

Equality Impact Assessment

Title of the Assessment	GM Common Minimum Licensing Standards
Lead Officer for this initiative	John Garforth
Officer completing the analysis	Danielle Doyle
Phone	07789 508546
Email	danielle.doyle@manchester.gov.uk

Question 1	
What is the main aim and purpose of the activity?	The main purpose of the activity is to propose a set of taxi and private hire minimum licensing standards for adoption by Greater Manchester's ten local authorities. The purpose of this is to standardise licensing conditions and policies across Greater Manchester (GM) so that the travelling public can have greater assurance with regard to the safety and risk assessments that have taken place for licensed drivers and vehicles, including the emissions standard of vehicles they are travelling in. The activity will also provide a valuable platform from which to raise public awareness about the variance in standards nationally and deter the use of non-GM licensed vehicles within the conurbation, thereby protecting business within GM.

Question 2	
List the main elements of the activity?	The project includes a set of standards split into 4 main categories: Drivers, Vehicles, Operators and Local Authority. The standards are a set of policy requirements or licence conditions by which licence holders and local authorities have to adhere to.

Question 3	
What outcomes does the activity aim to achieve?	The project aims to: <ol style="list-style-type: none"> 1. Meet the requirements of the DfT's Statutory Guidance for Taxis and Private Hire 2. Improve public safety 3. Improve the customer experience (both passengers customers and licensee customers) 4. Achieve clean air objectives 5. Deter GM residents and visitors from using non-GM licensed vehicles

Question 4	
Who are, or will be, the main beneficiaries of the activity?	Passengers who use taxi/PH services, taxi/PH operators, proprietors and drivers, and licensing authorities themselves.

Question 5	
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Do you need to consult with people who might be affected by it directly or indirectly? <i>Please justify your response</i>	Yes – a public consultation has already taken place, alongside targeted direct consultation with impacted groups.
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Question 6

Having due regard for the equality duty involves:

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

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

- Use the table below to record where you think that the activity could have a positive impact on any of the target groups or contribute to promoting equality, equal opportunities or improving relations within equality target groups.

- Use the table below to record where you think that the activity could have an adverse impact on any of the equality target groups i.e. it could disadvantage them and impact is high.

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

Age

Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Children and Young People (aged 19 and under)	Highly likely	Very low likelihood	<p>Children and Young people are by definition 'vulnerable' individuals. Improvements to the way licence applicants are assessed and monitored for compliance can only serve to improve the quality and safety of the licensed fleets, and reduce the risk of harm to the travelling public, particularly those classed as vulnerable. The MLS should also serve to raise greater awareness of the risks of travelling in vehicles licensed outside of GM to unknown standards, with little to no proactive compliance activity within GM</p> <p>There is a risk that the higher standards across GM will result in higher licence fees and improved compliance across the board, and this could mean that whilst they are able to, GM based operators could still choose instead to obtain licences outside of GM authorities. These operators may provide school contract based services, and this could be a risk if the processes and compliance monitoring of other authorities are not as robust as the GM MLS. This risk could be mitigated by authorities amending their schools contracts to require the use of licensed vehicles in the area where the school is based only.</p>

Older People (aged 60 and over)	Highly likely	Medium - high risk	<p>Many older people are reliant on taxis and private hire vehicles to travel. Improvements to the way licence applicants are assessed and monitored can only serve to improve the quality and safety of the licensed fleets, and reduce the risk of harm to the travelling public.</p> <p>There is a risk of the activity causing a reduction in the Hackney licensed fleet (cost of vehicles meaning risk of individuals leaving this trade), and a risk of licensees going to authorities outside of GM to get licensed due to the applications criteria, standards, compliance and therefore cost being higher; so GM travelling public could be forced to travel in vehicles with drivers of a lower quality and assessment standard.</p> <p>The MLS (if adopted in full) will likely result in higher costs to some licensees as proposals include additional testing requirements (eg. enhanced driving test), additional processing/checking requirements in the application process (background checks), and in some areas additional compliance activity to ensure the integrity of the activity, which in turn will result in higher licence fees. Data we currently hold on the age profile of our licensed fleet of drivers shows that around 40% of our licensees are over the age of 50, with 13% of licensees over the age of 60.</p>
Disability			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Disability (people with physical impairments, communication or sensory impairments, a learning disability or cognitive impairment, mental health problems, longstanding illness/health condition, other disability impairment).	Highly likely	Medium - high risk	<p>Improvements to the way licence applicants are assessed and monitored for compliance can only serve to improve the quality and safety of the licensed fleets, and reduce the risk of harm to the travelling public, particularly those classed as vulnerable. The proposals also seek to increase the number of Wheelchair Accessible and Accessibility enhanced public hire vehicles (Purpose built Hackneys with sight and audio adaptations) across the conurbation which would result in reducing the risk of people with disabilities not being able to get a suitable vehicle on a public rank. The MLS also seeks to improve the quality of training required of</p>

			<p>licensed drivers, including their awareness of their responsibilities towards passengers with disabilities, as well as improve the level of proactive compliance to ensure these standards are being adhered to and improve public confidence to report, as complaints from people with disabilities are traditionally low.</p> <p>The MLS should also serve to raise greater awareness of the risks of travelling in vehicles licensed outside of GM to unknown standards, with little to no proactive compliance activity within GM.</p> <p>However, the proposed MLS also carries a fairly high risk of reducing the licensed Hackney fleet, thereby conversely increasing the risk of people with accessibility needs not being able to access a suitable vehicle either by pre-booking or on a public rank. The MLS will also likely lead to increased licence fees, which in turn will result in increased fares, potentially affecting people with disabilities disproportionately if the individual is more reliant on accessible vehicles not widely available in the private hire industry.or for public hire.</p>
Gender			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Men	Highly likely	Medium - high risk	<p>The positive impacts of MLS will affect all members of the travelling public that use Taxi and Private Hire services, by providing a higher quality fleet of drivers and vehicles that will be assessed and monitored to be safe and minimise risk to the public.</p> <p>If there are any adverse implications of the MLS proposals for licensees, then this will affect men more than women, as 97% of our licence holders are male* (identified from their stated title on their licence application).</p> <p>There is a risk that if the proposed MLS drives growth of non-GM licensed vehicles being used by operators within GM, then all passengers will be travelling in vehicles with drivers to unknown standards with minimal compliance.</p>

Women	Highly likely	Low /medium risk	<p>The positive impacts of MLS will affect all members of the travelling public that use Taxi and Private Hire services, by providing a higher quality fleet of drivers and vehicles that will be assessed and monitored to be safe and minimise risk to the public.</p> <p>There is a risk that if the proposed MLS drives growth or non-GM licensed vehicles being used by operators within GM, then all passengers will be travelling in vehicles with drivers to unknown standards with minimal compliance, and females are more vulnerable when travelling alone in that regard.</p>
Transgender People	Highly likely	Low risk	<p>The positive impacts of MLS will affect all members of the travelling public that use Taxi and Private Hire services, by providing a higher quality fleet of drivers and vehicles that will be assessed and monitored to be safe and minimise risk to the public.</p> <p>There is a risk that if the proposed MLS drives growth or non-GM licensed vehicles being used by operators within GM, then all passengers will be travelling in vehicles with drivers to unknown standards with minimal compliance.</p>
Race			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Asian or Asian British Backgrounds (This includes Pakistani, Indians and Bangladeshi, Chinese or any other Asian background)	Highly likely	Medium - high risk	<p>Whilst race and ethnicity data is not collected or recorded as part of the licensing process, but we know from seeing our applicants in person and our daily interactions that the vast majority of our licensed fleet are non-white males (both British and non-British); therefore any impacts, both positive and adverse will likely affect this target group disproportionately.</p> <p>BAME licensees are also more likely to live in Lower Super Output Areas (LSOAs) with higher levels of deprivation and this is borne out in the postcode data of our licence holders where the overwhelming majority have postcodes identified as LSOAs. It would be a reasonable inference that these licence holders are more likely to have socio-economic pressures and live in housing that is less likely to have</p>

			<p>private parking and the ability therefore for at home EV charging; therefore requirements for more expensive fully electric vehicles carry an adverse risk to the viability of these individuals continuing in the industry.</p> <p>All sections of the travelling public should benefit from MLS.</p>
<p>Black or Black British Backgrounds (This includes Caribbean, African or any other black background)</p>	<p>Highly Likely</p>	<p>Medium - high risk</p>	<p>Whilst race and ethnicity data is not collected or recorded as part of the licensing process, we know from seeing our applicants in person and our daily interactions that the vast majority of our licensed fleet are non-white males (both British and non-British); therefore any impacts, both positive and adverse will likely affect this target group disproportionately.</p> <p>BAME licensees are also more likely to live in Lower Super Output Areas (LSOAs) with higher levels of deprivation and this is borne out in the postcode data of our licence holders where the overwhelming majority have postcodes identified as LSOAs. It would be a reasonable inference that these licence holders are more likely to have socio-economic pressures and live in housing that is less likely to have private parking; therefore requirements for more expensive fully electric vehicles carry an adverse risk to the viability of these individuals continuing in the industry.</p> <p>All sections of the travelling public should benefit from MLS.</p>
<p>Mixed /Multiple Ethnic Groups (This includes White and Black Caribbean, White and Black African, White and Asian or any other mixed background)</p>	<p>Highly Likely</p>	<p>Medium - high risk</p>	<p>Whilst race and ethnicity data is not collected or recorded as part of the licensing process, we know from seeing our applicants in person and our daily interactions that the vast majority of our licensed fleet are non-white males (both British and non-British); therefore any impacts, both positive and adverse will likely affect this target group disproportionately.</p> <p>BAME licensees are also more likely to live in Lower Super Output Areas (LSOAs) with higher levels of deprivation and this is borne out in the postcode data of our licence holders where the overwhelming majority have postcodes identified</p>

			<p>as LSOAs. It would be a reasonable inference that these licence holders are more likely to have socio-economic pressures and live in housing that is less likely to have private parking; therefore requirements for more expensive fully electric vehicles carry an adverse risk to the viability of these individuals continuing in the industry.</p> <p>All sections of the travelling public should benefit from MLS.</p>
White British Background (This includes English, Scottish & Welsh, Irish and Gypsy or Irish Travellers)	Highly likely	Low risk	Whilst all sections of the travelling public should benefit from MLS, there is little to no evidence to suggest that this target group would be particularly adversely affected over any other.
Non-British White Backgrounds (This includes Irish, Polish, Spanish, Romanians and other White backgrounds)	Highly likely	Low risk	Whilst all sections of the travelling public should benefit from MLS, there is little to no evidence to suggest that this target group would be particularly adversely affected over any other.
Arabs	--	--	Don't have the data to specifically address the factor but would otherwise say would be impacted in the same way as other BAME groups.
Any other background not covered by any of the above	---	---	Data on race and ethnicity not held so no data
Religion/Belief			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Buddhists			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Christians			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Hindus			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Jews			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Muslims			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Sikhs			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver

Others			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Sexual Orientation			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Gay men			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Lesbians			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Bisexual			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver

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

Question 8	
If you have identified one high adverse impact or any medium/low adverse impacts, what improvements to the activity could you make to mitigate high/medium/low adverse impacts? Please give details of the improvements you plan to make.	<p>The highest cost risk is that around the requirements for vehicles. Mitigation has already been identified in the form of a substantial Clean Taxi Fund and discussions are ongoing with central government with regards to additional funding support in this area. Engagement with the trades continues in order to understand the ongoing impacts and risks, particularly in the recovery from the pandemic.</p> <p>Further mitigation is proposed by way of an extended exemption period for the CAP, for GM licensed Hackneys and Private Hire vehicles.</p> <p>In order to mitigate the risk of introducing MLS in the absence of wider and meaningful national reform, a public awareness campaign is essential to encourage residents and visitors to use only GM licensed vehicles (and drivers) when travelling.</p>

Question 9		
Have you set up equality monitoring systems to carry out regular checks on the effects your activity has on the following groups?		
Equality Group	Has an equality monitoring system been set up? (Y/N)	Details
Age	N	Whilst we capture this data, we are not monitoring regularly. In order to monitor we'd have to change our Data sharing agreements to explain how this will be used.

Disability	Y	We currently monitor on a quarterly basis the number of complaints we get relating to a disability issue, so we can continue to monitor the impacts over the course of the activity.
Gender	N	We would have to have a clear reason for capturing in our DSA and to begin to capture and monitor this information would increase processing (and therefore licence fee) costs.
Race	N	We would have to have a clear reason for capturing in our DSA and to begin to capture and monitor this information would increase processing (and therefore licence fee) costs.
Religion/Belief	N	We would have to have a clear reason for capturing in our DSA and to begin to capture and monitor this information would increase processing (and therefore licence fee) costs.
Sexual Orientation	N	We would have to have a clear reason for capturing in our DSA and to begin to capture and monitor this information would increase processing (and therefore licence fee) costs.
Other	N	

Question 10

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

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

Question 11

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

Question 12

Is a Full Impact Analysis needed? If in Question 6 you identified two or more adverse impacts then you should either

- abort the activity, or
- carry out a full analysis

Question 13

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

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