

Equality Screening Form

Question	Response
Q1) Name of the strategy, policy, programme or project being assessed.	Draft West Suffolk Taxi Licensing Policy Handbook
Q2) In no more than five lines and using Plain English, summarise the purpose of the policy or proposal, and its desired outcomes.	<p>To harmonise the current Forest Heath and St Edmundsbury taxi policies ahead of the creation of a single authority for West Suffolk in April 2019.</p> <p>This EQIA considers the impacts on all groups who use, drive or own taxi vehicles throughout West Suffolk.</p>
Q3) Who should benefit from the proposal and in what way?	West Suffolk Council will have a single harmonised policy for hackney carriages and private hire businesses and users.
<p>Q4 Is there any evidence or reason to believe that in relation to this proposal, there may be a difference in:</p> <ul style="list-style-type: none"> • Levels of participation • Uptake by different groups • Needs or experiences of different groups • Priorities • Other areas? 	<p>There may be a small negative financial impact on some businesses as follows:</p> <ul style="list-style-type: none"> • Private Hire and Hackney businesses in the current SEBC area, who could previously use vehicles which were 7 years old at first licence and it is proposed their vehicles must be 5 years old. • Meanwhile, there is a positive benefit to private hire businesses from the point of view of creating a level playing field across West Suffolk in terms of their requirements. <p>A very small number of survey responses (9 out of 63) thought the proposed policy changes would have an impact on those with</p>

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a protected characteristic. In summary, the reasons are related to zones and age of vehicle requirements:

- 'Zones' could mean that hackneys refuse to pick up those with a disability in some areas of the council
- Not all disabled persons need a disabled access vehicle
- Encouraging use of smaller cars could make it harder for disabled persons to get an accessible taxi

It should be noted that the continuation of current licensing areas maintains the current situation so there should be no change in the supply of accessible vehicles in any area of West Suffolk. The rationale for this is set out in the committee report. Refusal to pick up disabled passengers is against the law and is an enforcement issue.

All newly plated vehicles must wheelchair accessible, meaning only that they are capable should a passenger require disabled access.

The maximum age of vehicle requirements have been updated post consultation meaning that the changes do not include any reduction in age for larger vehicles. Therefore, this review is not expected to encourage use of smaller vehicles over larger wheelchair accessible vehicles.

Given the demographic of PHV and Hackney drivers, the changes to the policies should not disproportionately impact on those with a protected characteristic.

It is useful to consider the demographic profile of operators and users of Taxi and Private Hire Vehicles:

Taxi and Private Hire Vehicle drivers (PHVs)

- Recent data from the Department for Transport found that in 2016/17, the average age of a taxi driver was 48 and 97% of drivers were male¹.
- The two main ethnic groups of drivers at the national level were White and Asian or Asian British, making up 47% and 38% of drivers respectively. Data is not available for West Suffolk as a whole, but given the ethnic composition of the area, the proportion of Asian and Asian British drivers is likely to be considerably smaller (SEBC White British (Eng/Scot/Welsh/NI – 91.6%; FHDC – 77.2% (NB presence of US Visiting Forces)).

There was an increase in the proportion of non-UK nationals working as drivers in England, rising to 21% in 2016/17, compared to 8% in 2006/07.

Although taxi drivers and PHV drivers are likely to be from an ethnic minority, the proposed changes to the policies will not affect this group disproportionately.

Users of Taxis and Private Hire Vehicles (PHVs)

- The same data from the Department of Transport found that, in 2015 (the latest dataset on mobility), those with

¹ <https://www.gov.uk/government/statistics/taxi-and-private-hire-vehicles-statistics-england-2017>

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	<p>mobility difficulties used Taxis and PHVs more than people who do not (16 trips per person versus 10 trips per person). These figures have remained stable since 2010. Taxis and PHV usage made up 3% of their trips, compared to just 1% without mobility difficulties.</p> <ul style="list-style-type: none"> • Further, in 2016, on average, women made more Taxi or PHV trips than men since 2002. • Although this suggests women are more likely to use Taxis and PHVs, the proposed harmonisation of the taxi policies will not disproportionality affect this group.
<p>Q5) Using the evidence listed above, fill in the table below to highlight the groups you think this policy or proposal has the potential to impact upon:</p> <p>(i) Is there any potential for negative impact? Yes or No</p> <p>(ii) Are there opportunities for positive impact or to promote equality of opportunity?</p>	<p>(i) A very small potential negative impact on SEBC Private Hire and Hackney vehicles where vehicle licensing requirements have been tightened in order to align them across West Suffolk</p> <p>(ii) There are opportunities for positive impact for all individuals. The proposal to log and report all customer complaints to the council could increase public safety. The proposals to relax some vehicle licensing requirements should</p>
<p>Q6) Considering your answers to questions 1-5, do you believe a Full Equality Impact Assessment is needed?</p>	<p>No.</p>
<p>Q7) Considering our duty to proactively tackle disadvantage and promote equality of opportunity, list the actions required.</p>	<p>A small negative impact on those with a physical disability is identified and an action is in place to mitigate this.</p>

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Impacts Table				
	Is there potential for negative impact? YES or NO	Are there opportunities for positive impact? YES or NO	If YES, please provide details of the impact below	
			Positive Impact	Negative Impact
All groups or society generally	NO	YES	<p>As outlined above, the proposal to log and report all complaints to the council may increase public safety, thus benefitting all users of PHVs.</p> <p>Mainly consistent policy across West Suffolk (with the exception of zones) which could contribute towards make taxi licensing more accessible and easily enforceable.</p>	<p>There is the potential for a small financial impact for some Private Hire and Hackney businesses in the current SEBC area, who could previously use vehicles which were 7 years old at first licence and it is proposed their vehicles must now be 5 years old.</p>

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<p>Age - Older or younger people</p>	<p>NO</p>	<p>YES</p>	<p>Tighter criteria for the maximum age exemption for vehicles in good condition will apply to private hire vehicles commonly used as school buses, so should further ensure the safety of these vehicles for school children</p>	
<p>Disability - People with a disability</p>	<p>NO</p>	<p>YES</p>	<p>Relaxed maximum age limit (from brand new to 3 years and 3 months) compared to current St Edmundsbury conditions meaning there could be more applications for wheelchair accessible hackney vehicles.</p>	
<p>Sex - Women or men</p>	<p>NO</p>	<p>NO</p>		

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Pregnancy or maternity - including expectant or new parents i.e. pregnancy and maternity	NO	NO		
Marriage and civil partnership – including same sex couples	NO	NO		
Race - People who are black or from a minority ethnic background (BME)	NO	NO		
Religion - People with a religion or belief (or who choose not to have a religion or belief)	NO	NO		
Sexual Orientation - People who are lesbian, gay or bisexual (LGB) or in a Civil Partnership	NO	NO		
Gender Reassignment - People who are transitioning from one gender to another	NO	NO		
<i>Families and those with parenting or caring responsibilities (The Families Test)</i>	NO	YES	The new operator guidelines helps bring our policy up to the national benchmark in terms of ensuring public safety in taxis	
<i>Individuals on low income</i>	NO	NO		

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<p><i>Those suffering rural isolation</i></p>	<p>NO</p>	<p>YES</p>	<p>Retaining the hackney carriage zones comprising of the areas of Forest Heath and St Edmundsbury should maintain the status quo in terms of supply and demand and therefore availability of taxis should not adversely affected by the creation of a single West Suffolk Council</p>	
<p><i>Those who do not have English as a first language</i></p>	<p>NO</p>	<p>NO</p>		

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Action Plan				
Equality group/ characteristic	Action/milestone	Responsibility (Project manager or partner organisation)	Achievement date	Monitoring arrangements
Disabled users of hackney carriages or private hire vehicles	Undertake an unmet demand survey to review the number and proportion of wheelchair accessible vehicles across West Suffolk	David Collinson	April 2020	Ongoing monitoring of licence application numbers Work with the disability forum to ensure we are notified if there is a noticeable reduction in availability of Wheelchair Accessible Vehicles as result of any of the policy proposals.
Hackney carriage drivers/proprietors on low income	Schedule a future review and consultation to understand the benefits of retaining or abolishing hackney carriage zones in the long term	David Collinson	April 2020	Look into holding future taxi forums as part of policy review
Drivers with English as a second language	Ensure changes are communicated effectively to those for whom English is not their first language	David Collison	March 2019	Ongoing engagement with taxi businesses

Sign off section

This Screening Level EqIA was completed by:

Name

Job Title

Signature

Date

On completion, please submit this document with the policy or proposal. Guidance and advice on draft and final versions can be obtained from:

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18 December 2018