



## **Improving Safety in Private Hire Vehicles Addison Lee Group Consultation Response**

The following sets out Addison Lee Group's considered response to Transport for London's (TfL) consultation on improving safety in private hire vehicles (PHVs). Addison Lee is Europe's largest private hire car company. We use cutting-edge technology to dispatch a total of around 5,000 vehicles, of which 4,200 are passenger vehicles, to more than 10 million journeys per year. Operating in London for more than 40 years, we are a major employer in the capital and the biggest private sector employer in the London Borough of Camden.

### **Part One: Addison Lee views on specific measures relating to an advanced driving test and vehicle signage**

#### **1. Driver Tests for PHV drivers**

##### Proposals 1 & 2 – Advanced driving test

Addison Lee is at the forefront of professionalising the PHV industry and supports the introduction of regulations which would help to improve safety standards across the sector. We believe the introduction of an advanced driving assessment, as set out in Proposals 1 and 2, would further improve industry standards and thus benefit public safety, as such agree Addison Lee supports Proposals.

Addison Lee believes that better drivers not only improve road and passenger safety, but also make better and more economical use of the vehicle itself. This in turn reduces emissions as well as the costs associated with wear and tear of vehicles.

While we see the benefits of making these changes, they would undoubtedly cause significant disruption to the industry. Introduction of these new tests requires careful and pragmatic implementation. In order for Addison Lee to support these tests we believe the following is required.

Before this requirement can be introduced further consideration is needed on the likely impact on drivers, including what additional training would be needed and the potential costs of undertaking this. Furthermore, any driver that fails to pass the test would lose their livelihood – in order to manage such scenarios we believe TfL has an obligation, in partnership with the wider industry, to provide support, guidance and advice to drivers. TfL also need to provide full clarity setting out the policy regarding retaking the test, including whether there will be a limit on the number of times a test can be taken and the gap between retakes.

Our internal information suggests that some PHV drivers are likely to view the introduction of these Proposals as overly prescriptive and may result in some drivers leaving the industry.

We believe that the challenges experienced with the introduction of the English language test for PH drivers provides a useful case study, with lessons that can be learned, for TfL in relation to these proposals. Indeed, TfL should explore opportunities to consolidate any advanced driving test requirement and English language test – particularly as they are to be tailored to the PHV sector.

In order to ensure minimal disruption, it is vitally important that any test required to show advanced driving skills be undertaken at the point where a current license is at its natural renewal point. Existing drivers should also be provided with at least six months in which to pass the test. For new



drivers, taking the test for the first time, TfL should identify a date from which the requirement becomes applicable at the earliest possible opportunity and make sufficient announcements to promote it.

Further clarity on how the tests will be run, and by whom, is also necessary. Again, here we see parallels and potential opportunities to consolidate the test with the English language test.

Given the existing driver training programmes run by Addison Lee, including our NVQ Level 2 qualification, we would welcome a discussion with TfL regarding the feasibility of whether we might be able to incorporate an accredited advanced driving assessment into our current NVQ Level 2. The Addison Lee Diploma provides a full NVQ Level 2 qualification in Road Passenger Vehicle Driving and covers areas including English language capabilities, passenger safety elements, local topography and appropriate driver behaviours.

We would be interested to see what consideration TfL have given to these issues and any further analysis on the potential impact on drivers, in particular those that fail the test.

### Proposal 3 – Enhanced wheelchair assessment

Addison Lee supports Proposal 3, to introduce an enhanced wheelchair assessment for the drivers of all wheelchair accessible PHVs. We support measures which improve driver training and customer service, especially for those drivers who serve more vulnerable members of society.

Addison Lee agrees that the requirement should be limited to those drivers who drive wheelchair assessable PHVs.

We believe further information should be given to provide clarification on how often a driver would be required to undertake the assessment, or take refresher courses.

## **2. Private Hire Vehicle Signage**

### Proposal 1 – Contact information signage in PHV's

Addison Lee recognises the importance of appropriate signage and ensuring contact information is available to passengers, we support the principles of the proposals. Addison Lee believes that for certain private hire vehicles, in particular those which provide a chauffeur service, there is a need for TfL to maintain necessary exemptions to carrying signage.

We believe further discussion is required around placement of signage in vehicles. For example, we believe it could be more appropriate for signage to be placed on the back of front-seat headrests rather than on windows.

While the suitability of combined signage depends on vehicle size and the prevalence of other signage, in principle Addison Lee supports the introduction of a combined sign to provide relevant information to passengers.

We believe that TfL should provide further information on their proposed process for handling customer complaints resulting in passengers using the contact information included on signage. In particular, TfL should set out their proposed procedures for contacting operators following a



customer complaint and whether it will be standard practice that operators are contacted following a complaint made against them/one of the drivers.

In reference to improving cyclists' safety, Addison Lee recognises the problems associated with car-dooring and supports measures to raise awareness amongst passengers of the need to be mindful of cyclists in order to prevent car-dooring incidents – which are one of the most common accidents experienced by cyclists.

Addison Lee is committed to reducing the risk of car-dooring incidents involving our vehicles. We recently launched *Addison Lean*, a dedicated campaign to encourage both drivers and passengers to adopt the “Dutch reach” manoeuvre when exiting the vehicle. The campaign has received positive support from many MPs and AMs. It is widely accepted that when using the “Dutch reach” the risk of a car-dooring incident injuring a cyclist is reduced. As part of our campaign, we are introducing in-car signage to raise awareness amongst passengers, as well as stickers to be placed on wing-mirrors to act as a reminder to drivers. These stickers are also available to the public. We are pleased to have been able to work closely with TfL on this campaign.

#### Proposal 2 – Introduction of coloured licence discs

Addison Lee supports the introduction of measures which assist the work carried out by compliance officers and helps them to more easily identify licensed PHVs. The proposal that licence discs be fluorescent in colour represents a means of achieving this. However, we have concerns that certain fluorescent colours could appear unsightly and therefore would like engage in further dialogue with TfL on this point to ensure an agreeable solution can be reached which achieves the laudable aim behind this proposal.

#### Proposal 3 – Increasing the visibility of PHVs

Addison Lee supports the maintenance of the two-tier system of PHVs and taxis, which allows only taxis the ability to ply for hire. As noted above, ensuring compliance officers are able to easily identify PHVs is important in maintaining this distinction and ensuring public safety. However, we remain unconvinced of the merits set out under this proposal and believe a rethink is required to identify the most appropriate measures to clearly differentiate PHVs from taxis. Furthermore evidence is required to demonstrate that difficulty distinguishing between taxis and PHVs exists amongst compliance officers and consumers.

In particular, we are concerned that insufficient consideration has been given to potential difficulties likely to be experienced when attempting to secure a licence plate and bracket under a vehicle's number plate. Such a solution would not be appropriate for the fleet of vehicles currently used by Addison Lee.

Addison Lee does not believe that the measures set out in this proposal present a suitable set of solutions to address the problems associated with cross border hiring. We have set out a strong case for the introduction of national standards, to replace the current guidelines, which would set out clear requirements which all drivers, vehicles and operators must meet. Please see Appendix A for further details on Addison Lee's proposals for minimum standards.

#### Proposal 4 – Exemptions from displaying the licence disc



Addison Lee supports the continuation of granting exemptions from displaying the proposed mandatory signage on a case by case basis. Our customer feedback shows clear support for these exemptions and TfL should maintain the current system in place for granting these.

#### Proposal 5 – Private hire driver ID

Addison Lee recognise that knowing the driver's ID and licence information is an important part of securing passenger safety, as such we support the motivation behind this proposal. However, we believe the detail of the proposal raises a number of key questions which require further exploration.

Addison Lee has an obligation to ensuring the safety of our driver partners as well as our passengers. This includes data protection and privacy commitments, and ensuring personal information is not inappropriately shared with third parties. We are concerned that displaying a version of the PHV driver's ID card on the front windscreen would compromise our commitment to protecting drivers' personal privacy.

Addison Lee operates a fleet of around 5,000 vehicles, running such a large fleet inevitably involves situations which require a driver to swap one vehicle for another. Requiring the display of a driver's ID on the windscreen would therefore present operational challenges which make such a requirement onerous.

The consultation document rightly recognises that the current ID card can be difficult to read. However, we do not believe that placing this information in another format on the windscreen resolves this concern, as anyone wishing to read it would need to be in very close proximity to the vehicle.

It is our view that TfL, in partnership with industry and other stakeholders, should continue to explore alternative ways of ensuring relevant information is provided to passengers ahead of a journey beginning. Technology solutions have provided an important means of giving passengers information regarding their driver, vehicle and other relevant details. Where the customer can receive it, Addison Lee already provides full details of vehicle and driver (including photo) prior to pick up via app, email, and web confirmation.

### **Part Two: Addison Lee views on PHV insurance arrangements and what measures could be adopted relating to driver applicant character and conduct checks**

#### **3. Hire or reward and operator fleet insurance**

We believe changes are needed to the existing PHV hire or reward insurance requirements. Addison Lee supported the changes to insurance requirements introduced in 2016. We have long argued that, as a vital means of ensuring public safety, all PHV operators should be required to provide appropriate hire or reward full fleet insurance as a main policy for all vehicles within their fleet. As outlined in Appendix A, we believe this requirement should be a key component of national standards for operators.

We believe there are numerous benefits to requiring that PHV operators be responsible for ensuring they have hire or reward fleet insurance for all PHVs available to them. Firstly, it would help with the removal of rogue operators and drivers from the road. It would also provide significant reassurance to passengers and the wider public that all PHVs are fully and appropriately insured. Removing the



burden from drivers also provides benefits and removes the possibility of a driver cancelling their premium without an operator becoming aware.

Addison Lee believes that drivers should be required to provide evidence that they are covered by applicable insurance if requested to do so by a TfL compliance officer. We recognise that different sized operators will require different solutions to this and are therefore open to exploring further what form this requirement should take. The options outlined in the consultation could all make up part of a workable solution.

#### **4. Background character checks for private hire driver licence applicants**

Addison Lee believes that all applicants for a PHV drivers licence should be required to meet certain background and character checks in order to quality. This is a vital component of securing public safety.

As set out in Appendix A, below, we believe that all drivers should satisfy the following requirements:

- All drivers must complete and pass a compulsory enhanced DBS check every twelve months. Any applicant with serious convictions, such as violence, sexual assault or fraud, must be refused a licence.
- An English language competency test and health check for all drivers as part of licence application.
- All drivers to undertake a minimum level of training, to include passenger safety elements, local topography and appropriate driver behaviours.

We do not believe, at this stage, we are in a position to comment any further on this and would require TfL to provide further clarity on this proposal. Once further details are made available we would welcome the opportunity to provide further comment and feedback.

#### **Appendix A – Addison Lee Recommendations for National PHV Industry Standards**

The following sets out Addison Lee Group's recommendations for national PHV industry standards. The overarching focus is on how best to effectively ensure passengers' safety when travelling in a private hire vehicle.

Addison Lee strongly believes that the best way to ensure a passengers' safety and raise standards across the industry is through the introduction of mandatory National Minimum Standards for operators, drivers and vehicles. These should be implemented through a single legislative framework, replacing the current guidelines issued to local authorities, which have resulted in a patchwork of fragmented standards, differing widely from one licencing authority to another. We have set out below suggested areas for inclusion in this framework.

National Standards for Operators:

- A requirement that all operators qualify for and hold a National Certificate of Professional Competence specific to the taxi and PH industry – the details of which should be defined in consultation with industry and other stakeholders.



- All operators, regardless of size, to be responsible for securing full hire or reward insurance for all taxi and PH vehicles working for, or contracted to, them. Thereby moving the insurance cover obligation from the driver to the operator.
- An obligation that all operators must be PCI<sup>1</sup> compliant and registered with the Information Commissioner's Office (ICO).
- Operators must offer, or provide access to, training opportunities for drivers covering driving skills, navigation, cycle awareness and customer service.
- Prior to a journey starting operators must provide to the passenger details of the vehicle and driver, including vehicle manufacturer, model and number plate, as well as driver name and licence number.
- An obligation for operators to ensure they are aware of where and how their vehicles are used when "on-call", through the use of telematics and vehicle tracking

#### National Standards for Drivers:

- All drivers must complete and pass a compulsory enhanced DBS check every twelve months. Any applicant with serious convictions, such as violence, sexual assault or fraud, must be refused a licence.
- An English language competency test and health check for all drivers as part of licence application.
- All drivers to undertake a minimum level of training, to include passenger safety elements, local topography and appropriate driver behaviours.

#### National Standards for Vehicles:

- All new vehicles or vehicles new to licensing must be no older than five years.
- From 1 January 2019, all PHVs licensed for the first time must have a Euro 6 petrol or diesel engine, or a Euro 4 petrol-hybrid engine.
- Every vehicle, whether licenced for the first time or relicensing, must have passed an MOT service no more than 14 days prior to vehicle inspection.

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<sup>1</sup> <https://www.pcisecuritystandards.org/>