



# Report to Licensing Committee

**Date:** 3<sup>rd</sup> February 2021

**Title:** Statutory Taxi & Private Hire Vehicle Standards

**Author:** Simon Gallacher, Principal Licensing Officer (Aylesbury Vale area)

## **Recommendations:**

1. To note and comment on the actions taken by the Council's Licensing Service in response to the Department for Transport's Statutory Taxi & Private Hire Vehicle Standards.

## **1. Background**

- 1.1 In accordance with the Policing and Crime Act 2017, the Department for Transport published new standards for taxi and private hire vehicles, ("standards"), in July 2020 with the aim of safeguarding children and vulnerable adults from abuse and exploitation. Councils must have regard to these new standards and it is expected that they will be adopted unless there is compelling local reason not to.
- 1.2 The publication of the new standards has proved timely and coincides with the preparation of the new Buckinghamshire Council Taxi and Private Hire Licensing Policy, ("Policy"). The majority of the recommended standards have been included in the draft copy of the Policy which has been subject to recent consultation. A separate report will be presented to the Licensing Committee with results of the Policy consultation.
- 1.3 This report has been prepared in respect of the Secretary of State's expectation that licensing authorities publish their response to the standards, with details of the policies and plans to deliver the recommended measures. A summary of each recommended standard is provided, together with an indication whether the standard will be adopted and how the Licensing Service plans to ensure the standard will be met. The content of this report is without prejudice to the final decision in respect of the new Policy and it is acknowledged that measures may need to be revised should alternative policy decisions be made.

## **2. Statutory Standards**

### **2.1 Licensing Policy.**

2.2 *Authorities should produce a 'cohesive policy document' that brings all procedures together (including a convictions policy). When formulating policies, the overriding objective must be to protect the public. Policies should be reviewed every five years, with interim reviews should significant issues arise and annual performance reviews.*

2.3 The Policy commits to a review at least every 5 years to ensure it remains up to date. In addition minor amendments may be made in agreement with the Chairman of the Licensing Committee, Cabinet Member for Regulatory Services and Head of Service for Licensing. The Licensing Service intends to prepare an annual report for the Licensing Committee's consideration on its performance, supplemented by quarterly reports on such matters as details of enforcement activities, outcome of court proceedings and statistical data on licences issued.

### **2.4 Duration of licences**

2.5 *Licences should not be granted for a shorter period than the statutory 3 year period for drivers, or 5 years for operators. Some licensing authorities may issue licences for shorter periods because of concerns that longer duration licences increase the risk that licence holders may receive convictions and fail to disclose these or where there are doubts whether an applicant is fit and proper as a "probationary" period. This is not an appropriate approach, risks can be mitigated by regular interim checks and engagement with the local police to encourage the use of Common Law Police Disclosure powers.*

2.6 The Policy commits to granting licences for the full duration, although they may be issued for shorter periods depending on the circumstances of the case, for example on request of the applicant or in compliance with the Immigration Act 2016 where applicants have limited leave to work. Licences will never be granted on a probationary basis and the Policy is clear that decisions that concern whether an applicant is fit and proper to hold a licence will always be made on the balance of probabilities. If there are doubts whether an applicant can be considered fit and proper the licence will not be granted. The Policy sets out a number of measures to address interim checks, such as the use of the DBS update service and joint enforcement activities. In addition the Licensing Service has good working relations with Thames Valley Police, regularly sharing intelligence and engaging in joint operations.

### **2.7 Whistleblowing**

2.8 *It is recommended that authorities have effective internal procedures for staff to raise concerns and procedures in place for any concerns to be dealt with openly and fairly.*

- 2.9 Buckinghamshire Council has readily accessible whistleblowing policy and procedure documents on the Council's staff web pages for staff to report if they think someone else at the council is doing something dangerous, illegal or unethical. Reporting staff also have the option of remaining anonymous.
- 2.10 **Local consultation.**
- 2.11 *It is recommended good practice to consult when proposing significant changes in local licensing rules. Consultation should include passengers and trade groups.*
- 2.12 The council has conducted a comprehensive consultation exercise in relation to the Policy and the inclusion of the new standards. Trade representatives, passenger groups, individual licence holders and the wider community have had the opportunity to respond to both the pre-consultation and full consultation surveys. Stakeholder meetings and workshops have been held with trade representations and local Councillors.
- 2.13 **Changing Licensing Policy**
- 2.14 *Any changes in the licensing requirements should be followed by a review of the licences already issued. Where change is needed to the licensing requirements, the same need is applicable to those already in possession of a licence. A pragmatic approach should be taken and a reasonable amount of time allowed, for example to allow drivers the opportunity to undertake new training or gain new qualifications.*
- 2.15 In accordance with the recommended standard on language proficiency, see para 2.36, all drivers are expected to have proficient English language skills. Existing drivers who have not satisfactorily passed the English language assessment will be required to do so. Once the new Policy is implemented, it is proposed that drivers will have a minimum period of 12 months to demonstrate that they meet the standard. After this time drivers who have not demonstrated that they meet the required standard will be unable to renew their licence.
- 2.16 Whilst not included in the recommended standards, the Policy recognises that to help meet the council's commitment to keep children and vulnerable people safe, all licensed operators should be required to attend the same safeguard training as drivers, see 2.33. Existing operators have a period of 12 months to attend the training from the date of implementation of the policy, with refresher training every 3 years. It is anticipated that this requirement will place a minimal additional burden on the trade as many licensed operators have already attended the training by virtue of also holding driver's licences.
- 2.17 Operators and vehicle licence holders will now be required to provide annual Basic Disclosure certificates from the DBS, see 2.52 for further details. All licensed drivers will now be required to subscribe to the DBS update service and submit to 6 monthly Enhanced DBS checks, see 2.30 for further details.

## 2.18 **Gathering and sharing information**

2.19 *Licensing authorities must consider a full range of information available to them when making a decision whether to grant a licence and to meet ongoing obligations to ensure licensees remain suitable to continue holding licences.*

2.20 The Policy and working practices of the Licensing Service make use of the measures referenced in the standards. Data Barring Service (DBS ) checks are required of drivers, operators and vehicle licence holders (see relevant sections below). The Licensing Service maintains close working relations with Thames Valley Police, with information sharing procedures and protocols in place. Licence holders are required to notify the Licensing Service within 48 hours of arrest, charge, caution or conviction for any offence. The Licensing Service will make a referral to the DBS if a decision to refuse or revoke a licence is on the basis that a person is thought to represent a risk to a child or vulnerable adult. All licence applicants are required to declare whether they have ever held a licence with another licensing authority and whether they have ever had a licence revoked, refused or suspended. The Licensing Service routinely uses the national register of revocations and refusals, “NR3”, to conduct searches and record instances of revocation and refusal. The Licensing Service works with colleagues within the council to share safeguarding information. All complaints are recorded on a licence holder’s file, even if no further action is taken. Complaints can be made via the Council’s website, via email, telephone or in person at the Council offices. Under the Policy all licence applicants and licence holders are required to provide certificates of good conduct from any country they have lived in from the age of 18 years if they have been absent from the UK for a continuous period of 3 months; this policy amalgamates and strengthens current arrangements in the legacy areas where different approaches have been taken to certificates of good conduct.

## 2.21 **Decision making**

2.22 *It is recommended that all individuals that determine whether a licence is issued should be required to undertake sufficient training. As a minimum this should include licensing procedures, natural justice, child sexual exploitation awareness, disability and equality awareness and making difficult and controversial decisions. It is recommended that licence decisions, particular contentious matters, should be referred to a committee of the Council for determination. The reason for this recommendation is to avoid the risk of bias and to ensure a separation of decision making and investigation bodies. It is acknowledged that an alternative model may be adopted where it is appropriate in the local circumstances.*

2.23 The statutory standards are clear that regardless of the decision making model adopted, the objective must be to separate the investigation of licensing concerns and the management of the licence process. The Policy proposes that a panel of

delegated expert officers and a manager review licence investigations and make contentious licence decisions where there is a breach of, or non-compliance with, policy requirements. All officers involved in decision making are trained in accordance with the recommended standards. This model reflects the approach currently taken within all the legacy District areas and has been shown to be robust, consistent and efficient. In addition the effectiveness of this approach has been evidenced by consistent successful appeal outcomes in the Courts across the legacy areas (the majority of taxi licensing decisions are appealed through the magistrates court where there is a perceived negative impact on the applicant). Buckinghamshire Council is now one of the largest taxi licensing authorities in the country, licensing in the region of 3500 drivers and 2500 vehicles. As a result there is a need to make timely, consistent and robust licence decisions that fulfil the Council's obligations and achieve the correct outcome for the travelling public, whilst also ensuring that the process in itself does not create additional cost and delay for the trade. There is a clear need for member involvement, scrutiny and accountability in this area and, as proposed, the Licensing (Regulatory) Committee will have full oversight of all contentious licence decisions made via the quarterly reporting mechanism referred to in para 2.3, enabling discussion, consideration and review of the consistency and robustness of decisions taken.


**2.24 Fit and proper test**

2.25 *It is recommended that the following test be applied: "Without any prejudice, and based on the information before you, would you allow a person for whom you care, regardless of their condition, to travel alone in a vehicle driven by this person at any time of day or night?"*

2.26 The above fit and proper test is explicitly quoted in the new Policy, see "Criminal Records and Unacceptable Behaviour Policy". Furthermore the Policy makes it clear that all decision making concerning applicants and licensees is on the civil burden of proof, that is, on the balance of probabilities. Applicants and licensees are not given the benefit of the doubt and if the decision maker is only "50/50" that an individual is fit and proper then they will not be permitted to hold a licence.

**2.27 Criminal convictions and rehabilitation**

2.28 *In order to achieve consistency, and to mitigate the risk of legal challenge, licensing authorities should have a clear policy for the consideration of criminal records. The policy should include reference to serious offences which would prevent an applicant being granted a licence and periods of rehabilitation for lesser offences. The standards provide a recommended schedule for assessing previous convictions based on work of the Institute of Licensing, the Local Government Association, National Association of Licensing Enforcement Officers and Lawyers in Local Government.*

- 2.29 The Policy incorporates the criminal convictions assessment schedule recommended in the standards, shown in the “Criminal Records and Unacceptable Behaviour Policy”. The Policy provides further specific details on rehabilitation periods for minor and major motoring offences, as stated in the original document referenced by the standards but not included in the standards themselves. For minor motoring offences where the driver has accumulated 7 or more points there is a recommended 5 year minimum rehabilitation period and for serious motoring offences this rises to 7 years. There is also a proposed rehabilitation period of minimum 7 years for licensing and vehicle use offences.
- 2.30 **Criminality checks for drivers**
- 2.31 *All individuals applying for or renewing a taxi or private hire vehicle driver’s licence should be subject to an enhanced DBS and barred list check.*
- 2.32 All drivers applying for new and renewal licences are required to provide a current Enhanced DBS certificate, including a check of the children and adult barred lists. Enhanced DBS certificates may provide details of both spent and unspent convictions, as well as additional information pertaining to criminal matters. Any information provided will be considered in light of the Criminal Records and Unacceptable Behaviour Policy. This policy also makes it clear that drivers who appear on any barred list will not be granted a licence. In accordance with the Policy, all drivers, including existing drivers, will be required to maintain a subscription with the DBS update service. Furthermore all licensed drivers will be required to consent to a mandatory 6 monthly criminality check, in accordance with the recommended standards.
- 2.33 **Safeguard awareness**
- 2.34 *It is recognised that the taxi and private hire trade can play an important role in recognising and reporting cases of abuse, exploitation or neglect of children and vulnerable adults. Guidance and advice should be provided to drivers through mandatory training. The training should also include awareness of ‘County lines’.*
- 2.35 All drivers licensed by Buckinghamshire Council have undertaken exploitation safeguard training and it is an ongoing requirement for new drivers. The Policy proposes that licence holders be required to attend refresher training at least every three years. Criminal exploitation of children and vulnerable persons evolves and changes in nature overtime, it is important that those involved in the trade are regularly updated on developments and receive routine reminders how to identify and report signs of abuse and exploitation. The Policy requirement has also been expanded to include operators, while not a recommended requirement of the standards, operators can also play a key role in identifying and reporting safeguarding concerns.
- 2.36 **Language proficiency**
- 

- 2.37 *A lack of language proficiency could impact a driver's ability to understand written documents, such as those relating to the protection of children and vulnerable adults. Drivers need to understand the content of such documents so they can identify signs of exploitation and take the appropriate action. The ability to speak and understand English is relevant to identifying potential exploitation through communicating with passengers and their interaction with others. It is recommended that a test of driver's proficiency should cover both oral and written English language skills.*
- 2.38 The Policy recognises the importance of English language skills, not only for identifying and reporting safeguarding concerns, but also because it facilitates good communication with passengers and officials. The ability to communicate in English can also help avoid confrontation and stressful situations, such as disputes over fares and misunderstanding over directions. In line with the recommended standard that changes to licensing requirements should be applied to all licence holders, and in recognition of the important role that English language plays in addressing safeguarding concerns, it is proposed that all licensed drivers undertake a formal English language assessment, using the approach currently adopted in the Aylesbury Vale area.
- 2.39 The Aylesbury Vale area of Buckinghamshire currently uses an automated telephone system which provides an objective assessment of the candidate's level of English language proficiency. The system has proved consistent and is being used by an increasing number of other local authorities and government departments. The test does not include an assessment of the candidate's ability to write English as this is not considered necessary for the purposes of promoting passenger safety and is not generally a skill required by drivers in their day to day duties.
- 2.40 Since the system was introduced in March 2019, over 350 drivers have successfully passed the test and the pass rate is just over 50%. Drivers who are able to demonstrate that they meet the assessment criteria by way of appropriate qualification certificate are exempt from the requirement to take the assessment.
- 2.41 There are currently approximately 3500 drivers licensed by Buckinghamshire Council. It is anticipated that approximately 3000 of the current licensed drivers will require an assessment. It is proposed that once the policy has been in place for 12 months drivers will no longer be able to renew their licence unless they can demonstrate that they meet the council's English language proficiency requirements. The Licensing Service understands that many working in the trade are apprehensive about this assessment. The council's Licensing Service intends to facilitate opportunities for drivers to practice and develop their English language skills once the Policy is adopted.
- 2.42 Latest research by the company developing the test system has indicated that the current pass level used by Aylesbury Vale could be reduced slightly while still

achieving the safeguarding objectives. It is anticipated with the additional training and slight reduction in test pass mark that the pass rate of existing drivers could be in the region of 75%. Drivers who are unsuccessful in passing the test will be directed to additional sources of support to help improve their English language skills. They will also have the opportunity to take further tests for which an additional cost will be incurred. It is proposed that drivers not be required to pay directly for the first test.

**2.43 Criminology vehicle licensing**

2.44 *As with driver licensing, the objective of vehicle licensing is to protect the public, who trust that the vehicles dispatched are above all else safe. It is important therefore that licensing authorities are assured that those granted a vehicle licence also pose no threat to the public and have no links to serious criminal activity. Although vehicle proprietors may not have direct contact with passengers, they are still entrusted to ensure that the vehicles and drivers used to carry passengers are appropriately licensed and so maintain the safety benefits of the licensing regime. It is recommended that licensing authorities require vehicle proprietors to supply a basic disclosure from the DBS on annual basis.*

2.45 The Policy requires applicants for a vehicle licence to provide a current basic disclosure certificate, issued within the previous 3 months. Where the vehicle licence is sought by more than one person or a limited company, each individual or company director is required to supply a valid disclosure certificate. Licensed drivers, who are subject to 6 monthly enhanced DBS checks, are not required to submit an additional basic disclosure certificate from the DBS if applying for a vehicle licence.

**2.46 In-vehicle visual and audio recording – CCTV**

2.47 *The standards recognise that CCTV can help provide a safer environment for the benefit of taxi and private hire vehicle drivers and their passengers. CCTV can act as a deterrent to prevent crime occurring, help reduce the fear of crime, assist with investigations into incidents of crime and insurance investigations. Licensing authorities are required to consult and identify if there are local circumstances which indicate whether the installation of CCTV would have a net positive or adverse effect on the safety of taxi and private hire vehicle users, taking into account potential privacy issues.*

2.48 Results from the recent Policy consultation indicate that there is a general consensus that CCTV in licensed vehicles is welcome, with some concerns around cost and privacy issues when the vehicle is used for non-work purposes. Due to the lack of compelling evidence from the consultation either way on the net benefit of CCTV, it is proposed that the mandatory requirement to install CCTV be removed from the Policy and replaced with guidance. As a consequence of this policy change, it will be



for the individual vehicle proprietor to make a decision on this matter. This policy will be kept under review and should evidence emerge to support the introduction of a mandatory requirement then a further consultation exercise will be carried out.

**2.49 Stretched limousines**

2.50 *It is recommended that limousines not be excluded from licensing by way of local licensing authority policies, where they otherwise meet the occupancy requirements of private hire vehicles (constructed to carry less than 9 passengers). There is a risk that a blanket policy of refusing to licence limousines may create an unacceptable risk to the travelling public as it may lead to higher levels of unsupervised operation.*

2.51 The Policy permits the licensing of stretched limousines and contains specific licence conditions to ensure their safe operation.

**2.52 Criminality checks for private hire operators**

2.53 *As with driver licensing, the objective in licensing private hire vehicle operators is to protect the public, who may be using operators' premises and trusting that the drivers and vehicles dispatched are above all else safe. It is important therefore that licensing authorities are assured that those that are granted a private hire vehicle operator licence also pose no threat to the public and have no links to serious criminal activity. Although private hire vehicle operators may not have direct contact with passengers, they are still entrusted to ensure that the vehicles and drivers used to carry passengers are appropriately licensed and so maintain the safety benefits of the driver licensing regime. Licensing authorities should request a basic disclosure from the DBS and that a check is undertaken annually.*

2.54 The Policy requires applicants for an operator licence to provide a current basic disclosure certificate, issued within the previous 3 months. Where the operator licence is sought by more than one person or a limited company, each individual or company director is required to supply a valid disclosure certificate. All licensed operators, including partners and company directors, are required to submit a new basic disclosure certificates from the DBS to the Licensing Service on an annual basis. Licensed drivers, who are subject to 6 monthly enhanced DBS checks, are not required to submit an additional basic disclosure certificate from the DBS if applying for an operator licence.

**2.55 Booking and dispatch staff**

2.56 *Licensing authorities should be satisfied that private hire vehicle operators can demonstrate that all staff that have contact with the public and/or oversee the dispatching of vehicles do not pose a risk to the public. Licensing authorities should, as a condition of granting an operator licence, require a register of all staff that will take bookings or dispatch vehicles is kept. Operators should be required to evidence that they have had sight of a Basic DBS check on all individuals listed on their register*

*of booking and dispatch staff and to ensure that Basic DBS checks are conducted on any individuals added to the register and that this is compatible with their policy on employing ex-offenders.*

- 2.57 The Policy requires operators to require Basic DBS Disclosures from any new member of staff and confirm that they comply with their own Policy for Employing Ex-Offenders. Furthermore operators are required to ensure that staff produce a new basic disclosure from the DBS on an annual basis.
- 2.58 **Operator record keeping**
- 2.59 *Licensing authorities should as a minimum require private hire vehicle operators to record the following information for each booking: the name of the passenger; the time of the request; the pick-up point; the destination; the name of the driver; the driver's licence number; the vehicle registration number of the vehicle; the name of any individual that responded to the booking request; the name of any individual that dispatched the vehicle.*
- 2.60 These minimum requirements are included as Policy conditions for operators. In addition operators are required to record the date on which the booking is made, date of the intended journey, contact details of the hirer if provided, details of the fare, and if applicable details of the operator to whom the booking is sub-contracted. This information is all required to be kept for a minimum of 12 months and made available on immediate request to the Licensing Authority.
- 2.61 **Use of passenger carrying vehicles (PCV) licensed drivers**
- 2.62 *PCV licensed drivers are subject to different checks from taxi and private hire vehicle drivers because the work they undertake is considered less risk to the public, such as driving a bus. The use of a driver who holds a PCV licence and the use of a public service vehicle (PSV) such as a large minibuses (more than 8 passenger seats) to undertake a private hire vehicle booking should not be permitted as a condition of the private hire vehicle operator's licence without the informed consent of the booker.*
- 2.63 The Council is not responsible for licensing public service vehicles and their drivers; vehicles that carry more than 8 passengers are outside the scope of the private hire vehicle licensing legislation. These vehicles are licensed by the traffic commissioners on behalf of the Department for Transport and generally their drivers are subject to less stringent checks because they represent less risk to the travelling public. Some licensed operators will occasionally use PSVs, such as large minibuses, to fulfil bookings. The Policy condition for operators requires that where a PSV is required to carry out a booking, the hirer must be informed that the driver may not have been required to provide an Enhanced Disclosure from the DBS.
- 2.64 **Enforcing the licensing regime**

- 2.65 *The standards recommend a number of measures to ensure licensed drivers continue to meet the expected standards. These include joint authorisation of enforcement officers; setting clear expectations for drivers and monitoring compliance, with well-publicised complaints procedures; suspension and revocation of drivers licences.*
- 2.66 The Policy clearly sets out the Licensing Service's commitment to proportionate and reasonable enforcement. The Licensing Service already carries out proactive enforcement activity, targeting high risk areas such as schools, town centres and train stations. Joint enforcement protocols with some neighbouring authorities are already in place and it is intended to expand these further. The Policy has been drafted with a view to making its content as accessible as possible and it is intended to provide further guidance to assist licence holders to comply with the council's expectations. The Policy proposes the expansion of the points based system already in place in the Aylesbury Vale area to help address lower risk instances of non-compliance. Penalty points may be awarded to licence holders (drivers, vehicles and operators) for failure to comply with the Council's conditions and standards. The points system facilitates timely and efficient enforcement action for less serious matters. There is no financial penalty associated with the points but licence holders who accrue multiple points may be subject to additional sanction such as a period of suspension. The Licensing Service already routinely uses regulatory sanctions such as suspension and revocation of licences in more serious cases of non-compliance, the measures proposed in the new Policy will support this approach further.

### **3. Summary**

- 3.1 The majority of the Department for Transport statutory standard have already been adopted by the former District Councils in existing policies and procedures. Similarly the new Buckinghamshire Taxi & Private Hire Vehicle Licensing Policy implements the vast majority of the new standards and in some instances the Policy requirements are more robust than the recommended standards. The Policy only departs from the standards in one key area, which relates to decision making. It is recognised for smaller authorities it may be appropriate to refer contentious decisions to the Licensing Committee for decision because of difficulties separating investigation and decision making roles among available experienced officers. Buckinghamshire Council's Licensing Service is sufficiently large and resourced to ensure that these functions are adequately separated with appropriate oversight of the differing roles. Furthermore, the large volume of decision making required, often at short notice, alongside the level of appeal work to the magistrate's courts, would present practical difficulties for the Council and taxi trade if all contentious decisions were referred to the Committee for determination.

## **4. Other options considered**

- 4.1 The implementation of the new standards is likely to place additional burdens on the both the Council and taxi and private hire trade in terms of time and financial resources. The Council could delay the implementation of these standards, however the Policing and Crime Act 2017 provides a statutory footing for the Secretary of State for Transport's guidance. Furthermore the Secretary of State has informed local authorities that not only is there an expectation that these standards be implemented, unless there is a local compelling reason not to, but that implementation should commence in early 2021. While there is clear concern for the trade under the current circumstances of the Covid-19 pandemic, the paramount and arguably sole consideration in taxi and private hire licensing is passenger safety and on this basis it is not considered appropriate to delay the implementation of the new standards.

## **5. Legal and financial implications**

- 5.1 Under section 177(1) of the Policing and Crime Act 2017, the Secretary of State for Transport may issue statutory guidance on exercising taxi and private hire vehicle licensing functions to protect children and vulnerable individuals who are over 18 from harm when using these services. Under section 177(4), licensing authorities "must have regard" to this guidance when exercising their functions. These functions include developing, implementing and reviewing their taxi and private hire vehicle licensing regimes. "Having regard" is more than having a cursory glance at a document before arriving at a preconceived conclusion. "Having regard" to these standards requires public authorities, in formulating a policy, to give considerations the weight which is proportionate in the circumstances. Although it remains the case that licensing authorities must reach their own decisions, both on overall policies and on individual licensing matters in light of the relevant law, it may be that the Statutory Taxi and Private Hire Vehicle Standards might be drawn upon in any legal challenge to an authority's practice, and that any failure to adhere to the standards without sufficient justification could be detrimental to the authority's defence.
- 5.2 The additional assessments, training requirements, changes to working practices and preparation of guidance and other supporting materials required to implement the new standards will incur additional costs. A further report will be presented to the Committee outlining these costs as part of the report on the proposed new fee levels following approval of the Buckinghamshire Taxi and Private Hire Licensing Policy

## **6. Corporate implications**

- 6.1 Protecting the vulnerable – taxi and private hire vehicles play a valuable role in transporting vulnerable members of the community such as children and those with

physical disabilities. Many children, including those with special educational needs, rely on taxis and private hire vehicles for school transport. The implementation of the statutory standards will help further promote the safety of children and vulnerable adults using licensed vehicles.

- 6.2 Property – N/A
- 6.3 HR – N/A
- 6.4 Climate change – N/A
- 6.5 Sustainability – N/A
- 6.6 Equality – an equality impact screening assessment and full equalities impact assessment have been carried out and accompany the Policy decision making process.
- 6.7 Data – a review of the existing data protection policies in place is required ahead of implementation and is now in process.
- 6.8 Value for money – while the paramount consideration is passenger safety, the Licensing Service will ensure that any associated additional costs involved in delivering these new standards will be kept to a minimum.

### **Key documents:**

DfT Statutory Taxi & Private Hire Vehicle Standards, July 2020

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/928583/statutory-taxi-and-private-hire-vehicle-standards-english.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/928583/statutory-taxi-and-private-hire-vehicle-standards-english.pdf)