manchester Hackney Carriage)

9.1.5 Impact on operators

Twenty-four operators provided comments on the potential impact of the proposal of which 5 stated the proposals would have negative impact on their business and would put drivers out of business (n=11).

"Unfortunately, my only option left would be to scrap my business. Years of hard work and dedication going down the drain" (Operator, Bolton)

"Am seriously considering closing my business of 20 Years. Am sure I'm not the only one." (Operator, Wigan)

10. Impact of Covid-19

Summary

- Three quarters (77%) of respondents have been financially impacted by COVID-19 with 88% of them making less profit than before the pandemic.
- Drivers and Operators in their comments highlighted that their debt has increased, and their savings have been used up due to the lack of work during the pandemic.
- Drivers requested in their comments a delay in implementing the proposals until the industry has recovered from the pandemic.
- Members of the public raised concerns about their safety as a passenger due to drivers disobeying government's rules.

10.1 Level of impact

Drivers of hackney and private hire vehicles, operators, vehicle lease companies and other businesses were asked about the impact of Covid-19 on their business.

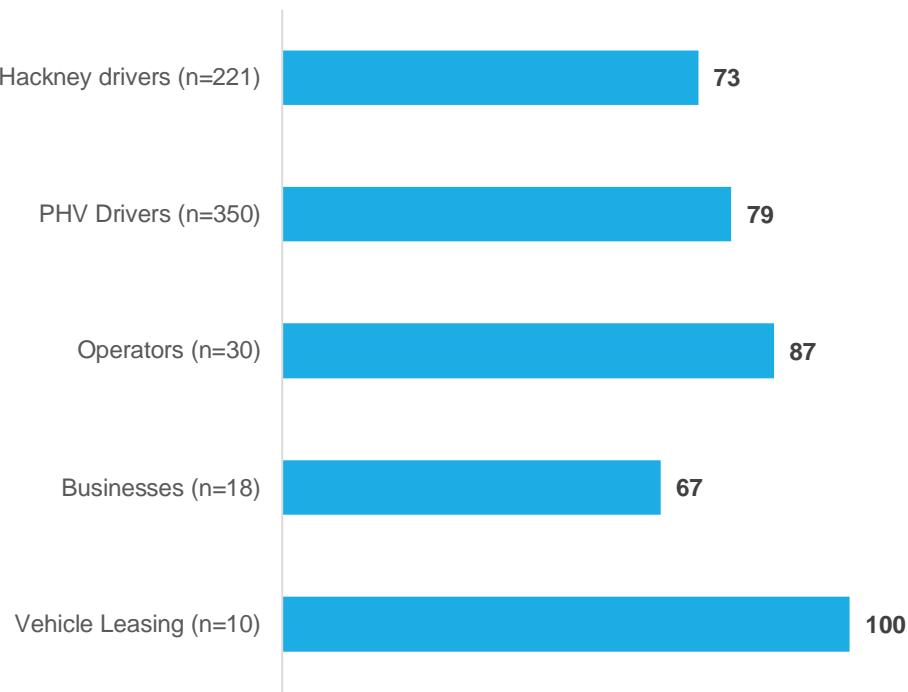
Respondents were asked whether they had seen a financial impact due to Covid-19, using four criteria, level of debt, level of savings, turnover and profitability. Table 10:1 shows the definition used, for the purpose of this report, for a driver, operator or business to be financially impacted by Covid-19.

Table 10:1: How being financially impact due to Covid-19 was defined

| Financial impact | Description |
|---|---|
| Financially impacted by Covid-19 | A driver, operator or business who has stated they have more debt or less savings or lower turnover or lower profitability as a result of the Covid-19 pandemic |
| Not financially impacted by Covid-19 | A respondent who has either now has either the same or less debt, the same or more savings, the same or higher turnover or the same or higher profitability as a result of Covid-19 |

Figure 10:1 shows the proportions financially impacted by Covid-19.

Figure 10:1: Businesses that have been financially impacted by Covid-19 (%)



Base: all hackney & PHV drivers and businesses

Caution should be used where base is small (n<50)

Overall, 77% of respondents who were asked about the financial implications of Covid-19 have been financially impacted. The general public and representatives were not asked about the financial impact of Covid-19.

Of the 77% of respondents who had been financially impacted by Covid-19:

- 88% stated they'd made less profit;
- 86% stated they had a lower turnover;
- 75% stated they now had less savings; and
- 73% stated they had more debt.

Of those financially impacted by Covid-19, 81% had received at least one type of financial support whether this was via the job retention scheme, a Government grant or loan, a business grant, self-employment income support or any other financial support.

The full breakdown of the financial impact of Covid-19 is shown in the data tables provided in Appendix E.

10.2 Comments about impact of Covid-19

As well as being asked about the level of impact Covid-19 has had on them and their business, all respondents including the general public and representatives were given the opportunity to provide comments about the impact of Covid-19.

455 respondents provided a comment about the impact Covid-19. Most of the comments were about the impact of Covid-19 on businesses, 77% of businesses and drivers commented on this and just over a third (36%) of the public and representatives commented.

Table 10:2 shows the main comments made by each type of respondent and shows a more detailed breakdown of the comments provided.

Table 10:2: Comments made about the impact of Covid-19 by type of respondent (n)

| | General public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--------------------------------------|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Effect on business | 68 | 64 | 98 | 17 | 2 | 2 | 11 |
| Effect on public | 14 | 37 | 33 | 6 | 0 | 1 | 2 |
| MLS Specific | 67 | 2 | 2 | 0 | 0 | 0 | 2 |
| Other Effects | 70 | 12 | 14 | 1 | 0 | 1 | 9 |
| Base | 199 | 93 | 119 | 21 | 2 | 3 | 18 |
| Proportion of respondent type | 20% | 40% | 34% | 66% | 11% | 30% | 50% |

10.2.1 Effect of Covid-19 on businesses

The table below shows the most frequently given comments about impact of Covid-19 on businesses.

Table 10:3: Detailed comments made for Covid-19 impact on businesses by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| No impact | 5 | 0 | 0 | 0 | 0 | 0 | 1 |
| Business has increased | 0 | 0 | 0 | 1 | 0 | 0 | 0 |
| General - business negatively affected by Covid-19 | 35 | 47 | 74 | 13 | 2 | 2 | 7 |
| Business may close | 0 | 1 | 1 | 0 | 0 | 0 | 0 |
| Business / work / Income has fallen | 23 | 16 | 19 | 3 | 0 | 1 | 4 |
| Staff are furloughed | 1 | 1 | 0 | 0 | 1 | 0 | 0 |
| Costs have increased / increased financial pressure | 9 | 3 | 3 | 0 | 0 | 0 | 0 |
| Savings / reserves have been used up | 2 | 7 | 5 | 1 | 0 | 0 | 1 |
| Debts have increased / can't afford more debt | 1 | 5 | 8 | 0 | 0 | 0 | 2 |
| Not been eligible for financial support | 1 | 3 | 4 | 0 | 0 | 0 | 1 |
| Brexit also causing issues | 1 | 0 | 1 | 0 | 0 | 0 | 0 |
| Base (Business) | 68 | 64 | 98 | 17 | 2 | 2 | 11 |

Many comments were received highlighting the impact on businesses including:

Business has been negatively affected: 47 hackney and 74 PHV drivers stated they had been negatively affected by Covid-19 with both reporting business / work / Income has fallen.

"The level of trade has substantially decreased due to Covid, then with the 10pm restrictions the night drivers came into the day shift which effectively killed the trade. Staying out 10 hours for £20 is depressing" (PHV Driver, Trafford and outside Greater Manchester)

"Due to the pandemic as a trade we have been impacted on big scale. The hospitality trade provides taxi with around 50% of our work this due to the restrictions has affected our business" (Operator, Rochdale)

"It is affected greatly and we have lost a lot of business in our town because of Covid-19 Having bars restaurants pubs clubs all shut it has badly affected our taxi trade we need the help from the government and our council to provide some help for the taxi drivers" (Hackney Driver, Manchester)

During the in-depth interviews most drivers and operators stated this had been an extremely tough period for them and their industry. Covid-19's impact on air travel and the night-time economy has negatively affected the hackney / PHV industry.

"I used to go every day, every day I'd go to the airport. So, one of the companies in Bolton that I work for, the airport, bringing all their clients in and out, a massive, huge company, I've done it for years and years. I've had nothing off them, because obviously they're not traveling, you know." (Operator, Salford)

"It's just at a standstill, really, there's no work available, because of COVID, because everything's all closed and it's very, very hard to make a living now." (PHV Driver, Rochdale)

Some respondents had regular contracts (school or hospital runs) and felt these were the only things keeping them afloat during this period and felt those who had this type of contract were in a better position than many other drivers.

"For me, I have school contracts with the council. If I didn't have that, I might as well just pack it in to tell you the truth. I've not been so bad, in fact, the school runs have saved me, I can get by on that." (Operator, Salford)

Respondents reported a 40%-50% decrease in their weekly income and a few reported a 90% decrease. Many have struggled to cover their costs and licensing fees.

"Three quarters, 90% gone, down and out. In fact, right now, I've only got, tonight I've got a flight coming in and they've come back early from the Canaries and I've got a gentleman who's a chairman of a company, he's going to South Africa, because he's got business there or he's going to London Heathrow and then he's returning in two weeks' time and that's it." (PHV, Executive Hire Driver, Salford)

Savings / reserves have been used up: Seven hackney and five PHV drivers stated the pandemic had caused them to turn to savings:

"I have used all my savings to put food on the table and pay my rent. Work is dead and what you are proposing is beyond ridiculous. It shows that you want all of us to leave the trade because Covid 19 has destroyed the hackney trade and now you want us to borrow money to pay for newer vehicles yet we won't even be able to pay the monthly's We need help not punishment" (Hackney Driver, Rochdale)

Debts have increased / can't afford more debt: five hackney and eight PHV drivers explicitly said they were now in debt which would prevent them from upgrading their vehicles.

"My concern is about the vehicle I'm driving as my car is about 15 years of age, but still in good condition and it passed to an PHV mot standard...I want to upgrade to a slightly used car but I have no money to buy a car due to my taxi business has badly affected by the Covid 19 it's still affect our livelihood. I can't even afford to get a car loan because of our current situation with a coronavirus" (PHV Driver, Wigan)

Many drivers in the in-depth interviews mentioned colleagues had left the industry or had taken up other jobs during this period in order to make ends meet.

"Some of my colleagues have left, taken up delivery jobs for delivery of parcels and food" (PHV Driver, Bolton)

10.2.2 Effect of Covid-19 on public

The table below shows the most frequently given comments about impact of Covid-19 on public.

Table 10:4: Detailed comments made for Covid-19 impact on public by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Increased financial pressures | 13 | 33 | 31 | 5 | 0 | 1 | 2 |
| Reduced bus routes | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Will increase prices | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Affecting poorer people / lower incomes | 1 | 1 | 0 | 1 | 0 | 0 | 0 |
| I may lose my job | 0 | 5 | 4 | 1 | 0 | 0 | 0 |
| Base (Public) | 15 | 37 | 33 | 6 | 0 | 1 | 2 |

13 comments from the public stated there had been an increase financial pressure during the pandemic.

"Taxi businesses must have been negatively impacted by coronavirus. I e.g. have never been in a taxi since March. I used them at least 2 or 3 times a month. Loss of income should be considered when imposing new standards and the costs involved" (Public, age 55-64, Manchester)

During the in-depth interviews users highlighted Covid-19 has changed their use of hackney and private hire vehicles. Some reported their usage had dropped significantly due to restrictions such as lockdowns and work from home policies.

However, a few stated their usage had increased because they are reducing the time, they spend on other modes of transport such as bus or tram.

"I'd say that at the start of COVID it definitely impacted it, however as in between obviously you had a break before the second lockdown, I started to use Ubers and taxis more and they had the whole plastic wrap in between you and the driver and you had to wear masks, so it did feel a lot safer and you obviously have to take responsibility yourself for keeping it like sanitised and things like that, but it did feel a lot safer." (User, Group 15)

10.2.3 Timings of proposals / consultation

The table below shows the most frequently given comments about the timing of the proposals.

Table 10:5: Detailed comments made for timing of the proposals by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Pandemic is temporary / shouldn't affect proposals | 28 | 0 | 0 | 0 | 0 | 0 | 1 |
| Less use of public transport due to Covid-19 | 8 | 0 | 0 | 0 | 0 | 0 | 0 |
| Timing for introduction should be reviewed / delayed due to Covid-19 | 28 | 10 | 11 | 1 | 0 | 1 | 8 |
| Consultation should be delayed until after Covid-19 | 5 | 4 | 3 | 0 | 0 | 0 | 1 |
| Covid-19 highlighted need to improve environment | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Base | 70 | 12 | 14 | 1 | 0 | 1 | 9 |

Timings should be delayed due to Covid-19: Members of the public (n=28), Hackney (n=10) and PHV (n=11) drivers and representatives (n=8) stated the timing for introducing the minimum licensing standards should be reviewed and / or delayed allowing the industry time to recover.

"Yes, the covid-19 crisis will prevent you from implementing these changes before your aspiration date. Personally I would recommend 2022 as the deployment date" (Public, age 55-64, Wigan)

During the in-depth interviews many drivers mentioned they were surprised the implementation of the standards was going ahead given Covid-19. Some drivers and operators felt very strongly this was poor timing and many in the industry will have no choice but to leave the industry due to the combined effects of Covid-19 and the introduction of the Minimum licensing standards.

Timings should not be delayed due to Covid-19: Conversely, 8 comments from the public stated the pandemic is temporary and should not affect the proposals. Those who stated this felt the pandemic should not be a barrier or an excuse for any more delay as the proposals are important, although some recognised consideration should be given to hackney / PHV drivers and businesses who are struggling financially due to the pandemic.

"While the impacts of Covid-19 cannot be ignored, it is an important ambition to move to a cleaner, greener taxi trade by the end of the decade to support our long-term environmental targets in Greater Manchester. However, in light of the pandemic, the level of funding to support the trade in upgrading the fleet is even more important than ever" (Public, age 25-34, Bolton)

10.2.4 Covid-19 and driver and passenger safety

The table below shows the most frequently given comments about Covid-19 and driver and passenger safety.

Table 10:6: Detailed comments made for Covid-19 and driver and passenger safety by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| There needs to be updated procedures | 26 | 0 | 0 | 0 | 0 | 0 | 1 |
| Drivers should be supplied with PPE | 4 | 0 | 1 | 0 | 0 | 0 | 0 |
| The hackney / PHV industry will take longer to recover | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Vehicles will need adapting due to Covid-19 | 21 | 0 | 0 | 0 | 0 | 0 | 0 |
| Driver safety has been impacted | 2 | 2 | 1 | 0 | 0 | 0 | 1 |
| Safeguarding in hackney / PHVs has been excellent | 4 | 0 | 0 | 0 | 0 | 0 | 0 |
| Concerns about drivers not following rules | 33 | 0 | 0 | 0 | 0 | 0 | 1 |
| Drivers need regular Covid-19 testing | 8 | 0 | 0 | 0 | 0 | 0 | 0 |
| Base | 67 | 2 | 2 | 0 | 0 | 0 | 2 |

Members of the public raised concerns about drivers not following "the rules" (n=33) including cleanliness of vehicles and not wearing masks. 21 comments also suggested PHVs needed adaption to help manage Covid-19 such as the installation of a screen as a divider between driver and passengers.

"Not all taxi drivers are wearing masks. If they disregard this, how can we have any confidence they are cleaning vehicles between passengers. Also generally dirty smelly taxis have clearly not been cleaned for a while never mind between passengers. We should be mystery shopping and taking licences off anyone that is not covid compliant. They should not be putting passengers lives at risk. Vulnerable immuno suppressed people have to use taxis because they cannot travel on public transport. They have to be safe and if they are paying for a service that service should not put them at risk (Public, age 45-54, Manchester)

11. Overall agreement

Summary

- Almost all (91%) members of the public agreed with the proposals.
- 67% of hackney drivers, 57% of PHV drivers, 67% operators and 70% of vehicle leasing disagreed with the proposals.
- Both PHV and hackney drivers disagreed with the proposals mainly because they afraid that it will put them out of business and will increase their debt

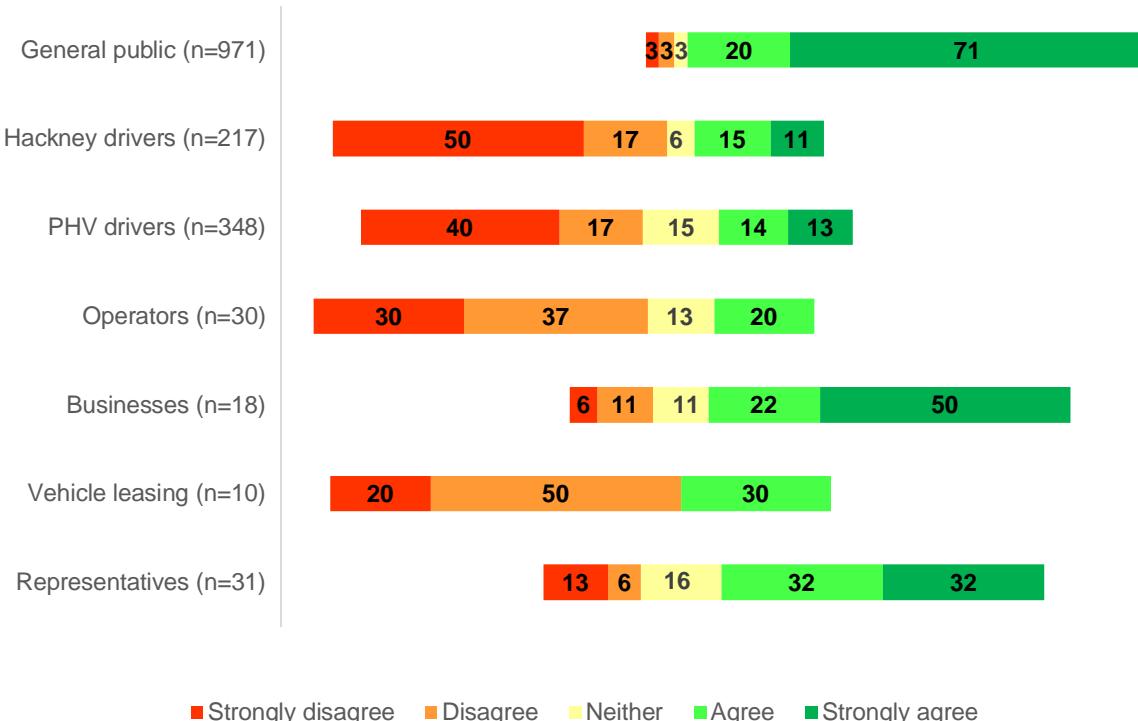
11.1 Extent of agreement

All respondents were asked:

Overall, to what extent do you agree or disagree with the proposed Greater Manchester minimum licensing standards for hackney carriages and private hire services.

91% of the general public agreed with the proposed standards overall as did a quarter of hackney (26%) and private hire vehicle (27%) drivers. However, two-thirds of hackney drivers (67%) and over half the private hire vehicle drivers (57%) disagreed with the standards overall.

Figure 11:1: Extent of agreement with the standards overall (%)



Base: all respondents

Caution should be used where base is small (n<50)

Don't know has been removed from the chart

General public

The level of overall agreement by age and gender was consistent ranging from 88% of the youngest men to 99% of men aged over 55. The proportion who agreed with the standards was the same amongst men and women of the same age.

The overall agreement in each local authority varied slightly with residents of Wigan having the lowest level of agreement to 98% of residents of Trafford who agreed.

Hackney / PHV industry

Two thirds (67%) of hackney drivers and 56% of private hire drivers disagreed with the proposed standards. Those drivers who rent or lease their vehicle were more likely to agree (47% of those who rent, or lease compared to 24% of owners).

None of the 30 operators or 10 vehicle leasing companies strongly agreed with the proposed standards, with three times as many operators disagreeing with the proposed standards.

Drivers from an Asian background were more likely to disagree (64%) with the proposals than drivers from a White British background (49%).

Respondents in Oldham (89%) and Bolton (82%) disagreed more than those licensed in Stockport (61%), Rochdale (60%), Wigan (51%) and Manchester (41%) *.

*Comparisons by district are reported for districts with 50 or more responses.

11.2 Reason for Agreement

General Public

A fifth (22%) of those who agreed with the proposed minimum licensing standard provided a comment. Of those that did, the main reason for agreeing included:

- General agree with the proposals (73%)
- Improve passenger safety (15%)
- Support the Driver Standards (7%)
- Improvements to drivers' local knowledge (5%)
- Will improve the environment (4%)
- Agree with CCTV (3%)
- Improvement to vehicle cleanliness (3%)
- Will encourage hackney / PHV use (2%)
- The timetable (1%)
- More accessible vehicles (1%)
- Agree with standard colour (1%)

A significant number of comments (42%) gave suggestion for improvements which are described in the next chapter.

Hackney and PHV drivers

Just 9 and 10 Hackney and PHV drivers respectively provided a comment. The Hackney driver comments were split between a generally supportive statement (n=4) and highlighting an aspect of the proposals they did not agree with (n=5).

Comments from PHV drivers included:

- General Agree (n=2)
- Enhanced CRB should be mandatory (n=1)
- Agree with language requirements (n=1)
- Agree with Age Limit proposals (n=1)
- Agree with proposed plan for vehicle testing (n=1)
- Agree CCTV should be mandatory (n=1)

As with Hackney drivers 12 comments were made highlighting aspects they did not agree with, even though they agreed overall.

11.3 Reasons for Disagreeing with the proposals

General Public

Of the 55 members of the public that disagreed with the proposal, just over a third (38%, n=21) provided a comment. Comments included:

- General oppose (n=10)
- Grants are not enough support / Funding is needed (n=1)
- Licensing cost will be expensive (n=1)
- Won't apply to non-GM hackney / PHVs / Should focus on stopping cross border trade (n=1)
- The deadline should be extended / delayed (n=2)
- Put drivers out of business / cause debt (n=2)
- Will lead to fare increases (n=1)

Some (n=14) described an aspect they agreed with.

Hackney and PHV drivers

Just over a quarter of hackney (n=37) and PHV (n=56) drivers gave a comment as to why they disagreed with the proposals.

Comments from hackney drivers included:

- General oppose (n=15)
- Put drivers out of business / cause debt (n=12)
- Licensing cost will be expensive (n=6)
- High cost of vehicles / funding not enough (n=7)
- Issue with cross border trade (n=5)
- Need more time / extend the deadline (n=8)
- Disagree with age limit (n=5)
- Other negative comment (n=4)

Comments from PHV drivers included:

- General oppose (n=18)
- Put drivers out of business / cause debt (n=18)
- High cost of vehicles / funding not enough (n=12)
- Licensing cost will be expensive (n=6)
- Disagree with driver standard (n=3)
- Will have a negative impact on disabled people / Low incomred (n=2)
- Issue with cross border trade (n=7)
- Need more time / extend the deadline (n=5)
- Disagree with standard colour / livery (n=7)
- Disagree with age limit (n=4)
- Disagree with vehicle standard (n=2)
- Need more attention to driver safety (n=7)
- Other (n=4)

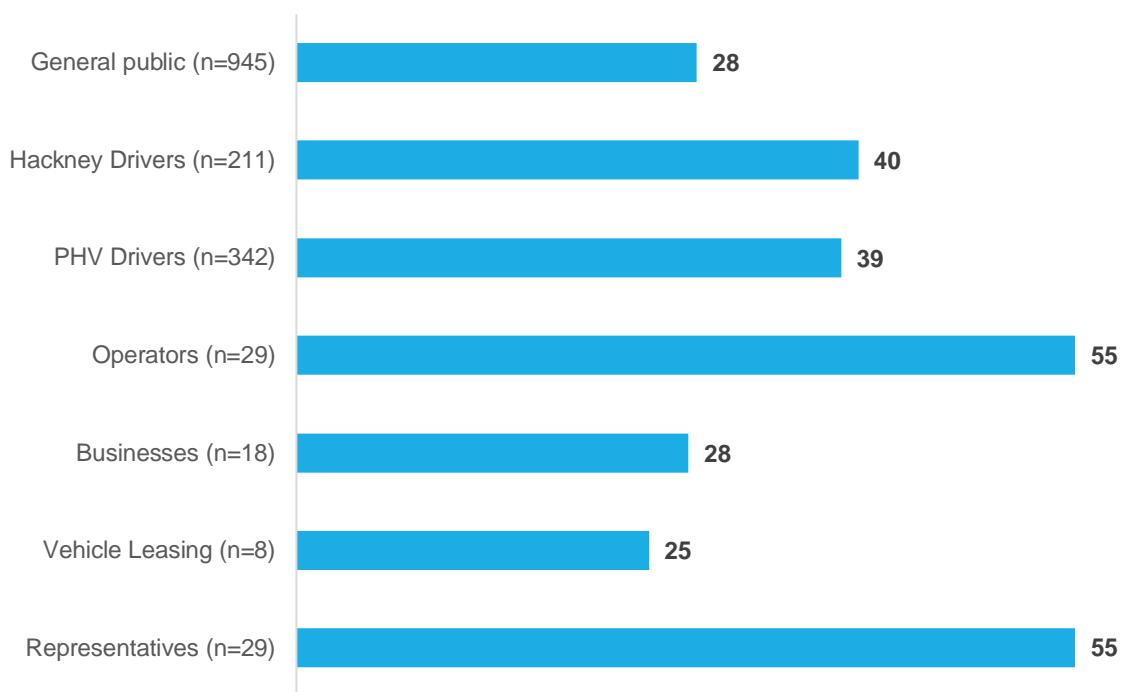
12. Changes to the proposed standards

Summary

- Many respondents (55% of operators and representatives, 40% hackney drivers and 39% PHV drivers) felt there were changes that would improve the proposed standards.
- Members of the public mainly suggested more spot checks, that cleanliness to be regulated and that drivers shouldn't use their personal phones when driving.
- PHV drivers suggested fares should be standardised.
- A high number of comments suggested stopping cross border trading and have more control over the drivers licensed outside of Greater Manchester.

A third of respondents felt there were changes would improve the proposed minimum licensing standards, ranging from 25% of vehicle leasing companies to 55% of private hire operators and representatives. Drivers of hackneys and private hire vehicles and operators were more likely to suggest changes to improve the minimum standards than the general public as shown in Figure 12:1.

Figure 12:1: Those who think changes would improve the proposed minimum licensing standards (%)



Base: all respondents

Caution should be used where base is small (n<50)

Most members of the public (91%) who thought there were changes that would improve the proposed minimum standards agreed with the proposed minimum standards. Overall, operators (86%), hackney and private hire drivers (both 70%) who wanted to suggest changes had generally disagreed with the proposed standards.

12.1 Suggested improvements

Around a third of respondents offered a suggested improvement. Almost half of comments received by members of the public (41%), hackney drivers (53%) and PHV drivers (41%) related to cross border trade. Further details are given in Table 12:1 and the following sections.

Table 12:1: Comments made for each standard by type of respondent (%)

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--------------------------------------|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General | 22 | 16 | 12 | 0 | 0 | 0 | 3 |
| Standards and checks | 125 | 16 | 30 | 9 | 0 | 0 | 8 |
| Other Suggestions | 61 | 12 | 38 | 10 | 1 | 1 | 5 |
| Financial implications | 26 | 4 | 5 | 0 | 0 | 0 | 1 |
| Cross Border Trade | 131 | 33 | 41 | 5 | 2 | 2 | 5 |
| Base | 322 | 62 | 99 | 15 | 5 | 3 | 14 |
| Proportion of respondent type | 32% | 27% | 28% | 47% | 26% | 30% | 39% |

12.1.1 General comments

The table below shows the most frequently given general comments about the standards.

Table 12:2: General comments made by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General agreement | 8 | 4 | 2 | 0 | 0 | 0 | 1 |
| General oppose | 7 | 11 | 9 | 0 | 0 | 0 | 2 |
| Need national standards, rather than regional | 7 | 1 | 1 | 0 | 0 | 0 | 1 |
| Base | 22 | 16 | 12 | 0 | 0 | 0 | 3 |

12.1.2 Standards and checks

The table below shows the most frequently given comments about the standards and checks.

Table 12:3: Detailed comments made for the standards by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Ensure these standards apply to Uber and Lyft too | 11 | 4 | 5 | 1 | 0 | 0 | 1 |
| Better regulation of code of conduct | 13 | 0 | 1 | 2 | 0 | 0 | 1 |
| Stop and spot check randomly, drugs, cleanliness etc | 21 | 7 | 4 | 4 | 0 | 0 | 0 |
| Drivers shouldn't be able to use personal phones | 21 | 0 | 2 | 0 | 0 | 0 | 1 |
| Need routine checks on operators and drivers | 11 | 2 | 1 | 2 | 0 | 0 | 0 |
| Standardisation of fares | 12 | 1 | 9 | 0 | 0 | 0 | 2 |
| Standard IDs are needed | 26 | 0 | 2 | 0 | 0 | 0 | 3 |
| Driver cleanliness / personal hygiene needs to be regulated | 24 | 3 | 4 | 2 | 0 | 0 | 1 |
| Need to regulate leaving engines running when stopped | 7 | 0 | 1 | 0 | 0 | 0 | 0 |
| Standards need to apply to all not just drivers of taxis | 10 | 1 | 2 | 0 | 0 | 0 | 1 |
| Customer service needs improving | 9 | 0 | 3 | 1 | 0 | 0 | 0 |
| Base | 125 | 16 | 30 | 9 | 0 | 0 | 8 |

Suggestions included:

Stop and spot check randomly, drugs, cleanliness etc General public (n=21), hackney drivers (n=7) and PHV drivers (n=4)

“Promote Police checks for dodgy taxi drivers” (Operator, Bolton)

“Random drug and alcohol checks should be conducted. Carried out by the Police doing a minimum number of checks each year” (Public, age 45-54, Wigan)

“Stop and check for drugs. Every so often have police (like when they have an area set aside where they pull cars over) pull taxi's over and check for drugs, etc.” (Public, age 25-44, location not provided)

Driver cleanliness / personal hygiene needs to be regulated General public (n=24), hackney drivers (n=3) and PHV drivers (n=4). Issues with cleanliness, appearance, odour and smoking were all mentioned.

"There needs to be more control on smoking in taxis by drivers and use of mobile phones by drivers, especially while driving without passengers" (Public, age 55-64, Bolton)

"We agree that standards need to be much higher and I am proud to say that my company has already set a high standard in our local area. In the Leigh area, where we operate, 90% of local drivers are unclean and scruffy and often smoking in their vehicles" (Operator, Wigan)

Standardisation of fares General public (n=12), hackney drivers (n=1) and PHV drivers (n=9). Other frequently suggested standards were regarding standardised fares across the region.

"Clearer defined payment amounts for journeys. The current system is too confusing and for Hackney cabs needs to be brought in line with private hire" (Public, age 25-34, Stockport)

Ensure these standards apply to Uber and Lyft too General public (n=11), Hackney drivers (n=4) and PHV drivers (n=5).

"Hopefully these standards will cover drivers operating through Uber and other apps." (Public, age 25-34, Tameside)

Members of the public and representatives further suggested:

Drivers shouldn't be able to use personal phones (n=21 and n=1 respectively):

"Write into contacts / licensing that any proven use of personal mobile phones will lead to loss of licence. I have had journeys where driver has spent most of journey chatting away on his phone!" (Public, age 65-74, Bolton)

Standard forms of ID: (n=26 and n=3 respectively) this was both a way to prevent fraud and to increase the feeling of safety for the public.

"Having the drivers ID and details visible for the customers to see and take note, one that drivers cannot hide as a lot of drivers use someone else's taxi licence to drive around." (Public, age 25-34, Rochdale)

"I hate the thought of getting into a taxi late at night and definitely wouldn't let my two daughters use the service! how are we supposed to know the driver is actually the person who has been screened / checked? look at what happened in Rotherham? "How do you propose to stop fake id cards? the worrying thing for me is UBER is more secure!" (Public, age 45-54, Stockport)

12.1.3 Other Suggestions

The table below shows the most frequently given comments about other suggestions.

Table 12:4: Detailed comments made for other suggestions by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Further discussion needed with the disabled community | 2 | 0 | 1 | 0 | 1 | 0 | 1 |
| More communication is needed from the authorities | 33 | 5 | 14 | 6 | 0 | 1 | 2 |
| Should be allowed to use bus lanes | 3 | 0 | 5 | 2 | 0 | 0 | 0 |
| Changes are welcome | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Drivers should be limited to how many hours they can work | 11 | 1 | 1 | 0 | 0 | 0 | 0 |
| Should be a minimum size of vehicle | 2 | 1 | 0 | 0 | 0 | 0 | 0 |
| Driver safety should be considered as much as passenger safety | 4 | 2 | 14 | 0 | 0 | 0 | 1 |
| Limit on number of licenses | 4 | 3 | 5 | 3 | 0 | 0 | 0 |
| Rules needed regarding lost property and complaints / need to be clear | 6 | 0 | 0 | 2 | 0 | 0 | 1 |
| Base | 61 | 12 | 38 | 10 | 1 | 1 | 5 |

Communication: Better communication between the Local Authorities and the public and drivers was mentioned by all types of respondent (members of the public, n=33; Hackney drivers, n=5; PHV drivers, n=14; operators, n=6; and representatives, n=2)

"We need lots of things to change, we need communication form the authority's, currently we have a bimonthly meeting in Trafford with 3 representatives of the 153 Blacks cabs, we have NO representatives with the 600? PH drivers at these meetings, we are not even asked or invited to attend? I was invited to represent the GMB union once, as they could not attend, I did attend, and I was shocked at what I heard at the meeting, the lack of knowledge by you guys about the trade, about what the customers wanted and needed was appalling. Why does Trafford Licensing not engage with the PH Trade? Not even a single invite to any of the 26 operators has been offered ever?" (Operator, Trafford)

Driver safety: 14 PHV drivers felt their health and safety was not given the same importance as that of users.

"A lot of private hire cars get attacked because people can see from far away that these are private hire because of the stickers and they been throwing bricks at the cars and its only private hire cars getting these attacks. I don't think that's fair to the drivers because their life is at risk and nobody thinks about them everyone is only thinking about the customer safety but what about the driver safety and all the cost that occur when the driver gets a brick through the window" (PHV Driver, Manchester)

12.1.4 Cross Border Trade

The table below shows the most frequently given comments about cross border trade.

Table 12:5: Detailed comments made for cross border trade by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Won't apply to non-GM taxis / Should focus on stopping cross border trade | 94 | 22 | 35 | 4 | 1 | 2 | 3 |
| MLS will push people to get licensed in other authorities | 4 | 2 | 2 | 2 | 0 | 0 | 2 |
| App based operators won't have to comply with standards | 0 | 0 | 2 | 0 | 0 | 0 | 0 |
| Drivers should only be allowed to work in their own area | 56 | 11 | 11 | 0 | 1 | 0 | 0 |
| Base | 131 | 33 | 41 | 5 | 2 | 2 | 5 |

The most common suggestion across all respondent types was regarding drivers who licensed in areas outside Greater Manchester, notably Wolverhampton and Sefton. 22 hackney and 35 PHV drivers, 94 public as well as 4 operators and 3 representatives all asked for tighter controls of out of area licences operating in Greater Manchester.

"We need to stop vehicles from outside of Greater Manchester (Wolverhampton and Sefton plated vehicles for example) working in this area. Licensing councils have no control or jurisdiction over these drivers. The loopholes being exposed by operators need to closed" (PHV Driver, Stockport)

"Stop the out of area licenses currently in the region, this unfairly curtails trade for regions licensed private hire driver in a very difficult time" (Public, age 65-74, Manchester)

Some respondents suggested going even further and only allowing drivers to work in their licensed area (General public, n=56; hackney drivers, n=11; PHV drivers, n=11).

"Licensed vehicles should work in their own areas where they have the knowledge and where they can be compliance checked" (Public, age 45-54, Oldham)

"The biggest issue as I have mentioned is the taxi plate. If you live in Trafford, your plate should be from Trafford and you shouldn't be able to go and operate with the plate in say Wolverhampton or vice versa. As this seems to be very common and I can only imagine it effects the lively hoods of the local cabbies if there are more taxis touting for business within the area they operate" (Public, age 35-44, Trafford)

12.2 Likelihood to agree if the suggested changes were made

There were 177 respondents who disagreed with the minimum licensing standards and wanted to suggest changes. 72% stated they were likely to agree with proposed minimum licensing standards if their suggested changes were made. The likelihood of agreeing with the proposed minimum standards by respondent shown is shown in Table 12:6.

Table 12:6: Likelihood of agreeing with the minimum licensing standards if their suggested changes were made (n)

| | General public | Hackney Drivers | PHV Drivers | PHV Operators | Businesses | Vehicle Leasing Company | Representatives |
|------------------------------------|----------------|-----------------|-------------|---------------|------------|-------------------------|-----------------|
| Extremely likely | 7 | 15 | 17 | 4 | 1 | 0 | 2 |
| Quite likely | 15 | 28 | 30 | 5 | 0 | 1 | 2 |
| Neither likely nor unlikely | 0 | 4 | 12 | 1 | 0 | 0 | 1 |
| Quite unlikely | 1 | 2 | 0 | 0 | 0 | 0 | 0 |
| Extremely unlikely | 0 | 4 | 13 | 0 | 0 | 0 | 0 |
| Don't know | 0 | 3 | 6 | 2 | 0 | 1 | 0 |
| Base | 23 | 56 | 78 | 12 | 1 | 2 | 5 |

Base: all those who disagreed with the proposed standards and suggested changes

Caution should be used where base is small (n<50)

13. Equality Impact Assessment (EQIA)

13.1 The EQIA

A draft Equality Impact Assessment had been produced to identify the potential impacts of the proposed minimum licensing standards on persons with protected characteristics. This was provided on the consultation website and respondents were asked to give any comments they may have. Very few (n=66) respondents provided a comment to this section of the questionnaire.

Table 13:1: Overall theme of comments by type of respondent (n)

| | General public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--------------------------------------|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| General | 13 | 3 | 0 | 3 | 0 | 0 | 2 |
| Queries about the proposals | 15 | 1 | 1 | 0 | 0 | 0 | 2 |
| Impacted Groups Passengers | 5 | 4 | 1 | 0 | 1 | 0 | 3 |
| Impacted Groups Drivers | 5 | 4 | 7 | 1 | 0 | 0 | 4 |
| Base | 35 | 9 | 10 | 4 | 1 | 0 | 7 |
| Proportion of respondent type | 4 | 4 | 3 | 13 | 5 | 0 | 20 |

13.2 General comments

The table below shows the general comments about the EQIA.

Table 13:2: General comments by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Support / agree with the Equality Impact Assessment (general) | 3 | 1 | 0 | 2 | 0 | 0 | 1 |
| Oppose / disagree with the Equality Impact Assessment | 2 | 1 | 0 | 1 | 0 | 0 | 0 |
| Should be no protected characteristics / everyone should be treated equally | 6 | 1 | 0 | 0 | 0 | 0 | 0 |
| Base | 13 | 3 | 0 | 3 | 0 | 0 | 2 |

There was some confusion amongst members of the public (n=15) about the EQIA, with a few saying the information / proposals was not available or they could not access it. A few members of the public felt:

- There should be no protected characteristics / everyone should be treated equally (n= 6) and a further 2 opposed it stating it was unfair

“The safety of passengers and other road users is of more importance than equality” (Public, age 55-64, Oldham)

- Three respondents showed support for the Equality Impact Assessment; and
- Two did not feel the EQIA would make any difference / does not matter

“It should help people with protected characteristics. Making it safer and standardising access and car types” (Public, age 25-34, Manchester)

“Equality impact assessment has failed to realise the gravity of situation. situation is far worse that they are depicting” (Hackney Driver, Manchester)

13.3 Impact on Passengers

A handful of respondents raised concerns the proposals could negatively impact the following:

- Poorest / lowest income households (n=6)
- Older people (n=2)
- Young people (n=1)
- Proposals will have a negative impact on women / females (n=1)
- Proposals will have a negative impact on disabled people and there were concerns not all disabilities / health issues will be considered or the proposal will reduce the transport options for disabled people (n=8)

“Would this raise the costs meaning that some people would chose to walk home instead of taxi after nights out, putting themselves at risk (students, young women etc.) this has already been a problem with deaths by young people falling into the canals and rivers around the city centre.” (Public, age 35-44, Stockport)

“Your proposals would see a huge decrease in the number of WAV licensed vehicles in Greater Manchester which will have a massive negative impact on disable people rely on taxis to get around” (Organisation, Tameside Owners and Drivers Association)

The following two extracts from representative organisations highlight the potential negative impacts on disabled travellers:

“We are disappointed that the consultation document and the Equality Impact Assessment makes no mention of the problems caused by guide dog refusals by the drivers of taxi and private hire vehicles. Guide dog refusals remain a significant issue in the UK. Our colleagues at Guide Dogs report that there has been a significant increase in refusals in the last few years and anecdotally we are seeing an increase in refusals after the first lockdown.

Research published by Guide Dogs in 2019 which provides a breakdown of where refusals take place and the reasons given. Taxis and Private Hire Vehicles (PHVs) remain the business most likely to turn away an assistance dog. Of assistance dog owners who reported at least one refusal in the last year, 73% reported they had been refused by a taxi or PHV driver during the same time period” (Organisation, RNIB)

“Drivers should also be trained and tested on how they communicate and supply evidence of licensing information to passengers, especially visually impaired people and people with learning difficulties.

There are continuing difficulties for disabled people using assistance dogs, including guide dogs. Where a driver has medical reasons for refusing to carry assistance dogs, they should provide the official information in Braille, tactile and standard formats, in at least Arial 14 point, to the passenger.

[disabled peoples organisations] receive regular reports of drivers refusing to stop for wheelchair users and visually impaired people and people with assistance dogs including wheelchair users and other disabled people. Some Hackney cab drivers and private hire vehicles also refuse to carry some disabled people, including those with assistance dogs and refuse to go to private addresses and to community centres where they know there will be disabled people requiring taxis. Training and assessment of drivers should include awareness that these practices are discriminatory and that they could be sanctioned or their license revoked if this happens. Enforcement practices should be improved including the ease of making complaints and of taking up complaints against drivers.

[our] members are very unhappy with the proposed white colour for private hire vehicles. White is not easily visible to people with visual impairments and is not always colour contrasted with its environment, particularly when the weather is poor, including rain and snow. We recommend that another more visually contrasted colour is used such as yellow, used in New York.” (Organisation, Manchester Disabled People's Access Group)

13.4 Impact on Drivers

The table below shows the most frequently given comments about the impact on drivers.

Table 13:3: Detailed comments made for the impact on drivers by type of respondent

| Theme | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing Company | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-------------------------|-----------------|
| Taxi drivers are being negatively impacted (general) | 0 | 2 | 6 | 1 | 0 | 0 | 2 |
| Unfair on older taxi drivers | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Proposals will have a negative impact on / should be more consideration for drivers from ethnic minorities | 4 | 2 | 1 | 0 | 0 | 0 | 4 |
| Proposals are unfair on drivers where English is a second language | 3 | 0 | 0 | 0 | 0 | 0 | 1 |
| Base | 5 | 4 | 7 | 1 | 0 | 0 | 4 |

Concerns were raised the proposals could negatively impact:

- **Drivers from ethnic minorities:** General public (n=4), Hackney (n=2) and representatives (n=4) all raised concerns about the impact on drivers from ethnic minorities.

"The Equality Impact Assessment is of a poor quality. The vast majority of hackney drivers in Greater Manchester are from the BAME community and the proposals suggested in the MLS will have a significant financial impact on that group in particular. I do not believe that TfGM and the GMCA can justify the imposition of these MLS proposals. I certainly do not believe they can be justified during a pandemic and the highly disproportionate impact on drivers from a BAME demographic raises some serious concerns in respect of them" (Unite the Union - Manchester Hackney Carriage)

- **Drivers with English as a second language:** General Public (n=3), Representatives (n=1) had concerns for drivers with English as a second language

"I am in the high risk as I am a male and of ethnic background I contribute to 2 of the 3 high risk assessments. Only the fact of being born in the UK does not affect my English language. So this is a serious concern for myself and about 90% of the drivers" (PHV Driver, Bolton)

- **Older drivers:** During the in-depth interviews, older drivers stated they were too late in their careers to be considering another big investment to upgrade their vehicle or take on daily charges. One respondent, who is currently in his late 60s said the implementation of these proposals will force him into retirement.

"Yes, I've got a rough idea of what they're proposing, what they want to do, yeah. They basically want people to have new vehicles and clean the air up and tidy up the drivers to make them respectable as well as the vehicles. It will make me retire." (Hackney Driver, Trafford)

Some of the older drivers we spoke to also highlighted whilst other drivers in their industry are changing careers and leaving the industry, they had found it harder to transfer their skills.

"I've been doing this job for thirty years now, which is the only job I know and I can't apply for another job, because I've got no qualifications. I'd be getting as a driver or an Uber driver or Uber Eats, you know, working in that kind of industry, where I've got no experience anyway, but all it is, it's just driving and just delivering. So, that's the only qualifications that I have that I can really get into and plus my age now, I'm 54 years old, you know, especially when I've been doing taxis since I was twenty years old, you know, it's going to be hard for me, especially at my age now." (PHV Driver, Rochdale).

Appendix A Methodology

Appendix A details the full methodology for the consultation. The questionnaire was designed by the Local Authorities in consultation with TfGM and AECOM. The following stages were then completed:

- Testing the questionnaire for clarity and understanding;
- Scripting the questionnaire;
- Data analysis; and
- Coding responses;

A.1 Testing the questionnaire

With any research, it is important to test and ensure the methodology and questionnaire are fit for purpose and ultimately provide the outputs that are required to fulfil the research objectives and questions. It was agreed AECOM would complete 12 cognitive interviews and a minimum of 50 pilot interviews of the survey.

Cognitive Testing

As some of the Minimum Licensing Standards information was not yet in the public domain, it was decided after a discussion with TfGM, six cognitive tests would take place internally at AECOM with members of staff outside of the Social and Market Research team who have knowledge and experience of the subject field to ensure the questionnaire is fit for purpose and that the technical language used is appropriate and clear for the respondent answering.

In addition, we also undertook six cognitive interviews with taxi / PHV users that were recruited by our in-house recruitment team. Their interviews were undertaken via MS Teams or Zoom and provided useful feedback to update and amend the questionnaire design.

Pilot Testing

To ensure the survey was tested, the questionnaire was delivered to internal AECOM staff to complete.

The survey link was emailed to AECOM staff based in Greater Manchester on Friday 25th September. Ninety respondents clicked on the link in the email and of those, 67 respondents went on to complete all or part of the survey.

The pilot was used to test the data we obtained from the responses and the length of the questionnaire. The survey took on average 23 minutes to complete of all those that completed the survey with the shortest being 3 minutes and the longest being just over 60 minutes.

For the purpose of the pilot, at the end of the survey we provided an open comment box to receive feedback on the questionnaire. We reviewed these comments against the revised questionnaire to ensure any errors in format were corrected before the final questionnaire was approved for distribution for the live survey.

A.2 Scripting the questionnaire

The questionnaire was scripted using Askia survey software. The script was checked that all text matched the paper questionnaire, routing was accurate, and the survey was user-friendly for anyone completing it.

A.3 Data analysis

Data was imported from Askia into SPSS (Statistical Package for the Social Sciences).

All paper copies received were reviewed, quality checked before the responses were entered in the online questionnaire.

Data was cleaned by allocating additional codes to identify where respondents had been shown a question but chosen not to give a response and where respondents had been routed past a question, e.g. the general public were not asked about the effect of Covid-19 on their business. Additional variables were created using syntax in preparation for analysis, for example, those who were and were not financially impacted by Covid-19.

A.4 Coding responses

For each open-ended question, a process of human coding was completed to develop themes based on the responses provided for each question.

For each question, a code frame was developed to capture the key themes from an initial set of responses and TfGM reviewed each code frame. A team of trained coders worked to code each response in each question and where the potential for new codes emerged, these were added to the code frame in agreement with TfGM. All coding went through two sets of reviewing by AECOM, prior to a final review from TfGM.

A.5 Late responses

Guide Dogs for the Blind Association

The Association was particularly concerned about guide dog owners being refused trips. For the licensed drivers' standards, they welcomed the conditions for assistance dogs, however they wished to see the standards go further and make it illegal for drivers to refuse trips.

To enforce this, they recommended it is made clear that local authorities can suspend or revoke a drivers' licence if they refuse to carry an assistant dog without a medical exemption certificate. They highlighted that the policy does not refer to how access refusals would be policed, making suggestions for 'test purchases and mystery shopping exercises. The Association also supported the proposals for licensed drivers to undertake an enhanced DBS check, register for the DBS update service, and the requirement to take the most direct route. However, they suggested if a driver has been convicted of refusing to carry an assistance dog, they should not be issued a licence by the Local Authority.

They asked for more detail to be provided about the process and requirements for licensed drivers to acquire a medical exemption certificate. They suggested the certificate should be issued by the relevant local authority, authorised by a medical professional and accompanied by medical evidence. Furthermore, there should be an 'embossed or raised 'E' and a braille marker' on the certificate for braille and non-braille readers.

In terms of training for licensed drivers and PHV operators, the Association supported the requirement to undertake disability awareness training but would like there to be more details about what will be included in this training. Some suggestions for the training included: society's attitudes to disability, awareness to customer care, etiquette and communication.

Finally, they supported the proposal for standardised colours of taxi's and PHV's across Greater Manchester, particularly the proposed badges of a black background with yellow text providing a good contrast for the partially sighted. They did however express concerns regarding the use of the colour white for PHV's, as it may make it more difficult to identify a PHV easily.

A.6 Organisations, Elected representatives and Businesses who responded

Organisations

The list of organisations who responded to the consultation are shown below. Two responses were provided but did not confirm they were authorised to provide a response on behalf of that organisation. One other organisation did not confirm they were authorised to respond on behalf of the organisation.

- Bolton College
- Brandlesholme Community Centre
- Greater Manchester Ageing Hub
- The Hackney Drivers Association Ltd
- Licensed Private Hire Car Association (LPHCA)
- Manchester Disabled People's Access Group
- National Private Hire and Taxi Association (NPHTA)*
- North West Regional Pensioners' Association (NPC)
- Private Hire Drivers Association Ltd
- Royal National Institute of Blind People (RNIB)
- Salford City Council
- Tameside Owners & Drivers Association
- Unite the Union (Manchester Hackney Carriage)

*2 responses from different geographical areas

Councillors and Elected Officials

The list of Councillors and Elected Officials who responded to the consultation and the areas they represent are shown below. Five responses were provided without a name or area.

| Name | Area represented |
|--------------------|----------------------------|
| Hilary Fairclough | Astley Bridge Bolton |
| Nick Peel | Bolton |
| Chris Gordon | Bredbury and Woodley, SMBC |
| Charlotte Morris | Elton, Bury |
| Akhtar Zaman | Halliwell Bolton |
| Jim Ellis | Hindley, Wigan |
| Kevin McKeon | Horwich North East |
| Julie Pattison | Kearsley, Bolton |
| Arnie Saunders | Kersal |
| A R Khayal | Oldham |
| Jim McMahon OBE MP | Oldham West & Royton |
| Susan Haworth | Not provided |
| Roy Driver | Stockport |
| Robin Garrido | Worsley, Salford |

Businesses, vehicle leasing companies and private hire operators

A list of businesses and private hire operators who responded to the consultation are shown below.

- Seven businesses did not provide their name and one did not confirm they were authorised to respond on behalf of the business.
- Six private hire operators did not provide their name.
- Three vehicle leasing companies did not provide their business name.

| | |
|--|----------------------------------|
| Abacus Minibuses Ltd | New Star Private Hire |
| ADC Exec Travel | Ola UK Private Limited |
| Adi | Orbit Taxis, Bolton |
| Atlas Minibuses Limited | Parkway Cabs and Cars Ltd |
| Bolton Airport Transfers & Executive Minibuses | Philip Barton MCD BA(Hons) MRTPI |
| Bus1 Airport Chauffeurs | Prestige Chauffeurs Limited |
| Buzz2go Minibuses Ltd | Private Hire |
| Canadian charcoal pit | Rikshaw Ltd |
| Central Newline Cars | Rochdaletowntaxi limited |
| CLK transport solutions ltd | RTS Rentals Limited |
| Conrad Executive Travel & Private Hire | Sapphire Vehicle Rentals Ltd |
| Cremins Travel Ltd | Skem Settle Cars |
| Digital ID | Smart Minibus |
| Direct Accident Hire Ltd | Streamline cars |
| Dts transport | STS cars |
| DVSA | Top Mark's school of motoring |
| Ekko kar Manchester | Uber |
| Emma Dunn Ltd | Z Cars in Oldham |
| Empire chauffeur services svp | |
| Executive travel | |
| H59 transport ltd | |
| Hyde Accessible Transport LTD | |
| I-cabs | |
| J&M Travel | |
| Manchester Airports Group | |
| Medico UK Limited | |

Appendix B Qualitative Research Report

B.1 Introduction

Around 2,000 hackneys and approximately 11,500 private hire vehicles (PHVs) are licensed by the ten Greater Manchester local authorities at the time of writing. Currently, each local authority in Greater Manchester has a different set of standards for licensing drivers, vehicles and operators in their area.

The ten Greater Manchester local authorities, supported by Transport for Greater Manchester (TfGM), have developed proposals for a consistent set of Greater Manchester-wide minimum licensing standards (MLS), referred to as GM MLS herein; the purpose of which is to help deliver improved safety, reduce vehicle emissions and improve vehicle accessibility for customers. The proposals include standards for drivers, vehicles, operators, and the ten Greater Manchester licensing authorities.

The GM MLS consultation took place from 8th October 2020 to 3rd December 2020 and sought views about the proposed standards from members of the public, hackney drivers, private hire vehicle (PHV) drivers, owners and operators and all other stakeholders, such as businesses and organisations.

In order to gain greater understanding of stakeholder views on the proposed changes, a series of focus group and in-depth interviews were undertaken.

The purpose of this report is to present the findings of the focus groups and in-depth interviews. The findings of the consultation can be found in Section 4 of this report.

The report is structured as follows:

- Section B2: Research objective;
- Section B3: Methodology;
- Section B4: Findings; and
- Section B5: Summary.

B.2 Objectives

The GM MLS consultation gave a voice, not only to those who work in the taxi industry, but also to individuals and businesses who are the customers. In addition to the consultation, the qualitative phase of this research gave those in the taxi industry a further opportunity to provide their feedback on the minimum standards, suggestions for adaptation and to identify what impact they will have on them and the industry.

The objectives for the qualitative research were to gather:

- stakeholder opinions on current taxi and PHV standards;
- suggestions and expectations of the standards for:
 - Drivers;
 - Vehicles*;
 - Operators; and
 - Local Authorities, specifically enforcement and delivery of the standards.
- responses to the proposed MLS standards when presented to the group;
- views on the proposed timetable for implementation;
- perceived impacts of the proposals; and
- an insight into the impacts of Covid-19 on the industry.

**As part of the discussion about vehicle standards, we also referred to the Greater Manchester Clean Air Plan (GM CAP) and how the minimum vehicle standards will require taxis and PHVs to meet the emissions requirements of the GM CAP and the evident link between the two consultations.*

The GM CAP includes a proposal for a Clean Air Zone (CAZ), which, from April 2022, will require owners / operators of all ‘non-compliant’ vehicles to pay a daily charge each time they enter the designated zone. For the non-compliant hackney and PHV vehicles, the daily charge is currently proposed to be £7.50. However, there are a series of temporary and permanent exemptions included in the proposal, including a temporary exemption for all Greater Manchester licensed wheelchair accessible hackney carriage and PHVs until 31st December 2022.

In recognition of the potential impact of the charge and to improve the quality of hackney and PHV fleets and thus reduce emissions of harmful emissions, the GM CAP includes a funding package to help support hackney and PHV drivers upgrade to compliant vehicles.

B.3 Methodology

Qualitative research methods have been utilised to gain a greater level of insight into the awareness and attitudes towards licensing standards and the impacts of them. As part of the commission, AECOM organised and facilitated a series of focus groups and depth interviews with the public, hackney and PHV drivers and operators to probe understanding of the current and proposed licensing standards for the local authorities of Greater Manchester and of the region, on behalf of TfGM.

Sample Profile

The research was split into two parts:

- Four focus groups with hackney / PHV users across the ten local authorities of Greater Manchester (these respondents are referred to as “Users” throughout the following report); and
- One-to-one in-depth interviews with hackney / PHV drivers / operators licensed in one of the ten local authorities of Greater Manchester.

Users Profile

Users, who could be impacted by the proposals, were identified and recruited to take part in the groups based on:

- Age;
- Gender;
- Disability;
- Taxi / PHV frequency of use; and
- Income.

The following were represented across the focus groups:

- *Location*: all ten local authorities;
- *Age*: respondents were aged from 18 to 72 years old;
- *Gender*: one group was a female only group. Two-thirds of respondents were female;
- *Disability*: Six respondents had physical impairments, whilst two had cognitive impairments;
- *Taxi / PHV frequency of use*: all use at least once a fortnight or more; and
- *Income*: four respondents were retired, three were students, one was unemployed, and the rest all held some level of employment.

A full breakdown of the groups can be seen at the end of this report.

Drivers and Operators’ Profile

In total, 40 in-depth interviews were conducted with hackney and PHV drivers and operators representing:

- 11 operators (two operators were drivers as well);
- 15 hackney drivers / 14 PHV drivers:
 - Of the hackney drivers, ten owned their vehicles and five leased them
 - Of the PHV drivers, nine own their vehicles and five leased them
- Drivers and operators were included from all ten GM districts; and
- The respondents were aged between 30 and 68 years old.

Recruitment

All participants were screened to ensure they met the eligibility criteria for the focus group or depth interview they were being recruited for. Anyone who worked in public transport, for TfGM or Local Authorities, was excluded from participating in the research, as was anyone who was potentially part of a union. Participants were told the purpose of the research was to understand their awareness and views of the GM MLS consultation proposals.

The groups were structured to last up to one hour and 30 minutes to allow comprehensive coverage of the topics. Five participants were recruited for each group and all groups comprised of three to five participants. Due to Covid-19, the focus groups were completed virtually using Microsoft Teams or Zoom. All participants were compensated for their time to attend the group.

The in-depth interviews lasted up to 60 minutes. Due to the sensitive nature of the discussion at hand and the potential impact on the industry of the GM MLS proposals and the GM CAP proposals, it was felt depth interviews were more appropriate for drivers and operators than a focus group.

Discussion Guide

The basis of the discussion was a topic guide. This acted as an aide-memoire to the moderator to ensure all topics were covered during the focus groups.

- Awareness and understanding of current standards for hackney / PHV;
- Awareness of new proposals;
- Driver Standards;
- Vehicle Standards;
- GM CAP;
- Electric Vehicles;
- Clean Taxi Fund;
- Operator Standards;
- Local Authorities Standards;
- Impact of the proposals; and
- Impact of Covid-19 on the respondent, their trade, the industry and their ability to respond to these proposals.

Moderation

The focus groups and in-depth interviews were moderated by trained and experienced moderators using Microsoft Teams or Zoom for all groups and for the in-depth interviews, where possible. Some of the in-depth interviews were conducted via telephone due to the respondents' circumstances. The moderator stimulated the discussion using their knowledge of the study topic, with the assistance of a discussion guide and a list of frequently asked questions (FAQs) and slides with key information on, taking into consideration the research objectives. Throughout the discussion, the moderator introduced different topic areas (based on the discussion guide), information on the range of proposed standards, and information on these standards to encourage discussion and debate.

B.4 Findings

The following section will outline the each of the standards as identified in the consultation document and the findings from the qualitative research for those findings.

Current Standards

Not many participants in the user focus groups knew about the current standards, other than their own view of what is good or poor when travelling by taxi / PHV. Some of the users acknowledged they were aware of differences between hackneys and PHVs (such hackneys can be flagged down but PHV must be pre-booked) but none of them knew there are currently differences in standards between districts.

"Not in the districts. I knew there was for PHV and cabs, but no, not in the different districts. You mean the different licensing area. I'm not aware of any difference." (User, Group 1)

One user had investigated becoming a driver when they took early retirement, and it was only then they learnt there are differences in licencing requirements by local authority.

"I looked into being a taxi driver for when I was retiring and the different councils that are in [Greater] Manchester are vastly different on all sorts of things, even down to the tests you take, the local knowledge you take and everything, so you get to find out which one's the easiest to get your licence." (User, Group 1)

Many users stated the current standards don't affect their decisions on which operators to use but base their choices on previous experience.

"I'd say that there's a lot around, because like most streets with shops on do have taxi companies, there's a lot of choice. Obviously, I'm more inclined to go with ones that I've used before rather than newer ones or one-off kind of ones." (User, Group 15)

All operators and drivers were aware they needed to meet the appropriate standards for the local authority they are licensed in and some were aware they differed by district.

"The current ones are just the norm, have adhered to them for so long. They are strict but good and keep people in line." (Licensed hackney driver – own my vehicle - Salford)

"It's one of the most strict than anywhere else. Our cars can't be older than ten year old, but yeah, they can come and work, well, they do come and work in our borough and their cars can be twenty, twenty five year old. Some councils like Rochdale, just have one MOT a year, we have an MOT and we have an interim as well. They're very strict on us." (Licensed private hire driver – own my vehicle, Bury)

Many of the drivers and operators stated some of the current standards they meet are only adhered to when they first become a licensed driver, whereas some standards (e.g. vehicle testing) are more regular and repetitive during their term as a licensed driver.

"Yeah some of these standards are ongoing. Others we only do in the beginning. You could argue some should be repeated more than they are." (Licensed PHV driver, own my vehicle – Tameside)

"I don't know how some of these drivers have passed their driving tests in the first place. Sometimes I think we should be tested periodically on our driving." (Licensed PHV driver – own my vehicle - Salford)

Awareness of Proposed Minimum Licensing Standards

Only a few of the users were aware of the MLS proposals, but did not know what the proposal entailed.

"I'm not sure what is in there, but it should all be under one flag, you can't have a variance, that's ridiculous. (User, Group 1)

"I assumed they'd be the same, because you're going to be driving from like, you could be driving from one city to another with different rules, so I just assume they'd all have the same rules." (User, Group 15)

"Yeah, I do, I mean from my point of view I think it's all great stuff, I think setting standards, I think it's all positive and it should all be done and I agree with it. (User, Group 16)

Of the 40 hackney / PHV drivers and operators that took part, 32 were aware of the proposals, though in some cases, they were more aware of the CAP proposals (specifically the impact of the CAZ), rather than the introduction of the MLS.

"Yes, I've read through it, yeah, I've read through all sixty-six pages of that [MLS Consultation Document] and thirty-three pages of the other one, the Clean Air Act [Plan], yeah. Obviously, it's a bit over my head, but yes, I've got the general gist of it." (Licensed hackney driver – own my vehicle, Trafford)

A few respondents had some knowledge of the proposal and had formed an opinion on this limited knowledge quite early in the discussion.

"Yes, I've got a rough idea of what they're proposing, what they want to do, yeah. They basically want people to have new vehicles and clean the air up and tidy up the drivers to make them respectable as well as the vehicles." (Licensed hackney driver – own my vehicle, Trafford)

"Yeah. The standards are completely all over the place with all the councils. They were going to try it a few years ago where we all had a certain colour for private hire with these certain stickers on and I thought, yeah, that's good, Manchester tried it and the rest will follow. So I'm not surprised to know this is happening. "(Licensed hackney driver – own my vehicle, Salford)

Eight of the drivers who were interviewed were not aware of the proposals, and it was only through the course of the interview they comprehended how they would impact them and their future in the industry.

Driver Standards

The driver standards have been developed because earlier studies showed there was a lack of confidence in the level driver standards from members of the public. These standards are aimed at improving public confidence in both the hackney and PHV trades across Greater Manchester.

The proposed MLS covering Drivers include:

- Enhanced criminal record checks;
- Driver medical examinations;
- Knowledge tests;
- English language tests;
- Driving proficiency tests;
- Driver training;
- Dress code;
- Drug and alcohol testing; and
- PHV driver conditions.

Enhanced Criminal Record Checks

Proposed Standard: *It is proposed that all drivers will be required to undertake an enhanced disclosure check through the Disclosure & Barring Service (DBS). The check will include barred lists, such as details of unprotected spent convictions and police cautions. Drivers must also register to the DBS update service and maintain that registration to enable the licensing authority to routinely check for new information every six months.*

All respondents had assumed this standard was already in place, and if it wasn't a standard for all already, considered it should be.

"I would have expected it anyway, but obviously that's not a minimum, then, but yeah, that's definitely a very important proposal, I think." (User, Group 1)

"Is that not already standard though? As a girl who travels round on her own quite a lot, it is quite scary to think this might not already be mandatory for all drivers." (User, Group 2)

"I would choose the enhanced criminal record checks {as the most important to me}. I choose this because for me, like I wouldn't feel comfortable being in a car with someone that has like a bad criminal record." (User, Group 15)

"We already do that as standard. Don't know if other districts do, but we already do it and so we should." (Licensed hackney driver – own my vehicle, Manchester)

All drivers felt this is a positive standard and gives users confidence and trust in drivers, especially if it is explicit to all users this is a mandatory standard. All the drivers and operators involved said they already undertook these checks and therefore felt the standard was there to reassure users these checks take place.

"When the customer comes in to use our taxis, they should be able to be confident that all checks such as the DBS check, is undertaken as standard and be reassured that those checks are being completed." (Licensed Operator, Salford)

Driver Medical Examinations

Proposed Standard: *It is proposed that medical examinations are used to check drivers are medically fit to drive (the same examinations as applied by the Driver and Vehicle Standards Agency (DVSA) to the licensing of lorry and bus drivers).*

Few comments were made on the driver medical examinations. Of those made, similarly to the DBS checks, all respondents felt this should be a mandatory standard if it is not already. Users stated they want to feel safe when using taxis and so it is very important drivers are deemed fit to drive.

"Is that not just standard? I would expect it to be." (User, Group 16)

A couple of users did acknowledge health changes can occur at any time and something could happen unexpectedly, so it is impossible to prevent every scenario. Users felt operators, drivers and local authorities should be constantly monitoring the mandatory checks such as medical examinations, to ensure the likelihood of any driver or passenger being put at risk during is minimised.

"Yeah and while they're driving your life is in their hands, so if they're not medically fit to drive, like for example if they have epilepsy or heart conditions, it could cause a heart attack or something, you don't want to be in the car." (User, Group 15)

"It is impossible to stop everything, but as long as all the checks are happening, then it makes me feel more comfortable." (User, Group 1)

All drivers felt this is a positive standard and encourages trust and confidence in drivers from users, especially if it is explicit to all users this is a mandatory standard. All the drivers and operators involved said this happened already, as standard, so it doesn't change anything for them.

"Yeah. I've just had my own done, I've done that. It is standard practice." (Licensed hackney driver – own my vehicle, Salford)

One driver stated that as drivers can become licensed outside of Greater Manchester, but still work within the region, different standards in different areas could potentially put passengers at risk.

"I know one driver, ex [Greater Manchester authority] with a heart problem, lost his badge, because of his medical problem, but he's now got a Wolverhampton badge and he's now in a Wolverhampton plated private hire car for a local private hire company, but still works in the area. It's all wrong, there are no checks on them, but they are putting people at risk in the same way." (Licensed hackney driver – own my vehicle, Anonymised)

A couple of drivers pointed out most users do not realise drivers licensed outside of Greater Manchester may not necessarily be working to the same standards and assume any vehicle they get in is the same as those licensed in Greater Manchester.

"People just get in them, they don't care where they are licensed. I bet most think they are licensed locally." (Licensed private hire driver – own my vehicle, Salford)

Knowledge Tests

Proposed Standard: *It is proposed that applicants undertake a knowledge test. The test may include local area knowledge, local conditions, licensing law, road safety / highway code / cycle awareness, numeracy, reading and writing and safeguarding.*

This standard received a mixed reaction from all respondents as to whether the standard was necessary. Across all the groups, there were several respondents who regarded it positively and felt it should be part of the licensing process.

"You know the knowledge test. I don't think that necessarily happens in all areas, so that was something that I feel would be welcome." (User, Group 16)

One user gave an example of how a taxi driver stopped him as he didn't know where to drop his passenger off. The respondent reported getting in the taxi with them to show them where to go as it was clear the taxi driver was struggling to understand the directions. Users were surprised drivers did not know where they were going and felt they should. This knowledge gives the user confidence they are going to get to the correct destination on time and safely.

"Driver pulls up at the side of the road to ask me where a certain place was. It wasn't far away but because of the diversions in place due to roadworks, his sat nav was useless as it wasn't picking it up or giving him an alternative route. So, I ended up getting in with him and showing him the way as he was struggling, didn't know the area and his passenger was getting quite irate. I shouldn't need to do that though. (User, Group 16).

Conversely, some users referenced the prominence of 'Sat Navs', and did not feel the knowledge test was necessary. Some users highlighted most people use them and, therefore, it is no surprise hackney / PHV drivers now rely on them.

"You used to have to be able to find, before you got your taxi licence, you used to give a check and say how would you get to this part of a city and that was without a sat nav and you used to have to pass that test without a sat nav and now, you can do it just by using your sat nav and this is why there's so many certain people that can just get a taxi licence by using a sat nav and it didn't used to be the case years ago, you used to

have to have local knowledge to be able to get to somewhere without a sat nav and I prefer that personally.” (User, Group 1)

Most of the drivers felt the knowledge test was important and stated using ‘Sat Nav’ and / or asking for directions was a disservice to the customer.

Some drivers highlighted, relying on apps such as Google Maps, can result in the users being charged more than they should have been; there is sometimes a conflict between the shortest and fastest route.

“I once had one driver pull up and ask me where Old Trafford was, when working in Trafford. I get you might not know little places, hard to reach, but Old Trafford stands out and is well signposted and this driver was clueless. Had no idea. That’s not good enough in my eyes.” (Licensed hackney driver – own my vehicle, Trafford)

“Now, part of the stipulation for your badge, hackney badge employees, you take the shortest direct route. Unless instructed by the customer. They’ve got Google Maps, everything they do is app based, Uber is app-based and its app-based on Google Maps. Google Maps is not the shortest, it’s the fastest. If there’s a motorway anywhere near where you’re going or you’re coming from, he’ll jump on it and the customer has to pay, because it’s all done on distance. That is going against the bylaws of the town. The bylaws state that if you’re an operating service, it’s got to be shortest, most direct route.” (Licensed hackney driver – own my vehicle, Stockport)

Drivers again raised the issue of out of area drivers not being held to the same standards and not having to take the knowledge test. Drivers did not think this was fair to the those who are taking the test, or to the customers who don’t realise out of town drivers don’t adhere to the same standards.

English Language Tests

Proposed Standard: *It is proposed that new drivers undertake an assessment to ensure they can communicate in spoken English and in writing to a standard that is required to fulfil their duties, including in emergency and challenging situations.*

Some of the users supported the standard and felt, on occasion, they had found it difficult to communicate with a driver.

“Yeah, I think a basic knowledge of English is important and especially, as you get older and maybe your hearing’s not quite up to standard, I do think that a reasonable standard of spoken English is necessary. For me, that’s more important than knowing the area.” (User, Group 1)

“I think it’s really helpful actually that they’ve got the second bit as well, including emergency and challenging situations, because if you’re driving somebody to and from hospital,” (User, Group 1)

The introduction of face masks due to Covid-19 was felt to further hamper communication between driver and passenger. This was raised with reference to customers who may be hard of hearing or struggle without the body language element of communication.

“Actually now, when you’ve got masks on, the driver may wear a mask, you may wear a mask, and if you’ve got any problems with hearing, then you know, you don’t need an added thing thrown in that makes it difficult to understand the language as well.” (User, Group 1)

Some respondents felt it was unfair Greater Manchester drivers were held to these standards when drivers from other areas aren’t. A couple of drivers reported they had received complaints from their passengers about the area knowledge and language skills of drivers working in Greater Manchester but licensed elsewhere.

Driving Proficiency Tests

Proposed Standard: *It is proposed that all new drivers will be required to pass an on-road assessment with a Greater Manchester approved supplier.*

The users agreed with this standard and felt it should be mandatory for every driver; giving confidence their driver is safe behind the wheel.

"I agree with the driving proficiency test, because like the other person said, I've been in taxis before where they've tried racing other taxis, while I'm in the taxi." (User, Group 15)

Some drivers felt driving proficiency is not monitored enough as they had experienced poor driver behaviour, in particular using mobile phones while driving.

"I use taxis and so does my wife. The amount of times she's had a black cab and the driver's been on his mobile phone to his ear, while he's been driving" (Licensed hackney driver – own my vehicle, Tameside)

Driver Training

Proposed Standard: *It is proposed that licensing authorities will require all drivers to undertake training in safeguarding and awareness of child sexual exploitation, human trafficking, disability and dementia.*

All users thought this standard was a good idea and should be mandatory and updated over time. A couple of users were concerned that when referring to disability, the training includes all types of disability and not just physical disability. Given their previous experience (as users with disabilities) they felt some drivers don't know how to deal with respondents with "unseen" disabilities.

"I was just going to [say] that disability covers so many different impairments and people can have multiple impairments, some of which are not obvious, as well as mental health and all these may be challenging for the driver. The driver's mental health should also be identified in there. It is also important to do training around speech impediments as a lot of drivers could identify somebody as drunk so yes, I think driver training is very important." (User, Group 1)

Many of the drivers interviewed mentioned they had already undertaken training like this and felt it was useful, but they also highlighted how they felt some may do it but then forget about it afterwards.

"We've done all this in the past, we had to go and do an NVQ in this five years ago and we were told that you need this, reapply for your licence, but nothing's ever come of it, it's just a useful certificate they gave us." (Licensed hackney driver – own my vehicle, Salford)

It was apparent with one or two respondents; however, this was not the case and training has not been provided or insisted on.

"We've never heard of it, so none of my drivers have had child safeguarding training. I've never had it. Yet in the new minimum standards proposals I'm supposed to be doing a DBS every single year, because I'm an operator." (Licensed Operator, Trafford)

"I think they do like a day's training when you apply for a new badge, but they didn't apply it to existing badge holders, so I think now if you were applying you have to do like a half a day course of some kind. But when they brought it in, they didn't apply it to existing badge holders who have never done it. (Licensed PHV driver – own my vehicle, Rochdale)

Dress Code

Proposed Standard: *It is proposed a dress code is introduced to promote a positive image of the licensed hackney carriage and private hire trade in Greater Manchester. All clothing worn must be in good condition and the driver must keep good standards of personal hygiene.*

This was one of the standards users were unconcerned about as it impacts on them the least.

"I couldn't care less what my driver wears, if I'm honest. as long as it's not kind of, they look like they've just rolled out of bed, kind of thing." (User, Group 15)

A couple of users did highlight they would support a level of dress code within reason, but felt other aspects such as hygiene were more important.

"Well, I support the dress code. I think it's broad enough, so if somebody's wearing jeans it's not a big issue, but if their personal hygiene is not good, then it would be an issue, so yeah." (User, Group 1)

There was a consensus, amongst drivers, the dress code should not mean a uniform even though some of the drivers, working for an operator, stated they have an element of a uniform already in the form of branded polo shirt. Most respondents felt a full uniform was too far, but an outline of what was acceptable would be agreeable.

"It's illegal to drive a private hire vehicle wearing shorts, which are not below the knee, so they've got to be knee length shorts. I know the licensing laws, it's illegal to drive a taxi in flipflops. Yeah, half these drivers wouldn't know, I've told drivers that in the past, being a manager, I've pulled people in saying you can't wear that. You're not meant to wear a football shirt when you're driving a private hire vehicle either." (PHV operator, Trafford)

Drivers highlighted if a uniform was introduced, it needs to be comfortable, as drivers are in their vehicles for many hours during the day.

"It is our office for the day, so I need to be comfortable whilst I'm working. That's all I'm meaning. We could be in there for 12+ hours across the day." (Licensed PHV driver - own my vehicle, Wigan)

Drug and Alcohol Testing

Proposed Standard: *Driving under the influence of drugs and / or alcohol poses a risk to the public and other road users. The proposal is to develop a policy on the testing of drivers based on complaints or intelligence received.*

A handful of users were surprised by this proposed standard as they felt this should already be in place for the safety and reassurance of drivers themselves, as well as the safety of other road users, customers, and pedestrians.

"I'm quite shocked that the drug and alcohol one isn't in place; because that makes you kind of question whether or not, well should I be questioning now (the driver's behaviour) when I get in the taxi." (User, Group 2)

Users felt a consistent policy and process would be advantageous to drivers, operators, users and licensing authorities to enable everyone to know what process are being followed and adhered to by all parties involved.

"It seems sensible to have a consistent policy in place for all involved, know what the process is for complaining etc." (User, Group 2)

Some users felt it might be to quite to enforce these new policies, especially when it comes to drugs rather than alcohol.

"I think it's more problematic around drug testing, because, you know, it's difficult enough to know whether somebody's been taking certain kinds of drugs and you know, I mean there's so many different effects of different kinds of drugs that can produce inappropriate behaviour or dangerous behaviour, but I think the police have difficulty in themselves, you know, if you're on amphetamines, you know, that could have a bad effect, not just cannabis. It's not just cannabis these days, is it, it's other things." (User, Group 1)

Most drivers and operators felt this was a positive step and would encourage more stringent monitoring once the policy is in place and a fair and clear process is introduced. Some drivers supported the proposal and hoped it would help improve health and safety standards. For example, preventing drivers inadvertently being over the alcohol limit the morning after they had been drinking.

"I'm all in favour of that, I mean I'm not a drunkard, but I like a drink as much as anybody. I don't touch spirits, I like the odd beer and I very definitely like one or four glasses of wine when it's available, but I always make it a policy if I'm driving the next day I don't drink alcohol, simple as that." (Licensed hackney driver – own my vehicle, Manchester)

Again, respondents were concerned about how the standard would be applied (or not) to drivers from outside Greater Manchester.

"If they brought back spot checks and just did, you know, I'd imagine drug and alcohol might be police rather than council, but if they just did a pull over at the side of the road, breathalysed you and did whatever you have to do for a drugs test, I think it'd be quite, you know, if they do it random or like you said, if the customer reports a driver thinking they smell alcohol and followed it up. Yeah, but I think the only problem is, a lady was once saying to me she wanted to make a complaint and I said, it was an out of area town, you know, I'll use the example of Wolverhampton again, this lady, you know, they're working in Trafford, so she contacted Trafford Council only to find that it was Wolverhampton she had to contact." (Licensed PHV driver – lease my vehicle, Trafford)

Private Hire Vehicle Driver Conditions

Proposed Standard: *The private hire driver conditions are set out in detail in the Consultation document and include matters such as driver conduct, fares, convictions, assistance dogs and lost property.*

Very few PHV drivers had much to say on the PHV driver conditions other than they already knew they have their own conditions and must abide by those rules. One operator felt there needed to be competitive tariffs for PHV companies and drivers from within and outside Greater Manchester, otherwise it is leaving Greater Manchester-licensed PHV drivers at a competitive disadvantage.

"There needs to be a minimum tariff for every company. That includes private hire, hackney cannot charge below what the Government say. Greater Manchester they're going to come into a ten-borough group, they've got the opportunity to turn around and say no private hire company can charge less than this amount." (Licensed operator, Tameside)

Summary of Driver Standards

Overall, some drivers felt more policing and monitoring of driving standards need to take place to ensure safe driving.

"It's a very good idea, because it's the public that we're working with, it's the safety and the drivers, if they haven't got the safety and they don't abide by the rules or by the law, then they're in the wrong industry. Everything that you've just told me about all the standards and all the checking and everything, I think it's good, I think it's brilliant.

It's a good idea, they should do that. There's a lot of drivers out there that don't give a damn and like shortcut really and shortcuts, it's not feasible, it just gives us a bad name." (Licensed PHV driver – own my vehicle, Rochdale)

Vehicle Standards

The proposed MLS covering vehicles include:

- Vehicle emissions;
- Vehicle age;
- Vehicle colour;
- Accessible hackney carriages;
- Side and / or rear loading without the need for swivel seats;
- Vehicle livery;
- Vehicle testing;
- CCTV;
- Executive hire;
- Vehicle design; and
- Vehicle conditions.

Vehicle Emissions

Proposed Standard: *It is proposed that all licensed vehicles must comply with the current Euro standard (Petrol: Euro IV 2005 onwards, Diesel: Euro V1 2015 onwards) when they are first licensed, with an ambition for a zero-emission capable fleet by 2028.*

As previously stated, this standard is linked to the GM CAP where it is proposed all 'non-compliant' vehicles from April 2022 will have to pay a daily charge each time they enter the CAZ. For the non-compliant hackney and PHVs, the daily charge is currently proposed as £7.50, however there is a temporary exemption for all wheelchair accessible hackney carriage / PHV vehicles until 31st December 2022.

The GM CAP proposals include a funding package to help support non-compliant hackney and PHV drivers upgrade to compliant vehicles including:

- Clean Taxi Fund;
- Vehicle Finance Offer; and
- 'Try Before You Buy' Electric Hackney Vehicle Scheme.

Users felt there was a need to improve air quality and reduce air pollution in the region, but also felt it was not just the vehicles that were contributing to the pollution levels.

"It's just, I just in terms of the environment like it's not just cars, like so many things are giving out emissions at the moment and like global warming, like I just think it's really important that every small thing you can do, little changes you can make a big difference." (User, Group 15)

Drivers and operators recognised the concern for air quality, however, the majority felt they were being targeted when other vehicles and industries contribute to creating poor levels of air quality, such as HGVs, aviation, factories etc. This highlighted there was a lack of awareness amongst some drivers that non-compliant HGV's would also be impacted by the CAP.

"So they're doing more harm than good, it's going to kill the industry and it's going to play everybody into Uber's hands. So, Uber, they're doing this, that and the other, Uber don't have to provide wheelchair transport, we have to be wheelchair compliant. If all the taxis go, where are the wheelchairs going to go?" (Licensed hackney driver – own my vehicle, Stockport)

"It's just an absolute farce and why we've been singled out, we don't do pollute as much as some of these heavy wagons and that, why aren't they doing the wagons first? Why have we got to be singled out? That's my rant done." (Licensed hackney driver – own my vehicle, Stockport)

However, users also stated this standard could be costly and a challenge for drivers and operators, especially in the current climate.

"I'm very much in agreement and so long as there's enough time for people who, you know, that is their livelihood and that supports the family, you know, enough time for them to be able to do this." (User, Group 1)

If drivers or operators choose not to upgrade and are therefore charged for entering the zone, some users raised concerns about whether customers would be impacted by fare increases, suspecting some drivers may raise their fares to cover the charges.

"Will all drivers be able to afford this though or will we ultimately pay the price because the cost will be pushed on to our fares? If so, I'd probably look to see It was cheaper to bring my car into the city with me instead. Currently that is at my parents as I don't need it in the city, but if taxis were too expensive then maybe that would change." (User, Group 2)

Almost all the drivers and operators were aware of the CAP and the CAZ; only a few were unaware this is to be implemented soon.

Drivers and operators were concerned about this standard as they may not be able to afford to upgrade their vehicles.

"I'm horrified, I'm horrified. This is going to bankrupt everybody, they're going on about clean air, there's no electric cab available, there's only one that you can buy, and it isn't a pure electric cab, it's got a range of forty miles, but it has a petrol engine to charge it up. So, how can that be environmentally friendly?" (Licensed Operator, Stockport)

"We feel that the politicians who are pushing the Clean Air Act [Plan], again we say with good cause, we understand that, you know, the health of people is of primary concern, but we've got to be able to have a business that works at the end of it, if you know what I mean and if it works better by making it a five year timescale, rather than a three year one, in our view that's what we would be promoting, yeah." (Licensed Operator, Salford)

Some drivers stated initial information from licensing authorities and governing bodies indicated Euro 5 was going to be acceptable as a lower emission vehicle.

"That's one of their standards, they've raised it to thirteen years now, but at the time, my vehicle was too old, so I asked specifically what vehicle I needed to get, they told me a Euro 5, I've gone out and got it and now they've moved the goalpost, Euro 6 or you pay this emissions charge." (Licensed hackney driver – own my vehicle, Manchester)

"And what I failed to mention previous was all of these Euro 5s that we've all gone out and bought, because we were told that we had to put Euro 5 on, they've all got, they're all fitted with catalytic converters." (Licensed private hire driver – own my vehicle, Manchester)

So I've gone out and bought a Euro 5 emissions taxi for £20,000 and that's on top of the £40,000 I paid for my plate, so there's £60,000 I've put into this cab and two and a half years later they're telling me, yeah, they put a Euro 6 on, you're paying £37.50 a week, it's crippling. It's going to cripple the trade, it's wrong. (Licensed hackney driver – own my vehicle, Salford)

One respondent reported how they had purchased a Euro 5 vehicle, but now felt stuck with it because the re-sale value of it has already greatly reduced due to the proposed CAP. In turn, this means they have a larger finance gap to resolve if they were to upgrade their vehicle.

"Right, because they've now set the standards of Euro 6, Euro 5 vehicles are not wanted, they're not worth the trade-in. I've enquired about this. The best they would offer me is three grand." (Licensed hackney driver – own my vehicle, Stockport)

"I bought a very, very clean '11 plate cab in February (right before Covid-19) and I paid £5,000 for it. I won't get £1,000 for that now, purely because of this." (Licensed operator, Stockport)

Some drivers questioned whether the goalposts will be moved in the future too. Whilst currently Euro 6 is the standard, there is a concern that as technology and vehicles improve further, the standard may change again.

"It is Euro 6 now but what about in the future? Once technology improves." (Licensed hackney driver – own my vehicle, Trafford)

Drivers and operators felt the proposed deadline was unachievable for many and advocated a more organic transition period to allow drivers to upgrade within the timescales they had originally invested in.

"They should have, it should be done by natural progression. My Euro 5 isn't kicking out that much emissions, it's quite a low thing anyway, do you know what I mean?" (Licensed hackney driver – own my vehicle, Stockport)

During the interviews, drivers and operators spoke of the purchasing a vehicle as an investment; discussing how they budget for their investment based on the expected lifespan of a vehicle. They felt the proposals do not take the amount of investment made into consideration and, therefore, drivers that have already bought vehicles cannot afford to replace them within the proposed timescale.

"They come in at £60,000 odd and I'm thinking if I change it in the next two years and then they decide they've got to go all electric, that vehicle would be worthless, you know, after paying £60K for it. They've still got a lot of money invested in that vehicle, because you know they've not had it that long and if they were expected to change it to an electric one, they've got even less money back out of the previous investment in the vehicle." (Licensed hackney driver – own my vehicle, Salford)

Many of the older drivers felt it was too late in their lifetime to be making a significant investment and so they would not be able to upgrade their vehicles and would either sell their vehicle and lease a vehicle or retire from the industry.

"There's no mention of age in the consultation, people like me who are sixty, sixty-five, whatever they are, they're not going to take on a vehicle at the end of their working life. What are they going to do, stop working because they can't afford another vehicle, they haven't taken any of that into account." (Licensed hackney driver – own my vehicle, Trafford)

Clean Taxi Fund

When discussing the Clean Taxi Fund with operators and drivers, they stated the support was needed to help them upgrade, but they did not feel the proposals were enough to help them upgrade because of the following reasons:

- Existing finance;
- Ability to recover investment;
- Too large a gap between cost of new vehicle and funded amount; and
- Do not want / unable to take finance.

Drivers who already had a compliant vehicle or did not think they would have an issue with upgrading their vehicle, stated it would not be easy for other drivers.

"It was just, you know, if it equates to something, then 5,000, 10,000 towards per vehicle, it may make sense then." (Licensed private hire driver – own my vehicle, Salford)

"I think this is going to be very very difficult for a lot of the drivers out there and especially at a time like this now, because it's funding. I mean I've got a new vehicle and I try every three years for a new vehicle, but there'll be a lot of drivers out there who won't be able to do that and it's going to bring a lot of hardship." (Licensed hackney driver – own my vehicle, Salford)

Several drivers stated a large proportion of current drivers would be unable to find the funds to cover the difference between the funding provided and the price of a compliant vehicle. This was compounded by the financial difficulty many are currently in due to external circumstances.

"Well, yeah, but if they turn round and say I've got to pay 50 grand for a cab and they only give me 5, I've still got to find 45 grand and it just doesn't stack up for anybody and the finance companies are going to stop, as I say, they've already stopped these super cheap deals, the low deposit deals and all that and they're going to turn round and look at, scrutinise your books before they do anything." (Licensed Operator, Stockport)

"The funding is a great idea, but our situation right now is just awful. The industry is struggling and even if the funding sounds like a good idea, I doubt many people would take the risk. We are barely taking home 30% of our normal earnings and still having to find money for insurance, maintenance, licensing etc. Covid-19 means a lot of drivers won't take the risk." (Taxi, Hackney driver – own my vehicle, Salford)

"Yes, but as I say, it's not going to be a large amount, it's only going to be like 10% of your purchase price, something like that, which isn't a lot." (Licensed hackney driver – own my vehicle, Stockport)

Some drivers stated it was untenable regardless of the finer detail due to the existing finance they have, the investment they have made in the vehicle already, or the fact the industry and their income is currently struggling. Therefore, for these drivers, it is seen as too much of a risk, certainly in the short-term.

- *"If somebody offered me 10 grand to go and buy a new vehicle, I wouldn't accept it, because you're still looking at £30,000 finance, do you know what I mean, £30-40,000 finance." (Licensed hackney driver – own my vehicle, Stockport).*

In addition, some drivers have personal circumstances they are struggling with.

"Now, if you want to put that in perspective, I own 19,000 on my mortgage, that 19,000 will have me working, I am working now by twenty hours, so where's the decision, where do you make the decision on that? Do you saddle yourself up with 50,000? The Government, even if they offer, I think they're thinking at the moment

“it’s 10 grand, they’re looking at offering 10 grand, you’re still looking at £46,000, do you know what I mean?” (Licensed hackney driver – own my vehicle)

Some drivers said they would investigate the final proposals in order to understand the finer detail and whether they would see it as a viable option.

Vehicle Finance Offer

Many of the drivers were adamant any investment now is a risk and taking out any large finance support is a risk, as they could not guarantee being able to pay it back in the future.

“The world is so up in the air right now. Any investment is a risk at the moment and when you have a mortgage to pay and a family to support and you can’t even guarantee going out and earning enough just to cover your weekly costs (petrol, insurance, fees, any servicing or maintenance) then how can they expect people to upgrade vehicles and take on part of the expense with personal savings or loans. I won’t do that; I will leave the industry before taking something on like that at this time. The industry is struggling.” (Licensed PHV driver – own my vehicle, Bury)

Some drivers also believe current circumstances mean finance companies are more reluctant to offer finance or offer them at higher rates or interest which means it will be harder for them to pay back the money.

“This time last year you could buy a brand new cab for like £1,000 down and then like £550 a month over five years. Because they’ve got their fingers burnt, the finance companies, when Covid first started, there’s that many been handed back in, all them taxi deals have gone.” (Licensed hackney driver – own my vehicle, Stockport)

So even if they gave you £17,500 towards one of those vehicles you’re saddling somebody with a debt of almost £30,000. No one has the money to make up the difference these days.” (Licensed hackney driver – own my vehicle, Trafford)

Electric Vehicles and the “Try Before You Buy” Scheme

Proposed Initiative: To tackle the barriers to switching to electric vehicles, Greater Manchester is proposing a “Try Before You Buy” initiative for Greater Manchester licensed hackney carriage drivers. The opportunity to hire and assess the vehicle before making an investment should help to address identified uncertainties about operating costs, range anxiety and availability of charging infrastructure.

Hackney and PHV users thought drivers and / or operators were to try the scheme and see if it will work for them.

“I can see that scheme working with some drivers and companies. Gives them an opportunity to try it out.” (Taxi / PHV Users, G16, Inside GM)

“Isn’t electric the way we are going anyway? The drivers must be thinking longer term about a move to electric, is the infrastructure there though?” (Taxi / PHV Users, G1, Inside GM)

Some drivers felt the timing for this was poor, given the widespread impacts of Covid-19.

“I can’t see many drivers opting into that. No sense. We have enough going on without taking a scheme like that on.” (Licensed hackney driver – own my vehicle, Stockport).

The interviews with drivers and operators provided more detail of the industry’s concerns with electric vehicles in general, and the idea of this scheme; they felt there was a lack of electric charging points and infrastructure; a lack of technological advancements in battery life, parts maintenance and overall servicing and trust in the lifespan of the vehicle.

"A brand-new electric cab, the bottom end is £55,000. So even if they gave you £17,500 towards one of those vehicles, you're saddling somebody with a debt of almost £30,000." (Licensed hackney driver – own my vehicle, Salford)

"70,000 miles he said he'd done, and his batteries are goosed, and he didn't realise how much the batteries were. It's all right for 180 miles, then you get 160 miles and as the batteries start to die and get weaker and weaker you start getting electrical problems, you're getting forty miles, fifty miles, you've got to replace them for new ones then. So that's the problem with having electric vehicles on, good for the environment, but rubbish for the job, unless Tesla with their million-mile battery come along with a decent priced vehicle." (Licence operator, Tameside)

As well as drivers and operators feeling Greater Manchester does not currently have enough infrastructure for electric vehicles, several drivers and operators in the in-depth interviews questioned how a shared vehicle (i.e. between two drivers on a 24-hour basis) is charged.

"I mean I'd more than look at hybrids to start off. I wouldn't go all electric, because the facilities to charge for a taxi, whether you like it or not you do twelve hour shifts and then it jumps to someone else to do another twelve hour shift, so the car's doing a twenty four hour shift every day, but it needs to be maintained, looked after and charged and at the moment, there's no places to charge, not enough places to charge them." (Licensed hackney driver – lease my vehicle, Salford)

Some of the drivers in the in-depth interviews recited issues or problems they had heard from fellow drivers who have purchased electric vehicles, and their feedback was not good, nor encouraging them to consider getting a similar vehicle.

"I know a two-year-old electric car, it needs batteries already and it's costing him £1,200 and he wished he's never bought it now." (Licensed hackney driver – own my vehicle, Stockport)

One of the users who had a physical impairment mentioned whilst they understand the benefits of electric vehicles, they felt electric vehicles are not suitable for everyone.

"Actually there are particular issues for electric vehicles for disabled people, because they don't have any noise and therefore if you don't understand that there might be deaf and hard of hearing people, children and people with learning difficulties or dementia that might not actually see the electric, you know, be aware of the electric vehicle, you need to have a much more stringent driving standards." (Disabled user, Group 1)

Vehicle Age

Proposed Standard: *It is proposed that all licensed vehicles are under five years old at first licensing and no more than ten years old.*

Some users and drivers / operators supported the view a vehicle should have an age limit for safety reasons.

"And most people get cars maybe like every five or six years, so ten is quite old for a car. The more modern the car is, the less likely it is to have bad emissions and a lot of them have things put in place when they're being built to not release as many." (User, Group 15)

A couple of drivers and operators also felt it was unfair for the same age standard to be used for hackney and PHVs.

"In 2022, they shouldn't be coming with a 2014 car. It's going to be eight years. For an existing licence, even so in 2015 you should be at the point where you're looking at changing it, so I suppose COVID's kind of caused an issue with it, but pre COVID my opinion wasn't, bearing in mind this was from '21, my opinion is you should have a

compliant car, you should have a Euro 6 car for private hire drivers, but taxi drivers is a different thing. A taxi is a purpose-built vehicle, there must be, what, the best part of about £40,000, I imagine, to buy one. Yes, so if you bought a £40,000 vehicle, you're expecting to run that vehicle for a good 10-15 years and historically that is what's happened. So, you can't start saying to a vehicle that's on year seven, you must be changed. Not unless you're going to do something to assist. So, even though my drivers would be absolutely mad with me for saying this, at least with private hire, I would concentrate the assistance to taxi drivers in boroughs where taxi is a specialised purpose-built vehicle, not a saloon, so i.e. a London style black cab." (Licensed Operator, Tameside)

Hackney and PHV drivers were concerned about losing roadworthy vehicles in good condition. This was felt to be wasteful.

Respondents felt the proposed timetable would be difficult for those drivers who would have to replace their vehicles earlier than envisaged, as they have planned their future finance around a later date than those proposed. It was felt it would be difficult to adjust their finance plans sufficiently to meet the required standards within the timescale. This was particularly mentioned by drivers in Rochdale and Oldham, as they currently have a longer age limit on their vehicles.

"This will hit drivers hard in this area. You only need to look at the cars on the road currently to see that a lot of them will not meet this age criteria. No one has the money to update these cars, we are all still paying money off on them and getting no money in at the moment. Here is one of the most deprived parts of [Greater] Manchester." (Licensed PHV driver – own my vehicle, Rochdale)

Drivers and operators trading in districts currently under age limit standards of between seven and 12 years understood why ten years had been suggested and felt it fell in line with their own local authority and were less concerned about their ability to meet this criterion.

However, drivers and operators from districts where the age limit was longer felt they were being heavily penalised, and felt many drivers licensed in the area would struggle to meet the standard and therefore would go outside of the region to become licensed or leave the industry altogether. Once again, drivers and operators from Rochdale and Oldham highlighted this issue most.

"Rochdale Council they're not very strict with the ages of the vehicle, as long as the vehicle is in very, very good condition, because they're very, very strict on the MOTs, especially on private hire and public hire." (Licensed PHV driver – own my vehicle, Rochdale)

Two operators mentioned the impact this would have on their operations as they are currently able to manage their fleet by moving older vehicles to other areas where the current age standards are lower, for example, Manchester to Trafford, enabling them to stagger the replacement of their vehicles and manage their finances.

"I usually move the vehicles from Manchester to Trafford once they hit their age limit in Manchester. I now will be able to keep them longer in Manchester, but will get less out of them overall and won't be able to move them on to Trafford, so I will now need to update more vehicles in a smaller timescale." (Licensed operator, Trafford / Manchester).

Age Exemptions for Electric and Accessible Vehicles

Proposed Standard: *Different age policy for electric vehicles or accessible vehicles: A different age policy is being considered for electric vehicles so that they can be licensed for more than ten years.*

Several drivers agreed electric vehicles should have a longer life span and they felt drivers should be given the funding needed to buy one. Some drivers will only “buy-in” if they can have their vehicle for longer than ten years. They felt similarly about accessible vehicles, expressing how they felt it potentially costs more to have these vehicles or to have the modifications made to ensure they are accessible, so they felt they should be given longer if they have invested more to get such a vehicle.

“You need longer than ten years for electric vehicles. Is that not the point? That they should be lasting us longer and less harming to the air? For the cost of them to buy, ten years is too short.” (Licensed operator, Trafford)

Some drivers were open to the idea of looking into electric vehicles in the future, but felt now the investment required and the reputation of some of the electric vehicles on the network currently re-enforces their belief the technology is not ready or enough to sustain an electric vehicle for this purpose.

Vehicle Colour

Proposed Standard: *It is proposed that all PHVs should be white in colour and hackney carriages should be black (exceptions for advertising on some hackney carriages and executive hire, for example chauffeur services).*

The users felt having a standard vehicle colour could help identify taxis more easily and referenced London or New York (in reference to the Black Cabs or Yellow Cabs respectively).

“Well, they’re all yellow in America. It’s more about being able to identify the car, than colour. Yes, I thought that’s what it was, but I would think there should be something like a five year plan or something before they bring that in.” (User, Group 1)

However, some drivers and users were of the opinion it could be quite costly to implement this change and did not think it was worth the cost implications just to change the colours.

Well, this is where I would agree with, that’s a bit over the top, really and a lot of people use cars as hire vehicles and if they have to spray them all white. And what about the cost? (User, Group 1)

Most drivers did not agree with this standard, especially if it would directly affect them (i.e. their current vehicle was not going to be the required colour). In addition, it was recognised some drivers use the vehicles as personal cars, so they questioned how it would affect them by bringing in a defined colour.

“Some drivers use their personal car, so does that mean they’ll have to go and buy a new car, are they going to get funding for this new car, because it’s not their fault that they’re having to change the colour. I don’t think it should really matter what colour the car is. I think for black cabs they should be black, because I don’t know, that’s the general theme of them, isn’t it and they’re easy to spot and you’ll be able to tell them apart from other taxis, but in terms of private hire cars, I don’t know, I don’t see any bother with having it all one colour, but that’s just me.” (User, Group 15)

A couple of drivers did not like the idea because one district already has white private hire cars and felt drivers in the other nine districts were therefore being impacted more. White was not the colour of choice for many drivers.

“There’s ten boroughs in the whole of Greater Manchester, right. Only one borough has got white colour private hire taxis, which is Manchester, so shouldn’t they come to our standard and be a normal colour, why should we go to their standard? I don’t understand, above the rules, so why are we being pushed to Manchester standards, when Manchester city, they can afford, they have the businesses, there, what do we have in Rochdale? You know, how can we sustain, how can they justify making us pay extra money to paint our car a white colour, what’s the benefit for the driver, tell me what is the benefit for our drivers? I’m sorry, but there’s no benefit, is there?” (Licensed private hire driver – own my vehicle, Rochdale)

"Why do we all need to be all white colour, a level playing field. If so then make everybody suffer, including Manchester, make everybody yellow taxis, then, so then everybody would be the same, so why is Manchester being given special preferences, because there is white colour cars already, so they won't upset their drivers, but the rest of the nine boroughs have to accept it, so everybody has a white colour cab. So make it all yellow, make it yellow taxis, then." (Licensed private hire driver – own my vehicle, Rochdale)

Some drivers and operators also felt the idea of standard colours could affect the identity of some of the companies.

"I think it's an unreasonable request, because it doesn't affect the running of the car, but I think certain companies like to have all their vehicles a certain colour and I think they're the people who could dictate. It's like corporate identity, really, it's corporate identity and I think it would be wrong of the Government or any local authority to say this has to be this colour". (Licensed private hire driver – own my vehicle, Trafford)

Some drivers and users both highlighted how they felt part of this is to help the environment and air pollution, but they also felt this would mean some drivers will now need to go out and get their cars sprayed which surely cannot be good for the environment and will be costly to them.

"Yeah, I just don't understand that possibly spraying up to fifty thousand cars white is good for the environment." (Licensed PHV driver – own my vehicle, Wigan)

"What about the likes of like me who bought this two years ago, a couple of drivers have just bought new vehicles that are blue, there's one company that's bought twenty odd, dark blue and red minibus wheelchair vehicles, so have they got to spray all their vehicles white?" (Licensed hackney driver – own my vehicle, Tameside)

Accessible Hackney Carriages

Proposed Standard: *It is proposed that all hackney carriages should be wheelchair accessible.*

Opinions were polarised on this issue. Some users felt all vehicles should be wheelchair accessible, not just hackney vehicles.

"You can't like say to one group, like you need to change your car, you need to pay for it to be upgraded and make it wheelchair accessible, but not put the same standards on the ones that aren't a hackney carriage. Like if you're going to set a standard like that, why not just set it to everyone, but again it's another case of like if you say they all have to be accessible, will everyone have to buy a new car?" (User, Group 15)

However, one operator who specialises in the transportation of customers who need wheelchair accessible vehicles stated hackneys were not suitable for all types of wheelchair and therefore advocated the need for a mixed fleet.

"On the black cabs and I've got two of them, okay. The ramps that come down, they come down on an angle and, you know, that ramp the wheelchairs cannot actually get up on them and also the people, when they're sat in them, they'll bang their head against the roof. So, for some reason licensing seemed to think that anybody who's in a wheelchair would fit in a black cab. It's not the case, so you might have two thousand black cabs out there and they could say, oh, they're all wheelchair accessible. They are for full manual wheelchairs. Electric ones they can't fit." (Licensed operator – Trafford).

Some users and drivers felt a few drivers of accessible vehicles misused their position and charge extra for transporting a wheelchair user. One user specifically wanted all vehicles to

be accessible, so there would be less concern for the user on finding an accessible vehicle and the drivers would be less able to take advantage.

"But a lot of the time they do treat you, you know, what they do is they charge, they put the timer on and if it takes you ages to get into the cab and put your belt on and everything, they charge you for all that, you know and getting out the cab, they don't always put seatbelts on properly and things like that, but then the private hire companies don't usually have accessible vehicles." (User, Group 1)

Side and / or Rear Loading Without the Need for Swivel Seats

Proposed Standard: A policy as to whether purpose-built accessible vehicles should be side and / or rear loading without the need for swivel seats is being considered.

Most users and drivers did not have any comments on this standard as they had no knowledge or experience of this.

One driver mentioned how he thought many vehicles would qualify for this standard as he thought some local authorities already had this as a regulation.

"I mean I have a sliding door on the side, two sliding ones and the rear loaded is the big door that comes up. Okay, there's a row of seats there, but the row of seats can be moved. I mean I do put, where the large wheelchairs fit and if I do one, because it can be that you can't get them through the side door, because there's a big person, so they have to go through the rear door. So, what you do is, you just push the seats right forward, because they're all tracking, you just push them right forward. So, I would be fine." (Licensed hackney driver – own my vehicle, Stockport)

A further driver raised concerns about the cost of modifying vehicles to meet this standard. This has a knock-on effect to drivers' ability to finance a new vehicle, as the additional costs make it more difficult to recover their investment in the proposed age band.

"I use Renault Masters and Vauxhall Movanos, okay. The base model is 62 grand for a caravan?? I've then to spend about ten grand converting them into, you know, wheelchair accessible minibuses, that's £72,000 per vehicle. Now, if I've only got a ten year limit on those, that means £7,200 a year per vehicle is just spent, just on the casing. That's £7,200 a year." (Licensed Operator, Trafford)

Vehicle Livery

Proposed Standard: It is proposed all vehicles will display licence plates on the front and back of the vehicle, a 'Greater Manchester Approved' sticker on its bonnet and that PHVs will display stickers on both rear side doors which will include operator name, 'advanced bookings only', 'not insured unless pre-booked', and a sticker containing the operator name in the back window.

For users, the consensus was stickers, plates and information reassured them the taxi was registered and following all the correct procedures. Not many users were concerned about where the plate was registered, but the fact they had the plates was usually enough reassurance.

"The stickers are helpful to spot my vehicle in a crowd or know I am getting in the correct vehicle. It does help to feel safer when travelling around on my own." (User, Group 2)

"I don't pay attention to where the plates are registered. Now you have said it, I have seen Sefton and Wolverhampton plates, but never thought too much about it. I just

take note of the stickers, the company or the registration depending on which company I'm using." (User, Group 16)

"I tend to only notice the registration, to check it matches what comes up on my app". (User, Group 2)

Whilst the idea of approved stickers etc. on the vehicles was positive, because it allows users to identify taxis more easily, some drivers had concerns about the cost of them as they were considered a further expense.

"All the drivers are suffering [because of COVID], we're putting our hours in, but we're not making no money. So, with these proposals and all that, with the GM stickers and all this CCTV, yes, it's a good idea, but who's going to pay for it?" (Licensed private hire driver – own my vehicle, Rochdale)

It was also felt stickers cause damage to a vehicles paintwork, therefore some drivers were reluctant to have too many as repairing the paintwork is a further additional cost if they choose to sell their vehicle, or work for more than one firm.

"For example, like door stickers and door magnets, like I don't see the difference to be honest, because obviously stickers, a lot of people don't want to put stickers on, because it damages the paintwork on the car." (Licensed Operator, Oldham)

An operator felt too much signage on the outside of the vehicle puts off clients from using taxis for trips.

"I think there is only the minibus that's actually sign written on the outside, the two cars don't display anything on the outside of the car to say that they are taxis at all, because a lot of our customers do not want people to know that they're going away. Some of our clients expect discretion." (Licensed executive hire Operator, Wigan)

Vehicle Testing

Proposed Standard: *It is proposed that all vehicles more than three years old will be tested for safety, road worthiness and exhaust emissions at least twice a year. It is also proposed that all vehicles will be tested against the standard DVSA MOT standard as a minimum.*

All users spoke positively about vehicle testing and assumed this was standard and just the frequency varied in different areas and felt strongly this should be made more consistent.

"Yes, it's like saying that one part of the country you can have a different MOT standard to the rest of the country, it's ridiculous. So, it's like saying you could take your car for a MOT in a different part of the country and it would pass, and you could take it to a different part of the country, and it would fail, that's rubbish." (User, Group 1)

Some drivers acknowledged current standards vary by local authorities within Greater Manchester, with some stricter than others.

"It's one of the most stricter than anywhere. Our cars can't be older than ten year old, but yeah, they can come and work, well, they do come and work in our borough and their cars can be twenty, twenty five year old. Some councils like Rochdale, just have one MOT a year, we have a MOT and we have an interim as well. They're very strict on us. It should be the same for all." (Licensed hackney driver – own my vehicle, Salford)

A couple of drivers highlighted drivers are getting licensed outside Greater Manchester because they only test once a year.

"Well, we'd all like to go over to like Sefton and go and get a plate and go over there, get it MOT'd just once a year and come back and you think yeah, my car's as old as it wants, it can have a dint, that's me for another year. We have two a year." (Licensed PHV driver – lease my vehicle, Bury)

CCTV

Proposed Standard: *It is proposed that all licensed vehicles are fitted with mandatory CCTV. Cameras can act as a deterrent to the occurrence of a crime and can protect both drivers and passengers. Audio as well as visual recording is proposed, triggered by a panic button system.*

The idea of introducing internal CCTV cameras in the vehicles was generally met positively by all respondents. Users highlighted CCTV would be a good deterrent of poor behaviour and felt this would be a positive thing for both the driver and the customer.

However, some concerns were raised:

- Users were concerned about misuse / accidental use of the panic button and what the consequences would be.

"Is it for the driver or the customer, because, in principle, it is a good idea, but can you imagine having it in the back with a customer who has had a lot to drink on a night out?" (User, Group 1)

- Drivers raised concerns about the responsibility for data storage and management; would drivers be required to upload data to the authority, and will the data be recorded, and how will it be securely stored and managed by the drivers.

"Who is going to be responsible for the data? Are we going to have to download the data all the time and provide it? At what cost? I understand why this is being considered, but practically I'm not sure how this will work." (Licensed hackney driver – own my vehicle, Manchester)

- Some drivers already had dashcams, which offered the additional benefit of lowering their insurance. However, they explained there are strict rules on ensuring the camera only points outwards of the vehicle and not into the car, therefore protecting the privacy of the occupants. Therefore, questions were raised about the impact of CCTV on their insurance.

"You see I have a dashcam as it is cheaper for my insurance, but it has to point outwards, my insurance is very clear on that. Will my insurance now accept this CCTV inside the car?" (Licensed PHV driver - own my vehicle, Tameside)

- Drivers were concerned about the cost of CCTV installation and maintenance and what the expense would be to download and submit data.

"It's a very good idea having CCTV in the vehicle, because at the end of the day it's safety for yourself and safety for your passengers, but you know, who's going to pay for it, it's about £1,500 for a CCTV in a vehicle, especially for licensed." (Licensed PHV driver – own my vehicle, Rochdale)

Executive Hire

Proposed Standard: *It is proposed that the following standards apply to executive hire vehicles (e.g. chauffeur driven) – bookings to be confirmed by written contract, payments made in advance of the journey or by invoice afterwards, the types of vehicles to be licensed, dress code, business plan shared with licensing authority, vehicles not to be fitted with radios or data heads or meters, exemptions from plates and door signs and must be used exclusively for executive hire.*

Very few of the users or drivers who were not licensed for executive hire work had comments on the executive hire standards.

Those drivers who were licensed for executive hire work raised some concerns with adopting the same rules as PHVs.

- **Vehicle colour:** there is an expectation that executive hire cars are silver or black.

"Two of them are a dark grey and one of them is a silver. And we don't think we should be dictated to about the colour. I think it's an unreasonable request, because it doesn't affect the running of the car, but I think certain companies like to have all their vehicles a certain colour and I think they're the people who could dictate. It's like corporate identity, really, it's corporate identity and I think it would be wrong of the Government or any local authority to say this has to be this colour." (Licensed executive hire operator – own my vehicles, Wigan)

- **Booking and Paying:** they highlighted some of the other rules around booking and paying could be an issue based on how they work and how they book in clients compared to other PHV operators.

"Yeah, that is going to be a problem for us, because although we class as executive hire and chauffeur, apparently, according to the new rules that I was reading, it says that we won't be able to do that because our work isn't billed the same way. I think isn't there something, a clause in there about people having to pay on account? Some people pay in advance, some people pay on account, but most people pay usually by card or on the day, on the way out usually, very few people, I suppose you could say that when they were booking, because we don't do a, can you come and get us now. All our work is advance booking obviously. And when they ring us up, we fill in a form at our end, but they haven't signed it, so I don't know if that counts as a written contract or not." (Licensed Operator, Wigan)

Vehicle Design

Proposed Standard: *It is proposed that all vehicles conform to M1 vehicle standard (DVLA vehicle classification), no retrofitting of engines into older vehicles Liquid Petroleum Gas (LPG) conversions will be accepted, any retrofit emissions technology must have been approved as part of the Clean Vehicle Retrofit Accreditation Scheme (CVRAS), manufacturer window tints only, no vehicles will have been written off in any category, no roof signs on PHVs, no advertising other than local authority issued signage on PHVs.*

Again, many of the drivers agreed this was already part of their current standards and where they did differ, the change was achievable.

"Yeah none of that is surprising and I think most people would be able to deal with that. I know tints is sometimes an issue for drivers depending on what they buy, but I guess they would just have to sort it." (Licensed Operator – Manchester)

Vehicle Conditions

Proposed Standard: *This proposal includes matters such as identification plates, accidents, meters, fare tables and CCTV.*

Few users had comments on the vehicle conditions. However, drivers, both those who own or lease, highlighted the need to maintain the vehicles.

"Yes, the firm I work for are very good, you know, they keep up regularly with the maintenance, you know, they're very sort of conscientious about the vehicles, so to be honest, if they hadn't have been that way I probably would have ended up buying my own vehicle, but because they're pretty conscientious about the maintenance and, you know, the overall vehicle standards, you know, I've just carried on renting or leasing." (Licensed PHV driver – lease my vehicle, Trafford)

"It's about keeping your vehicle to standard, you know, that's your, it's our duty to keep in the condition where it's safe for you and safe for your passengers. It's our duty to keep it roadworthy standards." (Licensed PHV driver – own my vehicle, Rochdale)

However, some drivers did not think that this was the case for everyone and it is something that was not policed or monitored enough.

"I know that other drivers have trouble keeping their vehicles, what I'd call clean. I mean I tend to clean mine every third passenger and people go, what, because I sweep it out, I Hoover it out, I disinfect it, I do whatever I need to do, but I've done that since before these times. Not sure everyone is like me though, nor are they checked." (Licensed hackney driver – own my vehicle, Salford)

Operator Standards

As part of the proposals, several operator standards are listed including:

- Basic criminal record checks for all private hire operators and staff;
- More stringent requirements related to booking records; and
- Operators taking more responsibility for driver and staff behaviour.

When asked, most users said the proposed standards sounded sensible, but did not have much to add or debate on them.

The drivers and operators suggested most operators already abide by these standards and felt, going forward, these standards will not be difficult to meet. However, they questioned if the monitoring and policing of them will increase to ensure they are being met.

"Yes, operator standards in all of them are not too bad. It's just like the drivers, sometimes certain things they're a bit picky." (Licensed Operator, Oldham)

Some drivers felt the bigger operators will be able to implement the operator checks more easily and more cost effectively than the smaller operators.

"I think the bigger the company, the more support they'd give it. I think the smaller units are aware of what's going on and they're just trying to get to keep going, yeah, to get through it as an organisation." (Licensed private hire driver – rent my vehicle, Salford)

A couple of operators did not understand why their staff need to have CRB checks.

"I know the drivers have to, but why the office staff?" (Licensed operator – Stockport)

Several drivers stated the monitoring of drivers in their vehicles currently differs by districts, so having operators to take more responsibility for driver and staff behaviour will be better for the industry.

"I've seen drivers on the phone whilst driving and no one does anything about it. Operators need to take more responsibility for that." (Licensed hackney driver – Anonymised)

Local Authorities Standards

As part of the proposals, several standards for local authorities are listed, including:

- Submission of licence applications up to eight weeks in advance of licence expiry;
- If approved, licence to be issued within five working days;
- Common enforcement approach and framework to which licensing fees are set; and
- Training for Councillors reviewing licence applications.

Throughout the research, few had comments about these standards. Certainly, the users agreed with the standards in principle, but they also admitted to not knowing if these were reasonable or not, given their lack of knowledge in how they work in practice.

A couple of the drivers reported their experience of dealing with local authorities in licensing and felt it can be difficult to communicate with the authorities when they had queries to deal with. Respondents would like to be able to speak to licencing authorities directly rather than through email correspondence.

“For me the service is, it’s poor, and you can’t even phone them, you can’t call them, everything’s by email now. So, what are all these fees about, everything that we do regarding licensing tests and everything else, we have to do it all ourselves, the same with your badge, same with doing your licence, your badge, you’ve got to do it all online yourself.” (Licensed hackney driver – lease my vehicle, Manchester)

“There’s nobody there, it’s all emailed, if you get it wrong you get it wrong and when you go for your test, oh, you’re not booked in, you’ve got to book a retest, that’s £60, your cab fails, that’s another £60. They fail your cab over nothing, you know, they failed my cab once over a windscreen wiper and the back screen??, and that cost me another £60 to retest it and I was off the road for two days.” (Licensed hackney driver – lease my vehicle, Manchester)

A few drivers also mentioned sometimes they had to wait for weeks for any response to queries they may have and is difficult when some response may be needed before you can drive again.

“Sometimes I can’t get them on email, can’t get them on the phone and before COVID-19 if I went there to see them, then the queue would be too long to wait around. I don’t have time to give up income to sit and wait for them to respond to me.” (Licensed hackney driver – Anonymised)

Impact of the Proposals on the Respondents

Participants felt given their interactions with customers sometimes on a one-to-one basis, it is important users can feel safe and reassured all checks have been undertaken before they step in the vehicle.

“Yeah, I think they’re a very sensible set of proposals that should benefit customers, you know, which is what it’s all about ultimately, isn’t it, it’s us, people who use the taxis, you know, how safe we are and how well served we are.” (User, Group 1)

In general, the users felt the timetable was workable even though a couple of respondents cautiously highlighted current circumstances with Covid-19 may make it more problematic for some drivers to adapt.

“I’m very much in agreement as long as there’s enough time for people who, you know, that is their livelihood and that supports the family, you know, enough time for them to be able to do this.” (User, Group 1)

Many of the drivers and operators felt the timetable for the proposals was too short and was forcing something that could instead simply occur as a natural transition over a longer period, especially considering the current circumstances.

“Natural transition – let everybody get back on their feet before you try and hammer them again, because if you’re going to hammer people, they’re just not going to use that service. They’re going to say, no, I’m not doing that school contract anymore, they’re going to hand them back into the councils and then on the first day of September in 2022, whatever it is and the council’s come begging, please, please help me out. Why force it?” (Licensed operator – own and lease vehicles, Stockport)

"That's our concern, not the Clean Air Act [Plan] in itself, but the timeframe with which things are trying to [be] done for, which with particularly with this COVID-19, you know, pandemic, which looks like now it's going to be at least a year is just thrown, you know, drove a cart and horse through all the plans regarding the other vehicles and everything else, what is financially viable and practical." (Licensed operator, Salford)

"So they can't go changing things, it's going to need a long time after this has finished, it's going to be next year before we start getting back to a normality, I reckon, at least April, May, like if they've brought in any new standards for the year after, it's just a continuous loss of money for all the drivers." (Licensed PHV driver – own my vehicle, Tameside)

Some drivers and operators mentioned a lot of money so far has been invested in many of these vehicles, and now they won't get their money worth for the vehicle if they are forced to change it earlier than when they had planned to.

"Yeah, yeah, but you know, like what you've got to remember, these clean air things, you can't just bring it in like that, clean air, it has to be done from a date, doesn't it? You know, like you let the vehicles work themselves out over time. A lot of these black cabs, they're invested to do that and then carry on." (Licensed hackney driver – own my vehicle, Salford)

Some of the older drivers who have invested many years in the industry felt they are too late in their lives to be considering another big investment to upgrade their vehicle or take on daily charges. One respondent, who is currently in his late 60s said the implementation of these proposals will force him into retirement.

"Yes, I've got a rough idea of what they're proposing, what they want to do, yeah. They basically want people to have new vehicles and clean the air up and tidy up the drivers to make them respectable as well as the vehicles. It will make me retire." (Hackney owner driver, Trafford)

Some of the older drivers highlighted that whilst some are leaving the industry and finding other jobs to do during the Covid-19 pandemic, they have found themselves to be in a position where age puts them at a disadvantage for finding new employment.

"I've been doing this job for thirty years now, which is the only job I know, and I can't apply for another job, because I've got no qualifications. I'd be getting as a driver or an Uber driver or Uber Eats, you know, working in that kind of industry, where I've got no experience anyway, but all it is, it's just driving and just delivering. So, that's the only qualifications that I have that I can really get into and plus my age now, I'm 54 years old, you know, especially when I've been doing taxis since I was twenty years old, you know, it's going to be hard for me, especially at my age now." (Licensed PHV driver – own my vehicle, Rochdale).

Lastly, one or two drivers felt these rules should just be making it compulsory, but most drivers should already be following them, including having a car that is young enough on the roads.

"In 2022, they shouldn't be coming with a 2014 car; it's going to be eight years. For an existing licence, even so in 2015 you should be at the point where you're looking at changing it, so I suppose COVID has kind of caused an issue with it, but pre COVID my opinion wasn't, bearing in mind this was from '21, my opinion is you should have a compliant car, you should have a Euro 6 car for private hire drivers, but taxi drivers is a different thing." (Licensed Operator, Tameside)

Impact of Covid-19

All users highlighted Covid-19 has changed their use of hackney and PHVs during the past eight months. Some reported their usage had dropped significantly due to restrictions, such as lockdowns and working from home policies. Whereas others stated their usage had

increased since they are reducing the time they spend on other modes of transport, such as bus or tram, which a couple of drivers also recognised.

"I'd say that at the start of COVID, it definitely impacted it, however as in between obviously you had a break before the second lockdown, I started to use Ubers and taxis more and they had the whole plastic wrap in between you and the driver and you had to wear masks, so it did feel a lot safer and you obviously have to take responsibility yourself for keeping it like sanitised and things like that, but it did feel a lot safer." (User, Group 15)

The impact of Covid-19 on drivers and operators was raised throughout the in-depth interviews. Drivers and operators reported significant reduction in business. The majority reported at least a 40-50% decrease in their weekly income, and some went as far as reporting an 80% decrease. Many stated they have struggled to cover their costs and licensing fees during this pandemic, and they don't see the situation improving soon:

"Yes, it's definitely impacted. It's tougher, it's tougher, you get a lot of quiet periods now, whereas before you used to be reasonably employed during the day. I think one of the good things to start with is when Boris says don't use buses, because people took it literally, so they all started using taxis. So, there's a certain element of people that still do it now, because they feel safer, you know, being in a taxi with a driver, but they're not mixing with twenty other people and I think there is an element of that." (Licensed PHV driver – own my vehicle, Salford)

"Three-quarters, 90% gone, down and out. In fact, right now, I've only got, tonight I've got a flight coming in and they've come back early from the Canaries and I've got a gentleman who's a chairman of a company, he's going to South Africa, because he's got business there or he's going to London Heathrow and then he's returning in two weeks' time and that's it." (Licensed executive hire Driver – own my vehicle, Salford)

Drivers and operators explained one of the main changes has been the reduction in commuting and business journeys as many workplaces were instructed to work from home. The taxi and private hire industry suddenly lost a significant amount of business journeys, as workers are now completing business meetings virtually from home.

"There is no business trade now. Everyone is working from home. All the big offices, no one there. All been done online, so there is no business trade, not like there used to be" (Licensed private hire driver – own my vehicle, Tameside)

"There's been a lot of changes, a lot of people are really scared now to going out, that's why they're not using public transport or anything, using taxis like they used to. They're just staying in now and plus all the shops, because of the essentials, the places that have to open, it's just made a lot of difference to us as kind of a business. There's no work, so it's affected a lot of people." (Licensed PHV driver – own my vehicle, Rochdale)

Participants stated another big loss due to Covid-19 is the impact on air travel. Bookings to and from the airport are a significant staple for many hackneys and PHV drivers across the region, with Manchester Airport locally, as well as Liverpool and Leeds both approximately an hour away. Some stated between 20% and 50% of their regular income is airport work which has now disappeared due to restrictions.

"I used to go every day, every day I'd go to the airport. So, one of the companies in Bolton that I work for, the airport, bringing all their clients in and out, a massive, huge company, I've done it for years and years. I've had nothing off them, because obviously they're not traveling, you know." (Licensed Operator, Salford)

Respondents noted night work is also usually a large part of the hackney and private hire industry, particularly Friday and Saturday evenings. However, the continued social distancing measures, curfews and lockdowns have meant the hospitality industry has, for the large part of 2020, been out of action. The drivers felt this work has all but disappeared and it is a huge loss to the industry.

"It's just at a standstill, really, there's no work available, because of COVID, because everything's all closed and it's very, very hard to make a living now." (Licensed PHV driver – own my vehicle, Rochdale)

Many drivers mentioned how colleagues of theirs had left the industry or had taken up other jobs during this period in order to make some money.

"Some of my colleagues have left, taken up delivery jobs for delivery of parcels and food." (Licensed private hire driver - own my vehicle, Bolton)

Some respondents had regular contracts (school or hospital runs) which have kept them afloat during this period and felt those who had this type of contract were in a better position than many other drivers.

"For me, I have school contracts with the council. If I didn't have that, I might as well just pack it in to tell you the truth. I've not been so bad, in fact, the school runs have saved me, I can get by on that." (Licensed Operator, Salford)

Impact of Drivers with Licences from Outside of Greater Manchester

Users were not aware outside Greater Manchester licensed vehicles could come into Greater Manchester and still trade the same as Greater Manchester licensed vehicles. Some did notice the different plates but didn't understand or know what difference that makes to the vehicle or driver they are using.

"Yeah I check licence plates, not sure why but it is something I've been aware of for a while and I've noticed more and more plates from outside Greater Manchester." (User, Group 16)

Once highlighted within the group setting, most users were quick to pick up on how it was likely these standards would not apply to them or certainly would not be able to be enforced and debated how that could affect the standards and service they received.

"I'm guessing though that if they are licensed elsewhere that these standards won't matter to them?" (User, Group 16)

However, most of drivers highlighted, without prompting, the impacts of allowing drivers with licences from outside Greater Manchester to work in the region and they reported a negative impact on them and their business.

"Yeah, I think it's easier to get a Sefton badge, that's what it is, it's easier. I think it's easier, but it's like cheaper as well, because certain parts are cheaper, and they can charge what they like." (Licensed Operator, Oldham)

Operators felt they were already meeting a lot of the standards in their day-to-day management. However, they raised frustration that they are held to these standards when others are not (i.e. coming in from outside of the region).

"I'm a Trafford licence operator, so I can only take on Trafford licensed drivers. I don't want to go down the Wolverhampton route, but I'm being forced into it, yeah. We have a load of daft rules compared to others." (Licensed operator, Trafford)

"There are a lot of taxi drivers, private hire drivers or whatever, because they're getting badges easier in other areas. Obviously, it's lessening income for everyone else." (Licensed Operator, Oldham)

"All these out of town drivers, the Ubers etc, are coming in and taking what little trade we have left. And they don't even have to abide by our rules!" (Taxi driver – own my vehicle, Salford)

Many of the drivers highlighted, whilst they thought the aim of the GM MLS is a good idea in principle, there is concern there is nothing to stop drivers licensed elsewhere with less stringent standards, coming into the region, taking work from them. For those not licensed within Greater Manchester, it could potentially mean:

- their vehicle could be at a lower standard (tested less often and therefore potentially less safe);
- their vehicle could be a different colour and age than the specifications suggested;
- the driver will only have completed a knowledge test for the area where they are licensed, so potentially their knowledge will be limited in the area in Greater Manchester where they will be working and will be reliant on other drivers, the customer or a Sat Nav to complete the fare;
- the driver may not have to go through as many checks or tests as the drivers in Greater Manchester;
- their license fee will most likely be cheaper, their insurance could be cheaper;
- this could make them more competitive to firms inside or drivers inside Greater Manchester as they won't have as many overheads, if working to lower standards; and
- saturation of the market resulting in more taxis than available fares.

B.5 Summary

It was clear from the focus groups most hackney / PHV users felt if the standards were not already in place as proposed, then most of them should be. Many felt these proposals were a step in the right direction to ensuring there are consistent standards across the region, so all users are receiving a similar level of service.

Many of the users were not aware of the proposals for GM MLS or GM CAP, so the information presented to them in the groups was new and provoked some debate around the practicalities of implementing the standards and the timing of the implementation for hackney and PHV drivers or owners. Whilst they thought the proposals were a good idea in general, for improving safety, driving and air quality, a handful of users thought there could be a detrimental impact on the industry and the drivers themselves if forced to implement some of these standards in the timeline suggested. A few users were concerned the proposal could cause costs to be passed on to them and / or cause some drivers to get into financial trouble, particularly given the current expectation that Covid-19 restrictions must be impacting their industry already.

Most hackney / PHV drivers or operators were aware of the proposals going into the discussion and had considered how it may impact them. The level of prior knowledge was mixed amongst the drivers and operators, with some merely identifying knowledge of just the high-level proposals, whereas others knew a lot of the finer detail and the potential financial impact to them.

Many drivers and operators felt the driver standards were something most of them complete anyway and if not, they should be. However, the vehicle standards generated most discussion amongst drivers and operators due to the cost implications of upgrading their vehicles, as many of them currently own or drive a Euro 5 or less hackney or PHV. They explained the pandemic has made things much harder and many are taking home less than 50% of their normal weekly wage. Many do not feel in a sufficiently financially stable position to upgrade their vehicles soon and take on more debt or finance when the industry is struggling as whole and with no certainty in when the pandemic will end or what future travel patterns will look like.

A big issue was mentioned throughout by drivers / operators - the impact of these proposals on Greater Manchester licensed drivers, whilst drivers licensed in other areas do not need to adhere to the standards but can still work in Greater Manchester. Some drivers acknowledged this could further widen the gap between the standards of Greater Manchester licensed vehicles and drivers compared to outside Greater Manchester vehicles and drivers coming in. Most felt users were unaware of the differences and therefore don't include that in their decision-making process when choosing a taxi / PHV to go with, yet felt it is unfair these drivers come into the region, unchecked, un-monitored but take some of their work.

Respondent Profile

Table A.1: Confirmed Taxi / PHV Users: (n=4 mini groups)

| Group | Criteria |
|-----------------------------|--|
| 1. Taxi / PHV users | Use at least once a fortnight or more Aged 18-34 Mix of genders Low income Respondents with disabilities |
| 2. Taxi / PHV users | Use at least once a fortnight or more Aged 35+ Mix of genders Respondents with disabilities |
| 15. Taxi / PHV users | Use at least once a fortnight or more Aged 65+ Mix of genders Respondents with disabilities |
| 16. Taxi / PHV users | Use at least once a fortnight or more Aged 18-34 Female respondents only |

Table A.2: Confirmed Taxi / PHV Driver and Operator In-depths (n=40)

| Group | Criteria |
|------------------------------|--|
| Taxi drivers | Mix of districts, must own vehicle Mix of ages Mix of ethnicity |
| Taxi drivers | Mix of districts, will lease vehicle and therefore focus on MLS as predominant subject topic in group Mix of ages Mix of ethnicity |
| PHV drivers | Mix of districts, must own vehicle Mix of ages Mix of ethnicity |
| PHV drivers | Mix of districts, will lease vehicle and therefore focus on MLS as predominant subject topic in group Mix of ages Mix of ethnicity |
| Operators (min of 10) | 1 from each district of GM |

Appendix C Questionnaire



**Greater Manchester
Minimum Licensing
Standards**

Greater Manchester taxi and private hire minimum licensing standards – proposals for consultation

Bolton | Bury | Manchester | Oldham | Rochdale | Salford | Stockport | Tameside | Trafford | Wigan

Instructions on completing the questionnaire

It should take anywhere from 10 to 30 minutes depending on your answers. The last day that you can respond is Thursday 3 December 2020.

If you have any concerns or questions about the questionnaire please email info@gmtaxistandards.com or call 0161 244 1100.

Throughout this questionnaire, when Greater Manchester or GM is used to describe the decision-making body for the proposals, it refers to the 10 Local Authorities of Greater Manchester.

Please use a black or blue pen to complete the questionnaire.

When writing comments, it is preferable if you use capitals to make sure we can clearly read your response. If at any time you run out of space in a section please go to the end of the questionnaire and continue to write on the additional pages provided. Please include the question number on this additional page to ensure we can clearly match your response to the question.

You will note that there are question numbers attached to each question and these may not run in sequential order, this is due to this being part of a larger questionnaire and to save paper we have removed sections and questions which are not relevant to you.

Alongside this, there will still be certain questions which will not be applicable for you, depending on your previous answers and your own circumstances. Where this is the case there is a comment in CAPITALS above the question to state who should answer the question, based on the answers provided.

When you reach a question which is not applicable to you then please move to the next page and continue to do so until you see a comment in capitals which states:

EVERYONE CAN ANSWER THESE QUESTIONS

All responses will go to AECOM – the independent agency who are managing and analysing the responses.

Please post your completed questionnaire to: Freepost RUBS-XRAT-GLBK, AECOM, 1 New York Street, Manchester, M1 4HD. You do not need a stamp.

If you have any supporting documents that you'd like to submit you can include these when posting the questionnaire.

At the end of this document please tick the box to advise that you've submitted extra documents and note the titles of these documents.

Thank you for providing responses for this consultation.



Background

There are two types of vehicles that the general public call 'taxis'

- Hackney carriages are licensed to pick up people who wave for the vehicle to pull over and stop at the roadside or from an authorised taxi rank. Hackney carriages are often purpose built 'black cabs' but don't have to be (depending on local policy) and they may also do pre-booked work.
- A private hire vehicle is only permitted to pick people up via a pre-arranged booking. This might be over the phone, or using an app-based booking system.

Around 2,000 hackney carriages and approximately 14,000 private hire vehicles are currently licensed by the ten Greater Manchester Local Authorities.

At present each Local Authority in Greater Manchester has a different set of standards for licensing drivers, vehicles and operators in their area.

What's changing?

Proposals have been developed to establish a consistent set of Greater Manchester-wide minimum licensing standards to help deliver improved safety, reduce vehicle emissions and improve vehicle accessibility for customers.

This collaborative approach between the 10 Greater Manchester Local Authorities seeks to establish minimum licensing standards in a number of key areas, while allowing Local Authorities to exceed these, where they consider this to be appropriate.

We want your views

We now want your views on the proposed set of minimum licensing standards but before answering any of the consultation questions, please read the consultation document. This can be found at gmtaxistandards.com.

The consultation is open until 23:59 on Thursday 3 December 2020.

Who can take part?

We want as many views as possible on this important consultation. You can answer, wherever you live in the UK, as a member of the public, an individual working in this sector (e.g. as a driver) or in an official capacity (e.g. as an elected representative, business or organisation).

Where can I find more information?

Before answering any of the consultation questions, please read the consultation document. This can be found here on gmtaxistandards.com.

If you have any questions or concerns about the questionnaire, please email info@gmtaxistandards.com or call 0161 244 1100.

For support to respond to this consultation or to request copies of the consultation document and questionnaire please contact info@gmtaxistandards.com or 0161 244 1100. Support for non-English speakers is available on 0161 244 1100.

Confidentiality and data protection

TfGM has commissioned the independent research organisation AECOM to receive and analyse responses to the consultation, and to prepare a report of the findings. Transport for Greater Manchester (TfGM) are the data controller and are delivering this consultation for the 10 Greater Manchester Local Authorities under delegated authority. Both TfGM and AECOM will process your personal data in accordance with the Data Protection Act (DPA) 2018, and the General Data Protection Regulation (GDPR).

Information you provide including personal information in response to the consultation will only be published in aggregate form or anonymised. However, if you are responding to the consultation in an official capacity, we may attribute comments you make to the organisation or body you represent. It should be noted that information provided in response to this consultation, including personal information, may be subject to disclosure in accordance with the access to information regimes. These are primarily the Freedom of Information Act 2000 (FOIA), the Environmental Information Regulations (EIR) 2004, the Data Protection Act (DPA) 2018, and the General Data Protection Regulation (GDPR). Therefore, if we receive a request for disclosure of the information, we cannot give an assurance that confidentiality can be maintained in all circumstances.

Further details of how TfGM process your data and for details of how you can exercise your rights are available at tfgm.com/privacy-policy or from the Data Protection Officer by emailing data.protection@tfgm.com. For AECOM's privacy policy, please visit aecom.com/privacy-policy or email privacyquestions@aecom.com.

If you no longer wish for us to use your personal information during the analysis stage, you have a right to have the relevant information deleted. Please email privacyquestions@aecom.com before the consultation ends at 23:59 on Thursday 3 December 2020.

EVERYONE CAN ANSWER THESE QUESTIONS

Q0.1 Are you a ...?

Please tick one only

- Member of the public
- Licensed hackney carriage driver – own my vehicle
- Licensed hackney carriage driver – rent/lease a licensed vehicle that is kept at my home address
- Licensed hackney carriage driver – rent/lease a licensed vehicle that is not kept at my home address
- Licensed private hire driver – own my vehicle
- Licensed private hire driver – rent/lease a licensed vehicle that is kept at my home address
- Licensed private hire driver – rent/lease a licensed vehicle that is not kept at my home address
- Private hire operator
- Organisation (e.g. schools, charities, social enterprise, trade organisations, government bodies)
- Vehicle lease company (or owner of licensed vehicles used by others)
- Business (including self-employed and sole traders)
- Councillor / elected official

ONLY ANSWER IF YOU ARE RESPONDING AS A COUNCILLOR OR ELECTED OFFICIAL

Q0.1a. Please provide the following details

The area are you elected to represent.

Your name.

ONLY ANSWER IF YOU ARE A PRIVATE HIRE OPERATOR / TAXI TRADE ASSOCIATION / CHARITY OR OTHER ORGANISATION / VEHICLE LEASE COMPANY OR BUSINESS:

Q0.2 Please provide the name of the organisation you are responding on behalf of

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

Q0.3 Are you authorised to respond on behalf of this organisation?

Please tick one only

- Yes
- No

Q0.4 What is the size of your business?

Please tick one only

- Sole trader / self-employed (1 person)
- Micro business (2-9 employees)
- Small business (10-49 employees)
- Medium business (50-249 employees)
- Large business (250+ employees)

This questionnaire asks for your views on the proposed minimum licensing standards within four areas:

- Drivers
- Vehicles
- Operators
- Local Authorities

It also asks for your views on the timetable and impact of the proposals.

You have the opportunity to give any further comments at the end.

If you want further information about each of the standards and the rationale behind them, please read the consultation document which can be found at gmtaxistandards.com.

It should be emphasised that these are minimum standards the 10 Greater Manchester Local Authorities can work to. Some Local Authorities may already be working to higher standards or may plan to do so, this consultation will not affect that work.

The standards set out in this document also incorporate the Department for Transport's recently published Statutory Taxi and Private Hire Vehicle Standards. The Department for Transport's standards can be found at www.gov.uk/government/publications/statutory-taxi-and-private-hire-vehicle-standards. The Local Authorities acknowledge these standards and aim to build on them.

SECTION 1

EVERYONE CAN ANSWER THESE QUESTIONS

Proposed minimum licensing standards for licensed drivers in Greater Manchester

Enhanced criminal record checks: It is proposed that all drivers will be required to undertake an enhanced disclosure check through the Disclosure and Barring Service (DBS). The check will include Barred Lists such as details of unprotected spent convictions and police cautions. Drivers must also register to the DBS update service and maintain that registration to enable the licensing authority to routinely check for new information every six months.

Driver medical examinations: It is proposed that medical examinations are used to check drivers are medically fit to drive (the same examinations as applied by the Driver and Vehicle Standards agency (DVSA) to the licensing of lorry and bus drivers).

Knowledge tests: It is proposed that applicants undertake a knowledge test. The test may include local area knowledge, local conditions, licensing law, road safety / highway code / cycle awareness, numeracy, reading & writing and safeguarding.

English language tests: It is proposed that new drivers undertake an assessment to ensure they are able to communicate in spoken English and in writing to a standard that is required to fulfil their duties, including in emergency and challenging situations.

Driving proficiency tests: It is proposed that all new drivers will be required to pass an on-road assessment with a Greater Manchester approved supplier.

Driver training: It is proposed that Licensing Authorities will require all drivers to undertake training in safeguarding and awareness of child sexual exploitation, human trafficking, disability and dementia.

Dress code: It is proposed a dress code is introduced to promote a positive image of the licensed hackney carriage and private hire trade in Greater Manchester. All clothing worn must be in good condition and the driver must keep good standards of personal hygiene.

Drug and alcohol testing: Driving under the influence of drugs and / or alcohol poses a risk to the public and other road users. The proposal is to develop a policy on the testing of drivers based on complaints or intelligence received.

Private hire driver conditions: The private hire driver conditions are set out in detail in Appendix 3 of the consultation document and include matters such as driver conduct, fares, convictions, assistance dogs and lost property.

EVERYONE CAN ANSWER THESE QUESTIONS

Q1. To what extent do you agree or disagree with the proposed minimum licensing standards for licensed drivers in Greater Manchester?

Please tick one only

Strongly agree

Disagree

Agree

Strongly disagree

Neither agree nor disagree

Don't know

SECTION 1

EVERYONE CAN ANSWER THESE QUESTIONS

Q1a. Please use this space to provide any comments relating to the proposals for minimum licensing standard or standards for licensed drivers in Greater Manchester.

If you are commenting on a specific standard or standards, please mention the standard you are referring to.

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

SECTION 2

EVERYONE CAN ANSWER THESE QUESTIONS

Proposed minimum licensing standards for licensed vehicles in Greater Manchester

Vehicle emissions: It is proposed that all licensed vehicles must comply with the current Euro standard (Petrol: Euro IV 2005 onwards manufacture, Diesel: Euro V1 2015 onwards manufacture) when they are first licensed, with an ambition for a zero-emission capable fleet by 2028.

Vehicle age: It is proposed that all licensed vehicles are under 5 years old at first licensing and no more than 10 years old.

Different age policy for electric vehicles: A different age policy is being considered for electric vehicles so that they can be licensed for more than 10 years.

Vehicle colour: It is proposed that all private hire vehicles should be white in colour and hackney carriages should be black (exceptions for advertising on some hackney carriages and executive hire, for example chauffeur services).

Accessible hackney carriages: It is proposed that all hackney carriages should be wheelchair accessible.

Side and / or rear loading without the need for swivel seats: A policy as to whether purpose-built accessible vehicles should be side and/or rear loading without the need for swivel seats is being considered.

Vehicle livery (special design): It is proposed all vehicles will display licence plates on the front and back of the vehicle, a 'GM Approved' sticker on its bonnet and that private hire vehicles will display stickers on both rear side doors which will include operator name, 'advanced bookings only' and 'not insured unless pre-booked', and a sticker containing the operator name in the back window.

Vehicle testing: It is proposed that all vehicles more than three years old will be tested for safety, road worthiness and exhaust emissions at least twice a year. It is also proposed that all vehicles will be tested against the standard DVSA MOT Standard as a minimum.

CCTV: It is proposed that all licensed vehicles are fitted with mandatory CCTV. Cameras can act as a deterrent to the occurrence of a crime and can protect both drivers and passengers. Audio as well as visual recording is proposed, triggered by a panic button system.

Executive hire: It is proposed that the following standards apply to executive hire vehicles (e.g. chauffeur driven) - bookings to be confirmed by written contract, payments made in advance of the journey or by invoice afterwards, the types of vehicles to be licensed, dress code, business plan shared with licensing authority, vehicles not to be fitted with radios or data heads or meters, exemptions from plates and door signs and must be used exclusively for executive hire.

Vehicle design: It is proposed that all vehicles conform to M1 vehicle standard (DVLA vehicle classification), no retrofitting of engines into older vehicles (Liquid Petroleum Gas (LPG) conversions will be accepted), any retrofit emissions technology must have been approved as part of the Clean Vehicle Retrofit Accreditation Scheme (CVRAS), manufacturer window tints only, no vehicles will have been written off in any category, no roof signs on private hire vehicles, no advertising other than Local Authority issued signage on private hire vehicles.

Vehicle conditions: Details of proposed Greater Manchester private hire and hackney carriage vehicle conditions can be found in Appendices 4 and 5 respectively and include matters such as identification plates, accidents, meters, fare tables and CCTV.

Q2. To what extent do you agree or disagree with the proposed minimum licensing standards for licensed vehicles in Greater Manchester?

Please tick one only

Strongly agree

Disagree

Agree

Strongly disagree

Neither agree nor disagree

Don't know

SECTION 2

EVERYONE CAN ANSWER THESE QUESTIONS

Q2a. Please use this space to provide any comments relating to the proposals for minimum licensing standard or standards for licensed vehicles in Greater Manchester.

If you are commenting on a specific standard or standards, please mention the standard you are referring to.

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

SECTION 3

EVERYONE CAN ANSWER THESE QUESTIONS

Proposed minimum licensing standards for licensed operators in Greater Manchester

Common licence conditions: It is proposed that common conditions are attached to each private hire operator licence setting out their responsibilities and how records should be kept with regards to bookings, vehicles and drivers working from and for their company.

Criminal record checks for operators and staff: It is proposed that each private hire operator licence requiring operators and their staff (paid or unpaid) are DBS checked every year to ensure that only safe and suitable people have access to operator records.

Vehicle owners who are not licensed drivers, including Directors of companies or partners, are to have a basic DBS check as a part of their application process.

- Q3. To what extent do you agree or disagree with the proposed minimum licensing standards for licensed operators in Greater Manchester?**

Please tick one only

Strongly agree

Disagree

Agree

Strongly disagree

Neither agree nor disagree

Don't know

- Q3a. Please use this space to provide any comments relating to the proposals for minimum licensing standard or standards for licensed operators in Greater Manchester.**

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

SECTION 4

EVERYONE CAN ANSWER THESE QUESTIONS

Proposed minimum licensing standards for Local Authorities in Greater Manchester

Timescales for applications to be submitted and received: It is proposed that applications may be submitted up to eight weeks in advance of licence expiry. Once an application has been determined a driver/vehicle or operator licence will be issued within five working days.

An agreed common enforcement approach: It is proposed an agreed common enforcement approach across Greater Manchester is developed so that the standards will be adhered to in practice and drivers will comply with them.

An agreed framework to which licensing fees are set: It is proposed that a framework governing levels of licensing fees (including enforcement and compliance costs) will be agreed.

Councillor training (relevant to their role) before they hear applications: Councillors already receive training but this proposal confirms that councillors with responsibility for licensing will receive training each year and new councillors will receive training before they hear licensing applications.

Appropriate delegated powers for Licensing Managers: It is proposed that appropriate delegated powers (trusting others to make decisions) will be in place for Licensing Managers and Heads of Service to suspend or revoke licences on the grounds of public safety when an urgent need arises.

Excellence in Licensing Award: Local Authorities are also considering a scheme where members of the public can nominate drivers and companies who they wish to be considered for an 'Excellence in Licensing Award'.

Q4. To what extent do you agree or disagree with the proposed minimum licensing standards for Local Authorities in Greater Manchester?

Please tick one only

Strongly agree

Disagree

Agree

Strongly disagree

Neither agree nor disagree

Don't know

Q4a. Please use this space to provide any comments relating to the proposals for minimum licensing standard or standards for Local Authorities in Greater Manchester.

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

SECTION 5

EVERYONE CAN ANSWER THESE QUESTIONS

Timetable

It is acknowledged that there needs to be a period of transition before Licensing Authorities implement any proposals agreed following this consultation. This will also allow the trade to consider their options for vehicles going forward. To support Greater Manchester licensed hackney carriage and private hire vehicle owners to upgrade, the Greater Manchester Clean Air Plan proposals include a 'Clean Taxi Fund' and a series of other measures, more information on this can be found at cleanairgm.com.

A timetable has been set out which proposes:

- New vehicles being licensed from 1 April 2021 will be required to meet the standards that are approved following this consultation.
- Most of the other policy areas that are approved will start to come into force from April 2021, for example relating to driver and operator standards.
- From April 1, 2021 it is proposed that all existing licensed vehicles will commence transitioning to meet the standards that are approved following this consultation. This will include the stated emissions requirements and age of vehicles.
- The transition period will be determined by each individual Licensing Authority having considered current and revised policies and the likely effect on the trade, but it is expected that all vehicles would have to be compliant with the proposed emissions standards by April 1, 2024 (non-compliant vehicles will still be liable to pay the Clean Air Zone charge from Spring 2022). This will mean that from April 2023, hackney and private hire vehicles will need to meet Minimum Licensing Standards to secure a vehicle licence.
- From 2025 all new-to-licence vehicles would need to be Zero Emission Capable (ZEC) (*a vehicle which emits no more than 75g/km CO₂ exhaust emissions and be capable of being operated with no emissions for a minimum range of 20 miles*).
- From April 2028 all who submit their vehicle for a licence would need to be ZEC.

Q5. To what extent do you agree or disagree with the proposed timetable for minimum licensing standards in Greater Manchester?

Please tick one only

- | | |
|---|--|
| <input type="checkbox"/> Strongly agree | <input type="checkbox"/> Disagree |
| <input type="checkbox"/> Agree | <input type="checkbox"/> Strongly disagree |
| <input type="checkbox"/> Neither agree nor disagree | <input type="checkbox"/> Don't know |

Q5a. Please use this space to provide any comments relating to the proposed timetable.

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

SECTION 6

EVERYONE CAN ANSWER THESE QUESTIONS

Impact

When considering the impact, you may also want to review current licence standards within the Local Authority you live in or are currently licensed with. A link to these can be found on gmtaxistandards.com or you can contact each Local Authority Licensing Department directly. A summary of current licensing standards and case studies of how the proposals may affect vehicle owners can be found at Appendices 8 and 9 within the consultation document.

Having read through the proposals for minimum licensing standards in Greater Manchester...

Q6a. Please use this space to describe how you / your business will be affected by these proposals (if at all) if they are approved and implemented.

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

SECTION 6

ONLY TO BE ANSWERED BY BUSINESSES INCLUDING VEHICLE LEASING COMPANIES OR ANYONE WHO WORKS IN THE TAXI TRADE

COVID-19

Local Authorities are aware that businesses have been, and continue to be, impacted by the COVID-19 pandemic.

To understand the impact on you and your business / organisation please answer the following questions.

Q6b. Which of the following best reflects your trading status as a result of the COVID-19 pandemic?

Please tick all that apply

- Have continued trading throughout
- Currently trading, having temporarily paused - but have resumed trading during the pandemic
- Paused trading
- Permanently ceased trading
- Other (please write in)

Q6c. Have you or your business received any of the following as a result of the COVID-19 pandemic:

Please tick all that apply

- Coronavirus job retention scheme (aka Furlough)
- Government-backed accredited loans or finance agreements (aka CBIL / BBLS)
- Business grants funded by the UK and devolved governments
- Self-employment income support scheme
- Other government support
- Other loans / grants (please write in)

- Not applied for any of these schemes
- Not applicable for my business or organisation

Q6d. Please tell us how the COVID-19 pandemic has affected the following aspects of your business:

Please tick one per row

| | A lot less than before | Less than before | Same as before | More than before | A lot more than before | Not applicable | Don't know | Prefer not to say |
|--------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Level of debt | <input type="checkbox"/> |
| Reserves / Savings | <input type="checkbox"/> |
| Turnover | <input type="checkbox"/> |
| Profitability | <input type="checkbox"/> |

SECTION 6

ONLY TO BE ANSWERED BY BUSINESSES INCLUDING VEHICLE LEASING COMPANIES OR ANYONE WHO WORKS IN THE TAXI TRADE

Q6e. Please tell us how the COVID-19 pandemic has affected your ability to meet the proposed Greater Manchester Minimum Licensing Standards?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

SECTION 6

ONLY TO BE ANSWERED BY ORGANISATIONS, A MEMBER OF THE PUBLIC OR AN ELECTED OFFICIAL

Local Authorities are aware that people and businesses have been, and continue to be, impacted by the COVID-19 pandemic.

Q6f. Do you have any comments on the impact of the COVID-19 pandemic on the proposals outlined within the consultation document?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

SECTION 7

EVERYONE CAN ANSWER THESE QUESTIONS

Overall proposals

Q7a. Overall, to what extent do you agree or disagree with the proposed Greater Manchester minimum licensing standards for hackney carriages and private hire services.

Please tick one only

Strongly agree

Disagree

Agree

Strongly disagree

Neither agree nor disagree

Don't know

Q7b. Please explain your answer.

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

SECTION 7

EVERYONE CAN ANSWER THESE QUESTIONS

Q7c. Are there any changes that you think would improve the proposed minimum licensing standards?

Please tick one only

Yes

No

Don't know

IF ANSWERED YES ABOVE

Q7d. Please provide further details as to the changes you think would improve the proposed standards.

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

Q7e. If you disagreed with the proposals, how likely would you be to agree with them if the changes you suggested in answer to the previous question were made?

Please tick one only

Extremely likely

Quite unlikely

Quite likely

Extremely unlikely

Neither likely or unlikely

Don't know

SECTION 8

EVERYONE CAN ANSWER THESE QUESTIONS

Draft Equality Impact Assessment

Q8. A draft Equality Impact Assessment has been produced to identify the potential impacts of the proposed minimum licensing standards on persons with protected characteristics. This can be found at gmtaxistandards.com.

Please use this space to provide any comments on the draft Equality Impact Assessment.

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

SECTION 9

THERE ARE QUESTIONS TO BE ANSWERED ON THIS PAGE IF YOU ARE

- A LICENSED TAXI OR PRIVATE HIRE DRIVER, OWNER OR OPERATOR
- AN ORGANISATION INCLUDING TRADE ASSOCIATION OR CHARITY
- A VEHICLE LEASING COMPANY

About you

ANSWER IF YOU ARE A TAXI OR PRIVATE HIRE DRIVER, OWNER OR OPERATOR

Q9. Which Local Authority are you licensed with?

Please tick all that apply

- | | |
|---|-------------------------------------|
| <input type="checkbox"/> Bolton | <input type="checkbox"/> Tameside |
| <input type="checkbox"/> Bury | <input type="checkbox"/> Trafford |
| <input type="checkbox"/> Oldham | <input type="checkbox"/> Manchester |
| <input type="checkbox"/> Rochdale | <input type="checkbox"/> Salford |
| <input type="checkbox"/> Stockport | <input type="checkbox"/> Wigan |
| <input type="checkbox"/> Outside Greater Manchester (please write in) | <input type="text"/> |

ANSWER IF YOU ARE IN A TRADE ASSOCIATION, CHARITY OR VEHICLE LEASE COMPANY

Q10. Which Local Authority are based in?

Please tick all that apply

- | | |
|---|-------------------------------------|
| <input type="checkbox"/> Bolton | <input type="checkbox"/> Tameside |
| <input type="checkbox"/> Bury | <input type="checkbox"/> Trafford |
| <input type="checkbox"/> Oldham | <input type="checkbox"/> Manchester |
| <input type="checkbox"/> Rochdale | <input type="checkbox"/> Salford |
| <input type="checkbox"/> Stockport | <input type="checkbox"/> Wigan |
| <input type="checkbox"/> Outside Greater Manchester (please write in) | <input type="text"/> |

Q11. How many drivers / members do you represent? OR How many licensed vehicles do you own?

Please write in your response below

SECTION 9

EVERYONE CAN ANSWER THESE QUESTIONS

We must consider how different people will be affected by our strategies and policies, and we also want to make sure we hear from people from all of Greater Manchester's diverse backgrounds. Therefore the last few questions are about you, to help us ensure we hear from a range of voices, and to help identify any possible discrimination or barriers for particular groups of people. The personal information you give us will remain strictly confidential and we will not use it in a way that could identify you. If there are questions you would prefer not to answer please choose the 'prefer not to say' option.

Q12. Which Local Authority do you live in?

Please tick one only

- | | |
|---|-------------------------------------|
| <input type="checkbox"/> Bolton | <input type="checkbox"/> Tameside |
| <input type="checkbox"/> Bury | <input type="checkbox"/> Trafford |
| <input type="checkbox"/> Oldham | <input type="checkbox"/> Manchester |
| <input type="checkbox"/> Rochdale | <input type="checkbox"/> Salford |
| <input type="checkbox"/> Stockport | <input type="checkbox"/> Wigan |
| <input type="checkbox"/> Outside Greater Manchester (please write in) | <input type="text"/> |

Q13 What is your home postcode?

Q14: How old are you?

Please tick one only

- | | |
|-----------------------------------|--|
| <input type="checkbox"/> Under 13 | <input type="checkbox"/> 45-54 |
| <input type="checkbox"/> 13-17 | <input type="checkbox"/> 55-64 |
| <input type="checkbox"/> 18-24 | <input type="checkbox"/> 65-74 |
| <input type="checkbox"/> 25-34 | <input type="checkbox"/> 75+ |
| <input type="checkbox"/> 35-44 | <input type="checkbox"/> Prefer not to say |

SECTION 9

EVERYONE CAN ANSWER THESE QUESTIONS

Q15: What is your ethnic group?

Please tick one only

- | | |
|--|--|
| <input type="checkbox"/> Asian or Asian British - Indian | <input type="checkbox"/> Mixed - White and Black African |
| <input type="checkbox"/> Asian or Asian British - Pakistan | <input type="checkbox"/> Mixed - White and Asian |
| <input type="checkbox"/> Asian or Asian British - Bangladesh | <input type="checkbox"/> Mixed - Any other mixed background |
| <input type="checkbox"/> Asian or Asian British - Chinese | <input type="checkbox"/> White - English/Welsh/Scottish/Northern Irish/British |
| <input type="checkbox"/> Asian or Asian British - Kashmiri | <input type="checkbox"/> White - Irish |
| <input type="checkbox"/> Asian or Asian British - Any other Asian background | <input type="checkbox"/> White - Gypsy or Irish Traveller |
| <input type="checkbox"/> Black or Black British - Caribbean | <input type="checkbox"/> White - Eastern European |
| <input type="checkbox"/> Black or Black British - African | <input type="checkbox"/> White - Any other White background |
| <input type="checkbox"/> Black or Black British - Any other Black background | <input type="checkbox"/> Other ethnic group - Arab |
| <input type="checkbox"/> Mixed - White and Black Caribbean | <input type="checkbox"/> Other ethnic group - Other |
| | <input type="checkbox"/> Prefer not to say |

Q16: What is your religion?

Please tick one only

- | | |
|------------------------------------|--|
| <input type="checkbox"/> Buddhist | <input type="checkbox"/> Sikh |
| <input type="checkbox"/> Christian | <input type="checkbox"/> Other religion |
| <input type="checkbox"/> Hindu | <input type="checkbox"/> No religion |
| <input type="checkbox"/> Jewish | <input type="checkbox"/> Prefer not to say |
| <input type="checkbox"/> Muslim | |

Q17: How do you describe your gender?

Please tick one only

- | | |
|--|--|
| <input type="checkbox"/> A man (including Trans Man) | <input type="checkbox"/> In another way |
| <input type="checkbox"/> A woman (including Trans Woman) | <input type="checkbox"/> Prefer not to say |
| <input type="checkbox"/> Non-binary | |

Q18: Do you identify as trans/transgender?

Please tick one only

- | | |
|------------------------------|--|
| <input type="checkbox"/> Yes | <input type="checkbox"/> In some ways |
| <input type="checkbox"/> No | <input type="checkbox"/> Prefer not to say |

SECTION 9

EVERYONE CAN ANSWER THESE QUESTIONS

Q19: Which of the following best describes how you think of yourself?

Please tick one only

- Bisexual
- Gay man
- Gay woman or lesbian
- Heterosexual

- Other sexual orientation
(please specific)

- Prefer not to say

Q20: Are your day-to-day activities limited because of a health problem or disability?

Please tick one only

- Yes, limited a lot
- Yes, limited a little

- No

- Prefer not to say

Q21: Could you please tell me which of the conditions best describe your health issues or disability?

Please tick all that apply

- Learning disability
- Mental ill health
- Mobility disability

- Sensory disability

- Prefer not to say

- Other disability (please write in)

EVERYONE CAN ANSWER THESE QUESTIONS

Q22. How did you hear about this consultation?

Please tick one only

- Email
- Twitter
- Facebook
- Instagram
- LinkedIn
- Posters
- Search engine advert
- Other (please write in)

- Radio
- Local newspaper
- Events
- gmtaxistandards.com website
- Website (not gmtaxistandards.com website)
- Word of mouth
- Prefer not to say

SECTION 9

EVERYONE CAN ANSWER THESE QUESTIONS

Please see privacy notice at tfgm.com/privacy-policy to see how your data will be held and your individual rights under GDPR.

Q23: CONTACT

Please tick all that apply

- You would like to be kept informed on the development of the Minimum Licensing Standards proposals
- You own / drive an impacted vehicle and would like information about support when it becomes available
- You are willing to take part in further research / consultation activity
- I do not want to provide my contact details

Q24: CONTACT

Please provide the following details

Name

Telephone Number

Email address

NOTE: If you are aged under 13, we require the contact details from a parent or legal guardian and they must confirm they have given their permission to provide their contact details by ticking below:

- As a parent/guardian of the person responding to this consultation who is aged under 13, I have provided my contact details.

Thank you for sharing your views on the Greater Manchester proposals for Minimum Licensing Standards. Once the consultation has closed on 3 December 2020, all the feedback received will be read and considered to help shape the final proposals.

Please post your completed questionnaire to the address below. You do not need a stamp.

Greater Manchester Minimum Licensing Standards
Freepost RUBS-XRAT-GLBK
AECOM
1 New York Street
MANCHESTER
M1 4HD.

IF YOU HAVE RUN OUT OF SPACE WHEN WRITING A COMMENT, PLEASE COMPLETE YOUR COMMENT HERE:

Question:

Question:

For support to respond to this consultation or to request copies of the summary document and questionnaire please contact info@gmtaxistandards.com or 0161 244 1100. Support for non-English speakers is available on 0161 244 1100.

Prosimy o kontakt przez email info@gmtaxistandards.com lub telefonicznie pod numerem 0161 244 1100 po pomoc w odpowiedzi na tą konsultację lub aby móc otrzymać egzemplarze dokumentacji z podsumowaniem wraz z ankietą.

Wsparcie dla osób nie mówiących po angielsku można otrzymać pod numerem 0161 244 1100.

এই পরামর্শে সাড়া দিতে সাহায্যের জন্য অথবা সামানি ডকুমেন্ট অর্থাৎ সারমর্ট এবং প্রশ্নালার কপি পেতে ইমেইলে যোগাযোগ করুন - info@gmtaxistandards.com

অথবা এই নামারে ফোন করুন- 0161 244 1100

যান্ত্র ইংরেজি বলেন না তাদের জন্য সহযোগিতার ব্যবস্থা রয়েছে, সাহায্য পেতে এই নামারে ফোন করুন- 0161 244 1100

اس مشاورت کا جواب دینے میں مدد یادستاویر کا خلاصہ اور سوانح کی کاپی حاصل کرنے کیلئے براہ مریانی ای میل پر رابطہ کیجئے یا info@gmtaxisstandards.com پر ٹیلی فون کیجئے۔
جن افراد کو انگریزی زبان بولنے میں مدد و رکار ہے وہ اس نمبر 0161 244 1100 پر فون کریں۔

"દસ્તાવેજના સારાંશ અને પ્રશ્નાલિની નકલો મેળવવા માટે અથવા આ પરામર્શનો જવાબ આપવા માટે મદદ મેળવવા કૃપા કરીને info@gmtaxistandards.com પર ઇમેઇલ ભારા સંપર્ક કરો
અથવા તમે 0161 244 1100 પર ટેલિફોન કરી શકો છો.

"જ લોકો અગ્રેજુ નથી બોલતા, તેઓ મદદ મેળવવા, 0161 244 1100 પર ટેલિફોન કરી શકે છે."

"الحصول على الدعم للرد على هذه الاستشارة أو لطلب نسخ من الوثيقة الموجزة والاستبيان، يرجى التواصل على البريد الإلكتروني info@gmtaxistandards.com أو الإتصال بالرقم 0161 244 1100.

يتوفر الدعم لغير الناطقين باللغة الإنجليزية على الرقم 0161 244 1100.

Appendix D Current licensing standards

Taxi and Private Hire Minimum Licensing Standards Audit - GM 10 Local Authorities

| Bury | Bolton | Manchester | Oldham | Rochdale | Salford | Stockport | Tameside | Trafford | Wigan |
|---|--------|--|--------|----------|--|---|----------|---|--|
| Criminal Record Checks - applicants require an enhanced DBS certificate and sign up to the DBS update service | | No update service approval sought this year. | | | | Enhanced DBS required but not yet required to register with update service. | | Enhanced DBS required but not yet required to register with update service. | Enhanced DBS required but not required to sign up to the update service. |
| Require certificate of good conduct for applicants who have lived outside the UK for 6 months or more | | | | | If applicants have not lived in UK consecutively for the last 5 years, will require certificate of good conduct. | | | | If applicant has lived outside of the UK for more than 3 months in the past 5 years they will require a certificate of good conduct. |
| Applicants/drivers must meet DVLA Group 2 Medical Standards and medicals to be undertaken by GPs who have access to applicant's full medical history - and proposed frequency | | | | | | | | Must be completed by applicant's own doctor but currently only require Group 1. | Group 2 Medical with any Doctor. |
| Applicants required to take a local area knowledge test | | | | | | | | | |
| Authorities to ensure that drivers can communicate in English orally and in writing to a standard required to fulfil their duties | | | | | | | | | |
| Authorities must require all drivers to undertake safeguarding/child sexual exploitation/human trafficking awareness training and also disability awareness training | | | | | | | | | |
| All new drivers required to pass a practical driving test with a GM approved supplier | | | | | | | | | |

Taxi and Private Hire Minimum Licensing Standards Audit - GM 10 Local Authorities

| | Bury | Bolton | Manchester | Oldham | Rochdale | Salford | Stockport | Tameside | Trafford | Wigan |
|--|------|---|---|---|----------|--|--|--|--|--|
| All licensed vehicles must comply with the current Euro standard relating to vehicle emissions at first licensing. (Petrol - Euro IV 2005 + and Diesel - Euro VI 2015 +) | | | Enhanced DBS required but not yet required to register with update service. | | | | | | | |
| All vehicles must be under five years of age at first licensing and will not be licensed beyond ten years of age. | | | | PH vehicles - up to 7 years until 12 years HC vehicles - up to 7 years until 14 years. | | Must be under 4 years. | | PH vehicles - upto 5 years until 12 years PH WAV's & HC vehicles - upto 5years until 15 years. | 4 years and 10 years unless vehicle is in exceptional condition. | PH vehicles - off at 7 years HC vehicles - off at 10 years. |
| Vehicle Colour - all Private Hire vehicles will be white in colour and all taxis/hackney carriage vehicles to be black in colour | | | Currently allow 'True Silver' in PHVs also. | | | | | Currently, all WAVs must be black. | | |
| Vehicle Stickers as prescribed by the Council only - no advertisements, no magnetic stickers | | Approved adverts on taxis. No adverts on private hire, however problems with company wraps on private hire. | | | | Limited advertising is permitted on PHV as per policy. | Limited advertising is permitted on PHV as per policy. | | | "Pre booked vehicle stickers as prescribed by the Council only. Approved adverts only - Any livery to be authorised by the Council". |
| All taxis to be Wheelchair Accessible Vehicles (WAV). | | | | | | | | | | |
| All Licensed vehicles over the age of three will be tested at least twice a year | | | | | | | | | | Limited advertising is permitted on PHV as per policy. |

Taxi and Private Hire Minimum Licensing Standards Audit - GM 10 Local Authorities

| | Bury | Bolton | Manchester | Oldham | Rochdale | Salford | Stockport | Tameside | Trafford | Wigan |
|--|---|----------------------------|------------|--|--|---|--|--|---|--|
| Not allowing retrofit of engines | | | | | | | | | | |
| Not licensing vehicles that have previously been written off | | Allow category D vehicles. | | Will consider licensing Cat S & N - must pass Autolign inspection. | Will consider licensing Cat S & N provided it meets the Council's compliance test. | We allow if they are professionally repaired and meet DVSA standards and compliance test. | Will consider licensing Cat S & N provided it meets the Council's compliance test. | Will consider licensing Cat S & N - must pass Autolign inspection. | | Will consider licensing written off vehicles as long as they pass our vehicle inspection test. |
| Window tint allowances (as proposed) | "Current failure item - Light transmittance through: a. front-window glass is less than 75%. b. side-door glass is less than 70%. c. remaining glass (except rear window) is less than 70%". | | | | | | As manufacture / factory fitted. | | "Current failure item - Light transmittance through: a. front-window glass is less than 75%. b. side-door glass is less than 70%. c. remaining glass (except rear window) is less than 70%". | As manufacture / factory fitted. |
| No roof signs on PHVs | | | | | | | | | | |
| Proprietors to have DBS check | | | | | | | | | | Not currently but considering basic disclosures for applicants who are not current licensed drivers. |
| All Licensed vehicles to be fitted with mandatory CCTV cameras to a standard yet to be determined. | | | | | | | | | | |

Taxi and Private Hire Minimum Licensing Standards Audit - GM 10 Local Authorities

| | Bury | Bolton | Manchester | Oldham | Rochdale | Salford | Stockport | Tameside | Trafford | Wigan |
|---|------|---|---|--------|--|---|---|----------|----------|--|
| Operator Licence Conditions that set clear requirements around records and responsibilities | | Have this but proposed conditions go further and put further responsibilities around policy and training. | Have this but proposed conditions go further and put further responsibilities around policy and training. | | We do have conditions relating to this, but proposed conditions are more robust. | Have this but proposed conditions go further and put further responsibilities around policy and training. | Have this but proposed conditions go further and put further responsibilities around policy and training. | | | |
| DBS Checks for Operators and Staff every three years | | | DBS for Operator Licence Holders but not staff at present. | | A basic/standard DBS required at the point of application from operators who are not currently licensed as a driver. | | DBS for Operator Licence Holders but not staff at present. | | | Not currently but considering basic disclosures for applicants who aren't current licensed drivers - if implemented this would be done every 5 years in line with their licence. |
| Fit and Proper criteria for operator applications | | | This will be dealt with in the suitability policy. | | | | | | | |

Appendix E Responses to closed questions

Are you responding as...

| | N | % |
|---|------|------|
| Member of the public | 999 | 59% |
| Licensed hackney carriage driver – own my vehicle | 207 | 12% |
| Licensed hackney carriage driver – rent / lease a licensed vehicle that is kept at my home address | 15 | 1% |
| Licensed hackney carriage driver – rent / lease a licensed vehicle that is not kept at my home address | 10 | 1% |
| Licensed private hire driver – own my vehicle | 315 | 19% |
| Licensed private hire driver – rent / lease a licensed vehicle that is kept at my home address | 31 | 2% |
| Licensed private hire driver – rent / lease a licensed vehicle that is not kept at my home address | 7 | 0% |
| Private hire operator | 32 | 2% |
| Organisation (e.g. schools, charities, social enterprise, trade organisations, government bodies) | 17 | 1% |
| Vehicle lease company (or owner of licensed vehicles used by others) | 10 | 1% |
| Business (including self-employed and sole traders) | 19 | 1% |
| Councillor / elected official | 19 | 1% |
| Base | 1681 | 100% |

What is the size of your business?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|---|----------------|----|-----------------|----|-------------|----|-----------|----|------------|------|-----------------|----|-----------------|----|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Sole trader / self-employed (1 person) | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 10 | 56% | 0 | 0% | 0 | 0% |
| Micro business (2-9 employees) | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 4 | 22% | 0 | 0% | 0 | 0% |
| Small business (10-49 employees) | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 2 | 11% | 0 | 0% | 0 | 0% |
| Medium business (50-249 employees) | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 6% | 0 | 0% | 0 | 0% |
| Large business (250+ employees) | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 6% | 0 | 0% | 0 | 0% |
| Base | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 18 | 100% | 0 | 0% | 0 | 0% |

Are you authorised to respond on behalf of this organisation?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-------------|----------------|----|-----------------|----|-------------|----|-----------|------|------------|------|-----------------|------|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Yes | 0 | 0% | 0 | 0% | 0 | 0% | 29 | 100% | 16 | 94% | 9 | 100% | 11 | 85% |
| No | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 6% | 0 | 0% | 2 | 15% |
| Base | 0 | 0% | 0 | 0% | 0 | 0% | 29 | 100% | 17 | 100% | 9 | 100% | 13 | 100% |

To what extent do you agree or disagree with the proposed minimum licensing standards for licensed drivers in Greater Manchester?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-----------------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Strongly agree | 777 | 80% | 72 | 33% | 92 | 26% | 5 | 17% | 14 | 78% | 2 | 20% | 15 | 48% |
| Agree | 135 | 14% | 54 | 25% | 109 | 31% | 11 | 38% | 2 | 11% | 6 | 60% | 11 | 35% |
| Neither agree nor disagree | 10 | 1% | 27 | 12% | 41 | 12% | 7 | 24% | 0 | 0% | 0 | 0% | 1 | 3% |
| Disagree | 22 | 2% | 34 | 15% | 40 | 11% | 2 | 7% | 0 | 0% | 2 | 20% | 2 | 6% |
| Strongly disagree | 23 | 2% | 28 | 13% | 62 | 18% | 4 | 14% | 1 | 6% | 0 | 0% | 2 | 6% |
| Don't know | 2 | 0% | 5 | 2% | 4 | 1% | 0 | 0% | 1 | 6% | 0 | 0% | 0 | 0% |
| Base | 969 | 100% | 220 | 100% | 348 | 100% | 29 | 100% | 18 | 100% | 10 | 100% | 31 | 100% |

To what extent do you agree or disagree with the proposed minimum licensing standards for licensed vehicles in Greater Manchester?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-----------------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Strongly agree | 627 | 65% | 27 | 12% | 41 | 12% | 2 | 7% | 9 | 53% | 0 | 0% | 10 | 32% |
| Agree | 228 | 23% | 24 | 11% | 42 | 12% | 6 | 20% | 2 | 12% | 4 | 40% | 8 | 26% |
| Neither agree nor disagree | 29 | 3% | 18 | 8% | 40 | 11% | 7 | 23% | 1 | 6% | 1 | 10% | 3 | 10% |
| Disagree | 47 | 5% | 52 | 24% | 60 | 17% | 4 | 13% | 1 | 6% | 3 | 30% | 7 | 23% |
| Strongly disagree | 41 | 4% | 98 | 45% | 161 | 46% | 11 | 37% | 4 | 24% | 2 | 20% | 3 | 10% |
| Don't know | 0 | 0% | 1 | 0% | 4 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Base | 972 | 100% | 220 | 100% | 348 | 100% | 30 | 100% | 17 | 100% | 10 | 100% | 31 | 100% |

To what extent do you agree or disagree with the proposed minimum licensing standards for licensed operators in Greater Manchester?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-----------------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Strongly agree | 791 | 81% | 87 | 41% | 114 | 33% | 8 | 27% | 12 | 67% | 1 | 10% | 18 | 58% |
| Agree | 128 | 13% | 54 | 26% | 112 | 32% | 14 | 47% | 5 | 28% | 5 | 50% | 7 | 23% |
| Neither agree nor disagree | 31 | 3% | 20 | 9% | 55 | 16% | 3 | 10% | 0 | 0% | 3 | 30% | 3 | 10% |
| Disagree | 7 | 1% | 7 | 3% | 19 | 5% | 0 | 0% | 0 | 0% | 0 | 0% | 2 | 6% |
| Strongly disagree | 12 | 1% | 9 | 4% | 40 | 12% | 5 | 17% | 1 | 6% | 1 | 10% | 1 | 3% |
| Don't know | 3 | 0% | 34 | 16% | 7 | 2% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Base | 972 | 100% | 211 | 100% | 347 | 100% | 30 | 100% | 18 | 100% | 10 | 100% | 31 | 100% |

To what extent do you agree or disagree with the proposed minimum licensing standards for local authorities in Greater Manchester?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-----------------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Strongly agree | 656 | 68% | 51 | 23% | 67 | 19% | 6 | 20% | 10 | 56% | 1 | 10% | 15 | 48% |
| Agree | 214 | 22% | 106 | 49% | 112 | 32% | 7 | 23% | 5 | 28% | 4 | 40% | 11 | 35% |
| Neither agree nor disagree | 57 | 6% | 38 | 17% | 67 | 19% | 9 | 30% | 1 | 6% | 4 | 40% | 3 | 10% |
| Disagree | 10 | 1% | 7 | 3% | 31 | 9% | 1 | 3% | 0 | 0% | 1 | 10% | 0 | 0% |
| Strongly disagree | 14 | 1% | 11 | 5% | 54 | 16% | 5 | 17% | 1 | 6% | 0 | 0% | 2 | 6% |
| Don't know | 16 | 2% | 5 | 2% | 15 | 4% | 2 | 7% | 1 | 6% | 0 | 0% | 0 | 0% |
| Base | 967 | 100% | 218 | 100% | 346 | 100% | 30 | 100% | 18 | 100% | 10 | 100% | 31 | 100% |

To what extent do you agree or disagree with the proposed timetable for minimum licensing standards in Greater Manchester?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-----------------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Strongly agree | 571 | 59% | 26 | 12% | 40 | 12% | 2 | 7% | 8 | 44% | 0 | 0% | 8 | 26% |
| Agree | 239 | 25% | 13 | 6% | 41 | 12% | 3 | 10% | 4 | 22% | 3 | 30% | 12 | 39% |
| Neither agree nor disagree | 65 | 7% | 15 | 7% | 45 | 13% | 5 | 17% | 1 | 6% | 1 | 10% | 3 | 10% |
| Disagree | 48 | 5% | 38 | 17% | 62 | 18% | 10 | 33% | 2 | 11% | 2 | 20% | 4 | 13% |
| Strongly disagree | 39 | 4% | 124 | 57% | 144 | 42% | 10 | 33% | 3 | 17% | 4 | 40% | 4 | 13% |
| Don't know | 6 | 1% | 2 | 1% | 14 | 4% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Base | 968 | 100% | 218 | 100% | 346 | 100% | 30 | 100% | 18 | 100% | 10 | 100% | 31 | 100% |

Which of the following best reflects your trading status as a result of the Covid-19 pandemic?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|--|----------------|----|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|----|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Have continued trading throughout | 0 | 0% | 18 | 8% | 53 | 16% | 10 | 33% | 8 | 44% | 1 | 10% | 0 | 0% |
| Currently trading, having temporarily paused - but have resumed trading during the pandemic | 0 | 0% | 127 | 59% | 161 | 48% | 12 | 40% | 5 | 28% | 5 | 50% | 0 | 0% |
| Paused trading | 0 | 0% | 63 | 29% | 98 | 29% | 6 | 20% | 5 | 28% | 3 | 30% | 0 | 0% |
| Permanently ceased trading | 0 | 0% | 5 | 2% | 19 | 6% | 0 | 0% | 0 | 0% | 1 | 10% | 0 | 0% |
| Other | 0 | 0% | 3 | 1% | 6 | 2% | 2 | 7% | 0 | 0% | 0 | 0% | 0 | 0% |
| Base | 0 | 0% | 216 | 100% | 337 | 100% | 30 | 100% | 18 | 100% | 10 | 100% | 0 | 0% |

Have you or your business received any of the following as a result of the Covid-19 pandemic?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|---|----------------|----|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|----|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Coronavirus job retention scheme (aka Furlough) | 0 | 0% | 16 | 9% | 14 | 4% | 6 | 21% | 5 | 31% | 4 | 44% | 0 | 0% |
| Government-backed accredited loans or finance agreements (aka CBIL / BBLS) | 0 | 0% | 7 | 4% | 14 | 4% | 7 | 24% | 2 | 13% | 5 | 56% | 0 | 0% |
| Business grants funded by the UK and devolved governments | 0 | 0% | 7 | 4% | 15 | 4% | 6 | 21% | 2 | 13% | 2 | 22% | 0 | 0% |
| Self-employment income support scheme | 0 | 0% | 106 | 59% | 221 | 66% | 11 | 38% | 5 | 31% | 2 | 22% | 0 | 0% |
| Other government support | 0 | 0% | 19 | 11% | 15 | 4% | 1 | 3% | 0 | 0% | 0 | 0% | 0 | 0% |
| Other loans / grants | 0 | 0% | 17 | 9% | 12 | 4% | 2 | 7% | 1 | 6% | 0 | 0% | 0 | 0% |
| Not applied for any of these schemes | 0 | 0% | 15 | 8% | 26 | 8% | 5 | 17% | 4 | 25% | 1 | 11% | 0 | 0% |
| Not applicable | 0 | 0% | 10 | 6% | 42 | 13% | 2 | 7% | 1 | 6% | 1 | 11% | 0 | 0% |
| Base | 0 | 0% | 179 | 100% | 335 | 100% | 29 | 100% | 16 | 100% | 9 | 100% | 0 | 0% |

Level of debt: Please tell us how the Covid-19 pandemic has affected the following aspects of your business

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-------------------------------|----------------|----|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|----|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| A lot less than before | 0 | 0% | 30 | 17% | 66 | 20% | 0 | 0% | 3 | 17% | 0 | 0% | 0 | 0% |
| Less than before | 0 | 0% | 0 | 0% | 6 | 2% | 0 | 0% | 1 | 6% | 3 | 30% | 0 | 0% |
| Same as before | 0 | 0% | 11 | 6% | 15 | 4% | 5 | 17% | 2 | 11% | 0 | 0% | 0 | 0% |
| More than before | 0 | 0% | 35 | 20% | 79 | 23% | 8 | 27% | 5 | 28% | 1 | 10% | 0 | 0% |
| A lot more than before | 0 | 0% | 83 | 47% | 119 | 35% | 10 | 33% | 4 | 22% | 5 | 50% | 0 | 0% |
| Not applicable | 0 | 0% | 7 | 4% | 19 | 6% | 2 | 7% | 0 | 0% | 0 | 0% | 0 | 0% |
| Don't know | 0 | 0% | 4 | 2% | 8 | 2% | 1 | 3% | 0 | 0% | 0 | 0% | 0 | 0% |
| Prefer not to say | 0 | 0% | 5 | 3% | 26 | 8% | 4 | 13% | 3 | 17% | 1 | 10% | 0 | 0% |
| Base | 0 | 0% | 175 | 100% | 338 | 100% | 30 | 100% | 18 | 100% | 10 | 100% | 0 | 0% |

Reserves / Savings: Please tell us how the Covid-19 pandemic has affected the following aspects of your business:

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-------------------------------|----------------|----|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|----|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| A lot less than before | 0 | 0% | 88 | 62% | 125 | 52% | 14 | 54% | 4 | 31% | 7 | 78% | 0 | 0% |
| Less than before | 0 | 0% | 13 | 9% | 44 | 18% | 5 | 19% | 4 | 31% | 0 | 0% | 0 | 0% |
| Same as before | 0 | 0% | 2 | 1% | 2 | 1% | 1 | 4% | 2 | 15% | 1 | 11% | 0 | 0% |
| More than before | 0 | 0% | 8 | 6% | 8 | 3% | 1 | 4% | 2 | 15% | 1 | 11% | 0 | 0% |
| A lot more than before | 0 | 0% | 19 | 13% | 28 | 12% | 1 | 4% | 0 | 0% | 0 | 0% | 0 | 0% |
| Not applicable | 0 | 0% | 5 | 3% | 17 | 7% | 1 | 4% | 0 | 0% | 0 | 0% | 0 | 0% |
| Don't know | 0 | 0% | 4 | 3% | 4 | 2% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Prefer not to say | 0 | 0% | 4 | 3% | 12 | 5% | 3 | 12% | 1 | 8% | 0 | 0% | 0 | 0% |
| Base | 0 | 0% | 143 | 100% | 240 | 100% | 26 | 100% | 13 | 100% | 9 | 100% | 0 | 0% |

Turnover: Please tell us how the Covid-19 pandemic has affected the following aspects of your business:

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-------------------------------|----------------|----|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|----|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| A lot less than before | 0 | 0% | 118 | 78% | 179 | 72% | 18 | 62% | 8 | 53% | 9 | 90% | 0 | 0% |
| Less than before | 0 | 0% | 7 | 5% | 30 | 12% | 5 | 17% | 2 | 13% | 1 | 10% | 0 | 0% |
| Same as before | 0 | 0% | 0 | 0% | 3 | 1% | 0 | 0% | 4 | 27% | 0 | 0% | 0 | 0% |
| More than before | 0 | 0% | 5 | 3% | 3 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| A lot more than before | 0 | 0% | 15 | 10% | 14 | 6% | 3 | 10% | 0 | 0% | 0 | 0% | 0 | 0% |
| Not applicable | 0 | 0% | 3 | 2% | 7 | 3% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Don't know | 0 | 0% | 2 | 1% | 4 | 2% | 0 | 0% | 1 | 7% | 0 | 0% | 0 | 0% |
| Prefer not to say | 0 | 0% | 1 | 1% | 9 | 4% | 3 | 10% | 0 | 0% | 0 | 0% | 0 | 0% |
| Base | 0 | 0% | 151 | 100% | 249 | 100% | 29 | 100% | 15 | 100% | 10 | 100% | 0 | 0% |

Profitability: Please tell us how the Covid-19 pandemic has affected the following aspects of your business:

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-------------------------------|----------------|----|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|----|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| A lot less than before | 0 | 0% | 119 | 79% | 171 | 70% | 20 | 69% | 7 | 50% | 9 | 90% | 0 | 0% |
| Less than before | 0 | 0% | 9 | 6% | 34 | 14% | 4 | 14% | 3 | 21% | 1 | 10% | 0 | 0% |
| Same as before | 0 | 0% | 0 | 0% | 3 | 1% | 0 | 0% | 3 | 21% | 0 | 0% | 0 | 0% |
| More than before | 0 | 0% | 3 | 2% | 3 | 1% | 1 | 3% | 0 | 0% | 0 | 0% | 0 | 0% |
| A lot more than before | 0 | 0% | 11 | 7% | 15 | 6% | 2 | 7% | 0 | 0% | 0 | 0% | 0 | 0% |
| Not applicable | 0 | 0% | 4 | 3% | 8 | 3% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Don't know | 0 | 0% | 3 | 2% | 2 | 1% | 0 | 0% | 1 | 7% | 0 | 0% | 0 | 0% |
| Prefer not to say | 0 | 0% | 1 | 1% | 10 | 4% | 2 | 7% | 0 | 0% | 0 | 0% | 0 | 0% |
| Base | 0 | 0% | 150 | 100% | 246 | 100% | 29 | 100% | 14 | 100% | 10 | 100% | 0 | 0% |

Overall, to what extent do you agree or disagree with the proposed Greater Manchester minimum licensing standards for hackney carriages and private hire services?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-----------------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Strongly agree | 688 | 71% | 23 | 11% | 45 | 13% | 0 | 0% | 9 | 50% | 0 | 0% | 10 | 32% |
| Agree | 199 | 20% | 33 | 15% | 48 | 14% | 6 | 20% | 4 | 22% | 3 | 30% | 10 | 32% |
| Neither agree nor disagree | 26 | 3% | 12 | 6% | 53 | 15% | 4 | 13% | 2 | 11% | 0 | 0% | 5 | 16% |
| Disagree | 30 | 3% | 36 | 17% | 58 | 17% | 11 | 37% | 2 | 11% | 5 | 50% | 2 | 6% |
| Strongly disagree | 25 | 3% | 109 | 50% | 138 | 40% | 9 | 30% | 1 | 6% | 2 | 20% | 4 | 13% |
| Don't know | 3 | 0% | 4 | 2% | 6 | 2% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Base | 971 | 100% | 217 | 100% | 348 | 100% | 30 | 100% | 18 | 100% | 10 | 100% | 31 | 100% |

Are there any changes that you think would improve the proposed minimum licensing standards?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Yes | 268 | 28% | 84 | 40% | 132 | 39% | 16 | 55% | 5 | 28% | 2 | 25% | 16 | 55% |
| No | 357 | 38% | 38 | 18% | 89 | 26% | 4 | 14% | 6 | 33% | 2 | 25% | 8 | 28% |
| Don't know | 320 | 34% | 89 | 42% | 121 | 35% | 9 | 31% | 7 | 39% | 4 | 50% | 5 | 17% |
| Base | 945 | 100% | 211 | 100% | 342 | 100% | 29 | 100% | 18 | 100% | 8 | 100% | 29 | 100% |

If you disagreed with the proposals, how likely would you be to agree with them if the changes you suggested in answer to the previous question were made? *

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|------------------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|------|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Extremely likely | 135 | 58% | 27 | 33% | 37 | 28% | 7 | 44% | 4 | 80% | 0 | 0% | 9 | 60% |
| Quite likely | 49 | 21% | 35 | 42% | 53 | 41% | 5 | 31% | 0 | 0% | 1 | 50% | 2 | 13% |
| Neither likely nor unlikely | 30 | 13% | 7 | 8% | 13 | 10% | 2 | 13% | 0 | 0% | 0 | 0% | 3 | 20% |
| Quite unlikely | 1 | 0% | 5 | 6% | 1 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Extremely unlikely | 3 | 1% | 4 | 5% | 14 | 11% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Don't know | 15 | 6% | 5 | 6% | 12 | 9% | 2 | 13% | 1 | 20% | 1 | 50% | 1 | 7% |
| Base | 233 | 100% | 83 | 100% | 130 | 100% | 16 | 100% | 5 | 100% | 2 | 100% | 15 | 100% |

*Respondents who suggested changes were asked this question, irrespective of whether they agreed or disagreed with the overall proposed standards.

How old are you?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|--------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|----|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Under 13 | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| 13-17 | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| 18-24 | 35 | 4% | 0 | 0% | 1 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| 25-34 | 154 | 16% | 11 | 5% | 62 | 18% | 0 | 0% | 2 | 20% | 0 | 0% | 1 | 6% |
| 35-44 | 209 | 21% | 29 | 13% | 123 | 35% | 7 | 23% | 1 | 10% | 0 | 0% | 0 | 0% |
| 45-54 | 179 | 18% | 79 | 36% | 92 | 26% | 11 | 37% | 4 | 40% | 0 | 0% | 3 | 17% |
| 55-64 | 203 | 21% | 58 | 26% | 60 | 17% | 6 | 20% | 3 | 30% | 0 | 0% | 6 | 33% |
| 65-74 | 125 | 13% | 21 | 10% | 3 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 7 | 39% |
| 75+ | 32 | 3% | 1 | 0% | 0 | 0% | 1 | 3% | 0 | 0% | 0 | 0% | 1 | 6% |
| Prefer not to say | 37 | 4% | 22 | 10% | 9 | 3% | 5 | 17% | 0 | 0% | 0 | 0% | 0 | 0% |
| Base | 974 | 100% | 221 | 100% | 350 | 100% | 30 | 100% | 10 | 100% | 0 | 0% | 18 | 100% |

How do you describe your gender?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|--|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|----|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| A man (including Trans Man) | 441 | 46% | 145 | 78% | 264 | 77% | 21 | 72% | 9 | 90% | 0 | 0% | 10 | 56% |
| A woman (including Trans Woman) | 397 | 41% | 1 | 1% | 4 | 1% | 1 | 3% | 0 | 0% | 0 | 0% | 6 | 33% |
| Non-binary | 10 | 1% | 0 | 0% | 3 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| In another way | 8 | 1% | 1 | 1% | 2 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Prefer not to say | 111 | 11% | 40 | 21% | 71 | 21% | 7 | 24% | 1 | 10% | 0 | 0% | 2 | 11% |
| Base | 967 | 100% | 187 | 100% | 344 | 100% | 29 | 100% | 10 | 100% | 0 | 0% | 18 | 100% |

Do you identify as trans / transgender?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|--------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|----|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Yes | 3 | 0% | 1 | 1% | 10 | 3% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| No | 855 | 88% | 138 | 75% | 261 | 76% | 22 | 76% | 8 | 89% | 0 | 0% | 15 | 83% |
| In some ways | 9 | 1% | 1 | 1% | 2 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Prefer not to say | 100 | 10% | 44 | 24% | 70 | 20% | 7 | 24% | 1 | 11% | 0 | 0% | 3 | 17% |
| Base | 967 | 100% | 184 | 100% | 343 | 100% | 29 | 100% | 9 | 100% | 0 | 0% | 18 | 100% |

Which of the following best describes how you think of yourself?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|---------------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|----|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Bisexual | 32 | 3% | 51 | 24% | 24 | 7% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 6% |
| Gay man | 62 | 6% | 0 | 0% | 0 | 0% | 2 | 7% | 0 | 0% | 0 | 0% | 1 | 6% |
| Gay woman or lesbian | 10 | 1% | 0 | 0% | 1 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Heterosexual | 657 | 68% | 100 | 48% | 167 | 49% | 11 | 41% | 7 | 78% | 0 | 0% | 12 | 71% |
| Other sexual orientation | 9 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Prefer not to say | 193 | 20% | 59 | 28% | 148 | 44% | 14 | 52% | 2 | 22% | 0 | 0% | 3 | 18% |
| Base | 963 | 100% | 210 | 100% | 340 | 100% | 27 | 100% | 9 | 100% | 0 | 0% | 17 | 100% |

What is your religion?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|--------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|----|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Buddhist | 8 | 1% | 0 | 0% | 1 | 0% | 0 | 0% | 1 | 10% | 0 | 0% | 0 | 0% |
| Christian | 348 | 36% | 44 | 20% | 49 | 14% | 4 | 14% | 3 | 30% | 0 | 0% | 8 | 44% |
| Hindu | 10 | 1% | 0 | 0% | 2 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Jewish | 16 | 2% | 0 | 0% | 3 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 6% |
| Muslim | 28 | 3% | 126 | 58% | 186 | 54% | 8 | 29% | 2 | 20% | 0 | 0% | 3 | 17% |
| Sikh | 0 | 0% | 2 | 1% | 1 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Other religion | 25 | 3% | 1 | 0% | 5 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| No religion | 371 | 38% | 21 | 10% | 32 | 9% | 6 | 21% | 2 | 20% | 0 | 0% | 2 | 11% |
| Prefer not to say | 163 | 17% | 22 | 10% | 68 | 20% | 10 | 36% | 2 | 20% | 0 | 0% | 4 | 22% |
| Base | 969 | 100% | 216 | 100% | 347 | 100% | 28 | 100% | 10 | 100% | 0 | 0% | 18 | 100% |

Which of these bests describes your ethnicity?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|--|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|----|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Asian or Asian British - Indian | 12 | 1% | 4 | 2% | 41 | 12% | 6 | 20% | 0 | 0% | 0 | 0% | 0 | 0% |
| Asian or Asian British - Pakistani | 18 | 2% | 87 | 40% | 124 | 36% | 4 | 13% | 2 | 20% | 0 | 0% | 3 | 17% |
| Asian or Asian British - Bangladeshi | 4 | 0% | 5 | 2% | 12 | 3% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Asian or Asian British - Chinese | 3 | 0% | 0 | 0% | 1 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Asian or Asian British - Kashmiri | 2 | 0% | 28 | 13% | 16 | 5% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Asian or Asian British - Any other Asian background | 0 | 0% | 1 | 0% | 6 | 2% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Black or Black British - Caribbean | 3 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Black or Black British - African | 3 | 0% | 1 | 0% | 8 | 2% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Black or Black British - Any other Black background | 0 | 0% | 0 | 0% | 1 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Mixed - White and Black Caribbean | 5 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Mixed - White and Black African | 2 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Mixed - White and Asian | 4 | 0% | 1 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Mixed - Any other mixed background | 11 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| White English / Welsh / Scottish / Northern Irish / British | 751 | 77% | 63 | 29% | 78 | 22% | 13 | 43% | 7 | 70% | 0 | 0% | 12 | 67% |
| White – Irish | 18 | 2% | 1 | 0% | 2 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| White - Gypsy or Irish Traveller | 1 | 0% | 0 | 0% | 1 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| White - Eastern European | 5 | 1% | 0 | 0% | 3 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| White - Any other White background | 28 | 3% | 4 | 2% | 2 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 6% |
| Other ethnic group - Arab | 1 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Other ethnic group - Other | 8 | 1% | 6 | 3% | 1 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Prefer not to say | 92 | 9% | 17 | 8% | 53 | 15% | 7 | 23% | 1 | 10% | 0 | 0% | 2 | 11% |
| Base | 971 | 100% | 218 | 100% | 349 | 100% | 30 | 100% | 10 | 100% | 0 | 0% | 18 | 100% |

Are your day-to-day activities limited because of a health problem or disability?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|------------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|----|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Yes, limited a lot | 88 | 9% | 5 | 2% | 5 | 1% | 1 | 4% | 0 | 0% | 0 | 0% | 0 | 0% |
| Yes, limited a little | 163 | 17% | 9 | 4% | 25 | 7% | 3 | 11% | 2 | 20% | 0 | 0% | 4 | 24% |
| No | 630 | 65% | 177 | 83% | 274 | 79% | 17 | 61% | 7 | 70% | 0 | 0% | 11 | 65% |
| Prefer not to say | 87 | 9% | 21 | 10% | 45 | 13% | 7 | 25% | 1 | 10% | 0 | 0% | 2 | 12% |
| Base | 968 | 100% | 212 | 100% | 349 | 100% | 28 | 100% | 10 | 100% | 0 | 0% | 17 | 100% |

Disability

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|----------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|----|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Learning disability | 8 | 3% | 1 | 7% | 2 | 7% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Mental ill health | 43 | 17% | 2 | 14% | 2 | 7% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Mobility disability | 148 | 59% | 4 | 29% | 11 | 37% | 1 | 25% | 2 | 100% | 0 | 0% | 3 | 100% |
| Sensory disability | 26 | 10% | 1 | 7% | 1 | 3% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Other disability | 45 | 18% | 4 | 29% | 7 | 23% | 1 | 25% | 0 | 0% | 0 | 0% | 0 | 0% |
| Prefer not to say | 43 | 17% | 5 | 36% | 11 | 37% | 2 | 50% | 0 | 0% | 0 | 0% | 0 | 0% |
| Base | 251 | 100% | 14 | 100% | 30 | 100% | 4 | 100% | 2 | 100% | 0 | 0% | 3 | 100% |

Which Local Authority do you live in?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-----------------------------------|----------------|------|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|----|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Bolton | 141 | 14% | 6 | 3% | 78 | 22% | 6 | 21% | 0 | 0% | 0 | 0% | 8 | 44% |
| Bury | 90 | 9% | 5 | 2% | 27 | 8% | 1 | 3% | 0 | 0% | 0 | 0% | 1 | 6% |
| Manchester | 163 | 17% | 31 | 14% | 54 | 15% | 2 | 7% | 0 | 0% | 0 | 0% | 0 | 0% |
| Oldham | 101 | 10% | 65 | 30% | 25 | 7% | 3 | 10% | 2 | 20% | 0 | 0% | 3 | 17% |
| Rochdale | 73 | 7% | 20 | 9% | 56 | 16% | 2 | 7% | 1 | 10% | 0 | 0% | 0 | 0% |
| Salford | 63 | 6% | 1 | 0% | 15 | 4% | 3 | 10% | 1 | 10% | 0 | 0% | 3 | 17% |
| Stockport | 121 | 12% | 23 | 11% | 22 | 6% | 1 | 3% | 1 | 10% | 0 | 0% | 2 | 11% |
| Tameside | 61 | 6% | 20 | 9% | 24 | 7% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Trafford | 83 | 9% | 13 | 6% | 4 | 1% | 4 | 14% | 1 | 10% | 0 | 0% | 0 | 0% |
| Wigan | 40 | 4% | 28 | 13% | 33 | 9% | 4 | 14% | 1 | 10% | 0 | 0% | 1 | 6% |
| Outside Greater Manchester | 19 | 2% | 4 | 2% | 7 | 2% | 2 | 7% | 3 | 30% | 0 | 0% | 0 | 0% |
| Prefer not to say | 21 | 2% | 3 | 1% | 4 | 1% | 1 | 3% | 0 | 0% | 0 | 0% | 0 | 0% |
| Base | 976 | 100% | 219 | 100% | 349 | 100% | 29 | 100% | 10 | 100% | 0 | 0% | 18 | 100% |

Which Local Authority are you licensed with?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-----------------------------------|----------------|----|-----------------|------|-------------|------|-----------|------|------------|------|-----------------|----|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Bolton | 0 | 0% | 5 | 2% | 73 | 21% | 8 | 26% | 0 | 0% | 0 | 0% | 0 | 0% |
| Bury | 0 | 0% | 2 | 1% | 27 | 8% | 3 | 10% | 0 | 0% | 0 | 0% | 0 | 0% |
| Manchester | 0 | 0% | 52 | 23% | 53 | 15% | 7 | 23% | 0 | 0% | 0 | 0% | 1 | 100% |
| Oldham | 0 | 0% | 59 | 26% | 15 | 4% | 3 | 10% | 0 | 0% | 0 | 0% | 0 | 0% |
| Rochdale | 0 | 0% | 16 | 7% | 54 | 15% | 3 | 10% | 0 | 0% | 0 | 0% | 0 | 0% |
| Salford | 0 | 0% | 3 | 1% | 19 | 5% | 5 | 16% | 0 | 0% | 0 | 0% | 0 | 0% |
| Stockport | 0 | 0% | 23 | 10% | 39 | 11% | 2 | 6% | 0 | 0% | 0 | 0% | 0 | 0% |
| Tameside | 0 | 0% | 21 | 9% | 23 | 7% | 2 | 6% | 0 | 0% | 0 | 0% | 0 | 0% |
| Trafford | 0 | 0% | 14 | 6% | 14 | 4% | 5 | 16% | 0 | 0% | 0 | 0% | 0 | 0% |
| Wigan | 0 | 0% | 31 | 14% | 40 | 11% | 7 | 23% | 1 | 100% | 0 | 0% | 0 | 0% |
| Outside Greater Manchester | 0 | 0% | 2 | 1% | 3 | 1% | 1 | 3% | 0 | 0% | 0 | 0% | 0 | 0% |
| Base | 0 | 0% | 223 | 100% | 349 | 100% | 31 | 100% | 1 | 100% | 0 | 0% | 1 | 100% |

Which Local Authority are you based in?

| | General Public | | Hackney Drivers | | PHV Drivers | | Operators | | Businesses | | Vehicle Leasing | | Representatives | |
|-----------------------------------|----------------|----|-----------------|----|-------------|----|-----------|----|------------|------|-----------------|------|-----------------|------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Bolton | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 3 | 30% | 6 | 40% |
| Bury | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 2 | 20% | 6 | 40% |
| Manchester | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 2 | 11% | 3 | 30% | 6 | 40% |
| Oldham | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 3 | 17% | 2 | 20% | 4 | 27% |
| Rochdale | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 6% | 0 | 0% | 4 | 27% |
| Salford | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 6% | 2 | 20% | 5 | 33% |
| Stockport | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 2 | 11% | 3 | 30% | 4 | 27% |
| Tameside | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 5 | 33% |
| Trafford | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 6% | 1 | 10% | 3 | 20% |
| Wigan | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 4 | 22% | 1 | 10% | 5 | 33% |
| Outside Greater Manchester | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 4 | 22% | 0 | 0% | 4 | 27% |
| Base | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 18 | 100% | 10 | 100% | 15 | 100% |

Appendix F Coded responses to open questions

Comments related to Driver Standards

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| Agree with proposals / they are reasonable | 136 | 16 | 27 | 6 | 1 | 0 | 3 |
| Disagree with the proposals | 11 | 4 | 13 | 4 | 1 | 0 | 0 |
| These proposals will kill an already struggling trade | 8 | 8 | 26 | 4 | 0 | 1 | 2 |
| Concerns regarding driver fraud | 29 | 2 | 1 | 0 | 0 | 0 | 0 |
| Enhanced CRB should be mandatory | 74 | 6 | 7 | 1 | 0 | 1 | 6 |
| DBS check would make passengers feel safer | 12 | 0 | 0 | 0 | 0 | 0 | 1 |
| All Taxi drivers should not have a criminal background / have enhanced DBS check | 5 | 0 | 2 | 0 | 0 | 0 | 1 |
| DBS check every six months is expensive | 1 | 0 | 3 | 0 | 0 | 0 | 0 |
| Concern checks don't cover convictions obtained abroad | 9 | 0 | 1 | 0 | 0 | 0 | 2 |
| The cost of the medical is expensive | 0 | 0 | 2 | 0 | 0 | 0 | 0 |
| Health check should include being able to handle wheelchair users | 1 | 0 | 0 | 0 | 1 | 0 | 0 |
| Driver medical examinations are not necessary | 5 | 0 | 2 | 0 | 0 | 0 | 0 |
| Agree with medical examination | 11 | 4 | 1 | 1 | 0 | 0 | 7 |
| Non-NHS organisations should be allowed to issue medical certification | 0 | 0 | 0 | 0 | 0 | 0 | 1 |

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| The local knowledge test is not needed as most people use sat nav | 15 | 5 | 8 | 1 | 0 | 2 | 3 |
| The local knowledge test is needed - issue with drivers poor local knowledge | 108 | 7 | 9 | 3 | 0 | 0 | 4 |
| Knowledge test is only required for new drivers | 0 | 0 | 6 | 0 | 0 | 0 | 0 |
| Agree with language requirements | 72 | 10 | 14 | 1 | 0 | 0 | 4 |
| The enforcement of language tests will be controversial | 3 | 0 | 1 | 0 | 0 | 0 | 0 |
| Only a speaking / listening test is required, writing is not important | 11 | 0 | 0 | 0 | 0 | 1 | 2 |
| English and maths test is discriminating people with disabilities who are already a taxi driver | 3 | 1 | 0 | 1 | 0 | 0 | 0 |
| Language requirement is not necessary | 7 | 2 | 4 | 0 | 0 | 0 | 0 |
| Support proficiency tests proposals | 39 | 7 | 3 | 1 | 0 | 0 | 5 |
| Proficiency training / test should be live not virtual | 3 | 0 | 0 | 1 | 0 | 0 | 0 |
| A driver proficiency test would not serve any purpose for experienced drivers. | 6 | 3 | 7 | 1 | 0 | 0 | 0 |
| Driving proficiency should be constantly tested | 6 | 0 | 0 | 0 | 0 | 0 | 0 |
| Additional training subjects should be included | 26 | 2 | 2 | 0 | 1 | 0 | 5 |
| Any Driver Training should be optional | 5 | 5 | 4 | 1 | 0 | 0 | 1 |
| Safety needs improving for vulnerable groups | 23 | 0 | 1 | 0 | 0 | 0 | 2 |
| Driver behaviour needs improvement | 13 | 0 | 0 | 0 | 1 | 0 | 0 |
| Agree with driver training | 11 | 3 | 0 | 0 | 0 | 0 | 4 |

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| Agree with dress code | 21 | 2 | 2 | 1 | 0 | 0 | 2 |
| A designated uniform is uncomfortable to drive in all day | 9 | 9 | 8 | 0 | 0 | 0 | 3 |
| Disagree with a uniform (dress code) | 70 | 17 | 39 | 2 | 0 | 1 | 5 |
| Cultural / religious attire should be permitted | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Dress code should be decided by the taxi firm | 1 | 0 | 0 | 1 | 0 | 0 | 0 |
| Agree Taxi Drivers should be regularly tested for drugs and alcohol | 29 | 6 | 3 | 0 | 0 | 0 | 5 |
| Disagree with drug and alcohol testing | 0 | 1 | 1 | 0 | 0 | 0 | 1 |
| Concern about abuse of the system | 2 | 0 | 1 | 0 | 0 | 0 | 0 |
| Needs to be drug / alcohol support offered alongside | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Agree with PHV conditions | 3 | 1 | 0 | 0 | 0 | 0 | 1 |
| It is unfair to standardise taxi and PHV drivers but have their work classified differently | 2 | 0 | 2 | 0 | 0 | 0 | 0 |
| Other comments | 25 | 2 | 4 | 1 | 1 | 0 | 1 |
| Total | 454 | 66 | 138 | 17 | 5 | 3 | 22 |

Comments related to Licensed Vehicles

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| Welcome all changes / General agree | 68 | 1 | 3 | 2 | 1 | 1 | 2 |
| General comment on state of taxis / support the case for change | 8 | 0 | 1 | 0 | 0 | 0 | 0 |
| Don't change anything / not needed / don't support | 9 | 9 | 26 | 4 | 2 | 0 | 0 |
| Proposals would not increase safety | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Proposals would not improve driving standards | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Concerns regarding vehicle fraud | 10 | 1 | 0 | 0 | 0 | 0 | 1 |
| PHV should follow same rules as Hackney | 4 | 1 | 2 | 0 | 0 | 0 | 0 |
| Agree with timeline for a transition to a fully electric fleet | 23 | 3 | 4 | 0 | 1 | 0 | 0 |
| Should have a fully electric fleet earlier than proposed | 8 | 1 | 0 | 0 | 0 | 0 | 0 |
| Should give more time to switch to a fully electric fleet | 3 | 3 | 5 | 2 | 0 | 2 | 1 |
| Comment / concerns about suitability of some electric vehicles | 2 | 7 | 3 | 1 | 0 | 0 | 3 |
| Electric vehicles too new to understand suitability | 1 | 1 | 0 | 1 | 0 | 0 | 0 |
| Charging infrastructure needs improving / not yet ready | 5 | 7 | 2 | 3 | 0 | 0 | 1 |
| General Disagreement with Age | 1 | 2 | 0 | 0 | 0 | 0 | 0 |
| Agree with Age Limit proposals | 18 | 1 | 7 | 1 | 1 | 0 | 0 |
| Age limit should be higher than 10 years | 4 | 37 | 16 | 1 | 0 | 0 | 2 |
| Age limit should be less than 10 years | 11 | 1 | 4 | 0 | 0 | 0 | 0 |
| Electric cars should have same age limit as non-electric | 7 | 4 | 0 | 1 | 0 | 0 | 3 |

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| No age limit or higher for electric vehicles | 1 | 5 | 5 | 0 | 0 | 0 | 1 |
| Minibus maximum age should be 15years | 0 | 0 | 2 | 0 | 0 | 0 | 0 |
| Age is not important | 45 | 33 | 47 | 6 | 0 | 1 | 6 |
| 10 years isn't enough time to return investment | 0 | 8 | 2 | 2 | 0 | 0 | 2 |
| Suggestion of different Minimum age | 2 | 4 | 13 | 2 | 0 | 0 | 0 |
| Different age limits for different vehicle type | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Agree with white colour proposals | 46 | 2 | 3 | 0 | 1 | 0 | 2 |
| Support one colour but not white | 27 | 0 | 11 | 1 | 0 | 0 | 3 |
| Don't think standard colours are necessary | 138 | 20 | 68 | 10 | 1 | 1 | 8 |
| Vinyl wraps should be allowed as well as full resprays | 1 | 0 | 1 | 0 | 0 | 0 | 0 |
| Driver should have a choice of colour | 8 | 1 | 14 | 2 | 0 | 0 | 0 |
| A mixed fleet (types of vehicles) is important | 13 | 23 | 0 | 1 | 0 | 0 | 2 |
| Accessible vehicles are expensive / need to be subsidised | 3 | 6 | 1 | 0 | 0 | 0 | 0 |
| PHV should have to have same rules about accessibility | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| More accessible vehicles are needed | 34 | 6 | 0 | 0 | 1 | 0 | 3 |
| More consultation with disabled people required | 5 | 0 | 0 | 0 | 0 | 0 | 0 |
| Problem with design of accessible vehicles | 3 | 5 | 0 | 0 | 0 | 0 | 2 |
| Vehicle liveries should still be regulated | 9 | 3 | 9 | 2 | 0 | 0 | 3 |
| Problems with liveries e.g. distracting | 3 | 1 | 27 | 1 | 0 | 2 | 0 |

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| Liveries cause devaluation | 0 | 0 | 6 | 0 | 0 | 0 | 1 |
| Use stickers / livery to make cabs identifiable e.g. with a number | 27 | 1 | 1 | 1 | 0 | 0 | 4 |
| Large fines for improper use of liveries | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Some Manchester branding should be included i.e. bee / variation by district | 9 | 0 | 0 | 0 | 0 | 0 | 2 |
| Liveries can hinder driver to use it for their personal use | 2 | 0 | 3 | 0 | 1 | 1 | 0 |
| Disagree with livery - unspecified | 12 | 2 | 7 | 3 | 0 | 0 | 2 |
| Advertisement is a source of income | 6 | 1 | 0 | 0 | 0 | 0 | 2 |
| Agree with proposed plan for vehicle testing | 20 | 7 | 8 | 1 | 0 | 0 | 1 |
| More vehicle testing required than proposed | 3 | 1 | 0 | 1 | 0 | 0 | 0 |
| Less vehicle testing required than proposed | 10 | 4 | 16 | 2 | 0 | 0 | 1 |
| Reporting unroadworthy vehicles should be simple | 4 | 0 | 0 | 0 | 0 | 0 | 0 |
| Maintenance spot checks should be performed | 3 | 0 | 0 | 0 | 0 | 0 | 0 |
| Stricter checks on testing centres | 2 | 3 | 0 | 0 | 0 | 0 | 0 |
| Need more places to be able to conduct tests | 0 | 6 | 5 | 0 | 0 | 0 | 0 |
| Cars that have been written off and repaired should be allowed to be licensed again | 0 | 1 | 4 | 0 | 0 | 0 | 1 |
| Testing frequency should be based on the vehicle mileage | 5 | 1 | 0 | 0 | 0 | 0 | 0 |
| Agree CCTV should be mandatory | 46 | 6 | 12 | 2 | 0 | 0 | 3 |

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| CCTV should not be necessary / be optional / no need for CCTV | 10 | 1 | 11 | 0 | 0 | 0 | 3 |
| CCTV is expensive / Council should help fund | 5 | 5 | 21 | 2 | 0 | 2 | 2 |
| All taxis should also have a dash-cam filming outside of the car | 7 | 1 | 2 | 0 | 0 | 0 | 0 |
| CCTV should be used to assess driving standards too | 4 | 0 | 0 | 0 | 0 | 0 | 0 |
| Concern about privacy / data protection worries | 20 | 4 | 11 | 3 | 0 | 0 | 2 |
| Both drivers and passenger should have panic button | 5 | 0 | 0 | 1 | 1 | 1 | 1 |
| Executive hire should be exempt from colour regulations | 0 | 0 | 1 | 2 | 0 | 0 | 0 |
| Executive hire operators should have more duties of care | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Executive hire should be exempt from CCTV | 0 | 0 | 0 | 2 | 0 | 0 | 0 |
| Should be exclusions for specialist vehicles | 3 | 0 | 1 | 1 | 0 | 0 | 1 |
| The exclusive use clause for executive hire vehicles may be unfair on owner drivers | 1 | 0 | 1 | 0 | 0 | 0 | 0 |
| Executive hire shouldn't have different rules | 3 | 0 | 4 | 0 | 0 | 0 | 0 |
| General Disagreement | 6 | 1 | 0 | 0 | 0 | 0 | 1 |
| Issue with the accessible vehicle | 1 | 3 | 0 | 0 | 0 | 0 | 0 |
| Roof top signs that light up to identify a PHV | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Vehicle cleanliness is important | 24 | 1 | 3 | 2 | 0 | 0 | 0 |
| Other comments | 16 | 6 | 10 | 2 | 0 | 0 | 0 |
| Total | 449 | 114 | 187 | 24 | 7 | 6 | 20 |

Comments about Operators

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| Agree with the proposals (general) | 67 | 8 | 6 | 3 | 0 | 1 | 4 |
| Disagree with the proposals (general) | 3 | 3 | 6 | 0 | 0 | 0 | 0 |
| Concerns of illegal activities | 8 | 2 | 0 | 2 | 0 | 0 | 0 |
| Proposals are already in place | 3 | 1 | 5 | 1 | 0 | 0 | 0 |
| Common licence conditions should include prevent taxis selecting jobs | 21 | 0 | 2 | 0 | 0 | 0 | 0 |
| Common licence conditions should include providing clear information about fares and timeframe | 7 | 0 | 0 | 1 | 0 | 0 | 0 |
| Operators should only be licensed if their drivers are considered employees and given appropriate workers' rights. | 0 | 0 | 3 | 0 | 0 | 0 | 0 |
| Records of operators should be publicly accessible and regularly updated. | 3 | 1 | 0 | 0 | 0 | 0 | 0 |
| Operators need more accountability for their drivers | 11 | 0 | 4 | 1 | 0 | 0 | 0 |
| App based companies haven't been considered | 0 | 0 | 0 | 1 | 0 | 0 | 0 |
| Operators should be allowed to operate cross borders | 0 | 0 | 0 | 1 | 0 | 0 | 0 |
| Agree with all operators and staff having criminal record checks. | 59 | 9 | 8 | 1 | 0 | 0 | 1 |
| Agree because operators hold a lot of private information | 3 | 0 | 0 | 0 | 0 | 0 | 1 |
| The operator should not need DBS check | 8 | 2 | 2 | 3 | 0 | 1 | 0 |

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| Concerns about data protection with DBS checks / amount of details operators keep | 3 | 0 | 3 | 0 | 0 | 1 | 0 |
| DBS checks should be less frequent / less than annually | 2 | 2 | 3 | 2 | 0 | 0 | 1 |
| DBS checks should be more frequent / every 6 months | 2 | 0 | 1 | 0 | 0 | 0 | 0 |
| Other comments | 21 | 3 | 4 | 1 | 2 | 0 | 4 |
| Total | 191 | 28 | 39 | 11 | 2 | 3 | 8 |

Comments about Local Authorities

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| General Agreement | 40 | 5 | 8 | 1 | 0 | 1 | 2 |
| No change required | 10 | 1 | 7 | 0 | 0 | 0 | 0 |
| Centralise taxi licensing at TfGM in GM rather than undertaking the same task 10 times | 4 | 0 | 0 | 0 | 0 | 0 | 0 |
| Rules to ensure that there is no conflict of interest while hearing the applications | 2 | 0 | 1 | 1 | 0 | 0 | 0 |
| Concerns about Local Authorities ability to work together | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Timescale for application should be less than 8 weeks | 3 | 0 | 4 | 0 | 0 | 0 | 3 |
| More or no time restrictions for application | 0 | 0 | 6 | 0 | 0 | 0 | 0 |
| Time scale needs improvement | 2 | 0 | 3 | 0 | 0 | 0 | 0 |
| General Agreement to common enforcement | 5 | 2 | 2 | 0 | 0 | 0 | 1 |
| General Disagreement to common enforcement | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| Different licensing fee for different Local Authorities | 3 | 2 | 0 | 0 | 0 | 0 | 0 |
| One fee across the county / General Agreement | 0 | 0 | 3 | 1 | 0 | 0 | 2 |
| Licensing fee is very costly, and it should be affordable | 2 | 6 | 9 | 0 | 1 | 0 | 1 |
| General Agreement regarding councillor training | 15 | 1 | 3 | 1 | 0 | 0 | 4 |
| Additional subject suggestions for councillor training | 2 | 0 | 0 | 1 | 0 | 0 | 1 |
| Customer service provided by the councils needs improvement | 3 | 0 | 3 | 2 | 0 | 0 | 1 |

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| Disagreement with appropriate delegated powers for Licensing Managers. | 1 | 3 | 7 | 2 | 0 | 0 | 0 |
| General Agreement - delegated powers | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| Concern Regarding the abuse of delegated power | 1 | 0 | 0 | 2 | 0 | 0 | 1 |
| Concern about the authenticity of the award | 8 | 0 | 1 | 0 | 0 | 0 | 0 |
| It is a good Idea to appreciate drivers / taxis | 14 | 1 | 0 | 0 | 0 | 0 | 1 |
| Doesn't think as a good idea, i.e. waste of time and money | 6 | 3 | 3 | 0 | 0 | 0 | 0 |
| Other comments | 14 | 0 | 3 | 1 | 0 | 0 | 0 |
| Total | 112 | 22 | 51 | 8 | 1 | 1 | 12 |

Comments on Timescales

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| Agree with the proposals / agree it needs to be done | 35 | 2 | 2 | 0 | 1 | 1 | 2 |
| disagree with the proposal | 17 | 20 | 32 | 5 | 0 | 0 | 2 |
| The deadlines are very ambitious / too aggressive / unfair/ short / unreasonable | 17 | 13 | 8 | 4 | 1 | 1 | 1 |
| The deadline should be extended / delayed | 22 | 28 | 21 | 5 | 1 | 0 | 6 |
| Should be put into effect ASAP, people have been given enough notice | 46 | 2 | 2 | 0 | 0 | 0 | 0 |
| Many drivers have just bought a new, cleaner car and will be forced to replace them at a great expense | 3 | 2 | 7 | 2 | 0 | 1 | 0 |
| Proposals shouldn't be brought in during Covid-19 | 21 | 22 | 19 | 5 | 0 | 0 | 2 |
| Supply of vehicles isn't available currently | 1 | 3 | 0 | 0 | 0 | 0 | 2 |
| A phased implementation of colour vehicle should be considered | 5 | 0 | 1 | 0 | 0 | 0 | 2 |
| GM doesn't have the infrastructure for all the charging points required | 2 | 3 | 3 | 2 | 0 | 0 | 2 |
| Timeline should match CAP | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| Other comments | 16 | 3 | 11 | 1 | 0 | 0 | 0 |
| Total | 172 | 76 | 91 | 20 | 3 | 2 | 15 |

Comments on Impacts

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| General oppose / negative view of proposals | 16 | 21 | 23 | 4 | 0 | 0 | 3 |
| Negative impact on business (general) | 7 | 11 | 10 | 5 | 0 | 0 | 1 |
| Agree with proposals (general) | 69 | 0 | 5 | 1 | 3 | 0 | 2 |
| No impact on me / my business | 9 | 2 | 3 | 1 | 0 | 0 | 1 |
| Put drivers into debt | 6 | 11 | 22 | 1 | 0 | 0 | 0 |
| Put drivers out of business/bankrupt | 19 | 44 | 47 | 11 | 0 | 1 | 2 |
| Grants are not enough support / Funding is needed | 50 | 43 | 55 | 6 | 2 | 1 | 8 |
| High costs of new vehicle / electric vehicle | 17 | 55 | 80 | 10 | 2 | 0 | 2 |
| High maintenance costs of electric vehicles | 1 | 2 | 1 | 2 | 0 | 0 | 0 |
| Electric vehicles impractical (no access to EV points) | 2 | 0 | 2 | 0 | 0 | 0 | 1 |
| Licensing cost will be expensive | 4 | 14 | 15 | 1 | 1 | 0 | 2 |
| MLS proposals will improve environment | 14 | 1 | 1 | 0 | 1 | 0 | 0 |
| Include cleaning standard (based on Covid-19) | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Will improve passenger safety | 99 | 1 | 3 | 1 | 0 | 0 | 2 |
| Will lead to fare increases – Negative / unspecified | 29 | 1 | 6 | 1 | 0 | 0 | 0 |
| Will Improve facilities for disabled passengers | 5 | 0 | 1 | 0 | 0 | 0 | 2 |
| Will encourage use of taxi | 2 | 3 | 3 | 2 | 0 | 0 | 2 |

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| Will lead to fare increases - Happy to pay, worth it. | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| Other comments | 16 | 3 | 11 | 1 | 0 | 0 | 0 |
| Total | 172 | 76 | 91 | 20 | 3 | 2 | 14 |

Comments on Covid-19

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| No impact | 5 | 0 | 0 | 0 | 0 | 0 | 1 |
| Business has increased | 0 | 0 | 0 | 1 | 0 | 0 | 0 |
| General - business negatively affected by Covid-19 | 35 | 47 | 74 | 13 | 2 | 2 | 7 |
| Business may close | 0 | 1 | 1 | 0 | 0 | 0 | 0 |
| Business / work / income has fallen | 23 | 16 | 19 | 3 | 0 | 1 | 4 |
| Staff are furloughed | 1 | 1 | 0 | 0 | 1 | 0 | 0 |
| Costs have increased / increased financial pressure | 9 | 3 | 3 | 0 | 0 | 0 | 0 |
| Savings / reserves have been used up | 2 | 7 | 5 | 1 | 0 | 0 | 1 |
| Debts have increased / can't afford more debt | 1 | 5 | 8 | 0 | 0 | 0 | 2 |
| Not been eligible for financial support | 1 | 3 | 4 | 0 | 0 | 0 | 1 |
| Brexit also causing issues | 1 | 0 | 1 | 0 | 0 | 0 | 0 |
| Increased financial pressures | 13 | 33 | 31 | 5 | 0 | 1 | 2 |
| Reduced bus routes | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Affecting poorer people / lower incomes | 1 | 1 | 0 | 1 | 0 | 0 | 0 |
| I may lose my job | 0 | 5 | 4 | 1 | 0 | 0 | 0 |
| There needs to be updated procedures | 26 | 0 | 0 | 0 | 0 | 0 | 1 |
| Drivers should be supplied with PPE | 4 | 0 | 1 | 0 | 0 | 0 | 0 |

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| Vehicles will need adapting due to Covid-19 | 21 | 0 | 0 | 0 | 0 | 0 | 0 |
| Driver safety has been impacted | 2 | 2 | 1 | 0 | 0 | 0 | 1 |
| Safeguarding in taxis has been excellent | 4 | 0 | 0 | 0 | 0 | 0 | 0 |
| Concerns about drivers not following rules | 33 | 0 | 0 | 0 | 0 | 0 | 1 |
| Drivers need regular Covid-19 testing | 8 | 0 | 0 | 0 | 0 | 0 | 0 |
| Pandemic is temporary / shouldn't affect proposals | 28 | 0 | 0 | 0 | 0 | 0 | 1 |
| Less use of public transport due to Covid-19 | 8 | 0 | 0 | 0 | 0 | 0 | 0 |
| Timing for introduction should be reviewed / delayed due to Covid-19 | 28 | 10 | 11 | 1 | 0 | 1 | 8 |
| Consultation should be delayed until after Covid-19 | 5 | 4 | 3 | 0 | 0 | 0 | 1 |
| Covid-19 highlighted need to improve environment | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 193 | 92 | 118 | 21 | 2 | 3 | 18 |

Suggested Changes

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| General agreement | 8 | 4 | 2 | 0 | 0 | 0 | 1 |
| General oppose | 7 | 11 | 9 | 0 | 0 | 0 | 2 |
| Need national standards, rather than regional | 7 | 1 | 1 | 0 | 0 | 0 | 1 |
| Ensure these standards apply to Uber and Lyft too | 11 | 4 | 5 | 1 | 0 | 0 | 1 |
| Better regulation of code of conduct | 13 | 0 | 1 | 2 | 0 | 0 | 1 |
| Stop and spot check randomly, drugs, cleanliness etc | 21 | 7 | 4 | 4 | 0 | 0 | 0 |
| Drivers shouldn't be able to use personal phones | 21 | 0 | 2 | 0 | 0 | 0 | 1 |
| Need routine checks on operators and drivers | 11 | 2 | 1 | 2 | 0 | 0 | 0 |
| Standardisation of fares | 12 | 1 | 9 | 0 | 0 | 0 | 2 |
| Standard IDs are needed | 26 | 0 | 2 | 0 | 0 | 0 | 3 |
| Driver cleanliness / personal hygiene needs to be regulated | 24 | 3 | 4 | 2 | 0 | 0 | 1 |
| Need to regulate leaving engines running when stopped | 7 | 0 | 1 | 0 | 0 | 0 | 0 |
| Standard need to apply to all not just drivers of taxis | 10 | 1 | 2 | 0 | 0 | 0 | 1 |
| Customer service needs improving | 9 | 0 | 3 | 1 | 0 | 0 | 0 |
| Further discussion needed with the disabled community | 2 | 0 | 1 | 0 | 1 | 0 | 1 |
| More communication is needed from the authorities | 33 | 5 | 14 | 6 | 0 | 1 | 2 |
| Should be allowed to use bus lanes | 3 | 0 | 5 | 2 | 0 | 0 | 0 |

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|---|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| Changes are welcome | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Drivers should be limited to how many hours they can work | 11 | 1 | 1 | 0 | 0 | 0 | 0 |
| Should be a minimum size of vehicle | 2 | 1 | 0 | 0 | 0 | 0 | 0 |
| Driver safety should be considered as much as passenger safety | 4 | 2 | 14 | 0 | 0 | 0 | 1 |
| Limit on number of licenses | 4 | 3 | 5 | 3 | 0 | 0 | 0 |
| Rules needed regarding lost property and complaints / need to be clear | 6 | 0 | 0 | 2 | 0 | 0 | 1 |
| Rewards for changing to electric before proposed dates | 4 | 3 | 2 | 0 | 0 | 0 | 0 |
| Licence fee prices are too high | 4 | 0 | 2 | 0 | 0 | 0 | 0 |
| Cashless system should be implemented | 18 | 1 | 1 | 0 | 0 | 0 | 1 |
| Won't apply to non-GM taxis / Should focus on stopping cross border trade | 94 | 22 | 35 | 4 | 1 | 2 | 3 |
| MLS will push people to get licensed in other authorities | 4 | 2 | 2 | 2 | 0 | 0 | 2 |
| App based operators won't have to comply with standards | 0 | 0 | 2 | 0 | 0 | 0 | 0 |
| Drivers should only be allowed to work in their own area | 56 | 11 | 11 | 0 | 1 | 0 | 0 |
| Other comments | 50 | 5 | 12 | 0 | 2 | 0 | 2 |
| Total | 322 | 62 | 99 | 15 | 5 | 3 | 14 |

Comments about EQIA

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| Support / agree with the Equality Impact Assessment - it is fair / appropriate (general) | 3 | 1 | 0 | 2 | 0 | 0 | 1 |
| Oppose / disagree with the Equality Impact Assessment - it is unfair/not enough | 2 | 1 | 0 | 1 | 0 | 0 | 0 |
| Should be no protected characteristics / everyone should be treated equally | 6 | 1 | 0 | 0 | 0 | 0 | 0 |
| Equality Impact Assessment will not make any difference / does not matter | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Should be more consultation/engagement with those affected about the impact and who should be considered | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| Queries about the proposals / information not clear | 15 | 1 | 1 | 0 | 0 | 0 | 2 |
| Proposals will have a negative impact on elderly | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Proposals will have a negative impact on young people | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Proposals will have a negative impact on women/females | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Proposals will have a negative impact on disabled people | 0 | 1 | 0 | 0 | 0 | 0 | 2 |
| Concern about the impact on transport options for disabled (e.g. that the proposals will cause isolation) | 1 | 1 | 1 | 0 | 1 | 0 | 1 |
| Concern that not all disabilities/health issues will be considered | 3 | 0 | 0 | 0 | 0 | 0 | 0 |
| Proposals will have a negative impact on / should be more consideration for – poorest / lowest income households' people | 2 | 3 | 0 | 0 | 0 | 0 | 1 |

| | General Public | Hackney Drivers | PHV Drivers | PHV Operators | Business | Vehicle Leasing | Representatives |
|--|----------------|-----------------|-------------|---------------|----------|-----------------|-----------------|
| Taxi drivers are being negatively impacted (general) | 0 | 2 | 6 | 1 | 0 | 0 | 2 |
| Proposals will have a negative impact on / should be more consideration for drivers from ethnic minorities | 4 | 2 | 1 | 0 | 0 | 0 | 4 |
| Proposals are unfair on drivers where English is a second language | 3 | 0 | 0 | 0 | 0 | 0 | 1 |
| Other comments | 0 | 0 | 1 | 0 | 0 | 0 | 0 |
| Total | 35 | 9 | 10 | 4 | 1 | 0 | 7 |