

# Improving safety in Private Hire Vehicles

Consultation Report  
August 2020

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# Executive summary

## Background

This document explains the processes, responses and next steps of the consultation on improving safety in private hire vehicles (PHVs).

Transport for London (TfL) is responsible for the licensing, regulation, enforcement and compliance of taxi and private hire services.

We license approximately:

- 21,700 taxi drivers
- 17,100 taxis
- 2,000 private hire operators
- 108,600 private hire drivers
- 90,800 PHVs

Taxi and private hire services play an important role in delivering passenger transport services in London and it is essential that standards set by TfL ensure a high level of passenger safety. As part of our role, TfL has the ability to consider and set secondary legislation to enhance the safety and security of passengers using taxi and private hire services.

Improving the safety and security across the entire transport network is the key priority for the Mayor's Transport Strategy and the Mayor has set out a 'Vision Zero' approach to safety on London's streets whilst ensuring the transport system is safe and secure for all passengers<sup>1</sup>.

TfL has previously consulted on and introduced a range of new regulatory measures to enhance the security of private hire services. For example, we previously undertook a review of private hire regulations and consulted on a number of proposals<sup>2</sup>. Following the consultation we introduced a number of new requirements including:

- A requirement that private hire operators must provide a booking confirmation to passengers before their journey starts
- A voice contact requirement for private hire operators so as passengers can speak to someone during operators' hours of business and at all times during a journey

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<sup>1</sup> Vision Zero for London, <https://tfl.gov.uk/corporate/safety-and-security/road-safety/vision-zero-for-london>

<sup>2</sup> Private hire regulations review, 2015, <https://consultations.tfl.gov.uk/tph/private-hire-regulations-review/>

- A requirement that private hire operators must provide us with details of the drivers and vehicles they have used to fulfil private hire bookings, or have had available to them to fulfil bookings

To further improve the safety and security of passengers using private hire services, we consulted on a range of measures and sought views from the public, including the private hire trade and passengers using private hire services. We asked for views on a number of areas including:

- Driving tests for all private hire drivers
- Signage arrangements on PHVs
- Private hire driver identification on PHVs
- Hire or reward insurance requirements for PHVs
- Background checks for private hire drivers

We also commissioned an independent Integrated Impact Assessment (IIA) to cover the equality, health, environmental, business and economic impacts of the proposals. This was published during the consultation so as respondents could comment on it. Further information about the proposals plus a copy of the IIA is available on our website<sup>3</sup>.

Following the closure of the consultation we have been considering the responses to determine which proposals we recommend are taken forward. Our objective is to bring forward a package of measures that we consider will enhance the safety and security of passengers using private hire services in London. In developing these measures, our overriding objective is to further improve passenger safety while taking into account the important impacts that were identified as part of the IIA.

### **The consultation**

Between 26 March and 25 June 2018 we consulted on proposals for specific measures relating to driving standards and vehicle signage. We also sought views on the insurance requirements for PHVs and establishing background character information on PHV driver licence applicants who had lived overseas for an extended period or come to the UK from another country.

We received 5,348 responses to the consultation, 40 of which were from stakeholders. Headline findings include:

We proposed to introduce a driving test for applicants for a private hire driver's licence plus licensed PHV drivers. It was proposed that the standard of the test would be the same as the taxi driving test but would also reflect the unique challenges of driving in London and include role specific questions on driving a PHV in the capital. Half of all respondents supported the proposal for all existing PHV

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<sup>3</sup> Improving safety in PVHs, 2018, <https://consultations.tfl.gov.uk/taxis/improving-phv-safety/>

drivers to take an advanced driving assessment on the next renewal of their licence, with just over half (51 per cent) supporting the proposal for all PHV drivers to have to take an advanced driving test. Fifty-four per cent of PHV users who responded supported the proposal for all PHV drivers to take a driving assessment.

Over two thirds (68 per cent) of all respondents supported the introduction of a wheelchair assessment for drivers of wheelchair accessible PHVs and 70 per cent of all respondents felt that only PHV drivers who had completed the assessment should be allowed to drive wheelchair accessible PHVs.

Over half (57 per cent) of all respondents supported the introduction of signage in PHVs displaying customer contact information with over two thirds supporting the introduction of cycle safety signage (68 per cent) and seatbelt signage (69 per cent). However, fewer respondents (50 per cent) supported combining the messages into one sign.

Fifty-eight per cent of all respondents felt that the colour of the PHV licence disc should be changed annually and 54 per cent felt that PHVs should be more identifiable. There were mixed views on signage exemptions being considered by TfL on a case by case basis with 34 per cent of all respondents agreeing with this but 43 per cent disagreeing with the proposal.

Forty-nine per cent of all respondents agreed with the information on the PHV driver ID card being visible from outside of PHVs. Just over half (52 per cent) agreed that it should be displayed in the top nearside corner of the front windscreen.

Hire or reward insurance is a class of insurance and is required if vehicles are licensed for use as a taxi or PHV and carry passengers. In the consultation we asked if changes to the existing PHV insurance requirements were needed. Fifty-three per cent of all respondents agreed that changes were needed to the existing PHV hire or reward insurance requirements with 50 per cent of private hire users saying that changes were required. Of those who thought that changes were required 84 per cent said that hire or reward insurance should be in place at all times a vehicle is licensed as a PHV. Seventy-three per cent said that operators should be required to have hire or reward insurance in place covering all of the private hire drivers and vehicles available to them. The majority (78 per cent) of all respondents said that when working PHV drivers should be required to produce evidence that the PHV they are using is covered by hire or reward insurance.

We already require all private hire driver applicants to have an enhanced Disclosure and Barring Service (DBS) check but the most frequent suggestion relating to background character information was that it should be obtained through (DBS checks (41 per cent), with 23 per cent specifying that these checks would ensure proof of no criminal record or convictions and 18 per cent stating that the checks would ensure no criminal record or convictions in the person's country of origin.

## **Next steps**

We are now reviewing comments made during the consultation and these will inform any recommended changes to the relevant private hire licensing requirements or proposals taken forward for further consultation.

Details of any new private hire requirements, changes to existing requirements or new guidance will be published on our website at [tfl.gov.uk/tph](https://tfl.gov.uk/tph).

# 1. About the proposals

The Mayor's Transport Strategy published in March 2017 seeks 'to ensure that London has a safe, secure, accessible world-class taxi and PHV service with the opportunity for all providers to flourish'. It also seeks to ensure that this happens within the wider context of the Healthy Streets Approach and the vision for a healthier, greener, more sustainable city.

In 2018 we conducted a public consultation focussing on private hire services and public safety. The consultation was in two sections with section one containing specific proposals and section two seeking general views and requesting evidence to understand if further work was needed in some areas.

Section one of the consultation sought views on proposals for specific measures relating to driving standards, wheelchair assessments and vehicle signage.

The proposals consulted on were:

- An advanced driving assessment for all new PHV drivers
- An advanced driving assessment for all existing PHV drivers on the next renewal of their licence
- A wheelchair assessment for the drivers of all wheelchair accessible PHVs
- Whether only PHV drivers who had completed the wheelchair assessment should be allowed to drive wheelchair accessible PHVs
- Introducing new mandatory signage in PHVs which includes contact information for TfL and combining this with cycle safety information plus signage advising passengers to wear their seatbelt
- Colour coding the PHV licence discs and changing the colour annually
- Options to make PHVs more identifiable
- Exemptions from displaying the PHV licence disc being considered on a case by case basis
- Making the information contained on PHV driver identification cards more visible from outside of PHVs and a version of the ID card being displayed on the nearside of the PHV on the front windscreen in the top corner

Section two of the consultation sought views more generally on what measures could be adopted, firstly, relating to driver applicant character and conduct checks and secondly, PHV insurance. We invited views on areas that we considered would strengthen the regulation of private hire services in London.

We commissioned an independent Integrated Impact Assessment (IIA). The IIA covered the equality, health, environmental, and business and economic impacts of the proposals in the consultation. This was published on 25 May 2018 and comments on the IIA were invited.



A copy of the IIA report and more information about the proposals we consulted on is available on our website [here](#).

## **2. About the consultation**

### **2.1 Purpose**

The objectives of the consultation were:

- To give the public and key stakeholders easily-understandable information about the proposals and allow them to respond
- To understand the level of support or opposition to the proposals
- To understand any issues that might affect the proposals of which we were not previously aware
- To understand concerns and objections
- To allow respondents to make suggestions

### **2.2 Outcomes**

The potential outcomes of the consultation were:

- Following careful consideration of the consultation responses, we decide to proceed with some or all of the proposals as set out in the consultation
- Following careful consideration of the consultation responses, we modify some or all of the proposals in response to the issues raised and proceed with slightly revised proposals
- Following careful consideration of the consultation responses, we decide not to proceed with any of the proposals

### **2.3 Consultation history**

Meetings had taken place with private hire industry representatives to seek their views on the proposed changes. These were carried out by Mott MacDonald who we commissioned to carry out the Integrated Impact Assessment (IIA) (see also section 2.8.5). Mott MacDonald are an independent management, engineering and development consultancy. Annex D of the IIA provides a stakeholder engagement log.

### **2.4 Who we consulted**

This was a public consultation and open to anyone to respond to. We notified private hire trade representatives, licensees and other interested industry representatives alongside Local Authorities, London Councils, passenger groups, voluntary groups,

the Metropolitan Police, the City of London Police, MPs and GLA members about the consultation and encouraged them to respond. Appendix C lists all the stakeholders we consulted with.

In total we sent out approximately 340,000 emails when we launched the consultation. We sent out a similar number of emails for the consultation reminder.

## **2.5 Dates and duration**

Initially the consultation was open for 12 weeks between 26 March and 15 June 2018. On 25 May we published the IIA on our website. We emailed everyone to let them know this, and that we had extended the deadline for responses to 25 June 2018, and would welcome comments on the IIA. Copies of these emails are in Appendix D.

## **2.6 What we asked**

A full list of questions can be found in Appendix B.

## **2.7 Methods of responding**

Consultees could respond to the consultation via the consultation online portal, email or by letter using our freepost address.

## **2.8 Consultation materials and publicity**

We used a variety of methods to promote the consultation, these are listed below.

### **2.8.1 Website**

The consultation and supporting material was published online

[consultations.tfl.gov.uk/taxis/improving-phv-safety](https://consultations.tfl.gov.uk/taxis/improving-phv-safety)

### **2.8.2 Twitter**

We used Twitter to promote the consultation and tweeted from the @tfltp account and also the TfL Accessibility Twitter (Twitter.com/TfLAccess) account.

We tweeted about the consultation from the @tfltp account on 18 occasions and examples of the tweets are available in Appendix D.

### 2.8.3 Emails

We sent out approximately 340,000 emails to stakeholders and licensees including private hire operators, drivers and vehicle owners, industry organisations and companies(see 2.4).

We also used the weekly taxi and private hire email update to promote the consultation, this email is sent to all licensees we hold an email address for. An example of the weekly email update is available in Appendix D.

### 2.8.4 Press and media activity

We issued a press release about the consultation on 26 March 2018. A copy of this is available in Appendix D.

## 2.9 Analysis of consultation responses

Due to the number of open questions in this consultation and the predicted number of responses, we commissioned 2CV, a independent social research agency, to analyse the consultation responses.

All closed questions were reviewed and the results tabulated and reported.

All open questions, where respondents provided comments were read and analysed in detail

A code frame was developed for each of the open questions, consisting of a series of themes, which contained detailed comments (or “codes”) capturing the sentiment of each respondent who left an open text response. During the coding process, each open text response was analysed and either a new code was created or the response was added to one or more of the existing codes within the code frame. As this was an iterative process, some codes were merged as similar themes emerged. This process created a quantitative value for each code and theme which were used to rank themes. The “other” response categories were thoroughly reviewed and could not be broken down further.

The summary of consultation responses is in section 4.

We identified 41 duplicate responses and these were all reviewed so there was one response by each individual.

### 3. About the respondents

This section provides information about the 5,348 consultation respondents, including how they heard about the consultation and in what capacity they responded e.g. as private hire drivers.

The 40 stakeholder responses are reported separately in section 4.7

#### 3.1 How respondents heard about the consultation

4,840 out of 5,348 respondents answered this question. The majority heard about the consultation directly through an email from TfL, with social media a secondary source of awareness.

How respondents heard	Total	%
Received an email from TfL	3,098	58%
Social media	976	18%
Saw it on the TfL website	294	5%
Read about in the press	184	3%
Received a letter from TfL	29	1%
Other	259	5%
Not Answered	508	9%
<b>Total</b>	<b>5,348</b>	<b>100%</b>

### 3.2 Respondent type

Respondents were asked to state which of the following respondent types best described them:

- A private hire/minicab user
- A private hire operator
- A private hire driver
- A private hire vehicle owner
- A taxi (black cab) driver
- A taxi (black cab) owner
- A representative of an organisation

4,798 out of 5,348 respondents answered this question. The largest sub-group of respondents to the consultation were private hire drivers. Respondents could select more than one category so percentages have not been included in this table. The total refers to the total number of respondents.

Respondent type	Total
A private hire/minicab user	821
A private hire driver	2,400
A taxi (black cab) driver	1,566
A private hire vehicle owner	825
A taxi (black cab) owner	629
A private hire operator	233
A representative of an organisation	72
Not answered	550
<b>Total</b>	<b>5,348</b>

Private hire drivers who used the online form to submit their response were asked for how many years they had been licensed.

Private hire drivers – Years licensed for	Total	%
Less than 3 years	711	30%
3-5 years	592	25%
6-10 years	545	23%

11-15 years	273	11%
16-20 years	135	6%
Over 20 years	102	4%
Not Answered	42	2%
<b>Total</b>	<b>2,400</b>	<b>100%</b>

Private hire operators who used the online form to submit their response were asked how long they had been licensed for as well as how many drivers and vehicles they had available to them. Some private hire operators emailed their response to us and did not include the number of drivers or vehicles available to them.

Private hire operators - Length licensed	Total	%
Less than 3 years	38	16%
3-5 years	41	18%
6-10 years	41	18%
11-15 years	37	16%
16-20 years	22	9%
Over 20 years	19	8%
Not Answered	35	15%
<b>Total</b>	<b>233</b>	<b>100%</b>

Private hire operators	Drivers available		PHVs available	
	Total	%	Total	%
0-10	116	50%	115	49%
11-20	29	12%	26	11%
21-50	32	14%	30	13%
51-100	15	6%	16	7%
101-500	9	4%	8	3%
501-1,000	1	0%	1	0%

1,001-10,000	0	0%	0	0%
10,000 or more	0	0%	0	0%
Not Answered	31	13%	37	16%
<b>Total</b>	<b>233</b>	<b>100%</b>	<b>233</b>	<b>100%</b>

We reviewed the responses from respondents who said they had either over 1,000 drivers available (three over 1,000 and 10 over 10,000) or over 1,000 vehicles available (5 over 1,000 and 6 over 10,000). These did not appear to be accurate and so are not shown in the table above.

### 3.3 Respondent demographics

The majority of respondents to the consultation were male (76%).

Gender	Total	%
Male	4,082	76%
Female	308	6%
Trans Female	16	0%
Trans Male	15	0%
Gender Neutral	11	0%
Prefer not to say	354	7%
Not Answered	562	11%
<b>Total</b>	<b>5,348</b>	<b>100%</b>

Ethnicity	Total	%
Asian/Asian British	995	19%
Black/Black British	393	7%
Mixed	134	3%
Other Ethnic Group	143	3%
White	2,214	41%



Prefer not to say	812	15%
Not Answered	657	12%
<b>Total</b>	<b>5,348</b>	<b>100%</b>

Age	Total	%
Under 15	1	0%
16-20	6	0%
21-25	46	1%
26-30	222	4%
31-35	461	9%
36-40	668	12%
41-45	673	13%
46-50	657	12%
51-55	660	12%
56-60	446	8%
61-65	268	5%
66-70	130	2%
71+	70	1%
Prefer not to say	470	9%
Not Answered	570	11%
<b>Total</b>	<b>5,348</b>	<b>100%</b>

Sexual orientation	Total	%
Heterosexual	2,981	56%
Bisexual	76	1%
Gay man	38	1%
Lesbian	18	0%

Other	100	2%
Prefer not to say	1,281	24%
Not Answered	854	16%
<b>Total</b>	<b>5,348</b>	<b>100%</b>

Religious faith	Total	%
Christian	1,413	26%
Muslim	1,067	20%
Jewish	86	2%
Hindu	68	1%
Buddhist	38	1%
Sikh	26	0%
Other	108	2%
No religion	768	14%
Prefer not to say	1,073	20%
Not Answered	701	13%
<b>Total</b>	<b>5,348</b>	<b>100%</b>

Health problem or disability/ day-to-day limitations	Total	%
Yes, limited a lot	64	1%
Yes, limited a little	139	3%
No	3,844	72%
Prefer not to say	650	12%
Not Answered	651	12%
<b>Total</b>	<b>5,348</b>	<b>100%</b>

### 3.4 Postcode analysis

Of the 5,348 respondents who responded to the consultation, 3,193 provided a postcode.

Postcode	Total	%
Provided postcode – within Greater London	2,475	46%
Provided postcode – outside Greater London	718	13%
No postcode provided	2,155	40%
<b>Total</b>	<b>5,348</b>	<b>100%</b>

The 10 most frequent postcode regions of respondents within London were:

Postcode	Total	%
CR0	44	2%
E1	42	2%
E14	37	1%
E6	37	1%
E4	36	1%
HA8	36	1%
N1	36	1%
E3	34	1%
SE1	32	1%
E17	31	1%
Other London areas	2,110	85%
<b>Total</b>	<b>2,475</b>	<b>100%</b>

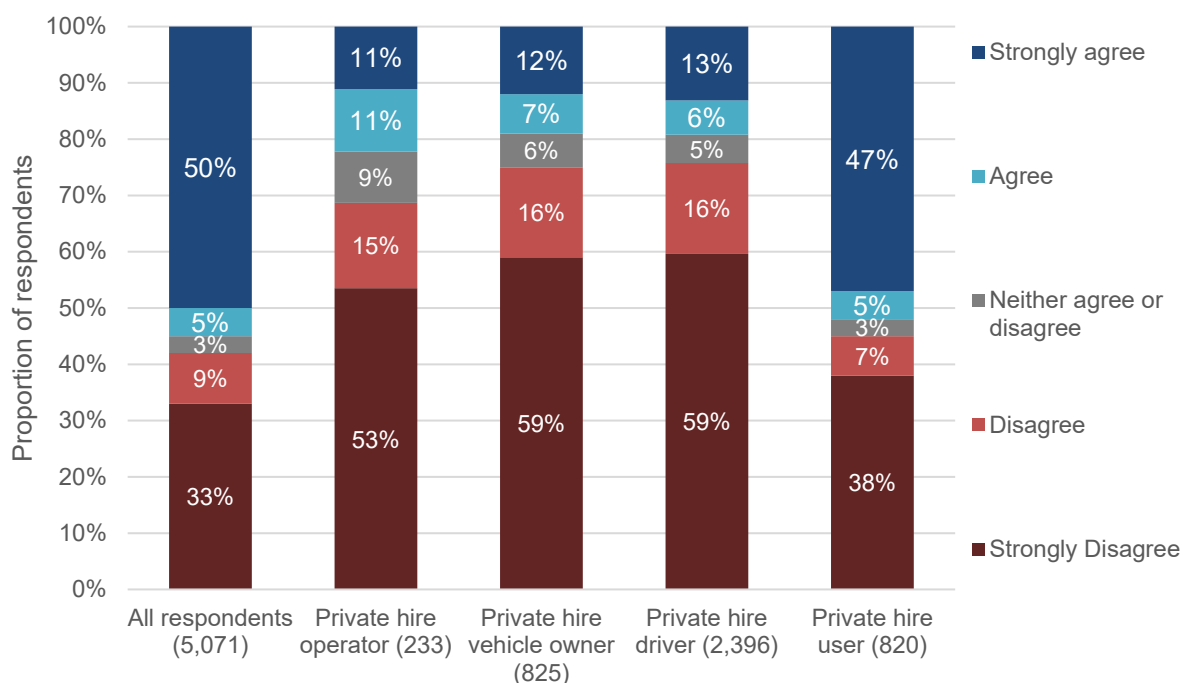
## 4. Summary of all consultation responses

### 4.1 Driving test for private hire drivers

#### 4.1.1 Question 1: Advanced driving test on next renewal of licence

We asked respondents to tell us whether they agreed or disagreed with the proposal to require all PHV drivers to take an advanced driving assessment when they next renew their licence.

#### Summary of responses to Question 1: Do you agree or disagree with the proposal to require all existing PHV drivers to take the advanced driving assessment on the next renewal of their licence?



Overall 55 per cent of all respondents agreed with the proposal, with 52 per cent of private hire users agreeing or strongly agreeing that this should be implemented. The majority of private hire operators, owners and drivers disagreed with the proposal to require all existing PHV drivers to take an advanced driving assessment on the next renewal of their licence. Only 19 per cent of PHV drivers agreed or strongly agreed. Information about the other comments from respondents is available in section 4.1.3.

For the advanced driving test proposals the IIA had identified a potentially disproportionate impact on PHV drivers. The table below shows the PHV drivers' responses split by ethnicity with the majority in each group disagreeing or strongly disagreeing with the proposal.

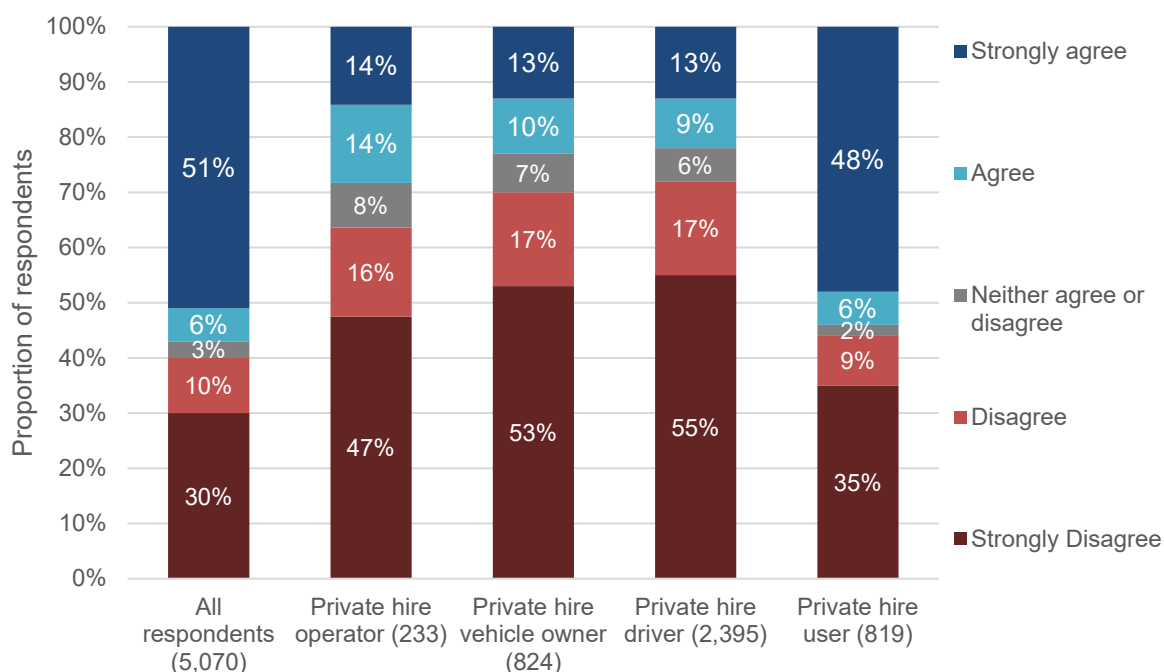
	Ethnicity (private hire drivers)			
	Asian	Black	Mixed/ Other	White
<b>Base</b>	837	304	160	623
	%	%	%	%
Strongly agree	11%	8%	16%	19%
Agree	5%	7%	7%	11%
Neither agree nor disagree	4%	4%	9%	6%
Disagree	17%	15%	20%	16%
Strongly disagree	62%	66%	48%	48%
No opinion	1%	1%	1%	0%
Net: Agree	16%	14%	23%	30%
Net: Disagree	79%	81%	68%	64%

There were 19 respondents who answered no opinion to this question, with a further 277 who did not answer this question.

#### 4.1.2 Question 2: Advanced driving test for all PHV drivers

We asked respondents to tell us whether they agreed or disagreed with the proposal to introduce an advanced driving assessment for all PHV drivers.

#### **Summary of responses to Question 2: Do you agree or disagree with the proposal to introduce an advanced driving assessment for all PHV drivers?**



Overall 57 per cent of all respondents agreed that a driving assessment should be introduced for all PHV drivers, with 54 per cent of private hire users agreeing or strongly agreeing that this should be implemented. 63 per cent of private hire operators, 60 per cent of PHV owners and 72 per cent of private hire drivers disagreed with the proposal to introduce an advanced driving assessment for all PHV drivers. Only 22 per cent of PHV drivers agreed or strongly agreed.

The table below shows PHV drivers' responses split by ethnicity with the majority of each group disagreeing or strongly disagreeing with the proposal.

	Ethnicity (private hire drivers)			
	Asian	Black	Mixed/ Other	White
<b>Base</b>	835	304	161	622
	%	%	%	%
Strongly agree	11%	8%	16%	19%
Agree	6%	9%	11%	15%
Neither agree nor disagree	5%	6%	9%	6%
Disagree	17%	18%	18%	16%
Strongly disagree	59%	58%	46%	44%
No opinion	1%	1%	1%	1%
Net: Agree	17%	17%	27%	34%
Net: Disagree	76%	76%	64%	59%

There were 27 respondents who answered no opinion to this question, with a further 278 who did not answer this question.

#### 4.1.3 Question 3: Comments on proposal to introduce an advanced driving assessment for all PHV drivers and for existing PHV drivers to take the assessment when they renew their licence (open question analysis)

This was an open question and respondents were given the opportunity to explain why they agreed or disagreed with proposals to introduce an advanced driving assessment for all PHV drivers or for existing PHV drivers to take the assessment when they renew their licence. 3,488 respondents answered this question. Analysis below shows the key themes that arose, (we have included here all codes mentioned by at least three per cent of respondents within any of the subgroups). A detailed analysis of comments is available in [Appendix A](#).

Safety was a key area mentioned for those who agreed with the proposal to introduce an advanced driving assessment, especially among private hire users. Just over a quarter (28 per cent) of all respondents who made additional comments mentioned PHV drivers having poor driving skills or driving dangerously. Just under a quarter of private hire users (23 per cent) also mentioned this. There were also mentions that having an advanced driving assessment would result in safer roads and fewer accidents (nine per cent of all respondents).

A quarter of respondents gave the response that advanced testing or advanced driving skills are needed (25 per cent), highest for private hire users (26 per cent). Those in the private hire industry were more likely to respond that it should not be a requirement as drivers are already licenced and current standards are sufficient (33 per cent of private hire operators, 37 per cent of private hire owners and 37 per cent of private hire drivers).

Suggestions for driver qualification requirements were also given by private hire operators, vehicle owners, drivers and users. The most frequent suggestions were that: all drivers should have a UK driving licence; the advanced driving assessment should only be a requirement for new drivers; that it should only be a requirement for drivers who have points on their licence or a history of accidents or poor driving; or that more experienced drivers should be exempt/exemptions should apply in some circumstances.

Among those in the private hire industry (operators, owners and drivers) there was some concern about the expense to drivers (13 per cent of drivers mentioned this) as well as some mentions that TfL could use this to make money (five per cent of all respondents).

**Summary of responses to Question 3: Please let us have any comments about the proposal to introduce an advanced driving assessment for all PHV drivers and for existing PHV drivers to take the assessment when they renew their licence**

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
<b>Base</b>	<b>3,488</b>		<b>160</b>		<b>558</b>		<b>1,571</b>		<b>532</b>	
	Count	%	Count	%	Count	%	Count	%	Count	%
<b>Overall Acceptance (Net)</b>	<b>1,694</b>	<b>49%</b>	<b>84</b>	<b>53%</b>	<b>304</b>	<b>54%</b>	<b>821</b>	<b>52%</b>	<b>283</b>	<b>53%</b>
Yes/should be a requirement/advanced testing/driving skills are needed	860	25%	23	14%	69	12%	163	10%	139	26%
No/should not be a requirement/drivers are already licenced/current standards are sufficient	719	21%	52	33%	208	37%	586	37%	125	23%
Other overall acceptance mentions	86	2%	8	5%	18	3%	52	3%	15	3%
<b>Safety (Net)</b>	<b>1,393</b>	<b>40%</b>	<b>23</b>	<b>14%</b>	<b>53</b>	<b>9%</b>	<b>170</b>	<b>11%</b>	<b>184</b>	<b>35%</b>
PHV drivers lack good/standard driving skills/are dangerous	965	28%	14	9%	21	4%	75	5%	125	23%
It would make the roads safer/less accidents/injuries/deaths	299	9%	1	1%	6	1%	25	2%	39	7%
PHV drivers are unfamiliar with area/roads and too focused on sat-navs causing accidents/dangerous conditions	182	5%	4	3%	6	1%	12	1%	14	3%
It would ensure safety/safety first	156	4%	1	1%	1	0%	14	1%	21	4%
It would ensure safety for the passenger/customer	147	4%	3	2%	9	2%	26	2%	18	3%
Other safety mentions	94	3%	2	1%	11	2%	32	2%	13	2%
<b>Driver Qualifications/ Requirements (Net)</b>	<b>1,073</b>	<b>31%</b>	<b>63</b>	<b>39%</b>	<b>214</b>	<b>38%</b>	<b>608</b>	<b>39%</b>	<b>163</b>	<b>31%</b>
All drivers should have to have a UK licence/pass a UK driving test	231	7%	12	8%	32	6%	101	6%	42	8%
Should only be required for new drivers/not current drivers	225	6%	23	14%	70	13%	194	12%	29	5%
Should be required for drivers with points/accidents/poor driving history only	132	4%	10	6%	49	9%	103	7%	27	5%



	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
Dependent on circumstances/certain experienced drivers should be exempt	125	4%	16	10%	45	8%	105	7%	23	4%
Taxi drivers should have advanced testing	114	3%	6	4%	28	5%	85	5%	24	5%
Other driver qualifications/requirements mentions	92	3%	4	3%	16	3%	46	3%	14	3%
<b>Miscellaneous (Net)</b>	<b>523</b>	<b>15%</b>	<b>31</b>	<b>19%</b>	<b>112</b>	<b>20%</b>	<b>342</b>	<b>22%</b>	<b>74</b>	<b>14%</b>
Biased/unfair/discrimination to PHV drivers	305	9%	18	11%	74	13%	231	15%	50	9%
Unhappy with mayor/ feel this is a political move by the Mayor	56	2%	4	3%	9	2%	33	2%	12	2%
Other miscellaneous mentions	96	3%	3	2%	23	4%	41	3%	15	3%
<b>Financial Responsibility (Net)</b>	<b>500</b>	<b>14%</b>	<b>35</b>	<b>22%</b>	<b>147</b>	<b>26%</b>	<b>378</b>	<b>24%</b>	<b>75</b>	<b>14%</b>
Costly/ concerned about the expense for the drivers	255	7%	18	11%	87	16%	201	13%	44	8%
TfL seeking to make money	165	5%	10	6%	41	7%	129	8%	23	4%
It should be free/no cost to drivers	69	2%	6	4%	26	5%	60	4%	15	3%
Other financial responsibility mentions	91	3%	7	4%	19	3%	52	3%	8	2%
<b>Convenience/Usefulness (Net)</b>	<b>223</b>	<b>6%</b>	<b>15</b>	<b>9%</b>	<b>74</b>	<b>13%</b>	<b>179</b>	<b>11%</b>	<b>36</b>	<b>7%</b>
A waste of time/money	103	3%	7	4%	34	6%	88	6%	15	3%
Would be an inconvenience	99	3%	9	6%	30	5%	74	5%	19	4%

Notes:

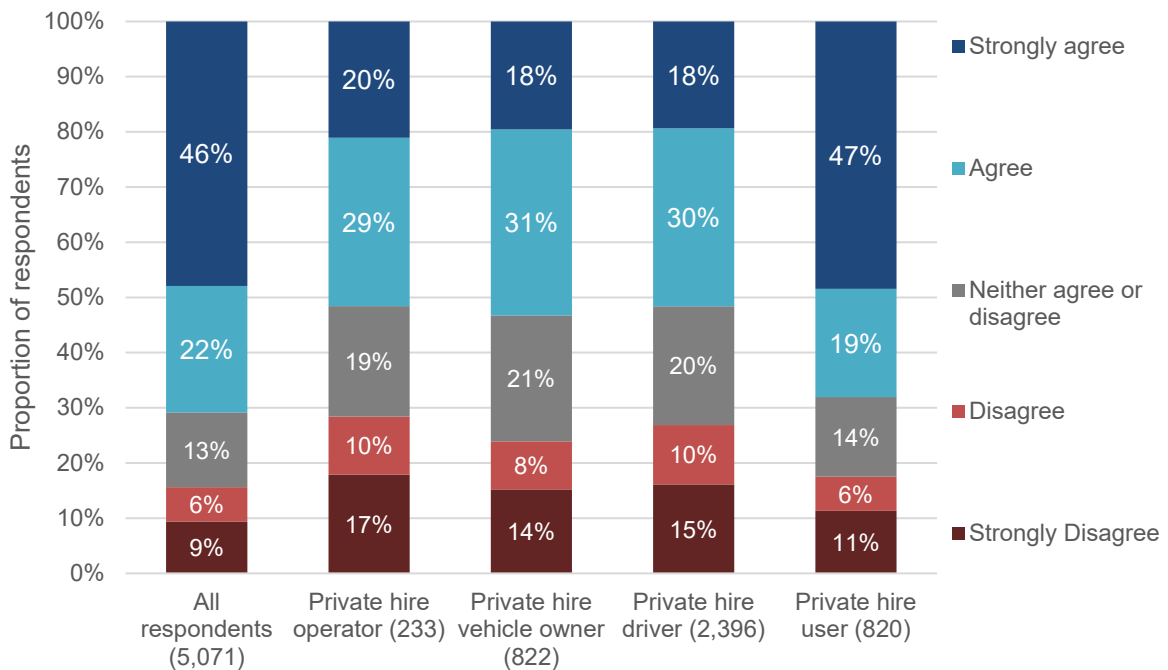
This is a summary table of the most frequent responses. Detailed responses are contained in Appendix A

Net is the total number of responses within the theme – the codes underneath these may not add up to the total since this is a summary table. Respondents may be coded into multiple codes.

#### 4.1.4 Question 4: Wheelchair assessment for the drivers of all wheelchair accessible PHVs

We asked respondents whether they agreed or disagreed with the proposal to introduce an enhanced wheelchair assessment for the drivers of all wheelchair accessible PHVs.

#### Summary of responses to Question 4: Do you agree or disagree with the proposal to introduce an enhanced wheelchair assessment for the drivers of all wheelchair accessible PHVs?



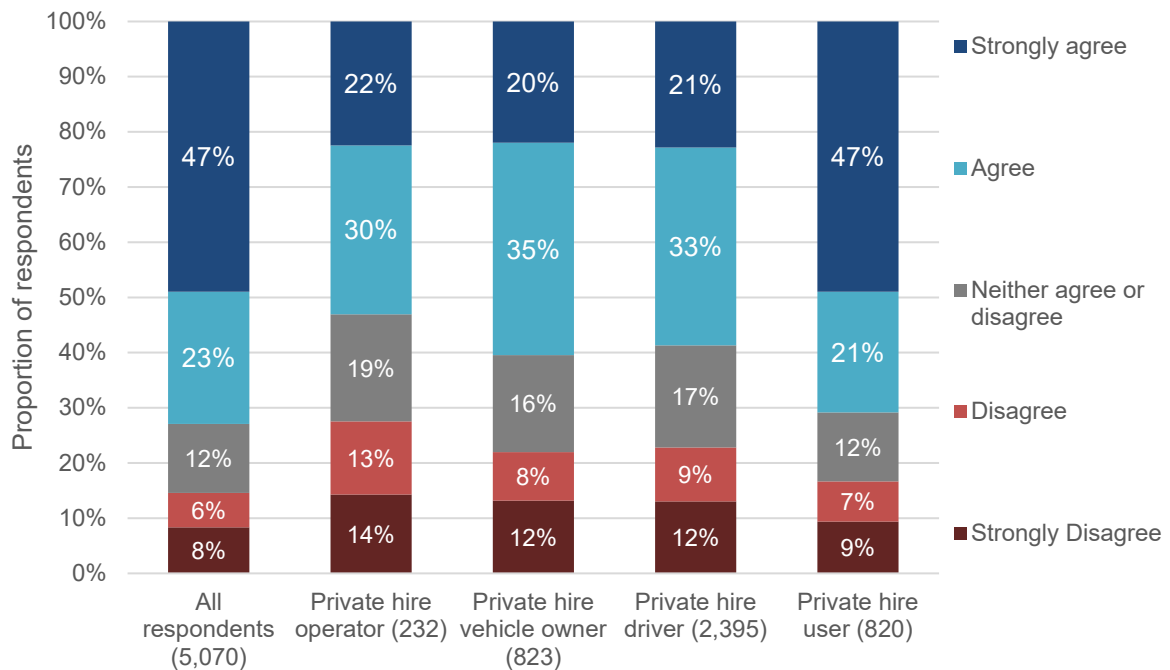
Overall, 68 per cent agreed or strongly agreed with the proposal to introduce an enhanced wheelchair assessment for the drivers of all wheelchair accessible PHVs. Disabled private hire users were even more likely to agree or strongly agree (73 per cent, note: low base of 62 respondents). PHV owners and drivers were less likely to agree. Agreement was higher among private hire users, with 67 per cent agreeing or strongly agreeing that this should be implemented.

There were 209 respondents who answered no opinion to this question, with a further 277 who did not answer this question.

#### 4.1.5 Question 5: Only PHV drivers who have completed the TfL wheelchair assessment allowed to drive wheelchair accessible PHVs

We asked respondents whether they agreed or disagreed with the proposal that only PHV drivers who have completed the TfL wheelchair assessment should be allowed to drive wheelchair accessible PHVs.

#### Summary of responses to Question 5: Do you agree or disagree with the proposal that only PHV drivers who have completed the TfL wheelchair assessment should be allowed to drive wheelchair accessible PHVs?



Overall, 70 per cent who answered agreed or strongly agreed that only PHV drivers who have completed the TfL wheelchair assessment should be allowed to drive wheelchair accessible PHVs.

Disabled private hire users were even more likely to agree or strongly agree (77 per cent, note: low base of 62 respondents).

Agreement was lower among private hire operators, owners and drivers and higher among private hire users, with 68 per cent of users agreeing or strongly agreeing that this should be implemented.

There were 225 respondents who answered no opinion to this question, with a further 278 who did not answer this question.

#### 4.1.6 Question 6: Comments on wheelchair assessment for the drivers of all wheelchair accessible PHVs (open question analysis)

Respondents were given the opportunity to explain why they disagreed with requiring a TfL wheelchair assessment for drivers of wheelchair accessible PHVs, with 820 respondents answering this question. Analysis below shows the key themes that arose (we have included here all codes mentioned by at least three per cent of respondents within any of the subgroups). A detailed analysis of comments is available in [Appendix A](#). Due to lower base sizes, responses for private hire operators, owners and drivers have been combined at this question. Only 10 disabled private hire users provided additional comments and so separate analysis of this group was not feasible due to the low base of respondents.

Among those who responded to the open question, 29 per cent stated that an enhanced wheelchair assessment should not be required as current standards are sufficient. 18 per cent responded that this should be required for all drivers, with private hire users most likely to agree that this should be required (22 per cent).

Some responded that all PHVs should be required to be wheelchair-accessible (five per cent); that the assessment should only be required for those with a wheelchair accessible vehicle (five per cent) and that assessments for private hire drivers should be the same as requirements for taxi drivers (four per cent).

Convenience and financial responsibility were key themes. Private hire operators, owners and drivers had some concern about expense for drivers (seven per cent) while users responded that the proposal could have the potential to limit availability of wheelchair accessible vehicles (seven per cent).

#### Summary of responses to Question 6: Wheelchair assessment for the drivers of all wheelchair accessible PHVs

	All respondents		Private hire operator/ driver/ vehicle owner		PHV users	
	Count	%	Count	%	Count	%
<b>Base</b>	<b>820</b>		<b>507</b>		<b>148</b>	
<b>Overall Acceptance (Net)</b>	<b>558</b>	<b>68%</b>	<b>332</b>	<b>65%</b>	<b>104</b>	<b>70%</b>
No, this should not be a requirement/drivers are already licensed/current standards are sufficient	234	29%	174	34%	35	24%
Yes, this should be a requirement/assessment is needed for all drivers	145	18%	62	12%	33	22%
All PHVs should be wheelchair accessible	42	5%	10	2%	9	6%
This should only be a requirement for	41	5%	30	6%	10	7%

drivers who have a wheelchair accessible vehicle						
	All respondents		Private hire operator/ driver/ vehicle owner		PHV users	
Private hire drivers should not have more assessments than taxi drivers	32	4%	20	4%	6	4%
Certain percentage of fleet should be wheelchair accessible	8	1%	3	1%	4	3%
Other overall acceptance mentions	49	6%	27	5%	8	5%
<b>Convenience/ Financial Responsibility (Net)</b>	<b>208</b>	<b>25%</b>	<b>133</b>	<b>26%</b>	<b>36</b>	<b>24%</b>
Costly/concerned about the expense for the drivers	58	7%	36	7%	6	4%
Will limit availability of wheelchair accessible vehicles/cause a wait	30	4%	19	4%	11	7%
TfL seeking to make more revenue/money	25	3%	20	4%	4	3%
Not all vehicles have wheelchair accessibility	21	3%	18	4%	3	2%
Would be an inconvenience	20	2%	14	3%	2	1%
Other convenience/financial responsibility mentions	29	4%	11	2%	1	1%
<b>Miscellaneous (Net)</b>	<b>123</b>	<b>15%</b>	<b>72</b>	<b>14%</b>	<b>19</b>	<b>13%</b>
PHVs are going to lose business/will destroy this industry	30	4%	13	3%	3	2%
Drivers should have a choice	21	3%	20	4%	5	3%
Need for training	21	3%	13	3%	4	3%
Other miscellaneous mentions	52	6%	22	4%	5	3%
<b>Safety (Net)</b>	<b>67</b>	<b>8%</b>	<b>23</b>	<b>5%</b>	<b>9</b>	<b>6%</b>
It would ensure safety for the passenger	37	5%	14	3%	5	3%

Notes:

This is a summary table of the most frequent responses. Detailed responses are contained in Appendix A

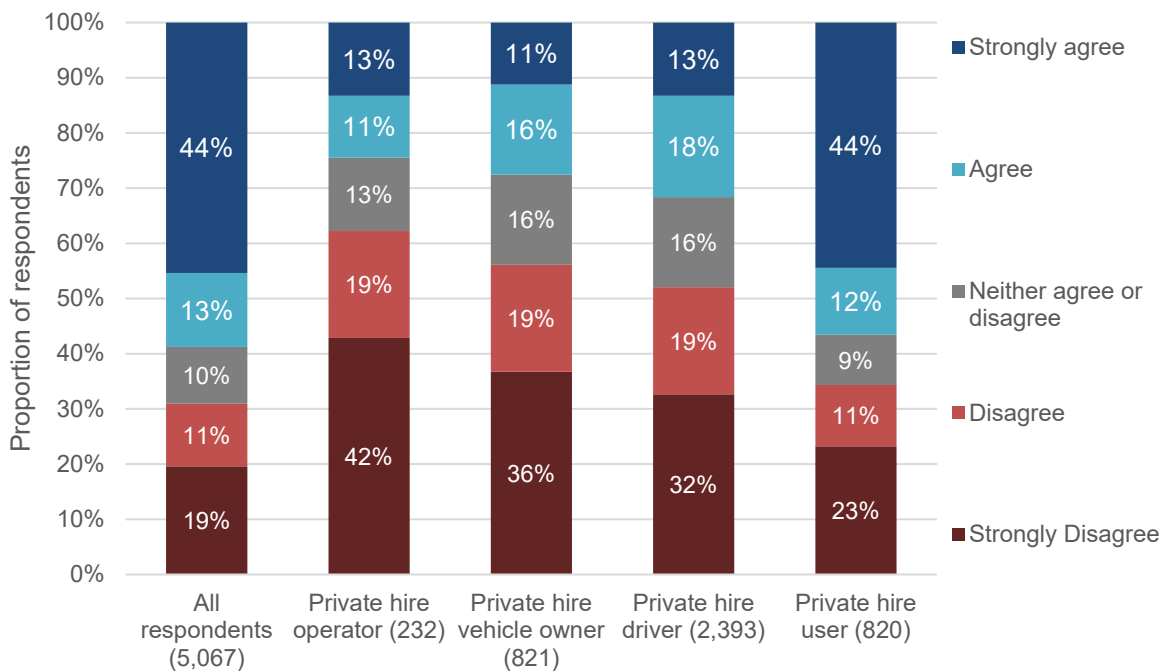
Net is the total number of responses within the theme – the codes underneath these may not add up to the total since this is a summary table. Respondents may be coded into multiple codes.

## 4.2 Private hire vehicle signage

### 4.2.1 Question 7: Additional signage in PHVs displaying customer contact information

We asked respondents whether they agreed or disagreed with the proposal to introduce additional signage in PHVs showing customer contact information.

#### Summary of responses to Question 7: Do you agree or disagree with the proposal to introduce additional signage in PHVs which will display customer contact information?



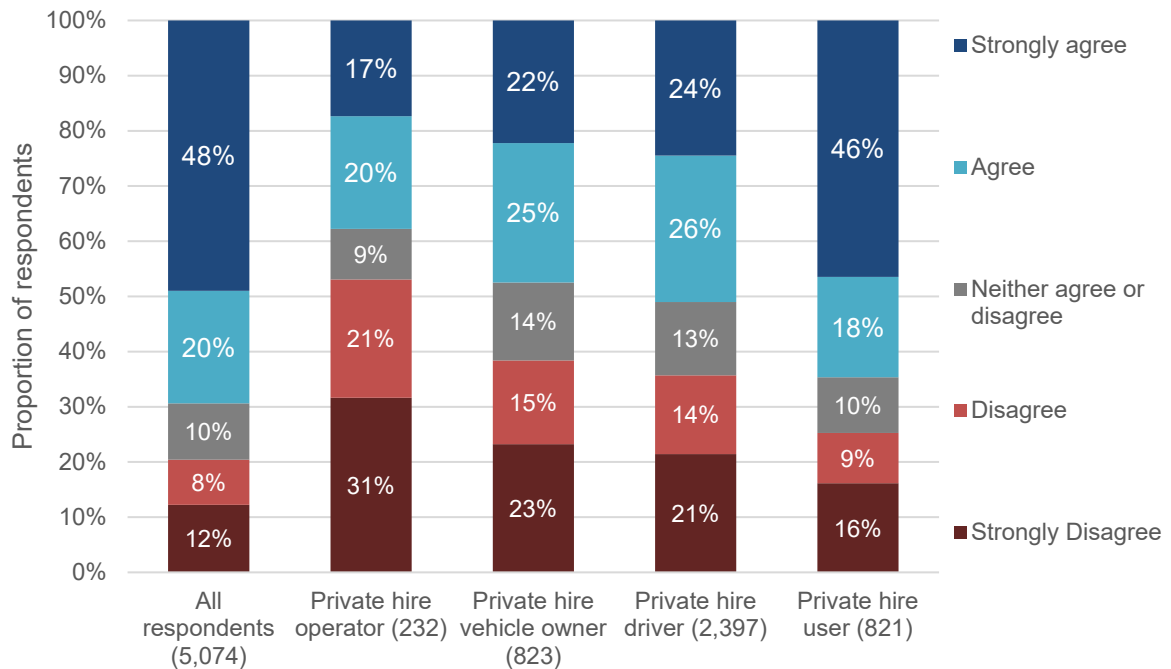
Overall, 57 per cent of respondents agreed or strongly agreed with the proposal to introduce additional signage in PHVs displaying customer contact information. Agreement was higher among private hire users, with 55 per cent agreeing or strongly agreeing, and lower for private hire operators (23 per cent) agreeing or strongly agreeing, owners (27 per cent) and drivers (30 per cent).

There were 98 respondents who answered no opinion to this question, with a further 281 who did not answer this question.

### 4.2.2 Question 8: Additional signage in PHVs advising passengers to look out for cyclists when opening the vehicle doors and getting out

We asked respondents whether they agreed or disagreed with the proposal to introduce additional signage in PHVs advising passengers to look out for cyclists when opening the vehicle doors and getting out of the vehicle.

**Summary of responses to Question 8: Do you agree or disagree with the proposal to introduce additional signage in PHVs advising passengers to look out for cyclists when opening the vehicle doors and getting out?**



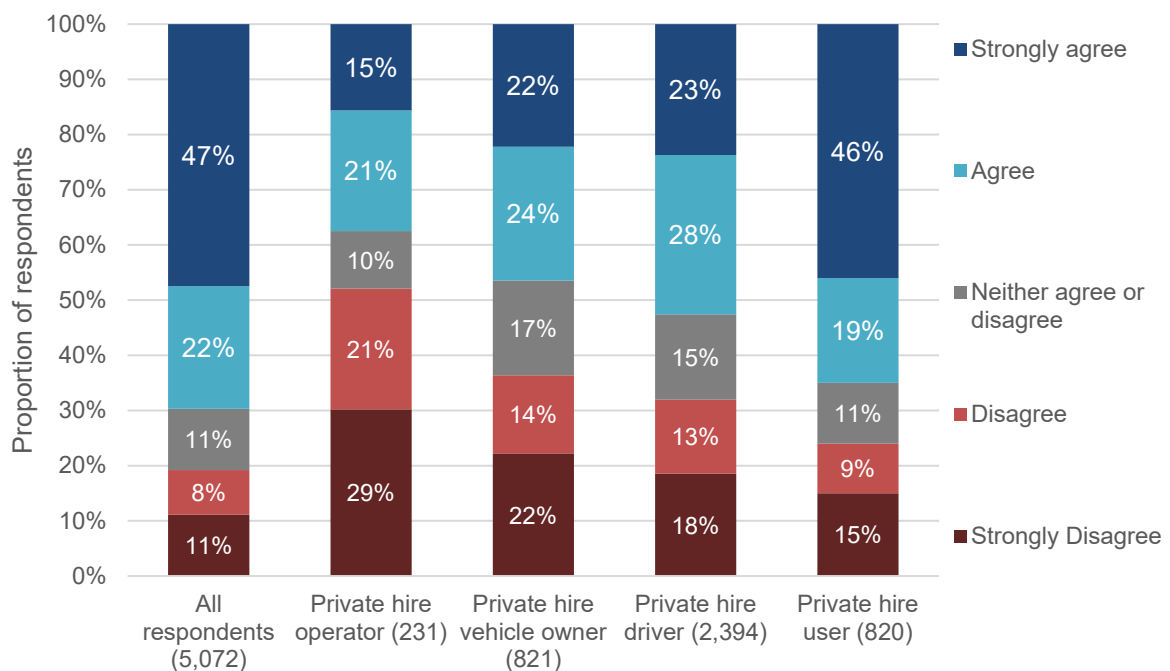
Overall 68 per cent of all respondents and 64 per cent of private hire users agreed or strongly agreed with the proposal. Levels of support were lower for private hire drivers (51 per cent agreeing or strongly agreeing), owners (46 per cent) and operators (37 per cent).

There were 90 respondents who answered no opinion to this question, with a further 274 who did not answer this question.

### 4.2.3 Question 9: Additional signage in PHVs advising passengers to wear their seatbelt

We asked respondents whether they agreed or disagreed with the proposal to introduce additional signage in PHVs advising passengers to wear a seatbelt.

#### Summary of responses to Question 9: Do you agree or disagree with the proposal to introduce additional signage in PHVs which will advise passengers to wear their seatbelt?



Overall 69 per cent of all respondents and 65 per cent of private hire users agreed or strongly agreed with this proposal. Levels of support were lower for private hire drivers (51 per cent agreed or strongly agreed), owners (45 per cent) and operators (36 per cent).

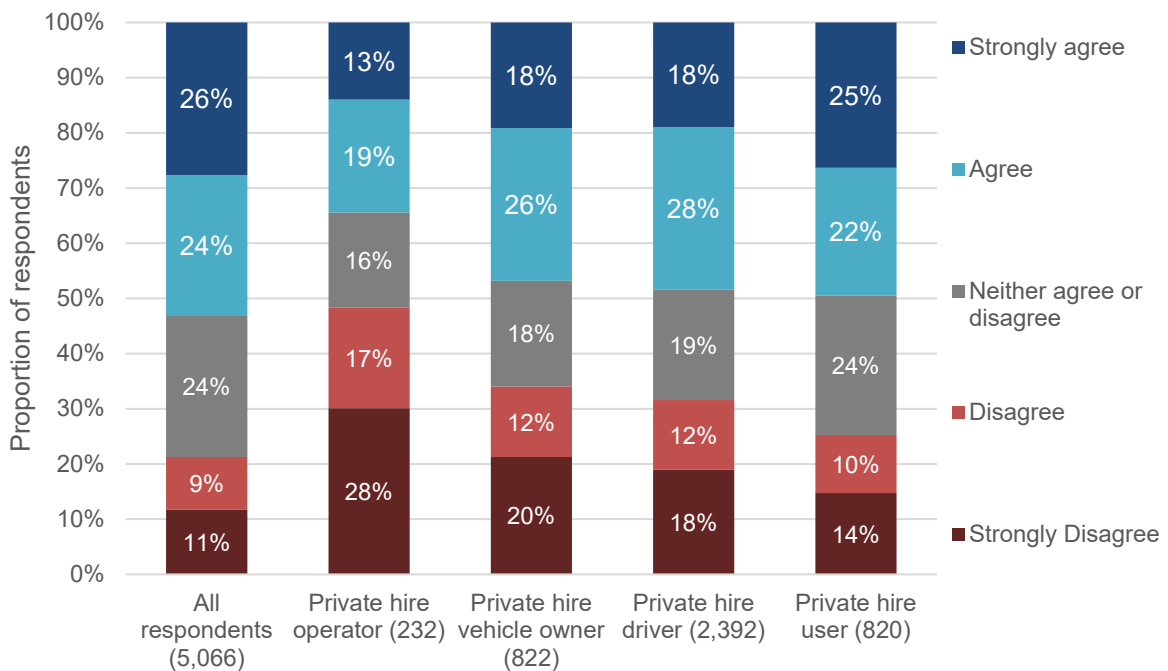
There were 87 respondents who answered no opinion to this question, with a further 276 who did not answer this question.



#### 4.2.4 Question 10: Combining messages into one sign

We asked respondents whether they agreed or disagreed that this additional signage should be displayed in one combined sign.

#### Summary of responses to Question 10: Do you agree or disagree that these messages should be displayed in one combined sign?



Half of all respondents agreed or strongly agreed that the additional signage should be combined in one sign. Forty-seven per cent of private hire users agreed or strongly agreed with the proposal. Agreement was lower among private hire operators (32 per cent), vehicle owners (44 per cent) and drivers (46 per cent).

There were 230 respondents who answered no opinion to this question, with a further 282 who did not answer this question.

#### 4.2.5 Question 11: Alternative suggestions to ensure that passengers are aware of the contact information or any comments on these PHV signage proposals (open question analysis)

Respondents were asked if they had any alternative suggestions to ensure that passengers are aware of contact information or any further comments on the proposals for additional signage in PHVs, with 2,448 respondents answering this question. Analysis below shows the key themes that arose ((we have included here all codes mentioned by at least three per cent of respondents within any of the subgroups). A detailed analysis of comments is available in [Appendix A](#).

Of those that responded to the open question, 30 per cent responded that the current proposals for signage are a good idea, with 18 per cent stating that the signage proposals are not needed.

Seventeen per cent of respondents had suggestions about the information that should be displayed in vehicle signage. This included: providing a company phone number for complaints/compliments and lost property (six per cent); including driver ID/and photograph (four per cent) and contact information for TfL (two per cent).

Nine per cent of respondents considered that this information was already provided, including four per cent mentioning by phone/app and three per cent that it was provided when booking a PHV.

Safety and security was also mentioned at lower levels, with suggestions to include information warning passengers to watch for cyclists when opening a door (three per cent) and warnings about seatbelt usage (two per cent). Six per cent commented that it should be the driver's responsibility to inform passengers of this information.

**Summary of responses to Question 11: Do you have any alternative suggestions to ensure that passengers are aware of the contact information or any comments on these PHV signage proposals?**

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
<b>Base</b>	2,448		127		385		993		361	
	Count	%	Count	%	Count	%	Count	%	Count	%
<b>Overall Acceptance (Net)</b>	<b>1,193</b>	<b>49%</b>	<b>76</b>	<b>60%</b>	<b>169</b>	<b>44%</b>	<b>411</b>	<b>41%</b>	<b>160</b>	<b>44%</b>
Yes, it's a good idea/much needed	736	30%	12	9%	22	6%	53	5%	81	22%
No, it is not needed/necessary/fine as it is now	434	18%	60	47%	138	36%	338	34%	74	20%
Other overall acceptance mentions	33	1%	7	6%	15	4%	27	3%	8	2%
<b>Information Displayed (Net)</b>	<b>424</b>	<b>17%</b>	<b>22</b>	<b>17%</b>	<b>74</b>	<b>19%</b>	<b>194</b>	<b>20%</b>	<b>84</b>	<b>23%</b>
Should include company (land line) phone number/for complaints/compliments/lost property	136	6%	11	9%	22	6%	48	5%	29	8%
Should include driver ID/including photo/badge number	91	4%	5	4%	12	3%	29	3%	17	5%
People will not read/pay attention to the signage	52	2%	1	1%	19	5%	36	4%	8	2%
Should include contact info directly to TfL/authorities	48	2%	4	3%	11	3%	18	2%	12	3%
Should include no smoking	26	1%	4	3%	11	3%	22	2%	8	2%
Other information displayed mentions	88	4%	4	3%	10	3%	51	5%	19	5%
<b>Placement/Visibility (Net)</b>	<b>262</b>	<b>11%</b>	<b>11</b>	<b>9%</b>	<b>37</b>	<b>10%</b>	<b>91</b>	<b>9%</b>	<b>52</b>	<b>14%</b>

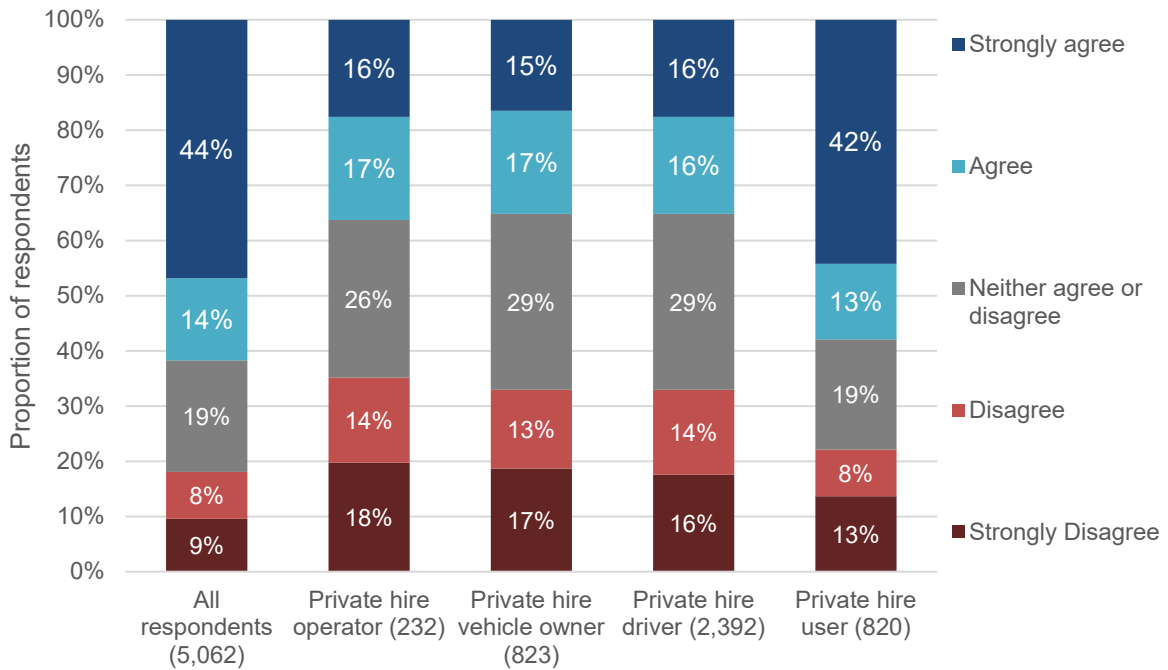
	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
It should be clearly displayed/easy to see/read	100	4%	4	3%	5	1%	14	1%	19	5%
Other placement/visibility mentions	82	3%	7	6%	22	6%	45	5%	25	7%
<b>Safety/ Security (Net)</b>	<b>263</b>	<b>11%</b>	<b>23</b>	<b>18%</b>	<b>72</b>	<b>19%</b>	<b>174</b>	<b>18%</b>	<b>48</b>	<b>13%</b>
Should include warning about cyclists/watch for cyclists when opening door	72	3%	4	3%	17	4%	42	4%	17	5%
Should include warning to wear seat belts/information about seatbelts	60	2%	9	7%	24	6%	38	4%	16	4%
To ensure safety for the passenger/customer	44	2%	4	3%	10	3%	29	3%	10	3%
To ensure safety for the driver	31	1%	3	2%	10	3%	27	3%	4	1%
Other safety/security mentions	94	4%	7	6%	26	7%	67	7%	12	3%
<b>Information already provided (Net)</b>	<b>226</b>	<b>9%</b>	<b>18</b>	<b>14%</b>	<b>71</b>	<b>18%</b>	<b>159</b>	<b>16%</b>	<b>46</b>	<b>13%</b>
Information provided on phone/app	97	4%	6	5%	28	7%	68	7%	22	6%
Information given when booked/by licensed office	70	3%	7	6%	29	8%	52	5%	16	4%
Information provided in email/text	51	2%	7	6%	12	3%	30	3%	15	4%
Other information already provided mentions	37	2%	3	2%	14	4%	30	3%	2	1%
<b>Miscellaneous (Net)</b>	<b>230</b>	<b>9%</b>	<b>28</b>	<b>22%</b>	<b>62</b>	<b>16%</b>	<b>152</b>	<b>15%</b>	<b>46</b>	<b>13%</b>

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
Make them similar to taxi/other PHV/authorities as done in the rest of the UK/world	55	2%	3	2%	11	3%	24	2%	15	4%
Signs/ stickers ruins the appearance of vehicles	45	2%	9	7%	23	6%	40	4%	10	3%
Should not apply to executive vehicles/chauffeurs	30	1%	14	11%	19	5%	25	3%	5	1%
Other miscellaneous mentions	95	4%	10	8%	22	6%	68	7%	21	6%
<b>Taking Responsibility (Net)</b>	<b>196</b>	<b>8%</b>	<b>25</b>	<b>20%</b>	<b>84</b>	<b>22%</b>	<b>156</b>	<b>16%</b>	<b>37</b>	<b>10%</b>
It should be the driver's responsibility to inform passengers	135	6%	22	17%	62	16%	108	11%	25	7%
Passengers should take responsibility/it's common sense	55	2%	2	2%	18	5%	45	5%	10	3%
<b>Financial Responsibility (Net)</b>	<b>45</b>	<b>2%</b>	<b>2</b>	<b>2%</b>	<b>14</b>	<b>4%</b>	<b>34</b>	<b>3%</b>	<b>8</b>	<b>2%</b>
Other financial responsibility mentions	28	1%	2	2%	10	3%	20	2%	4	1%

#### 4.2.6 Question 12: Changing PHV licence disc colour on annual basis

We asked respondents whether they agreed or disagreed that the colour of the PHV licence disc should be changed on an annual basis.

#### Summary of responses to Question 12: Do you agree or disagree with the proposal to change the colour of the PHV licence disc on an annual basis?



Overall 58 per cent of all respondents and 55 per cent of private hire users agreed or strongly agreed with the proposals.

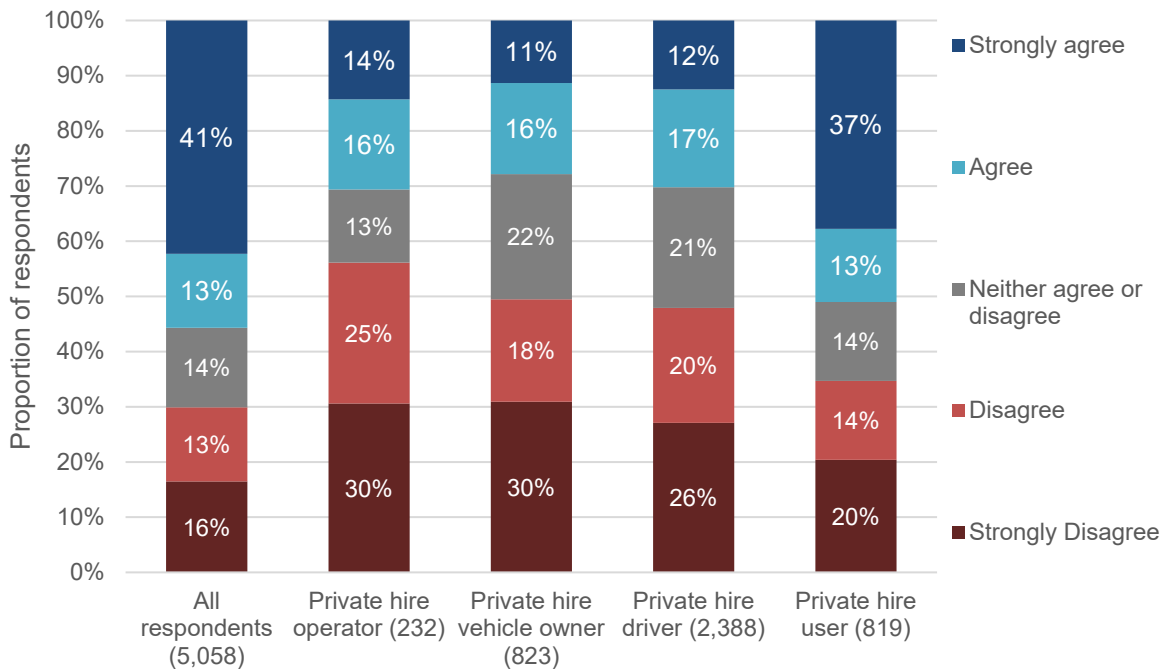
Levels of support for changing the PHV licence disc colour on an annual basis were lower for private hire operators, vehicle owners and drivers, with only 32-33 per cent agreeing or strongly agreeing with this proposal. The most common response from private hire licensees was “neither agree or disagree”.

There were 290 respondents who answered no opinion to this question, with a further 286 who did not answer this question.

#### 4.2.7 Question 13: Making licensed PHVs more identifiable

We asked respondents whether they agreed or disagreed that licensed PHVs should be more identifiable.

#### Summary of responses to Question 13: Do you agree or disagree with the proposal that licensed PHVs should be more identifiable?



Overall just over half (54 per cent) of all respondents agreed or strongly agreed with the proposal for licensed PHVs to be more identifiable. Half of private hire users agreed or strongly agreed with the proposal. Levels of support for the proposal were lower among private hire operators, vehicle owners and drivers with 27 to 30 per cent agreeing or strongly agreeing.

There were 136 respondents who answered no opinion to this question, with a further 290 who did not answer this question.

#### 4.2.8 Question 14: Reasons for supporting/not supporting proposal and ideas for how expired PHV licences can be identified (open question analysis)

Respondents were asked the reason for their support or opposition to the proposals that PHVs should be more identifiable, with 2,448 respondents answering this question. Respondents were also asked to provide any further suggestions for how expired PHV licences can be identified. Analysis below shows the key themes that arose ((we have included here all codes mentioned by at least three per cent of respondents within any of the subgroups), with detailed analysis of comments available in [Appendix A](#).

The most frequent response to the open question was that the information and signage is fine as it is currently (27 per cent), mentioned in particular by PHV operators, owners and drivers.

PHV operators had concerns that making PHVs more identifiable was inappropriate for executive vehicles and chauffeurs (18 per cent mentioning this). Operators were also more likely to mention that additional identifiers would ruin the look of the car and not be discreet (17 per cent compared with three per cent of all respondents).

Placement and visibility of signage was a key theme, with 16 per cent mentioning that PHV identification should be clearly displayed and easy to read. Also mentioned were: that tinted windows should not be permitted in PHVs due to visibility issues (12 per cent); coloured signage changing each year (eight per cent); signage to be displayed in the rear of car (seven per cent) and including signage which is larger than the current identifiers (five per cent).



**Summary of responses to Question 14: Please state either why you support the proposal that PHVs should be more identifiable, and what additional signage should be considered, or why you do not support this proposal. Please also include any other ideas for how expired PHV licences can be identified.**

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
<b>Base</b>	2,385		120		416		1,099		421	
	Count	%	Count	%	Count	%	Count	%	Count	%
<b>Placement/Visibility of signage (Net)</b>	<b>924</b>	<b>39%</b>	<b>30</b>	<b>25%</b>	<b>99</b>	<b>24%</b>	<b>230</b>	<b>21%</b>	<b>166</b>	<b>39%</b>
Should be clearly displayed/easy to see/read	389	16%	13	11%	38	9%	93	8%	66	16%
Tinted windows cause visibility issues/should not be permitted in PHVs	294	12%	1	1%	5	1%	13	1%	42	10%
Should be coloured/colour coded/changing colours yearly	195	8%	11	9%	39	9%	88	8%	39	9%
Should be displayed in the rear of the car	162	7%	7	6%	16	4%	26	2%	30	7%
Current identifiers too small/need larger identifiers	121	5%	1	1%	7	2%	19	2%	22	5%
Should be displayed in the front of the car	75	3%	3	3%	11	3%	20	2%	11	3%
Should be displayed on the outside of car/ so everyone can see it	73	3%	3	3%	5	1%	12	1%	19	5%
Should be displayed on doors/side/both sides	65	3%	2	2%	4	1%	12	1%	13	3%
Other placement/visibility of signage mentions	80	3%	4	3%	18	4%	37	3%	15	4%
<b>Overall Acceptance (Net)</b>	<b>887</b>	<b>37%</b>	<b>67</b>	<b>56%</b>	<b>232</b>	<b>56%</b>	<b>601</b>	<b>55%</b>	<b>167</b>	<b>40%</b>
No, the information/signage is fine as it is	639	27%	48	40%	186	45%	497	45%	123	29%

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
Yes, the information/signage should be more identifiable	217	9%	6	5%	29	7%	80	7%	37	9%
Not appropriate for executive vehicles/chauffeurs	53	2%	22	18%	30	7%	44	4%	11	3%
<b>Miscellaneous (Net)</b>	<b>622</b>	<b>26%</b>	<b>28</b>	<b>23%</b>	<b>124</b>	<b>30%</b>	<b>312</b>	<b>28%</b>	<b>121</b>	<b>29%</b>
Text message/app with car/driver information is sufficient/provides everything necessary before the ride	134	6%	9	8%	36	9%	97	9%	30	7%
It would increase touting/illegal work/ply for hire	116	5%	3	3%	8	2%	16	1%	24	6%
Waste of time/money	62	3%	2	2%	14	3%	48	4%	12	3%
Additional identifiers/colour changes will confuse/ distract customers	56	2%	7	6%	14	3%	34	3%	13	3%
Has a negative financial impact on/punishes PHV drivers	38	2%	1	1%	14	3%	32	3%	5	1%
Other miscellaneous mentions	97	4%	3	3%	27	6%	64	6%	16	4%
<b>Vehicle Identification (Net)</b>	<b>591</b>	<b>25%</b>	<b>42</b>	<b>35%</b>	<b>121</b>	<b>29%</b>	<b>252</b>	<b>23%</b>	<b>116</b>	<b>28%</b>
Should have plate/licence plate attached to car with information	178	7%	4	3%	12	3%	33	3%	27	6%
Should be similar to taxi/other PHV/authorities as done in the rest of the UK/world	132	6%	4	3%	12	3%	29	3%	26	6%
Additional identifiers would ruin the look of the car/not be discreet anymore	82	3%	20	17%	34	8%	61	6%	22	5%
We use same car for personal use as well/don't want signage displayed for personal use	72	3%	5	4%	24	6%	65	6%	11	3%

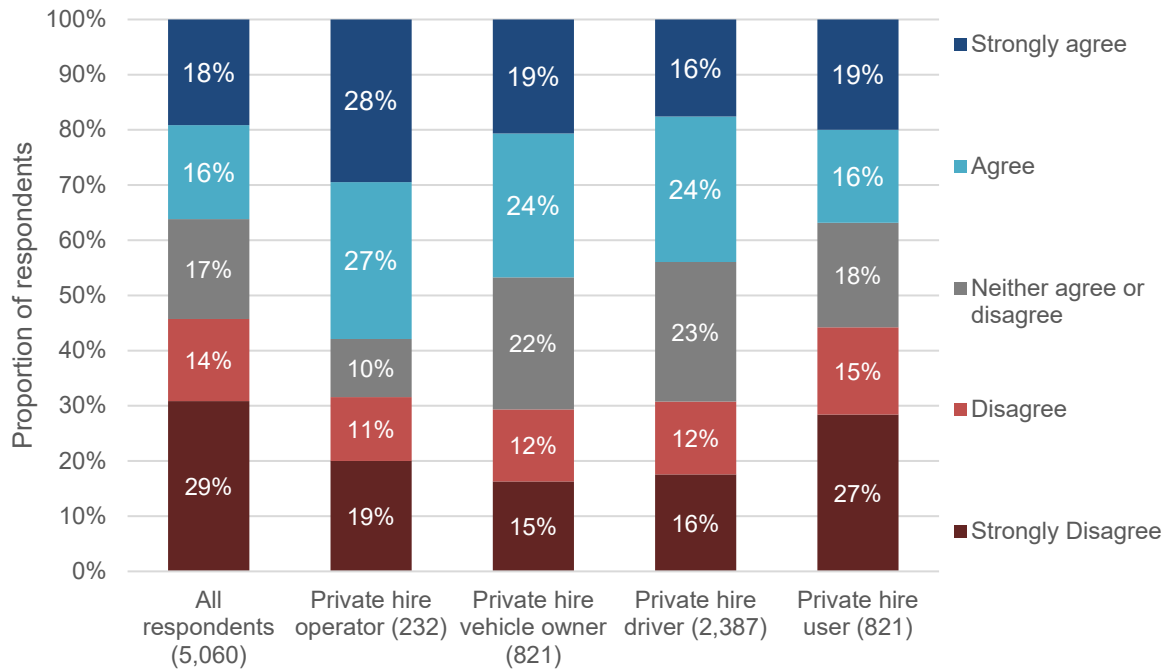
	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
Have a special identifier indicating the car as a PHV	61	3%	4	3%	9	2%	26	2%	14	3%
No need for special identifiers showing the car as PHV	59	2%	5	4%	21	5%	42	4%	14	3%
Should have sticker signage	42	2%	2	2%	16	4%	24	2%	8	2%
Should be removable signage	24	1%	1	1%	11	3%	24	2%	4	1%
Other vehicle identification mentions	53	2%	4	3%	18	4%	28	3%	6	1%
<b>Suggestions for information that should be displayed (Net)</b>	<b>496</b>	<b>21%</b>	<b>21</b>	<b>18%</b>	<b>51</b>	<b>12%</b>	<b>148</b>	<b>13%</b>	<b>91</b>	<b>22%</b>
Licence expiration date	156	7%	9	8%	30	7%	68	6%	44	10%
Driver ID/including photo/badge number	133	6%	5	4%	13	3%	31	3%	16	4%
"Pre-booked only" should be displayed on vehicle	79	3%	2	2%	3	1%	7	1%	16	4%
Other suggestions for information that should be displayed mentions	92	4%	4	3%	7	2%	41	4%	15	4%
<b>Safety (Net)</b>	<b>384</b>	<b>16%</b>	<b>16</b>	<b>13%</b>	<b>52</b>	<b>13%</b>	<b>140</b>	<b>13%</b>	<b>76</b>	<b>18%</b>
It would ensure safety for the passenger/customer	112	5%	4	3%	11	3%	27	2%	18	4%
It would ensure public safety/safety first (Unspecified)	89	4%	1	1%	5	1%	22	2%	20	5%
It would reduce unlicensed drivers	67	3%	2	2%	7	2%	15	1%	15	4%

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
It would ensure safety for the driver	33	1%	4	3%	8	2%	26	2%	5	1%
It will increase attacks/crimes/hate crimes/threats against driver/car	32	1%	1	1%	9	2%	28	3%	7	2%
Other safety mentions	80	3%	6	5%	18	4%	40	4%	15	4%

#### 4.2.9 Question 15: Exemptions from displaying signage

Respondents were asked whether they agreed or disagreed with the proposal that exemptions from displaying signage should be considered by TfL on a case by case basis.

#### Summary of responses to Question 15: Do you agree or disagree with the proposal that exemptions from displaying signage should be considered by TfL on a case by case basis?



Overall 34 per cent of respondents agreed or strongly agreed with the proposal that exemptions from displaying signage should be considered by TfL on a case-by-case basis, and 43 per cent disagreed or strongly disagreed. Just over one third (35 per cent) of private hire users agreed or strongly agreed with the proposal. Private hire operators were most likely to agree with exemptions on a case-by-case basis, with 55 per cent agreeing or strongly agreeing. Support was lower amongst private hire vehicle owners (43 per cent) and drivers (40 per cent).

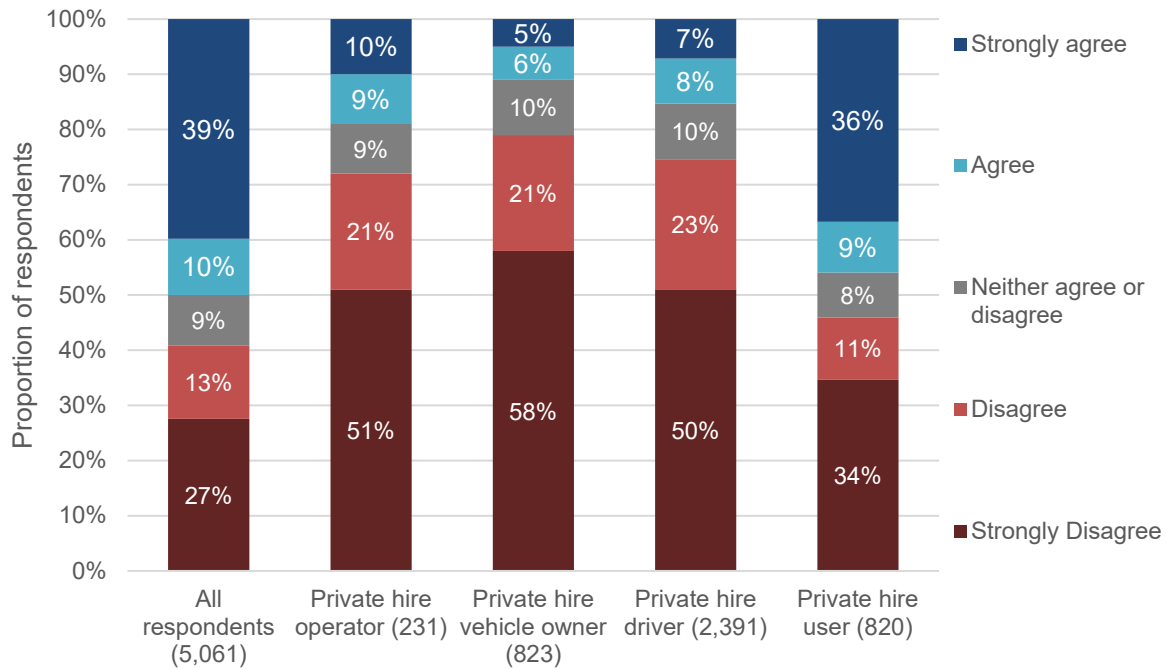
There were 305 respondents who answered no opinion to this question, with a further 288 who did not answer this question.

### 4.3 Private hire driver identification

#### 4.3.1 Question 16: Information on PHV driver ID card visible from outside PHVs

Respondents were asked whether they agreed or disagreed that the information contained on the PHV driver ID card should be visible from outside of PHVs.

#### Summary of responses to Question 16: Do you agree or disagree that the information contained on the PHV driver ID card should be visible from outside of PHVs?



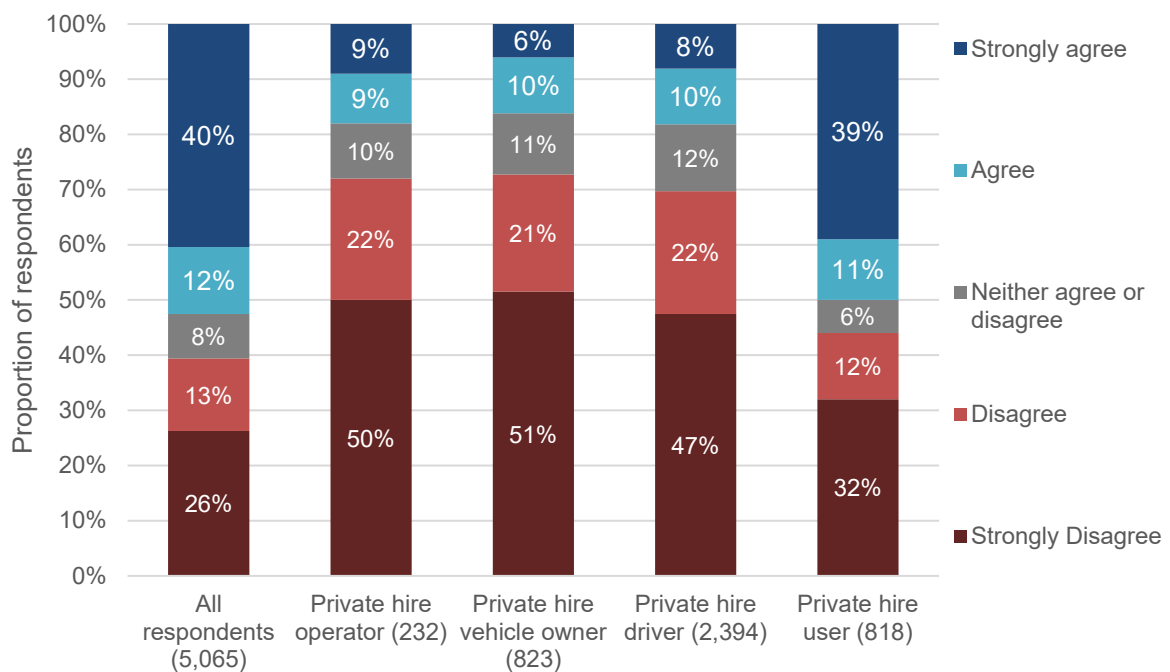
Overall, 49 per cent of all respondents agreed or strongly agreed with the proposal. 45 per cent of private hire users agreed or strongly agreed with the proposal. A majority of private hire operators, vehicle owners and drivers did not agree that the information contained on the PHV driver ID card should be visible from outside of PHVs. Between 72 to 79 per cent disagreed or strongly disagreed.

There were 77 respondents who answered no opinion to this question, with a further 287 who did not answer this question.

### 4.3.2 Question 17: PHV driver's ID displayed on the nearside of the PHV in top corner of front windscreen

Respondents were asked whether they agreed or disagreed with the proposal that a version of the PHV driver's ID card should be displayed on the nearside of the PHV on the front windscreen in the top corner.

#### Summary of responses to Question 17: Do you agree or disagree with our proposal that a version of the PHV driver's ID card should be displayed on the nearside of the PHV on the front windscreen in the top corner?



Overall 52 per cent of all respondents agreed or strongly agreed with the proposal. 50 per cent of private hire users agreed or strongly agreed with the proposal. In line with the strong disagreement for information on PHV driver IDs being visible from outside of PHVs, agreement among private hire operators, vehicle owners and drivers that a version of the PHV driver's ID card should be displayed on the nearside of the PHV on the front windscreen was also very low.

There were 78 respondents who answered no opinion to this question, with a further 283 who did not answer this question.

#### 4.3.3 Question 18: Reasons for supporting/not supporting proposal that information contained on PHV driver ID cards should be more visible from outside of PHVs (open question analysis)

We asked respondents why they agreed or disagreed with the proposal to make the information on PHV driver ID cards visible from outside of the vehicle, with 2,246 respondents answering this question. The table below shows all mentions of three per cent or more for any sub-group. A detailed analysis of comments is also available in [Appendix A](#).

The most common theme mentioned was safety and security. The most frequently mentioned concern was around personal data protection and privacy of the driver with private hire operators, owners, drivers and users all mentioning this (21 per cent of all respondents). There were also mentions of the risk of identity theft (12 per cent) and driver safety and security (nine per cent).

Eighteen per cent stated that this proposal is not necessary, and that the current information is sufficient. Eight per cent mentioned that the customer already has access to driver information through an app, with seven per cent stating that driver information should only be shown inside the car/to the customer.

Placement and visibility of signage was a key theme, with 15 per cent mentioning that tinted windows should not be permitted in PHVs due to visibility issues. Respondents also mentioned that there should be a plate attached to the PHV with information (11 per cent), PHV identification should be clearly displayed and easy to read (nine per cent) and that driver information should be displayed in the rear of car (eight per cent).



**Summary of responses to Question 18: If you do not agree that the information contained on PHV driver ID cards should be more visible from outside of PHVs or agree with our proposal please specify why?**

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
<b>Base</b>	2,246		143		503		1,295		374	
	Count	%	Count	%	Count	%	Count	%	Count	%
<b>Safety/Security (Net)</b>	<b>984</b>	<b>44%</b>	<b>75</b>	<b>52%</b>	<b>300</b>	<b>60%</b>	<b>724</b>	<b>56%</b>	<b>194</b>	<b>52%</b>
Invasion of privacy/personal/data protection/especially when I'm not working	477	21%	37	26%	182	36%	425	33%	107	29%
Risk of identity theft/fraud/scams/misuse of information	266	12%	26	18%	86	17%	219	17%	45	12%
The driver safety/security could be at risk	210	9%	20	14%	67	13%	168	13%	41	11%
It would increase risk of car damage/crimes/rude behaviour/discrimination towards PHV vehicles/drivers	68	3%	6	4%	28	6%	54	4%	15	4%
Could risk the safety of the passenger/customer	31	1%	5	3%	6	1%	10	1%	7	2%
Other safety mentions	59	3%	4	3%	11	2%	27	2%	13	3%
<b>Overall Acceptance (Net)</b>	<b>855</b>	<b>38%</b>	<b>74</b>	<b>52%</b>	<b>259</b>	<b>51%</b>	<b>615</b>	<b>47%</b>	<b>167</b>	<b>45%</b>
Not necessary/needed/the current set up/information is fine as it is	411	18%	38	27%	139	28%	351	27%	84	22%
Customer already receives this information through the app	178	8%	19	13%	66	13%	153	12%	36	10%
The information is/only needs displayed inside/to the customer	165	7%	9	6%	59	12%	139	11%	34	9%

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
Agree/current signage insufficient/should be more identifiable	136	6%	3	2%	4	1%	16	1%	22	6%
Not appropriate for executive vehicles/chauffeurs	25	1%	11	8%	16	3%	20	2%	4	1%
Other overall acceptance mentions	56	2%	3	2%	15	3%	36	3%	11	3%
<b>Placement/Visibility of Signage (Net)</b>	<b>660</b>	<b>29%</b>	<b>34</b>	<b>24%</b>	<b>82</b>	<b>16%</b>	<b>166</b>	<b>13%</b>	<b>82</b>	<b>22%</b>
Tinted windows cause visibility issues/should not be permitted in PHVs	338	15%	-	0%	2	0%	6	0%	34	9%
It should be clearly displayed/easy to see/read	199	9%	5	3%	14	3%	25	2%	15	4%
It should be displayed on rear/back of car	181	8%	2	1%	5	1%	11	1%	19	5%
Should not be put on window/windscreen/cluttering and restricting view for driver	63	3%	7	5%	22	4%	53	4%	11	3%
Current identifiers too small/need larger identifiers	60	3%	4	3%	6	1%	9	1%	4	1%
It should be displayed on window/windscreen	35	2%	4	3%	11	2%	20	2%	9	2%
Signs/stickers ruin/clutter the appearance of vehicles	34	2%	7	5%	15	3%	28	2%	6	2%
Other placement/visibility of signage mentions	71	3%	12	8%	22	4%	34	3%	16	4%
<b>Miscellaneous (Net)</b>	<b>383</b>	<b>17%</b>	<b>28</b>	<b>20%</b>	<b>87</b>	<b>17%</b>	<b>208</b>	<b>16%</b>	<b>62</b>	<b>17%</b>
Vehicles/IDs/licences are being shared/swapped/rented between drivers	89	4%	11	8%	20	4%	48	4%	16	4%
It would encourage illegal hailing/touting	60	3%	2	1%	6	1%	11	1%	7	2%

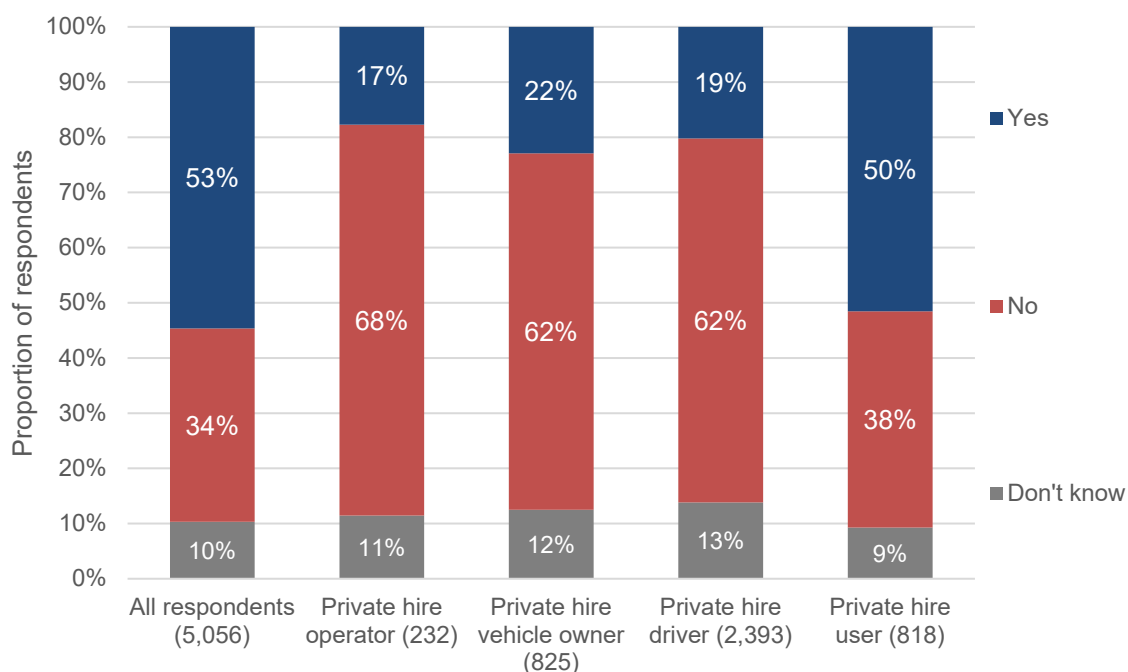
	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
Not fair/taxis/bus drivers/other public drivers don't have additional identifiers	53	2%	6	4%	17	3%	45	3%	11	3%
Vehicles are for private use as well/not only for work	40	2%	2	1%	15	3%	36	3%	7	2%
Other miscellaneous mentions	95	4%	6	4%	23	5%	46	4%	22	6%
<b>Information Displayed (Net)</b>	<b>358</b>	<b>16%</b>	<b>27</b>	<b>19%</b>	<b>90</b>	<b>18%</b>	<b>211</b>	<b>16%</b>	<b>56</b>	<b>15%</b>
Drivers wear their ID/badges around the neck/customers can ask for more info	148	7%	16	11%	55	11%	121	9%	26	7%
Driver ID should be displayed in car and not worn by driver around the neck	42	2%	3	2%	9	2%	21	2%	11	3%
Customers do not look at ID/licence/only at registration number	30	1%	4	3%	8	2%	25	2%	6	2%
Other information displayed mentions	92	4%	2	1%	15	3%	43	3%	8	2%
<b>Vehicle Identification (Net)</b>	<b>280</b>	<b>12%</b>	<b>14</b>	<b>10%</b>	<b>23</b>	<b>5%</b>	<b>46</b>	<b>4%</b>	<b>22</b>	<b>6%</b>
Should have plate/licence plate attached to car with information	241	11%	1	1%	6	1%	19	1%	19	5%
Luxury/executive/chauffeur cars should be excluded/not discreet anymore	30	1%	12	8%	15	3%	24	2%	3	1%

## 4.4 Insurance requirements for PHVs

### 4.4.1 Question 19: Whether changes are needed to existing PHV hire or reward insurance requirements

Respondents were asked whether they think any changes are needed to the existing PHV hire or reward insurance requirements.

#### Summary of responses to Question 19: Do you consider any changes are needed to the existing PHV hire or reward insurance requirements?



Just over half (53 per cent) of all respondents thought that changes were needed to the existing PHV hire or reward insurance requirements. Half of private hire users thought that changes were needed.

Private hire operators, vehicle owners and drivers were unlikely to think that changes are needed to the existing hire or reward insurance requirements, with over 60 per cent of each saying no changes are needed.

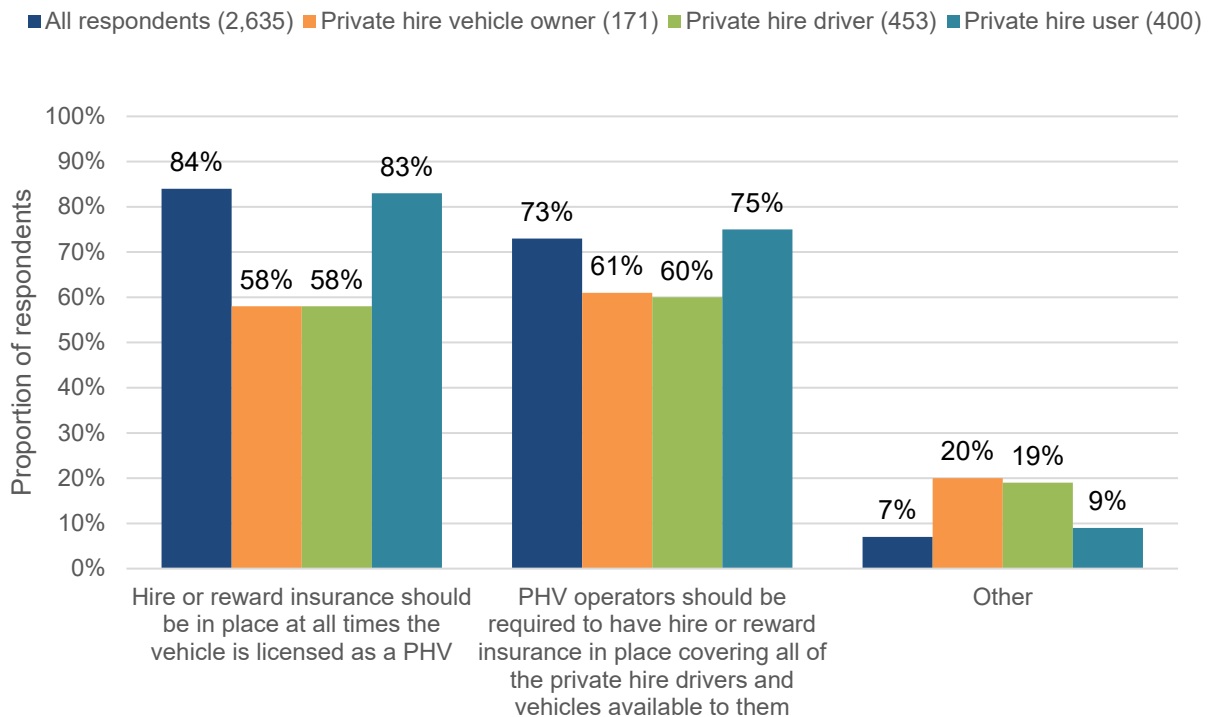
There were 169 respondents who answered no opinion to this question, with a further 292 who did not answer this question.

### 4.4.2 Question 20: Changes needed to existing PHV hire or reward insurance requirements (including open response analysis)

We asked respondents who said that 'Yes', changes should be made to the existing PHV hire or reward insurance requirements, what changes they thought should be made. Respondents were able to select from a list and also given the opportunity to specify other changes.

Not enough private hire operators answered this question for their answers to be reported separately (40 respondents).

### Summary of responses to Question 20: Do you consider any changes are needed to the existing PHV hire or reward insurance requirements?



Of those who thought that changes were required, 84 per cent of all respondents thought that hire or reward insurance should be in place at all times the vehicle is licensed as a PHV, with 73 per cent thinking that PHV operators should be required to have insurance in place covering all the private hire drivers and vehicles available to them. 83 per cent of private hire users thought that hire or reward insurance should be in place at all times the vehicle is licensed as a PHV. 75 per cent of users thought that PHV operators should be required to have insurance in place covering all the private hire drivers and vehicles available to them. For owners and drivers, around six in ten agreed with each of these courses of action.

‘Other’ responses are detailed in the table below (we have included here all codes mentioned by at least three per cent of respondents within any of the subgroups). A detailed analysis of ‘other’ comments is available in [Appendix A](#).

The most common ‘other’ response was concerning responsibility for hire or reward insurance, with mentions that operators should ensure insurance cover for every driver. Private hire users were more likely to say this than operators, owners or drivers.

Fifteen per cent of all respondents mentioned that PHVs should be required to display a hire or reward insurance certificate at all times.

### Summary of 'Other (specify)' responses to Question 20

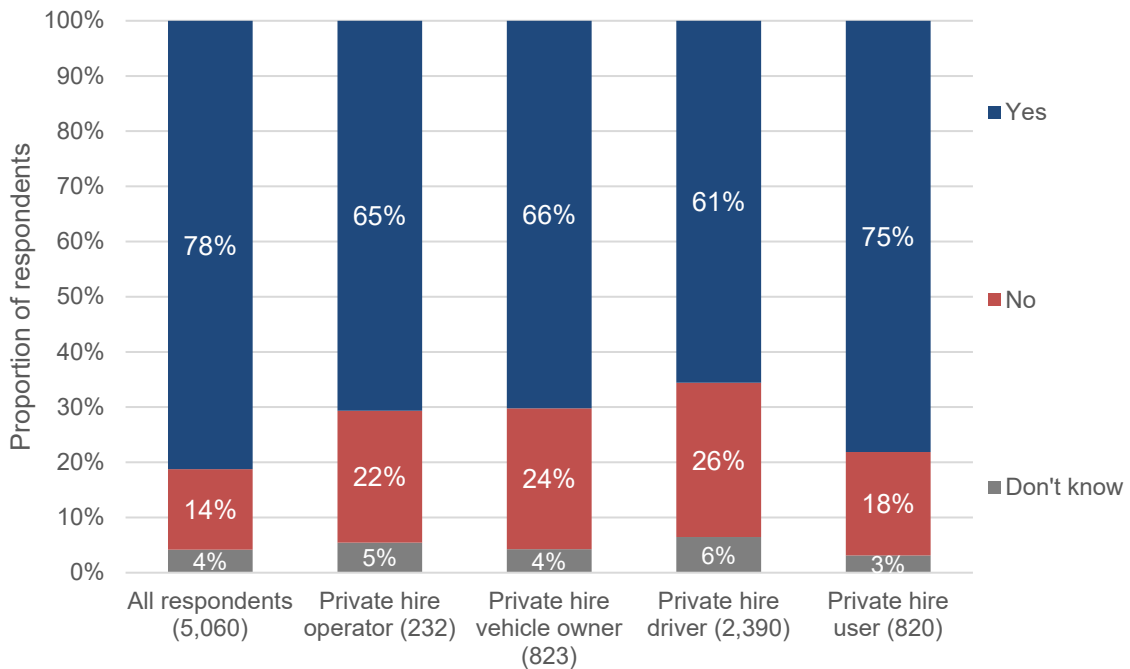
	All respondents		Private hire operator/ driver/ vehicle owner		PHV users	
	Count	%	Count	%	Count	%
<b>Base</b>	<b>1,154</b>		<b>326</b>		<b>166</b>	
<b>Taking Responsibility (Net)</b>	<b>710</b>	<b>62%</b>	<b>76</b>	<b>23%</b>	<b>83</b>	<b>50%</b>
Company should cover every driver/mentions taxi company arrangements	642	56%	47	14%	70	42%
Enforce penalty/punishment system/fines for those that are not in compliance	34	3%	13	4%	2	1%
Need to prevent drivers from switching policy to 3rd party insurance/less than full comprehensive H&R insurance after testing/licensing/registration	22	2%	7	2%	5	3%
Other taking responsibility mentions	21	2%	14	4%	5	3%
<b>Insurance Coverage/Requirements (Net)</b>	<b>379</b>	<b>33%</b>	<b>175</b>	<b>54%</b>	<b>81</b>	<b>49%</b>
All PHVs should be required to carry/display hire or reward insurance certificate at all times	173	15%	36	11%	36	22%
Should purchase yearly/not monthly/so it can't be cancelled after purchase	64	6%	13	4%	17	10%
Current insurance is sufficient/insurance is a requirement/you can't licence a vehicle without it	55	5%	44	13%	8	5%
Should be flexible/pay as you use/insurance only when working/not pay when on holiday/sick	45	4%	38	12%	13	8%
Can be checked through database/should have login system/database linked to insurance to check if insured	22	2%	17	5%	2	1%
Other insurance coverage/requirement mentions	52	5%	33	10%	15	9%
<b>Expense (Net)</b>	<b>126</b>	<b>11%</b>	<b>113</b>	<b>35%</b>	<b>24</b>	<b>14%</b>
Reduce/regulate the price of insurance	55	5%	52	16%	14	8%
Insurance is already expensive/you are trying to increase PHV driver costs	54	5%	51	16%	10	6%
Other expense mentions		2%		6%		2%

	All respondents		Private hire operator/ driver/ vehicle owner		PHV users	
	28		21		4	
<b>Safety/Security (Net)</b>	<b>29</b>	<b>3%</b>	<b>4</b>	<b>1%</b>	<b>7</b>	<b>4%</b>
It would make passengers feel safe knowing PHV is insured	12	1%	1	0%	5	3%
<b>Bias/Discrimination (Net)</b>	<b>26</b>	<b>2%</b>	<b>19</b>	<b>6%</b>	<b>4</b>	<b>2%</b>
This is biased/discrimination against PHV drivers/stop favouring taxis	17	1%	13	4%	2	1%
<b>Miscellaneous (Net)</b>	<b>24</b>	<b>2%</b>	<b>13</b>	<b>4%</b>	<b>2</b>	<b>1%</b>
Other miscellaneous mentions	24	2%	13	4%	2	1%

#### 4.4.3 Question 21: Whether PHV drivers should be required to produce evidence to confirm PHV is covered by hire or reward insurance

Respondents were asked their opinion on whether PHV drivers should be required to produce evidence that the PHV they are using is covered by hire or reward insurance.

**Summary of responses to Question 21: When working should PHV drivers be required to produce evidence to confirm that the PHV they are using is covered by hire or reward insurance?**



The majority (78 per cent) of all respondents agreed that PHV drivers should be required to produce evidence to confirm that the PHV they are using is covered by hire or reward insurance. Agreement was high among all respondent groups, highest for private hire users at 75 per cent. Amongst private hire licensees 65 of operators agreed that PHV drivers should be required to produce evidence to confirm that the PHV they are using is covered by hire or reward insurance with similar levels of support amongst vehicle owners (66 per cent) and drivers (61 per cent).

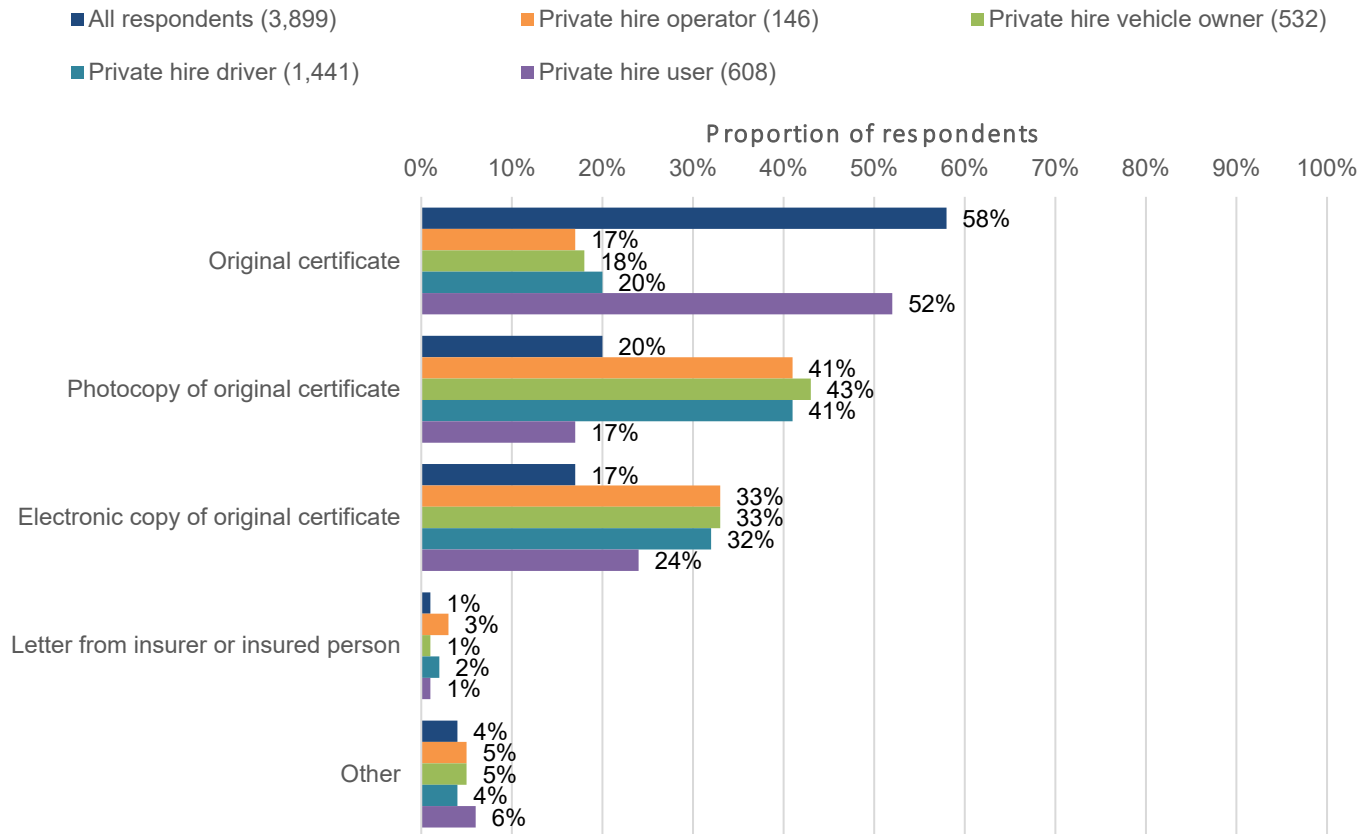
There were 196 respondents who answered no opinion to this question, with a further 288 who did not answer this question.

#### 4.4.4 Question 22: Evidence that should be provided for hire or reward insurance (including open response analysis)

If respondents thought that PHV drivers should be required to produce evidence that the PHV they are using is covered by hire or reward insurance when working, they were asked what form of evidence they should have to provide. Respondents were able to select from a list and also given the opportunity to specify other changes.

#### **Summary of responses to Question 22: If you answered yes, what form should the evidence they produce take?**





The evidence requested by most was the original certificate (58 per cent), with private hire users more likely to say this should be shown (52 per cent) than private hire operators, owners or drivers. Private hire operators, owners and drivers were more likely to say that a photocopy of the original certificate should be provided (41-43 per cent), with a third saying an electronic copy (32-33 per cent).

'Other' responses are detailed in the table below ( we have included here all codes mentioned by at least three per cent of respondents within any of the subgroups). A detailed analysis of 'other' comments is available in [Appendix A](#).

At the 'other' response, the most commonly mentioned options for showing evidence of hire or reward insurance were those already specified in the closed question: electronic copy/picture on phone (21 per cent), original certificate (19 per cent) or a picture/photocopy (12 per cent).

There were also mentions that the evidence should be displayed at all times (11 per cent) and that evidence should be displayed on the outside of the vehicle or on the dashboard (nine per cent).

Respondents also mentioned responsibility for hire or reward insurance with 12 per cent citing that it should be the responsibility of operators and nine per cent that private hire drivers should be prevented from cancelling insurance after licencing or after producing their certification.

### Summary of 'Other (specify)' responses to Question 22

	All respondents		Private hire operator/ driver/ vehicle owner		PHV users	
<b>Base</b>	<b>621</b>		<b>298</b>		<b>116</b>	
	Count	%	Count	%	Count	%
<b>Information Displayed (Net)</b>	<b>289</b>	<b>47%</b>	<b>165</b>	<b>55%</b>	<b>57</b>	<b>49%</b>
Electronic/online picture on phone/laptop/tablet	132	21%	105	35%	28	24%
Original certificate	118	19%	51	17%	22	19%
Picture/photo copy	76	12%	53	18%	19	16%
Letter from the insurer	36	6%	25	8%	10	9%
Email copy	19	3%	16	5%	5	4%
Driver ID/including photo/badge number of driver	18	3%	4	1%	5	4%
Sticker/disc (Unspecified)	13	2%	8	3%	3	3%
Insurance start/expiration date	11	2%	3	1%	4	3%
Colour-coded disc/sticker/label/different colour for different year	4	1%	-	0%	3	3%
Other information displayed mentions	20	3%	9	3%	5	4%
<b>Placement/Visibility of signage (Net)</b>	<b>173</b>	<b>28%</b>	<b>34</b>	<b>11%</b>	<b>36</b>	<b>31%</b>
Should be displayed at all times	69	11%	7	2%	12	10%
Should be displayed inside vehicle/on dashboard	56	9%	6	2%	10	9%
Should be displayed on window/windshield	24	4%	6	2%	7	6%
Should be carried on driver	21	3%	9	3%	7	6%
Other placement/visibility of signage mentions	10	2%	1	0%	3	3%
<b>Miscellaneous (Net)</b>	<b>167</b>	<b>27%</b>	<b>88</b>	<b>30%</b>	<b>35</b>	<b>30%</b>
Should already be in the database/ no need for other form of insurance	65	10%	37	12%	12	10%
Same as others/taxis	48	8%	10	3%	9	8%
We already have/carry documents/copies of insurance	40	6%	36	12%	9	8%

	All respondents		Private hire operator/ driver/ vehicle owner		PHV users	
Unfair to PHV as other taxis/bus drivers/public drivers don't have additional identifiers	7	1%	5	2%	3	3%
Other miscellaneous mentions	18	3%	9	3%	4	3%
<b>Taking Responsibility (Net)</b>	<b>129</b>	<b>21%</b>	<b>42</b>	<b>14%</b>	<b>17</b>	<b>15%</b>
It should be the responsibility of the operators	74	12%	31	10%	11	9%
Should prevent PHV drivers from cancelling insurance after licencing/producing their certification	54	9%	3	1%	5	4%
Other taking responsibility mentions	18	3%	9	3%	4	3%
<b>Safety (Net)</b>	<b>28</b>	<b>5%</b>	<b>6</b>	<b>2%</b>	<b>7</b>	<b>6%</b>
It would ensure public safety/safety first	24	4%	4	1%	6	5%
<b>Overall Acceptance (Net)</b>	<b>26</b>	<b>4%</b>	<b>19</b>	<b>6%</b>	<b>6</b>	<b>5%</b>
No, it is not needed/unnecessary/fine as it is now	23	4%	18	6%	6	5%

#### 4.4.5 Question 23: Evidence to support proposed changes/reasons will enhance public safety (open question analysis)

Respondents were asked if they had any evidence to support the proposed changes, and why they believe that the changes will enhance public safety, with 2,244 respondents answering this question. Key themes are shown below, with detailed analysis in [Appendix A](#).

Most commonly, respondents reiterated what information should be displayed (40 per cent), with 31 per cent stating that the original insurance certificate should be displayed.

The next most common theme was that the proposed changes would positively impact safety; minimising uninsured drivers (eight per cent) and enhancing public safety (six per cent).

**Summary of responses to Question 23: Please let us know of any evidence you have to support any proposed changes or why you feel this proposal will enhance public safety?**

	All respondents		Private hire operator/ driver/ vehicle owner		PHV users	
<b>Base</b>	<b>2,244</b>		<b>653</b>		<b>314</b>	
	Count	%	Count	%	Count	%
<b>Information Displayed (Net)</b>	<b>901</b>	<b>40%</b>	<b>126</b>	<b>19%</b>	<b>98</b>	<b>31%</b>
Original insurance certificate	700	31%	41	6%	69	22%
Photocopy of original certificate	75	3%	41	6%	8	3%
Electronic copy of original certificate	72	3%	24	4%	13	4%
Other information displayed mentions	46	2%	26	4%	10	3%
<b>Safety/ Security (Net)</b>	<b>538</b>	<b>24%</b>	<b>191</b>	<b>29%</b>	<b>105</b>	<b>33%</b>
It would ensure/prove driver is insured/minimises uninsured drivers	187	8%	21	3%	36	11%
It would ensure safety/enhance public safety	128	6%	39	6%	25	8%
It will prevent fraud/illegal activity	93	4%	13	2%	14	4%
It would ensure safety for passengers	79	4%	19	3%	11	4%
It will not enhance public safety	74	3%	64	10%	23	7%
It would ensure driver safety	48	2%	40	6%	13	4%
Other safety/security mentions	55	2%	36	6%	12	4%
<b>Overall Acceptance (Net)</b>	<b>455</b>	<b>20%</b>	<b>223</b>	<b>34%</b>	<b>89</b>	<b>28%</b>
No, I don't support/agree with proposed changes/existing regulations fine as is	105	5%	97	15%	23	7%
All other public drivers have to follow insurance requirements, so should PHV drivers	83	4%	10	2%	20	6%
Operator should handle the insurance issues/be held accountable for its fleet	62	3%	23	4%	14	4%
Proof of insurance can be verified online/through MID	45	2%	34	5%	9	3%
Yes, I support/agree with proposed changes	42	2%	3	0%	8	3%
Other overall acceptance mentions	99	4%	62	9%	16	5%
<b>Miscellaneous (Net)</b>		<b>14%</b>		<b>16%</b>		<b>16%</b>

	All respondents		Private hire operator/ driver/ vehicle owner		PHV users	
	308		104		50	
Drivers not currently being insured/purchase insurance and then cancel	73	3%	6	1%	13	4%
Gives customers/passengers peace of mind/confidence	51	2%	11	2%	11	4%
It would cover the passenger if there is an accident	47	2%	5	1%	11	4%
Insurance is expensive for drivers	37	2%	19	3%	4	1%
Other miscellaneous mentions	97	4%	51	8%	13	4%
<b>Placement/Visibility of Signage (Net)</b>	<b>161</b>	<b>7%</b>	<b>38</b>	<b>6%</b>	<b>25</b>	<b>8%</b>
Should be clearly visible/on display at all times	92	4%	8	1%	14	4%

## 4.5 Background checks for PHV drivers

4.5.1 Question 24: Establish background character information for persons who have lived outside the UK (open question analysis)

Respondents were asked to provide their views on how TfL could establish background character information for those who have lived outside of the UK, with 2,537 respondents answering this question. Ideas were collated into key themes shown in the table below (we have included here all codes mentioned by at least three per cent of respondents within any of the subgroups). A detailed analysis of comments is also available in [Appendix A](#).

The most frequent suggestion was that background character information should be obtained through DBS or CRB checks (41 per cent), with 23 per cent specifying that these checks would ensure proof of no criminal record or convictions and 18 per cent stating that the checks would ensure no criminal record or convictions in the person's country of origin.

A third of respondents mentioned that character information would be best established by enforcing a minimum residency in the UK before licensing as a PHV driver. The most common suggestions for length of UK residency were five years (13 per cent) or three years (11 per cent).

Some respondents agreed that background character information is needed and that drivers should not be licenced without proof of good standing (12 per cent), with eight per cent stating that this is needed for public safety.

**Summary of responses to Question 24: Please provide your views on how TfL can best establish background character information for persons who have lived for an extended period outside the UK or come to the UK from another country? Please provide any evidence to support your comments.**

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
<b>Base</b>	2,537		125		440		1,177		451	
	Count	%	Count	%	Count	%	Count	%	Count	%
<b>Criminal Records/Background Checks (Net)</b>	<b>1,382</b>	<b>54%</b>	<b>66</b>	<b>53%</b>	<b>250</b>	<b>57%</b>	<b>633</b>	<b>54%</b>	<b>250</b>	<b>55%</b>
DBS/CRB Checks	1,050	41%	50	40%	198	45%	493	42%	183	41%
There should be DBS/CRB checks/proof of no criminal record/ convictions	589	23%	29	23%	102	23%	254	22%	104	23%
There should be DBS/CRB checks/proof of no criminal record/convictions overseas/in country of origin	449	18%	21	17%	97	22%	234	20%	75	17%
Other DBS/CRB checks mentions	26	1%	5	4%	7	2%	11	1%	6	1%
<b>Length of Residency (Net)</b>	<b>831</b>	<b>33%</b>	<b>29</b>	<b>23%</b>	<b>91</b>	<b>21%</b>	<b>259</b>	<b>22%</b>	<b>156</b>	<b>35%</b>
There should be minimum 5 year waiting period/residency in the UK to be licenced	329	13%	9	7%	29	7%	99	8%	51	11%
There should be minimum 3 year waiting period/residency in the UK to be licenced	284	11%	6	5%	23	5%	71	6%	57	13%
There should be a minimum waiting period/residency in the UK to be licenced	88	3%	6	5%	12	3%	31	3%	20	4%
There should be minimum 10 year waiting period/residency in the UK to be licenced	57	2%	5	4%	11	3%	29	2%	14	3%

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
<b>Overall Acceptance (Net)</b>	<b>648</b>	<b>26%</b>	<b>34</b>	<b>27%</b>	<b>96</b>	<b>22%</b>	<b>263</b>	<b>22%</b>	<b>121</b>	<b>27%</b>
Is needed/don't issue without proof of good standing	296	12%	9	7%	33	8%	94	8%	58	13%
Needed for safety/public safety	210	8%	7	6%	18	4%	44	4%	37	8%
Not needed/okay as is/current background check is sufficient	103	4%	10	8%	28	6%	90	8%	15	3%
It can't be done/and that's the reason there are so many assaults/attacks	70	3%	5	4%	15	3%	29	2%	16	4%
Other overall acceptance mentions	54	2%	5	4%	9	2%	26	2%	13	3%
<b>General Background Check (Net)</b>	<b>351</b>	<b>14%</b>	<b>22</b>	<b>18%</b>	<b>64</b>	<b>15%</b>	<b>157</b>	<b>13%</b>	<b>84</b>	<b>19%</b>
Must provide references/character references	83	3%	8	6%	19	4%	37	3%	27	6%
Need to be able to determine/prove if driver is of good character	69	3%	3	2%	9	2%	18	2%	15	3%
There should be previous employment checks/verifications	58	2%	5	4%	13	3%	25	2%	15	3%
Should be passport/immigration checks/see where they have been	55	2%	3	2%	13	3%	35	3%	14	3%
Other general background checks mentions	94	4%	3	2%	16	4%	50	4%	18	4%
<b>Frequency/Length of Background Checks (Net)</b>	<b>200</b>	<b>8%</b>	<b>5</b>	<b>4%</b>	<b>30</b>	<b>7%</b>	<b>72</b>	<b>6%</b>	<b>38</b>	<b>8%</b>
There should be background checks of the past 5 years	79	3%	3	2%	20	5%	27	2%	18	4%
Other frequency/length of background checks mentions	76	3%	1	1%	6	1%	29	2%	13	3%

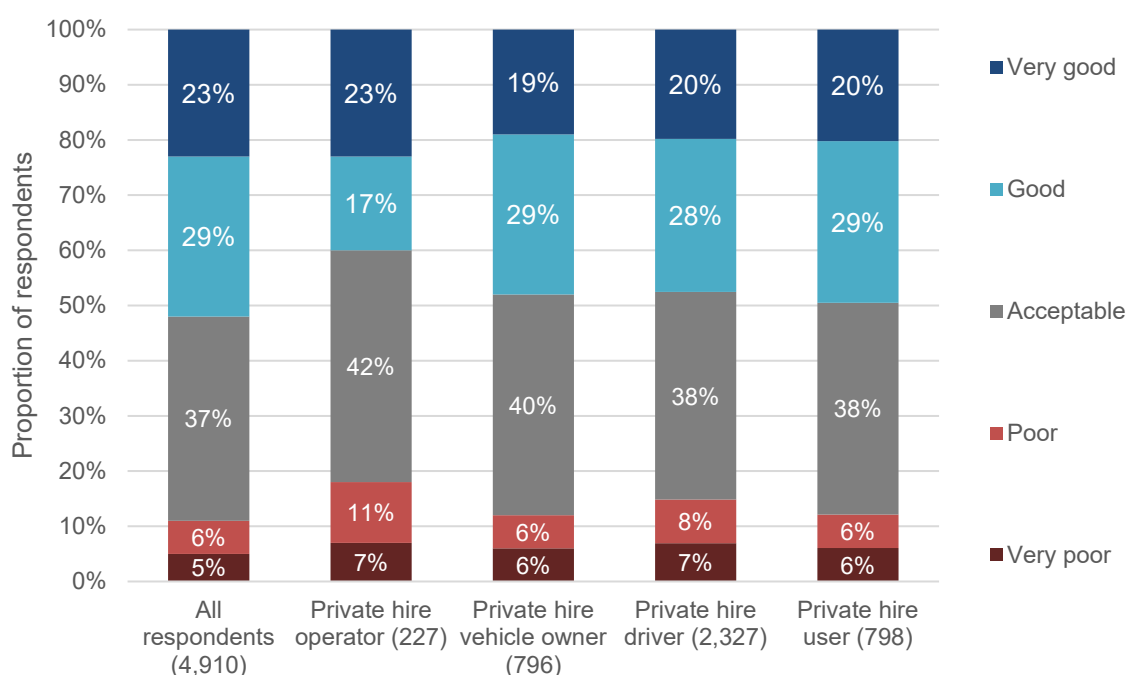


	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
<b>UK Licensing (Net)</b>	<b>124</b>	<b>5%</b>	<b>8</b>	<b>6%</b>	<b>23</b>	<b>5%</b>	<b>60</b>	<b>5%</b>	<b>27</b>	<b>6%</b>
Need to be familiar with UK driving standards/take UK driving test	50	2%	3	2%	9	2%	22	2%	12	3%
<b>Miscellaneous (Net)</b>	<b>448</b>	<b>18%</b>	<b>24</b>	<b>19%</b>	<b>72</b>	<b>16%</b>	<b>165</b>	<b>14%</b>	<b>87</b>	<b>19%</b>
Other miscellaneous mentions	95	4%	9	7%	19	4%	52	4%	17	4%

## 4.6 Summary of responses to Question 36: Further comments about quality of consultation - Issues commonly raised (open question analysis)

We asked respondents what they thought about the quality of the consultation. This was answered by 4,910 respondents.

**Summary of responses to Question 36: What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?**



Overall, 52 per cent thought consultation was good or very good, with only 11 per cent rating it as poor. Just under half (49 per cent) of private hire users thought it was good or very good.

We asked respondents for feedback on the quality of this consultation, with 719 respondents answering this question. The table below shows all mentions of three per cent or more for any sub-group. A detailed analysis of comments is also available in [Appendix A](#).

Two thirds had a negative comment about the consultation. This included reference to the proposals and comments on the consultation itself. Comments about the consultation survey included: that TfL needs to listen to the consultation results (13 per cent) and that the consultation was biased against PHV drivers (13 per cent).

About the proposals, the most common mentions were that taxi drivers and PHV drivers should adhere to the same rules (eight per cent); that the proposals should consider driver safety and wellbeing (six per cent) and that regulations should be for operators/that operators have responsibility for their fleet (five per cent).

Positive comments included that the consultation and proposals are necessary (six per cent) and that safety standards need to be put in place (six per cent).

**Summary of responses to Question 36: What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?**

	All respondents	
<b>Base</b>	<b>719</b>	
	<b>Count</b>	<b>%</b>
<b>Negative (Net)</b>	<b>490</b>	<b>68%</b>
<b>Survey (Subnet)</b>	<b>347</b>	<b>48%</b>
TfL needs to listen to the survey results/do their job to correct the issues	94	13%
Biased/discriminatory against PHV drivers	93	13%
Pointless irrelevant	44	6%
Not clear/simple/easy to understand	34	5%
Waste of time/money	28	4%
Need better presentation of the questions/method of delivery/accessibility	25	3%
Unaware of/not well-advertised/not well-distributed	23	3%
Lack of topics/questions covered	20	3%
<b>Overall Acceptance (Subnet)</b>	<b>153</b>	<b>21%</b>
Taxi drivers should be treated the same as PHV drivers/comply the same rules	58	8%
Proposals should cover drivers' safety/well-being	42	6%
Need to regulate the operators/operators' responsibility for their fleet	33	5%
No changes needed	23	3%
<b>Positive (Net)</b>	<b>124</b>	<b>17%</b>
<b>Overall Acceptance (Subnet)</b>	<b>85</b>	<b>12%</b>
Necessary/long overdue	44	6%
Need safety standards in place	44	6%
<b>Survey (Subnet)</b>	<b>44</b>	<b>6%</b>
Good consultation/information/material	25	3%
<b>Miscellaneous</b>	<b>87</b>	<b>12%</b>
Cost/money concern for drivers/money making scheme	33	5%
Cap/limit the number of PHVs/taxi drivers	28	4%
Other negative mentions	22	3%

## **4.7 Summary of stakeholder responses**

### **Addison Lee (AL)**

AL supported the proposals to introduce an advanced driving test assessment for new PHV drivers and existing PHV drivers. They felt that better drivers improve road and passenger safety and also help with the economical use of vehicles and with reducing emissions. They did state that making these changes would cause significant disruption within the private hire industry and so the introduction of the tests requires careful and pragmatic implementation. Addison Lee said that before the requirement could be introduced and supported by them further consideration of the impact on drivers was necessary and this should include what additional training would be needed and the cost of this. As drivers who fail the assessment could lose their livelihood, Addison Lee felt that TfL, in partnership with the private hire industry, needed to provide support, guidance and advice to drivers. They also stated that TfL would need to set out the policy regarding retaking the test, if there was a limit on the number of times it could be retaken and the gap between retakes.

AL also stated that their internal information suggested that some PHV drivers may view the proposals as overly prescriptive and so leave the industry. AL believed that the challenges with the English Language requirement provided a useful case study, that lessons could be learned from this and that TfL should explore opportunities to consolidate the driving and English language test.

AL said that in order to minimise disruption it is vitally important that any test be undertaken at the point where the PHV driver's licence needs renewing and existing PHV drivers should be allowed at least six months in which to pass the test. AL said that TfL should identify a date when the test will be a requirement for new PHV drivers at the earliest possible opportunity and make sufficient announcements to make drivers aware of this. They asked for further clarity on how the tests will be run and who will do this. AL also asked about the feasibility of incorporating an advanced driving test into their driver training. They said that they would be interested in seeing what consideration TfL has given to these issues and any further analysis on the impact of drivers, particularly those who fail the test.

AL supported the proposal to introduce a wheelchair assessment for the drivers of all wheelchair accessible PHVs. They felt that the requirement should be limited to drivers who drive these vehicles. They also said that further information should be provided on how often a driver would need to take the assessment or a refresher course.

AL recognised the importance of appropriate signage and ensuring contact information is available to passengers. They supported the principles of the proposal but felt that it is necessary to maintain exemptions for certain PHV services (e.g. chauffeurs).

They believed that discussions were needed with regards to the placement of signage and suggested that it could be more appropriate for signage to be placed on the back of the front-seat headrests. AL supported the principle of a combined sign but that the suitability of this would depend upon the size of the PHV and other signage.

AL said that TfL should provide further information on the proposed process for handling of customer complaints and should set out the proposed procedures for contacting operators following a complaint being made against them or one of their drivers.

AL mentioned their 'Addison Lean' campaign, which encourages drivers and passengers to adopt the 'Dutch-Reach', and their proposal for stickers to be placed on wing mirrors.

AL supported the introduction of measures which will assist Compliance Officers and said that changing the colour of the PHV licence disc represents a means of achieving this but they had concerns about certain colours being unsightly and asked for further dialogue with TfL to discuss this.

AL stated that they support the maintenance of the two-tier system of taxis and PHVs and that it was important for Compliance Officers to be able to easily identify PHVs but were unconvinced of the merits of the proposal about increasing the visibility of PHVs. AL believed that a rethink was needed in order to identify the most appropriate measures to clearly differentiate PHVs from taxis and that evidence was required to show that there were problems with passengers and compliance officers being able to distinguish between taxis and PHVs.

AL were particularly concerned about the difficulties with fixing licence plates and brackets to vehicles and this not being appropriate for the vehicles in their fleet. They also did not feel that the proposals presented a suitable set of solutions to address the problems associated with cross border hiring. They enclosed details of their proposals for minimum standards which set out requirements that all private hire operators, drivers and vehicles would need to meet.

AL supported the continuation of granting exemptions from displaying signage on a case by case basis.

AL recognised that an important part of passengers' safety was them knowing their PHV driver's ID and licence information and supported the motivations behind the PHV driver ID proposal but believed it raised a number of key questions. AL stated that they had an obligation to ensure the safety of their drivers, as well as passengers, and that this included data protection and privacy commitments. AL were concerned that displaying a version of the PHV driver ID card on the front windscreen would compromise their commitment to protecting drivers' personal privacy.

AL also felt that there would be operational challenges with this proposal as drivers use different PHVs. Although AL recognised that the current PHV driver ID card could be difficult to read they did not believe that this issue was resolved by the proposal. Instead they suggested that TfL, the private hire industry and other stakeholders should explore alternative ways of ensuring that relevant information is provided to passengers.

AL believed that changes were needed to the existing PHV hire or reward insurance requirements and that operators should be required to provide appropriate hire or reward full fleet insurance as a main policy for all vehicles within their fleet. AL believed that there are numerous benefits from requiring PHV operators to have hire or reward insurance which include removing rogue operators and drivers, providing reassurance to passengers and the wider public that PHVs are insured and removing the risk of drivers cancelling their premium but operators being unaware.

AL believed that drivers should be required to provide evidence that the PHV they are using is covered by hire or reward insurance. They were open to exploring what form the evidence should take but said that the options in the consultation could all make up part of a workable solution.

AL set out national standards for PHV drivers and these included enhanced DBS checks every 12 months, applicants with certain convictions being refused, English language tests, health checks and training covering various areas. They did not feel able to comment further until they had further clarity on what was being proposed.

### **Carey England Limited and also Chauffeur and Executive Committee of LPHCA**

Carey England strongly disagreed with the proposals that would require all new and existing PHV drivers to take the advanced driving assessment on the grounds that there is no strong evidence that demonstrates that there is a problem with the competence and driving standards of private hire drivers. They commented that operators do a good job of managing their drivers in terms of training required for their specific market and relevant use. Any additional training will be an additional cost burden on an already struggling sector with no tangible benefit to the travelling public or drivers.

Carey England had no opinion on the proposal to introduce a wheelchair assessment for the drivers of all wheelchair accessible PHVs though strongly disagreed with the proposal that only PHV drivers who have completed the TfL wheelchair assessment should be allowed to drive wheelchair accessible PHVs. They commented that most disabled travellers who use a wheelchair, can and prefer to travel in regular PHVs. Carey England continued that drivers provide assistance where required, but in many cases the passenger can enter/exit the wheelchair and then vehicle unaided. To create potential barriers to use could add to the stigmatisation of wheelchair users who prefer to use regular PHVs.

Carey England strongly disagreed with the proposal to introduce additional signage in PHVs which will display customer contact information, cycle safety information and a message advising passengers to wear their seat belt, and strongly disagreed that these messages should be displayed in one combined sign.

Carey England commented there is limited 'real estate' available in a vehicle to support all these notices. Applying notices to windows will restrict the passengers' view and create new safety issues. Covering PHVs in signs risks the travelling public confusing a PHV with a taxi and increases the risk of touting as the public will be unsure whether they are getting into a taxi. Carey felt that this would be a concern as the difference is not so clearly defined in other areas outside London where it is difficult to tell a PHV from a taxi. They concluded that they believe this is a serious safety concern and as such has been rejected multiple times by TfL in the past, only to be resurrected by groups with a vested interest to cause confusion.

Carey England agreed with the proposal to change the colour of the PHV licence disc on an annual basis though strongly disagreed with the proposal that licensed PHVs should be more identifiable commenting that PHVs by definition are privately hired. Any move to make them more identifiable would result in confusion with the travelling public who could mistake one for a taxi. They added that this is already a commonplace issue in areas outside of London.

Carey England strongly disagreed with the proposal that the information contained on the PHV driver ID card should be visible from outside of PHVs and strongly disagreed that it should be displayed on the nearside of the PHV on the front windscreen in the top corner.

Carey England continued that in most conditions it would not be possible to read the information and compare it with anything else, particularly when travelling at night. Passengers are already provided with the licence details of the vehicle and driver prior to collection, can easily check the registration number of the vehicle, check the image of the driver received, and that no more identification is required.

Carey did not consider any changes are needed to the existing PHV hire or reward insurance requirements, though agree with the proposal that when working PHV drivers be required to produce evidence to confirm that the PHV they are using is covered by hire or reward insurance. Evidence should be produced in the form of an electronic copy of the original certificate but it is not necessary to see a schedule including the index number of the vehicle or driver's name when a group policy clearly states 'any vehicle and any driver'.

Carey England concluded that TfL is the regulator and has a duty to ensure that all private hire drivers meet the required standards and conditions. They added that the regulator must therefore be confident in its processes and systems and would be

negligent in allowing licences to be issued unless it has confidence that the individual meets the criteria.

### **Crawford Cars Limited**

Crawford Cars Limited disagreed with proposals to introduce an advanced driving assessment for new and existing PHV drivers.

Crawford Cars disagreed with the proposals to introduce a wheelchair assessment for the drivers of wheelchair accessible PHVs but neither agreed nor disagreed that only PHV drivers who have passed the wheelchair assessment should be allowed to drive wheelchair accessible PHVs.

Crawford Cars strongly disagreed with displaying signage inside PHVs which had customer contact information and disagreed with displaying cycle safety information and a message advising passengers to wear a seatbelt. They strongly disagreed that these messages should be displayed in one combined sign.

They disagreed with the proposal to change the colour of the licence disc on an annual basis and disagreed with the proposal that PHVs should be more identifiable.

Crawford Cars strongly agreed with the proposal that exemptions from displaying signage are considered by TfL on a case by case basis.

They strongly disagreed that the information contained on PHV driver ID cards should be visible from outside of PHVs and strongly disagreed that a version of the ID card should be displayed on the front windscreen in the top corner. Crawford Cars commented there are enough methods to identify drivers already. Drivers have to wear and display their ID card and that booking confirmation also contains driver details.

Crawford Cars considered that no changes are necessary to the existing hire or reward requirements and that drivers should be required to produce evidence that the PHV they are using is covered by hire or reward insurance and this should be in the form of an electronic copy or original certificate.

In regard to background checks for PHV drivers they suggested having reciprocal data sharing information and background checks with countries, the police and government departments.

### **Driver Guides Association (DGA) Professional Association of Blue Badge Driver Guides)**

The DGA provided a number of comments and concerns about the details of the proposals. They expressed concern that the private hire sector is already over regulated. They questioned why new regulations are being proposed. They said blue badge driver guides are an example of being subject to regulations that are not only unnecessary but also inappropriate.



The DGA said they had no objection to ensuring PHV drivers were familiar with the Highway Code, drive safely and with consideration for their passengers and to other road users. They raised concerns that the cost be reasonable and the procedure not cause any delay in the issuing of a licence. They said requiring existing PHV drivers to take such a test on renewal would be an enormous undertaking and would likely result in long delays in renewing licences, causing loss of earnings for the driver. They said it should be reasonable and proportionate. They stated that ethnicity should not be a factor in determining policy. They said the lack of experience in the British standard of roadcraft could manifest itself in poor driving technique. They called for Members of the Institute of Advanced Motorist to be exempt from this requirement.

They did not support the PHV signage proposals. They raised concerns about filling the vehicle with notices. They questioned whether passengers read the signs. They said driver guides are already known by the passengers and/or the agency that made the reservation. They did not support displaying contact information in the vehicle. They expressed concern about displaying signage affixed to the windows obscuring the view of sightseeing tours.

They said they understand that a no-smoking sign is required by primary legislation, but no other signage should be required for blue badge driver guides. They said signs about 'dooring' are unnecessary. They expressed concerns about displaying a seatbelt sign. They said at the start of a tour the driver guide always checks to make sure that seat belts are being worn. They stated that for most driver guides the vehicle they use for bookings is their only vehicle and is used for private journeys, so this was another reason for not displaying notices.

They did not support the introduction of coloured licence discs. They supported the proposal that exemptions for displaying the licence disc should be considered on a case by case basis. They called for an automatic exemption in relation to the other proposed mandatory signage for blue badge driver guides and executive chauffeur companies, where the displaying of these notices would be unnecessary and inappropriate.

They opposed the private hire driver ID proposal. They said blue badge driver guides do not need any additional identification. They did not support the proposal to display this on the nearside of the PHV on the front windscreen in the top corner. They said this would present a security risk for the driver.

The DGA said that vehicles used by their members are insured for private hire use on an annual basis so a change in this requirement would not effect their members. They stated the current requirement for drivers to have their own insurance and for operators to have copies of their drivers' insurance certificates was adequate. They said it had worked well for many years. They said requiring operators to provide insurance would be an extra burden on the operator, in terms of time and cost and

would impinge on the flexibility and independence of the driver. They expressed concern about complications related to the vehicles being insured by several different companies. The association said it had no objection to carrying or displaying insurance details. They said evidence of photocopy of original certificate or an electronic copy of original certificate evidence should be produced.

### **Greater London Hire (GLH)**

GLH disagreed with proposals to introduce an advanced driving assessment for new and existing PHV drivers. They said they did not see why a PHV driver needed to have taken an advanced test when all PHV drivers have already taken a driving test which is designed for all to drive safely within the laws of the Highway Code. They said they did not understand why a PHV driver should be more 'advanced' than a member of the public who is taking passengers.

GLH agreed with the proposal to introduce an enhanced wheelchair assessment. They did not support the proposal that only PHV drivers that have completed the wheelchair assessment should be allowed to drive wheelchair accessible vehicles. They called for the design of the wheelchair requirement to be under the remit of an independent body. They said TfL did not have the necessary expertise to design the assessment.

They strongly disagreed with the proposal to display signage inside PHVs which had customer contact information, cycle safety information and a message advising passengers to wear their seat belt. They said they did not understand the rationale for the customer contact information. They said they did not understand the reasons why a person might leave the vehicle onto the road and not onto the pavement. They did not support the proposal that these messages should be displayed in one combined sign. They called for TfL to explain the legal framework advising passengers to wear seatbelts. They stated that all signage would confuse passengers unnecessarily.

GLH strongly disagreed with the proposal to change the colour of the PHV licence disc on an annual basis.

They strongly disagreed with the proposal for PHVs to be more identifiable. They said passengers booking PHVs are already supplied with sufficient information to book a PHV. They strongly disagreed with the proposal that exemptions from displaying signage should be considered on a case by case basis. They disagreed with the proposal that information contained on the driver ID card should be visible from outside of the vehicle and disagreed that a version of the ID card should be displayed on the front windscreen in the top corner. They stated that more generic internal or external signage would over complicate matters and would be difficult to enforce. They said they failed to see the benefits of the signage proposals.

Greater London Hire said that no changes were needed to the existing PHV hire or reward insurance requirements. They supported the proposal that drivers should be required to produce evidence to confirm that the PHV they were using was covered by hire or reward insurance. They stated that they thought this was already the case and said an e-copy would be acceptable.

### **Green Tomato Cars**

Green Tomato Cars agreed with proposals to introduce an advanced driving test for new and existing PHV drivers saying they expect the introduction of the advanced driving test to bring about accident reductions and fuel efficiency. They called for TfL to put forward incentives/rewards for drivers passing this test, given the cost and effort involved.

Green Tomato Cars agreed with the proposals to introduce a wheelchair assessment for the drivers of wheelchair accessible PHVs and that only PHV drivers who have passed the wheelchair assessment should be allowed to drive wheelchair accessible PHVs.

Green Tomato Cars disagreed with displaying signage inside PHVs which had customer contact information and a message advising passengers to wear a seatbelt. They neither agreed nor disagreed with displaying cycle safety signage though strongly agreed that messages should be displayed in one combined sign. They suggested that contact information should only be mandated in cars where booking of those cars would not have made it obvious how to make contact with customer services. They said otherwise it would be a duplication with only negative cost and aesthetic implications.

They strongly disagreed with the proposal to change the colour of the licence disc on an annual basis.

They also strongly disagreed with the proposal that PHVs should be more identifiable. They said PHVs could not be hailed so there would be no value in increasing ease of identification, other than for a customer to know where their car is on arrival. They said this is a marketing issue for each operator. They suggested TfL remove the prohibition on advertising on vehicles. They said without allowing advertising the cost and aesthetic downsides outweigh any positives.

Green Tomato Cars agreed with the proposal that exemptions from displaying signage are considered by TfL on a case by case basis.

Green Tomato Cars strongly disagreed that the information contained on PHV driver ID cards should be visible from outside of PHVs though agreed that a version of the ID card should be displayed on the front windscreen in the top corner.

They raised concerns about driver safety and data protection issues with displaying information contained in the driver ID card on the vehicle. They requested

clarification about the practical questions of how this would be achieved in a way that didn't cause problems with displaying the driver's identity outside of the vehicle when driving.

They said PHV operators should be required to have hire or reward insurance in place covering all of the private hire drivers and vehicles working for them at any given time. They said the fact a car is 'available' to an operator isn't a reason for that operator to insure it for hire. They also said this should only be mandated if the car is being used by that operator.

Green Tomato Cars said that PHV drivers should be required to produce evidence that the PHV they are using is covered by hire or reward insurance and this should be in the form of an e-copy included in databases available to TPH Inspectors, the police, etc.

In regard to background checks for PHV drivers they said it did not make sense to use a different DBS system or database when suitable ones already exist for background checks. They said this would be inefficient, costly and likely to increase errors and gaps.

### **iRide London Limited**

iRide strongly agreed with the proposal to introduce an advanced driving assessment for new and existing PHV drivers, stating it is needed by drivers for the private hire industry.

iRide agreed with the proposal to introduce a wheelchair assessment for the drivers of all wheelchair accessible PHVs and strongly agree with the proposal that only PHV drivers who have completed the TfL wheelchair assessment should be allowed to drive wheelchair accessible PHVs.

iRide strongly disagreed with displaying signage inside PHVs which had customer contact information, but strongly agreed with the proposal to display signage inside PHVs containing cycle safety information and a message advising passengers to wear a seat belt.

They strongly agreed that these messages should be displayed in one combined sign.

iRide strongly agreed with the proposal to change the colour of the PHV licence disc on an annual basis and strongly agreed with the proposal that licensed PHVs should be more identifiable on the grounds that passengers can see it is a PHV rather than guess.

iRide strongly disagreed with the proposal that exemptions from displaying signage should be considered by TfL on case by case.

iRide strongly agreed that information contained on the PHV driver ID card should be visible from outside of PHVs and should be displayed on the nearside of the PHV on the front windscreen in the top corner.

iRide felt that hire or reward insurance should be in place at all times the vehicle is licensed as a PHV, and that when working PHV drivers should be required to produce evidence to confirm that the PHV they are using is covered by hire or reward insurance. They believed the original insurance certificate should be produced.

### **The Keen Group Limited (TKG)**

TKG strongly disagreed with the proposals that require all new and existing PHV drivers to take an advanced driving assessment on the grounds that the introduction of an advanced driving test would be costly, time-consuming and would achieve very little as there is already an age restriction set at 21, requirement to have held a full DVLA driving licence for three years plus the vast majority of PHV drivers will have been doing the job for many years.

They added they would be much more in favour of driver training to include defensive driving techniques, passenger ride awareness, etc.

TKG strongly disagreed with the proposal to introduce a wheelchair assessment for the drivers of all wheelchair accessible PHVs and the proposal that only PHV drivers who have completed the TfL wheelchair assessment should be allowed to drive wheelchair accessible PHVs on the grounds that there are already training courses available which teach drivers and passenger assistants how to 'on-board', stow and secure a passenger safely in a wheelchair. Local authorities, delivering a service to clients with learning and or physical disabilities require proof of training, as a contractual requirement.

TKG felt that in the interest of safety, a driver should undergo appropriate training before being allowed to carry out journeys using wheelchair accessible vehicles.

TKG strongly disagreed with displaying signage inside PHVs which had customer contact information, cycle safety information, and a message advising passengers to wear a seatbelt and strongly disagreed that these messages should be displayed in one combined sign.

They commented that private hire bookings are made directly with a licensed operator and the customer will be aware of how to contact that operator if they need to. Drivers can and will advise passengers to put on a seatbelt and very rarely would a driver park in a fashion that would dictate that a passenger exited the vehicle in to the road/traffic side. Additional signage in the vehicle is completely unnecessary.

TKG strongly disagreed with the proposal to change the colour of the PHV licence disc on an annual basis and strongly disagreed with the proposal that licensed PHVs should be more identifiable. They commented that private hire bookings are made directly with a licensed private hire operator and the customer is made aware of the driver and vehicle they will be supplied with before the journey commences. They asked why PHVs need to be more identifiable and said that making them so could lead to an increase in touting activity, which the industry has worked hard to stamp out.

TKG strongly disagreed with the proposal that exemptions from displaying signage should be considered by TfL on a case by case basis.

They strongly disagreed that the information contained on the PHV driver ID card should be displayed on the nearside of the PHV on the front windscreen in the top corner. They said that customers who book private hire services are provided with driver and vehicle details before the journey commences and they can also ask to see a driver's PHV licence before entering the vehicle. The system in place is working well and this additional information on display will only serve to confuse the public.

TKG felt that changes are not needed to the existing PHV hire or reward insurance requirements, as many drivers travel for extended periods of time, and they do not believe it is right to for a person to insure against a risk that is not there. They asked why a driver who was not working would need to have hire or reward insurance in place.

TKG believed that when working PHV drivers should be required to produce evidence to confirm that the PHV they are using is covered by hire or reward insurance.

TKG did not feel that the proposed changes to hire or reward insurance will in any way improve public safety, as there are ample measures already in place to make sure that a driver has the correct insurance whilst carrying out private hire work plus checks are carried out by the police and TfL

TKG commented that TfL should stick to a strict character/criminal record background check and robust system where it is up to the applicant to prove that they are "Fit & Proper". They added that that character references given by people from outside of the UK who cannot be checked should not be accepted as proof of good character unless substantiated.

## **Uber**

Uber supported the principles of introducing an advanced driving test. They expressed concern about how this proposal would be delivered in a timely and cost-effective way. They asked about how it could be implemented more fairly for drivers. They suggested that several components of the driving assessment could be

consolidated into the topographical assessment. They expressed concern about the aggregate costs of becoming a private hire driver and the additional time added to the process.

They questioned whether the advanced driving assessment would be undertaken in the driver's PHV. They said this would be problematic if an applicant had to wait for their vehicle to be licensed before taking the assessment. They expressed concern that many drivers rent their vehicles and would be unable to earn an income from private hire to pay these costs during this period.

They raised concerns that the addition of an advanced driving test will represent another activity adding to the time investment that drivers would be required to make and may deter those with inflexible working patterns from being able to enter the private hire industry. They said it would lead to an increased cost for existing private hire licensees. They expressed concern that it would undermine flexible work. They said thousands of drivers in London operate on a part-time basis, working a few hours per week to earn some income around childcare, study or building a business. They said the additional process and cost to maintain/obtain a licence would threaten to end this attractive form of flexible earning.

They also raised concerns on the impact to private hire passenger services. They said private hire is an increasingly popular service for passengers especially those looking to give up their own cars or to connect with public transport. They raised a concern that by reducing the number of active private hire drivers, the sector would be unable to meet passenger demand. They suggested mitigations and improvements. They said it would be more reasonable to introduce any type of assessment upon licence renewal. This said this would give drivers appropriate time to decide if they would like to continue to operate in the private hire industry and make appropriate career changes if they deem the licensing process too expensive or overly complex. They suggested forcing all drivers to have taken the assessment by a fixed date (i.e. not upon renewal) would increase pressure on operators to support drivers through the assessment, and increase enquiries to TfL and require resourcing to verify assessment completion. They said it would put pressure on assessment centre capacity.

They expressed concern that taxi drivers licensed without the advanced driving assessment would also need to obtain it, adding to the volumes going through a designated provider. They also expressed concern that there is duplication relating to what is required for a driving licence and medical checks which all private hire drivers already go through. They said the eyesight check, for example, which TfL outlines in its proposed test, may be unnecessary since every driver must take a vision test as part of their private hire driving licence medical check. They suggested there is an opportunity to consolidate several components of the driving assessment into the topographical assessment. They called for consolidation to be considered.

Uber supported the notion of introducing a wheelchair assessment though had concerns about costs and burdens on drivers and/or operators, test capacity, and when the requirement is to apply, i.e. upon renewal or at a fixed date for all drivers. They asked for more clarity on whether drivers would need to take the assessment every time they are licensed. They called for the assessment to be run by a disability-focused organisation. They said the likes of Transport for All should at least advise or oversee the process in some way. They raised concerns that the objectives do not have the effect of reducing the number of wheelchair accessible vehicles on the road, so impacting passengers with mobility needs. They agreed with the proposal that wheelchair accessible PHVs should only be driven by PHV drivers who have completed the wheelchair assessment, whilst undertaking a booking.

Uber supported the PHV signage proposals saying it is important that additional burdens imposed on drivers and/or operators are reasonable and proportionate. They raised concerns about a potential negative impact. They called for clarification on the effort required in obtaining and installing the signage whether it will be carried out at the point of PHV licensing/renewal, or whether there will be a requirement to visit a centre by a specified date.

They agreed with the proposal to introduce signage in PHVs which will display customer contact information. They questioned whether it may be more suitable in certain circumstances to contact the operator directly to resolve the issue in the quickest way possible. They said signage should explain the various reporting options to passengers.

They agreed with the proposal to introduce mandatory signage in PHVs which will display dooring cycle safety sign.

They agreed with the proposal the proposal to introduce additional signage in PHVs which will advise passengers to wear their seatbelt.

They agreed with the proposal that these messages should be displayed in one combined sign.

Uber suggested that technology may have a role to play. They said app-based operators could support TfL's objectives by providing additional information through the app. They suggested further information could be provided on the e-receipt that follows the trip.

They agreed with the proposal to change the colour of the vehicle licence disc on an annual basis subject to the burden on drivers and operators being reasonable and proportionate. They said coloured discs seem the best option for a solution that is easily visible for compliance officers and members of the public.

Uber questioned whether the proposal that exemptions from displaying the proposed mandatory signage should be considered by TfL on a case by case basis. They



suggested use of general rules and/or principles, which would also allow for exceptional circumstances on a case by case basis.

The operator supported the principle and objective that the information contained on PHV driver ID cards should be more visible from outside of PHVs. They expressed concern about making drivers feel vulnerable, especially given their personal data would be exposed even when not in the car. They agreed with the proposal that a version of the PHV driver's ID card should be displayed in the front of the windscreen whilst reiterating their concerns in regard to the visibility of ID cards.

Uber stated that the current insurance requirement for the PHV market provides effective and comprehensive liability insurance protection to all third parties.

They did not support any requirement for operators to hold a separate primary hire or reward commercial motor fleet policy. They said the primary insurance obligation rests with the vehicle owner and the UK fleet motor insurance market typically limits insured vehicles to only those registered to the Commercial Company (plus its Directors).

They raised a concern that the fleet insurance option would not work for operator models that involve independent contractors using their own vehicles, often in connection with more than one private hire operator. They said requiring drivers to hold commercial insurance and requiring private hire operators to have fleet insurance would result in double coverage, a 'windfall' for insurance companies and no additional public safety benefit, with a more complex claim process for injured parties. They raised a further concern that the cost could also be too high for many operators, putting them out of business.

They expressed concern that including such a requirement for private hire operators would also introduce complexity for TfL when licensing drivers. They said dual insurance questions claims may happen (as owners/drivers must ensure their vehicle is insured under the Road Traffic Act) and it may restrict the ability of drivers to drive for multiple operators.

They said there are insurance products that operators can purchase to provide contingent protection that would provide assurance to TfL that every booking is covered by private hire insurance, including in circumstances of fraud or non-payment by the vehicle owner. They said this would be far more appropriate and practical than requiring the operator to purchase traditional fleet insurance for vehicles that they do not own.

Uber commented that PHV drivers should be required to produce evidence to TfL Compliance Officers that they are covered by hire or reward insurance, ideally in the form of an electronic copy of the original insurance certificate.

Uber supported efforts to maintain robust background checks for anyone working in private hire. They said it was not possible to drive on the Uber app without having attained an enhanced DBS check as part of the private hire licensing process.

They provided a number of comments around establishing background character information for persons who have lived for an extended period outside the UK or come to the UK from another country. They said the requirement around 'minimum residency in the UK' could prove problematic. They said it may be considered discriminatory and potentially contravenes the worker's rights when their visa or EU status states that they can work in the UK. They expressed concern that immigrants are highly represented in the private hire industry saying it is important that they are able to find stable, reliable work and are not inadvertently discriminated against.

They requested clarification about whether this impacts only new applicants or existing licensees. They questioned whether it would impact existing drivers, and whether current licences would be revoked. They expressed concern about introducing additional checks. They said it is important not to undermine public trust in the robust protections such as the enhanced DBS check and inadvertently create concern about passengers' safety when entering a vehicle before any new process is in place. They said there may be value in introducing 'self-declaration of criminal convictions by applicants'. They also said there are limitations of self-declaration.

## **GMB**

The GMB were not against a form of driving assessment and said that new applicants should take an advanced driving assessment as this would increase safety and all round driver awareness. However, they felt that current drivers would already have this through their experience of driving for a living and that seniority rights should be offered to drivers already in the trade if they have a good driving record and have held a PHV driver's licence for a certain time. They suggested that information about an existing PHV driver's driving and complaint history could be shown when they renew this licence. The GMB also mentioned that they did not want a situation with backlogs as is the case with the English language requirement. They felt that a major impact would be the cost plus drivers may have to take time off of work and have driving lessons.

The GMB said that evidence showed that accident rates were low, especially when compared to bus drivers who do undertake an advanced driving test. They suggested that collisions could be caused by drivers working excessive hours as a result of the downward spiral of driver incomes and increased costs. This was something they felt an advanced driving test would not address but suggested that higher rates would.

The GMB also said that many PHV drivers had completed courses in advanced driving. They asked a number of questions including how PHV drivers who were

trained in the security forces would be differentiated, who would undertake the assessment and if it would be done in-house.

The GMB mentioned that there would be equality impacts too and that drivers who are 45 years or older may struggle with new teaching methods. They did suggest that PHV drivers could spend a day doing a course about driving efficiently and using an electric vehicle, which would help reduce emissions. The GMB also suggested that combining this with an English test would address the issues of cost from having two separate tests. They also felt that drivers who could communicate with an examiner would be able to communicate with the public.

The GMB suggested alternative methods for assessing PHV drivers, including checking insurance or penalty points, and they felt that insurance and the mileage on vehicles between MOTs shows how much driving an individual has done.

The GMB highlighted that some newly licensed taxi drivers have not passed an advanced driving test and other taxi drivers may have undertaken a driving test some time ago but that there may have been changes to the Highway Code since then. They also asked how TfL could know when an individual last drove a taxi and felt that there was a risk of a discriminatory environment being created.

The GMB agreed that introducing a wheelchair assessment for the drivers of all wheelchair accessible PHVs was sensible. They felt that cost could be an issue but expected the operators to bear the cost as a way of encouraging drivers to remain in this area of the private hire industry. They said that if drivers had to pay for the assessment themselves then it is likely that they will leave this area of the industry, resulting in a shortfall in the number of PHV drivers who can meet the demand from passengers who need a wheelchair accessible PHV.

They also said that wheelchair users will be happier knowing that this PHV driver is fully trained. With regards to whether only PHV drivers who have completed the wheelchair assessment should be allowed to drive wheelchair accessible PHVs, the GMB felt that it was necessary for there to be an understanding of the process as well as empathy.

The GMB said that passengers who have booked a PHV will have the operator's details and the information sent to passengers could include TfL's details. They didn't feel that signage in the vehicles was needed and said that this had been discussed at meetings with TfL.

They suggested that contact details for TfL should be displayed to passengers who book a PHV in person at an office and for telephone bookings a recorded message could provide the details or the operator could advise the passenger of these.

The GMB said that a combined sign was not needed as the contact information sign was not needed and that too much signage could possibly be confusing and the legibility may be poor when it is dark. They also mentioned that business clients

preferred PHVs to be free from 'clutter'. The GMB suggested that signage may obstruct the view into the PHV from the outside which could be an issue if an offence is being committed or if there is an issue between passengers and the driver needs assistance. The GMB suggested that a sign covering penalties for verbally abusing or assaulting drivers, or not paying fares would be acceptable. They mentioned that similar signage is displayed in public buildings and that this could be voluntary for PHVs, rather than a mandatory requirement. They also felt that there was no regard to driver safety in the consultation.

On the cycle safety signage, the GMB said that too much signage would be unread and it is easier and more sensible for passengers to be reminded to look out for cyclists as they alight. They suggested that the majority of PHV drivers already do this and that executive and some other drivers will open the door for passengers. They also said that signage advising people to look out for cyclists was not displayed on taxis, buses, coaches or in private vehicles and so was not specifically needed in PHVs.

On signage advising passengers to wear their seatbelt, the GMB said that seatbelts have been mandatory for over 30 years and they found it unlikely that anyone travelling in a vehicle would not be aware of this. They said that if a passenger chooses to ignore the law then the driver reserved the right to refuse them.

On whether the signage should be combined, the GMB stated that there was no need for any signage. They said that further signage would serve no purpose unless TfL could show that there were many people who felt this was an issue.

The GMB agreed with the proposal to change the colour of the PHV licence disc annually. They stated that they had suggested this previously as it would help prevent fraud and make it easier for Compliance Officers to spot discrepancies. They also mentioned that their proposal of an external solution located on a plate would allow drivers' details to be shown as well as the date.

The GMB said that the issue with changing the colour annually would be that a driver could get a licence disc with a colour one month before the colour changes. They said that an alternative would be 24 different colours to identify the month and year of issue. The GMB stated that their proposed plate and external driver identifier would solve this issue and also stop the use of licensed vehicles by unlicensed drivers. It would also allow the use of vehicles for private purposes by other people. The GMB also said that enforcement stops touts but signage would not.

The GMB did not agree with the proposals regarding the information on the driver's ID being visible from outside of PHVs. They mentioned that it is a legal requirement that PHV drivers wear an ID badge with their name, photo and licence number on but that taxi drivers only wear a metal badge which does not have their photo or name on. They also said that passengers know the driver's details when they make a booking.

The GMB stated that 95 per cent of the time the passenger is provided with the vehicle make and model, registration, driver's name and licence number and often the driver's mobile number.

The GMB felt that information displayed in the windscreen could be used against drivers on social media. They also said that there could be problems with a driver using a PHV but a different driver's ID being displayed. They also felt that too much information about a driver could make them feel vulnerable, especially with aggressive passengers.

The GMB said that the current arrangement of considering exemptions from displaying signage should continue.

The GMB questioned how the costs of the proposals would be met if implemented and mentioned that costs for drivers all increasing.

The GMB stated that hire or reward insurance should be in place at all times unless there is proof that the vehicle concerned is not being used for private hire purposes. They highlighted that many drivers work during specific periods (e.g. school term times) and for certain periods do not require hire or reward insurance. They said that some other PHV drivers are from overseas and may go away for lengthy periods and their vehicles will not be used.

The GMB said that operators who have their own fleet of PHVs will have fleet insurance in place, as they own or lease the vehicles, and that this is standard practice within any industry that has its own fleet of vehicles.

The GMB mentioned that a copy of the hire or reward insurance is carried which can be produced when anybody asks to see it. They also stated that Plan Insurance's taxi insurance checker would be the perfect remedy as this would show if a vehicle was insured and if it was the type of insurance in place.

The GMB felt that the figures for PHVs not having hire or reward insurance were very low but that a 'one strike and out' rule would help prevent incidents of PHVs not having hire or reward insurance in place.

The GMB said that fleet type of insurance provides protection against uninsured drivers but should not be necessary if operators are checking insurance. They also said that a TfL database would be more practical and would help with prosecuting drivers who did not have the appropriate insurance.

The GMB said that if the proposal was to be introduced it would be discriminatory as a driver who had worked for several years and had a full no claims bonus may have to pay the same as a new driver or one with a history of accidents. They also said that drivers who have access to one vehicle and leave the trade could lose their own claims discount and may have to pay a premium. The GMB did not accept that a non-annual policy attracts a no claims bonus which may reduce costs to drivers. The

GMB said that small operators may struggle with the cost of running secondary fleet policies and could go out of business because of the high costs.

The GMB said that many PHV drivers work for more than one operator and asked who the driver would be insured with if there was a fleet policy in place.

The GMB said that drivers already carry evidence of hire or reward insurance and couldn't see why having a copy on a smartphone or tablet would not suffice.

The GMB stated that fleet insurance would not work if the driver owns or rents a PHV, it would only work if the operator owned the fleet. They believed that if this proposal was enforced it would create a restriction on trade as drivers would be forced to work for one operator. This would affect small operators who occasionally require additional drivers.

With regards to producing evidence of hire or reward insurance, the GMB suggested a solution used in Ireland with an insurance document displayed in the windscreen which could be inspected immediately without the need to ask to see further paperwork. They said that alternatively a paper or digital copy of the policy were the only choices.

The GMB did not feel able to suggest a solution with regards to establishing background character information on people who lived outside of the UK for a longer period or come to the UK from another country.

### **Licensed Private Hire Car Association (LPHCA)**

The LPHCA strongly disagreed with the proposals to introduce an advanced driving assessment for new and existing private hire drivers. The association expressed concern that only six per cent of their members supported these proposals. They said to get insured for hire or reward insurance at all, and at a viable cost, drivers needed to have an exemplary driving record. They said many London PHV drivers have driven for many years without fault accidents and or penalty points, so to retrospectively test such drivers would be unnecessary.

They called for a dialogue with TfL prior to the advanced driving test being introduced. They said many drivers would also have undertaken specialist driving training. They said training would be far more appropriate than testing. They called for lessons to be learned from the implementation of the English language requirement.

The association strongly opposed the proposals to introduce a wheelchair assessment for the drivers of wheelchair accessible PHVs and that only PHV drivers who have passed the wheelchair assessment should be allowed to drive wheelchair accessible PHVs saying nearly every London PHV carries elderly, disabled, special needs and vulnerable passengers and many PHVs are not specialist vehicles, but nevertheless they are the preferred mode of door-to-door transport for such

passengers. They said they are supportive of measures that improve disabled vehicle provision. They raised concerns that around 90 per cent of disabled passengers are not wheelchair bound and rely on normal PHVs for their transport, with many actually preferring non-wheelchair accessible vehicles. They said most PHV drivers with wheelchair accessible PHVs will have already undertaken training and or testing for such vehicles. They said the notion that TfL should do a separate wheelchair assessment is unnecessary.

They called for TfL to have further dialogue with the London PHV trade representatives, London's specialist PHV providers and disabled groups like the Disabled Persons Transport Advisory Committee (DPTAC) to discuss how private hire could play a greater role in providing appropriate vehicles. They said there are considerable qualifications in place for Specialist Disabled Vehicles that are already widely used by London's PHV drivers and operators who provide such services.

The association expressed concern that TfL setting up its own enhanced wheelchair assessment for the drivers of all wheelchair accessible PHVs would be costly and unnecessary. They also questioned whether TfL would be better placed to consider, modular disability vehicle training, when applicable, rather than blanket testing to avoid the types of problems that have ensued with the English language tests, 'one size fits all' approach. They called for a comprehensive list of exemptions for those already qualified to drive wheelchair accessible PHVs if TfL were to embark on its own enhanced wheelchair assessment for the drivers of all wheelchair accessible PHVs. They said they believe the great majority of drivers will already be qualified.

The association strongly disagreed with the proposals to display signage inside PHVs which had customer contact information, cycle safety information and a message advising passengers to wear their seatbelt. They strongly disagreed with proposals that these messages should be combined in one sign. They stated the private hire trade representatives and the wider London trade had consistently said that PHVs should have as little signage as possible displayed to both the previous Public Carriage Office and Transport for London for safety reasons. They said because PHVs are privately booked there is no need to display signs and signage. They said this confuses the public and would vary with signage regimes across the country.

They strongly disagreed with the proposal to change the colour of the PHV licence disc on an annual basis.

They strongly disagreed with the proposal that licensed PHVs should be more identifiable saying PHVs should not be more identifiable because they are privately booked and there are far more appropriate and safer methods than signage to identify PHVs and drivers. They stated all vehicles have a number plate, which cannot be easily compromised. They said TfL has previously introduced a range of

measures such as supplying the number plate and other details prior to the passengers being picked up.

The association raised a concern that it would be a retrospective move to put more signage on PHVs with today's technology already being used by the majority of PHVs.

They objected to more signage being put on a PHV because they said the vehicle would be confused as a taxi and it would confuse tourists and members of the travelling public regionally. They raised concerns that false signage has been used to aid and abet terrible sexual assaults.

They expressed concern that where PHVs have a lot of signage, drivers may be harassed to take people illegally which would compromise driver safety. They said PHVs must be pre-booked and unlike taxis that are hailed they must not be publicly hired. They said too much signage compromises that. They stated that TfL's recent policy on signage should not be changed. They said any front or side facing signage or branding should not be introduced.

They strongly agreed with the proposal that exemptions from displaying signage should be considered by TfL on case by case basis.

They strongly disagreed with the proposals that the information contained on the PHV driver ID card should be visible from the outside of PHVs and a version of the ID card placed on the front windscreen saying they would attract passengers towards unlicensed vehicles. They also said these measures would compromise drivers' safety and confuse the public, particularly foreign visitors and people from outside of London. They raised concerns that displaying a driver's personal details would compromise their safety and wellbeing because they would be revealing personal information to strangers who may use it for criminal purposes.

They said PHVs are booked and passengers already receive detailed information, electronically about how to call or contact the PHV operator. They also said drivers' photographs are now sent electronically where possible and drivers already have to wear a current TfL badge which gives all the details necessary to facilitate the driver's legitimacy. They concluded that more requirements will only serve to confuse and compromise a system that is already working fine.

The association considered that no changes are needed to the existing PHV hire or reward insurance requirements. They said hire or reward insurance should not be in place at all times the vehicle is licensed as a PHV because many drivers work seasonally or for periods such as term time and insure appropriately. They also said when a driver is broken down or subject to an accident, which will often not be their fault, they would normally transfer their cover to the vehicle being used from the one being worked upon.



The association raised concerns about this proposal. They said it was unnecessary because licensed operators must check their drivers' insurance. They said cover by the Motor Insurance Bureau (MIB) indemnity scheme would be provided in the event of no insurance. They also said TfL's own compliance figures showed that insurance issues on PHVs in London were not common.

The association said PHV drivers should be required to produce evidence that the PHV they are using is covered by hire or reward insurance and that all forms of evidence of this outlined in the consultation were acceptable. They also said they would welcome a copy of a fleet schedule (also known as a blanket policy) being accepted as evidence. They said enforcement officers also have the ability to check against the MIB database in real time. They said the police allowed drivers seven days to produce documentation. They stated that they did not know of any evidence to support any proposed changes to insurance requirements. They raised concerns that the proposals would increase costs, bureaucracy and would waste time.

The association said that industry representatives and the former regulator in London (the PCO) looked at the options for establishing background character information for persons who have lived for an extended period outside the UK or come to the UK from another country. They said the options for doing more than is done already by TfL are limited because the UK enhanced checking system is just that a UK system. The association suggested TfL should however follow up checks and references supplied robustly and deal with any flaws it has discovered in their systems.

### **The Private Hire Board (PHB)**

The PHB strongly disagreed with the proposals to introduce an advanced driving test assessment for new PHV drivers and existing PHV drivers. They stated that PHV drivers require at least three years of driving experience and must be aged over 21 and that there was no evidence that another test would improve safety. They did suggest that training on 'green' driving techniques, as was done in the past with the Energy Saving Trust, would be of greater benefit.

The PHB disagreed with the proposals to introduce a wheelchair assessment for the drivers of wheelchair accessible PHVs and that only drivers who had completed the assessment should be allowed to drive wheelchair accessible PHVs. They said that drivers are trained by the councils in wheelchair accessibility and companies have their own Passenger Assistance Training processes. They added that the proposal will just be tests and assessments for little purpose.

The PHB strongly disagreed with displaying customer contact information and signage advising passengers to wear their seatbelt inside PHVs. They disagreed that cycle safety information should be displayed inside PHVs or that the signage should be combined. They stated that passengers have pre-booked, and so know the contact information, and will receive a text with details of their booking. They

mentioned that further window signage could block the passengers' view, potentially creating an accident. The PHB said that drivers had a legal responsibility to remind passengers to wear their seatbelt. They also stated that signage of this nature can increase the likelihood of passengers insisting PHVs are taxis, and PHV drivers being forced to ply for hire which can increase the safety risk to the drivers. They added that many drivers are attacked and their safety is also paramount.

The PHB neither agreed nor disagreed that the colour of the PHV licence disc should be changed on an annual basis but strongly disagreed that PHVs should be more identifiable. They stated that all signage on PHVs causes misunderstandings amongst passengers about whether a vehicle is a taxi or PHV. They mentioned that these vehicles will be pre-booked and that passengers will be texted information about their vehicle. They also stated that there is an impact on driver safety when they have to refuse a passenger who hasn't made a booking. They mentioned that many drivers are attacked and that their safety is also important.

The PHB agreed that exemptions from displaying signage should be considered by TfL on a case by case basis.

The PHB strongly disagreed that the information on the PHV driver ID card should be visible from outside of PHVs and this being displayed in the top corner of the front windscreen. The PHB stated that drivers are experiencing abuse, mainly from taxi drivers, on social media. They also mentioned that passengers receive licence details of PHV drivers when they make a booking.

The PHB did not feel that any changes were needed to the hire or reward insurance requirements for PHVs. They mentioned that the vehicles are always covered by the Motor Insurance Database (MID) and the vehicle owner, driver and operator can all check the validity of insurance.

The PHB said that PHV drivers should be required to produce evidence of hire or reward insurance and that all of the options proposed should be ok if it is on the MID. They felt that any proposed changes would just be additional costs for an industry which is already insured.

The PHB suggested that where a person has lived overseas for an extended period of time or come to the UK from another country then there should be the equivalent of a DBS check in their country of domicile or if this is not available they should have lived in the UK for three years.

The PHB also felt that this had not been a true consultation but a tick box exercise to enable TfL to do what it wanted.

## **Romanian Uber Drivers in London (Facebook)**

The association agreed with proposals to introduce an advanced driving assessment for new and existing PHV drivers saying that it should be an advanced driving assessment in accordance with the difference between PHVs and black cabs.

They agreed with the proposal to introduce a wheelchair assessment for the drivers of all wheelchair accessible PHVs. They also agreed that that only PHV drivers who have completed the assessment should be allowed to drive wheelchair accessible PHVs.

They strongly disagreed with proposals to introduce PHV signage displaying customer contact information. They disagreed with introducing additional signage advising passengers to look out for cyclists when opening vehicle doors. However they did support introducing additional signage to advise passengers to wear their seatbelt. They said displaying seatbelt signage on the exterior is enough to make the vehicle more visible.

They agreed with the proposal that PHVs should be more identifiable and strongly disagreed with the proposal that exemptions from displaying signage should be considered by TfL on a case by case basis.

They strongly disagreed with the proposal that information contained on the PHV driver ID card should be visible from outside of PHVs and strongly disagreed that a version of the PHV driver's ID card should be displayed on the windscreen. They expressed concerns about drivers' identity information being used by others and expressed concerns about the difference between PHVs and black cab drivers.

They called for an electronic copy of original insurance certificate to be accepted and did not support other changes to existing private hire or reward insurance.

## **United Private Hire Drivers (UPHD)**

The UPHD responded to the Consultation with two submissions.

The UPHD strongly agreed with the proposal to introduce an advanced driving assessment for new and existing PHV drivers.

The UPHD strongly agreed with the proposal to introduce a wheelchair assessment for the drivers of PHVs which are wheelchair accessible and for only PHV drivers who had completed the assessment being allowed to drive wheelchair accessible PHVs.

For the driving test and wheelchair assessment proposals they commented that mandating further testing without making any provision for training or for how this training and testing will be paid for is not in itself going to improve standards, adding that driver training must be provided by private hire operators according to standards set by TfL as a condition of licensing. They felt that operators must also pay for the

assessment costs for their drivers. UPHD continued that testing must be independent and licensed operators must be prohibited from testing or certification to prevent fraud. They also stated that drivers must have the opportunity to retake a test if they fail.

The UPHD agreed with the proposal to display signage inside PHVs which had customer contact information, cycle safety information, and a message advising passengers to wear their seatbelt

They neither agreed nor disagreed that these messages should be displayed in one combined sign.

They disagreed with any requirement to carry private hire operator branded information in a PHV, adding that it is the PHV operator's responsibility to advise the customer of how they can be contacted during a journey to make a complaint or to recover lost property or any other reason.

The UPHD stated that this should be done at the point of booking and a reminder can be sent via text. They commented that operators need to do a much better job of explaining how the industry is regulated and what recourse the consumer has with the regulator. They felt that this should also be better explained to drivers by TfL, adding that permanently affixing operator contact details within the vehicle would interfere with the driver's ability to work for multiple operators.

The UPHD continued that the TfL branded sign should also advise of prohibition of drinking alcohol or smoking in the vehicle and passengers should be warned that violence or hate speech directed towards the driver will be prosecuted, as will making off without payment. They felt all signs must be capable of removal at the end of a shift as PHVs are not taxis and are used privately and it would be unreasonable for a driver to have to display regulatory information in their vehicle during private use.

The UPHD neither agreed nor disagreed with the proposal to change the colour of the PHV licence disc on an annual basis.

The UPHD neither agreed nor disagreed with the proposal that licensed PHVs should be more identifiable, adding that PHVs and drivers are already exceptionally well identified. The UPHD continued that details for both are checked by the operator and sent to the passenger in advance of the booking. They said that private hire drivers are required to wear a TfL picture ID and the PHV licence is displayed. They added that all details can be checked by the passenger before entering a PHV and that passengers can also use the TfL online licence checker in real time.

The UPHD did not oppose additional signage provided it did not include operators' livery and restrict the ability of a driver to work for multiple operators.

The UPHD agreed with the proposal that exemptions from displaying signage should be considered by TfL on case by case basis.

They disagreed that the information contained on the PHV driver ID card should be visible from outside of PHVs.

The UPHD have stated that they agree with the proposal that a version of the PHV driver's ID card should be displayed on the nearside of the PHV on the front windscreen in the top corner.

The UPHD agreed that driver and vehicle licence numbers should be displayed on the outside of the vehicle but not the driver's name or picture. They felt that too often they see innocent drivers abused on social media and this would make matters worse with little appreciable benefit. They mentioned that passengers can cross reference PHV and private hire driver licence numbers with their booking information and ask to see the driver's ID before entering the vehicle. They suggested that an additional picture ID should be displayed on the nearside front window facing into the vehicle as this would help the passenger to identify the driver during the journey in the event they need to report any issues.

The UPHD did not feel that any changes to the existing PHV hire or reward insurance requirements were needed.

The UPHD strongly believed PHVs should not have to carry hire or reward insurance during periods when the vehicle is not being used for hire and reward purposes, commenting that private hire work can be seasonal and some private hire drivers choose to spend some of year outside the UK. Therefore, it is not reasonable to expect drivers to have hire or reward insurance for such periods of time.

The UPHD felt that when working PHV drivers should be required to produce evidence to confirm that the PHV they are using is covered by hire or reward insurance and that a copy of the certificate in any format should be acceptable. They commented that they did not have evidence nor had they seen any evidence that the current practices were insufficient.

The UPHD also said that a more comprehensive review of safety was required and TfL had excluded some organisations from participating in this review in favour of operators and other stakeholders.

The UPHD also submitted a supplementary document for consideration, in which they made the following points:

- The proposals under consultation are not nearly sufficient to improve the safety and security of drivers and passengers
- A wider scope is essential and this should encompass driver and passenger safety rather than just passengers

- The UPHD submission to the DfT Task and Finish workstream on safety should be considered as part of this review
- TfL is still not pursuing a safety management systems approach to regulation and enforcement
- That TfL believes 'that problems of insufficient capacity can be magic-ed away by yet more testing'.
- There is an epidemic of violence being perpetuated against minicab drivers in London today with 50% having experienced physical assaulted, 78% have been threatened with violence and 83% have been victims of hate crime – all while working as a licensed private hire driver in London. They stated that TfL cannot continue to consult with drivers on safety while refusing to engage with them properly and ignore the threats drivers face.

The UPHD also included in their response a link to the results of a PHV driver survey. This is available at <http://www.uphd.org/wp-content/uploads/2018/06/UPHD-survey-2018-PPT.pdf>

### **Licensed Taxi Drivers Association (LTDA)**

The LTDA strongly agreed with the proposals to introduce an advanced driving assessment for new and existing PHV drivers. They said the proposals are in line with requirements for other licensing authorities across the UK, and in New York. They said taxi drivers in London invest around 8,000 hours of training for the Knowledge of London and advanced driving assessment, in order to obtain a licence. They called for PHV drivers to undertake an advanced driving test. They raised a concern that the lack of formal driver training for PHV drivers in London, compounded by the unique challenges of driving in London, has led to a number of accidents and collisions. They said in the All Party Parliamentary Group (APPG) on Taxis' inquiry into the future of the London taxi trade last year recommended that the Mayor and TfL should introduce an enhanced driving test for all PHV drivers.

The LTDA strongly agreed with proposals to introduce a wheelchair assessment for the drivers of wheelchair accessible PHVs and that only PHV drivers who have passed the wheelchair assessment should be allowed to drive wheelchair accessible PHVs

They strongly agreed with displaying information inside PHVs which had customer contact information, cycle safety information and a message advising passengers to wear their seatbelt and neither agreed nor disagreed that these messages should be displayed in one combined sign.

They commented that with the proliferation of tinted windows on PHVs it is often impossible to see the current disc. They stated all PHVs need to be clearly identifiable so that a passenger who has pre-booked can easily check the vehicles' licensing status either before entering or after exiting the vehicle. They said elsewhere in the country a licence plate attached to the rear of the vehicle is the

preferred option. They said this is a tried and trusted method and called for it to be adopted in London. They said in London taxis are prevented from having any tinted glass, they said for safety and parity the same should apply to PHVs.

They did not agree with the proposal that exemptions from displaying signage should be considered by TfL on case by case basis. They agreed with the proposal that the information contained on the PHV driver ID card should be visible from the outside of PHVs and should be displayed on the nearside of the PHV on the front windscreen in the top corner.

The LTDA stated hire or reward insurance should be in place at all times the vehicle is licensed as a PHV. They said PHV operators should be required to have hire or reward insurance in place covering all of the private hire drivers and vehicles available to them. They said both of these proposals were recommended by the APPG on Taxis report. They said an original certificate should be produced as evidence. They raised a concern that currently it is too easy for private hire drivers to cancel a hire or reward policy in favour of a social domestic and pleasure (SDP) insurance policy. They said that the substantial savings from cancelling the policy are attractive to private hire drivers earning low wages, and very difficult to detect and prevent as an ANPR check only shows if a vehicle is insured, not the level or type of insurance. They said it is also difficult for TPH Compliance Officers to verify what type of policy applies to a PHV. They said the only certain method of guaranteeing that all licensed PHVs are insured for hire or reward at all times is to require the operator to insure all vehicles working on its platform. They said the additional benefit of cheaper bulk insurance could be passed on to private hire drivers who currently have to buy individual policies.

The LTDA said all countries have differing standards or criminal and character checking agencies. They said it is important that whenever a passenger gets into a vehicle they have confidence that their driver has passed UK background checks and is a “fit and proper” person. They said the only method of providing a guaranteed checkable history is to require a minimum residency period in the UK before a licence can be issued. They called for a 5 year minimum residency period.

### **London Cab Drivers Club (LCDC)**

The LCDC strongly agreed with the proposals to introduce an advanced driving assessment for new and existing PHV drivers saying public safety is paramount for all drivers who transport members of the public. They said driving skills should be the highest they could possibly be. They raised concerns about the large number of PHV accidents and poor standards of driving. They said many drivers come from EU countries and further afield and have not undertaken a UK driving test. They welcomed introducing a level of professionalism to the industry.

The LCDC strongly agreed with proposals to introduce a wheelchair assessment for the drivers of wheelchair accessible PHV's and that only PHV drivers who have

passed the wheelchair assessment should be allowed to drive wheelchair accessible PHVs.

They strongly agreed with displaying information inside PHVs which had customer contact information, cycle safety information and a message advising passengers to wear their seatbelt and agreed that these messages should be displayed in one combined sign.

They did not agree with the proposal to change the colour of the PHV licence disc on an annual basis. They strongly agreed with the proposal that PHVs should be more identifiable. They said vehicles with tinted windows made it hard to see details of the existing roundel.

They strongly disagreed with the proposal that exemptions from displaying signage should be considered by TfL on a case by case basis.

The LCDC agreed that information contained on the PHV driver ID card should be visible from outside of PHVs and strongly agreed it should be displayed on the front windscreen. They said there should be a larger ID card so the public could check the details if they needed to.

The LCDC considered that changes are needed to the existing PHV hire or reward requirements. They said hire or reward insurance should be in place at all times the vehicle is licensed as a PHV. They said PHV operators should be required to have hire or reward insurance in place covering all of the private hire drivers and vehicles available to them. They called for PHV vehicles that operate in a 24/7 economy to have insurance that mirrors the working patterns of PHV drivers. They said PHV drivers should be required to produce evidence to confirm that the vehicle they are using is covered by hire or reward insurance and an original certificate should be made mandatory for all PHVs to carry. They raised a concern that there have been cases where PHV drivers have been involved in an accident and it has not been possible to see or read insurance documents.

In regard to background checks the LCDC called for all applicants for a PHV licence to have lived in the UK for a minimum of three years so a sufficient DBS check and other checks could be done.

## **Unite**

Unite agreed with the proposal to introduce an advanced driving assessment for all private hire drivers commenting this will help to improve driving standards across the private hire industry and thus support passenger, driver and road user safety and as part of TfL's Vision Zero initiatives.

Unite said that the Integrated Impact Assessment (IIA) commissioned by TfL shows that this proposed measure will carry benefits for the health of drivers, passengers



and road users. Unite highlighted that according to the IIA the proposal will also have environmental and economic benefits for operators.

Unite stated that their cab section puts passenger safety and wellbeing as a priority, and they endorsed all measures which will improve safety standards. Their members in the taxi section called for parity between private hire and taxi regulations with advanced driving assessments for all PHV drivers being the same as the advanced driving assessments for taxi drivers. Unite also called for a fair and equal licencing system for taxi and PHV drivers.

Unite stated they are concerned about the high numbers of PHV casualties from January to September 2017 as reported in the IIA. They said that these figures evidenced the need for PHV drivers to have more stringent driving assessments in order to improve passenger and road user safety. Unite fully supported the driver assessment content in appendix B of the consultation document.

Unite believed that all new private hire drivers should pass a Vocationally Related Qualification (VRQ) before they are issued with a private hire licence. They said that the VRQ should consist of various modules including enhanced driving, English and numeracy tests, an overview of legislation and disability needs of passengers.

Unite agreed with the proposal to introduce an advanced driving test for all existing PHV drivers on the next renewal of their licence because of the changing nature of streets with increased cycle lanes and a move towards autonomous and electric vehicles as part of the Mayor's Transport Strategy and 'healthy streets' initiatives, will signal a need for existing drivers to have further training and awareness of their vehicles and new road routes.

Unite agreed with the proposal to introduce a wheelchair assessment for the drivers of all wheelchair accessible PHVs and would go further in asking for equality and diversity training to be included as part of the enhanced wheelchair assessment.

They stated that wheelchair accessible PHVs should only be driven by private hire drivers who have completed the wheelchair assessment, whilst undertaking a booking. Unite felt that passengers with disabilities should be treated with dignity, care and regard and have access to suitable vehicles and trained drivers.

Unite commented that the lack of such training means that some drivers may be less likely to be aware of the needs and rights of disabled passengers and this can contribute to unacceptable practices, for example ignoring their attempts to hail a vehicle, carrying them in an unsafe manner, refusing to carry them at all or charging extra for the service.

Unite agreed with displaying signage inside PHVs which had customer contact information, cycle safety information and a message advising passengers to wear a seatbelt.

They felt that private hire passengers have a right to a complaints procedure which is independent of the operators, and that recent reports of operators not following the complaints procedure are alarming. Displaying customer contact information would be fundamental in ensuring TfL are able to investigate and deal with passenger complaints about driver and operator behaviour and accessibility issues.

Unite felt it was right that signage is in place to support passenger and cyclist safety as well as supporting drivers in avoiding accidents. Unite advised that the cyclist sign should be separate and on each side because passengers alight on both sides.

Unite added that the proposed seatbelt sign should be an illustration to inform overseas visitors.

Unite stated that all safety signage should be clear and distinct. They felt that combining all signage in one display sticker/area may confuse passengers, specifically those who suffer with vision impairment conditions or learning difficulties or where English is not their first language.

Unite recommended that TfL commission additional advertising to inform the public of how they can make a private hire related complaint and who this can be made to as there is low awareness of TfL's responsibilities regarding PHVs.

Unite said the driver's licence number and licensing area should also be clearly visible for the passenger. They commented that signage is an important safety feature for passengers. Displaying customer contact information can also be particularly valuable in combating discrimination and a useful tool to empower vulnerable and at risk passengers.

They added that further consideration should be given to alternative formats for signage such as large print and Braille as a way of making signage accessible to passengers with vision impairments.

Unite agreed with the proposal to change the colour of the vehicle licence disc on an annual basis as they believe this would improve detection and enforcement to ensure that only those with valid licences are able to operate as PHV drivers. Unite recommended that the expiry date on vehicle licence discs should be bold, clear and distinct so as to assist in compliance and detection.

Unite stated that their taxi section members feel strongly that there should be as little signage as possible on the outside of PHVs as this makes it easier for touts which poses serious concerns for passenger safety. Anything that encourages touting should be avoided as ultimately this puts passengers at risk. They also said that private hire regulations must reflect the spirit and intention of the 1998 PHV Act and added that app operators should not show vehicles available for immediate hire.

Unite disagreed with the proposal that exemptions from displaying the proposed mandatory signage should be considered by TfL on a case by case basis

commenting there should not be any exemption as this would affect TfL's approach to passenger safety and TfL's regulation of taxis and PHVs should be fair, equal and consistent.

Unite agreed with the proposal for all PHV driver IDs to be clearly visible on the outside of their vehicles to assist with passenger safety and prevent touting and other fraudulent practices commenting that a driver's identification should be clearly identifiable by passengers before entering the vehicle as a precautionary and safety measure. Unite continued there should be no exemptions to this important safety measure and they called for tinted windows to be outlawed in PHVs, as this also impacts on passenger safety.

Unite believed that PHVs should require hire or reward insurance at all times commenting that this is already a requirement for taxis and there should be consistency in applying this important regulation.

Unite said that TfL should stop people in London who don't hold a PHV licence from being able to drive the vehicle when it is "off duty". Unite said that if this change happens then the PHV would need to have hire or reward insurance permanently.

Unite called on operators to regularly check to see if their drivers are carrying hire or reward insurance.

Unite commented that PHV drivers should be required to produce evidence to TfL compliance officers that they are covered by the applicable hire or reward insurance policy for inspection and that PHV drivers should carry original certificates in their vehicles. They concluded that this is the standard for taxi drivers and has not had any adverse impacts on that trade.

Unite did not believe that the current requirements for private hire licensees with respect to DBS checks were "fit for purpose" and felt that the high numbers of sexual assaults and passenger complaints reported against PHV drivers provides evidence of a need for more robust vetting of PHV drivers.

Unite commented that national variations in the treatment of criminal convictions can vary greatly from nation to nation, even within EU member states adding that this evidences a need for a reasonable level of investigation of potential PHV drivers which should include a three year UK checkable history of cautions and convictions. They said that this is endorsed by their members in the taxi section as a way to mitigate against any difficulties in verifying the authenticity of a Certificate of Good Conduct (COGC). Unite and their members regarded passenger safety as paramount and called for stringent measures to ensure the safety of passengers.

Unite also called for greater consistency in respect of previous convictions, criminal records checks and training in parity with the requirements for taxi drivers.

## **Gett UK**

Gett said that PHV drivers should demonstrate a higher standard of driving than that required for a standard driving licence as professional drivers are carrying fare paying passengers in an urban environment.

Gett supported the proposal to introduce a wheelchair assessment for all new PHV drivers operating a wheelchair accessible PHV but added that there is a risk that the assessment discourages PHV drivers from choosing to purchase or use such a vehicle. Furthermore, drivers already using such a vehicle should be given a reasonable timeframe through which to complete any additional assessment.

Gett added that it is also important to note that all PHV drivers should be aware of the skills required to provide assistance to transport users with additional needs. This can include assisting a passenger into a vehicle and storing the wheelchair in the boot, or helping those with assistance animals. PHV drivers should be fully aware of their obligations under the Equality Act in this regard.

They stated PHVs should have the appropriate signage required to be easily identifiable to customers and enforcement officers. This included the proposal that TfL customer complaints procedures are clearly displayed in PHVs.

Gett supported having customer complaints procedures clearly on display though did not believe this would be practical for the operators' procedures. They felt that London is best served by PHV drivers accepting rides for multiple operators.

They added requiring drivers to display signage for multiple operators could be a disincentive to competition and be practically difficult to enforce. Gett would, however, support clear requirements on digital access (e.g. via an app) to operator complaints procedures.

Gett supported efforts to improve the visibility of PHVs through signage on the exterior of their vehicle, as this would assist toward marking out dangerous unregistered PHVs. Gett indicated this new signage should again be non-operator specific due to drivers using multiple platforms.

Gett supported the proposal to display a driver ID card on the front windscreen which would assist efforts to ensure the customer gets into the correct vehicle with the appropriate licensed driver. However they state it is impractical to think that consumers will check the photo ID of the driver on the front windscreen against the driver inside the vehicle, and lighting at night could make this difficult. They believed the best place to display a driver's photo ID is through the operator's platform or app; although this will only be available if a passenger books a journey through that platform. This ensures that the customer has clear information about the driver before, during and after they have completed their journey. The driver's information being available in an app can also provide assurance to passengers and allow them to make complaints about a driver in a more informed manner if required.

Gett stated that all taxis and PHVs should have their hire or reward insurance details available on an open API platform which could be checked by TfL, operators and enforcement officers. This could be similar to the UK police force's Automatic Number Plate Recognition (ANPR) software which allows the police to identify whether the vehicle in front of them is insured or not.

Before offering a ride to a driver, the operators' platforms could automatically check if insurance or licensing exists for that driver and vehicle. If it doesn't, the ride would not be offered. Similar software for TfL enforcement officers would allow them to instantly identify whether a taxi or PHV is properly insured.

Gett supported the introduction of a minimum three-year enhanced Disclosure and Barring Service check for drivers, to ensure that a full and comprehensive period of criminal history is available for consideration as part of the licensing process.

### **City of Westminster**

Westminster agreed with the proposals to introduce an advanced driving test for all PHV drivers and wheelchair assessment for drivers of all wheelchair accessible PHVs but neither agreed nor disagreed with the proposal that only PHV drivers who had completed the wheelchair assessment should be allowed to drive wheelchair accessible PHVs.

Westminster strongly agreed with the proposal to display customer contact information inside PHVs and agreed with the proposals to display cycle safety information and also signage advising passengers to wear their seatbelt inside PHVs. They neither agreed nor disagreed on the signage being combined.

Westminster strongly agreed with the proposals to change the colour of the PHV licence disc annually and that licensed PHVs should be more identifiable. They disagreed that exemptions should be considered on a case by case basis.

Westminster agreed that that the information displayed on the PHV driver ID card should be visible from outside of PHVs and that a version of the ID card should be displayed in the top corner of the front windscreen.

Westminster said that changes to the existing PHV hire or reward insurance requirements were needed and stated that hire or reward insurance should be in place at all times a vehicle is licensed as a PHV. They said that PHV drivers should be required to produce evidence that the PHV they are using is covered by hire or reward insurance and this should be in the form of a letter from the insurer or insured person.

## **London Borough of Croydon**

Croydon strongly agreed with the proposals to introduce an advanced driving test for all PHV drivers and wheelchair assessment for drivers of all wheelchair accessible PHVs. They also strongly agreed with the proposal that only PHV drivers who had completed the wheelchair assessment should be allowed to drive wheelchair accessible PHVs.

Croydon strongly agreed with the proposals to display customer contact information, cycle safety information and also signage advising passengers to wear their seatbelt inside PHVs. They neither agreed nor disagreed on the signage being combined but did suggest that London should aspire to have bike racks on the rear of vehicles as they have in Copenhagen.

Croydon agreed with the proposal to change the colour of the PHV licence disc annually and strongly agreed that licensed PHVs should be more identifiable.

Croydon strongly agreed that that the information displayed on the PHV driver ID card should be visible from outside of PHVs and agreed that a version of the ID card should be displayed in the top nearside corner of the front windscreen.

Croydon did not have an opinion on whether any changes were needed to the existing PHV hire or reward insurance requirements or whether PHV drivers should be required to produce evidence to confirm that the PHV are using is covered by hire or reward insurance. They stated that they supported the adoption of Intelligent Speed Adaptation in all TfL tendered and licensed road transport services as part of delivering the Vision Zero aims.

## **London Borough of Ealing**

Ealing strongly agreed with the proposals to introduce an advanced driving test assessment for new or existing PHV drivers and also to introduce a wheelchair assessment for the drivers of wheelchair accessible PHVs. They agreed that only PHV drivers who have passed the wheelchair assessment should be allowed to drive wheelchair accessible PHVs. They felt that the driving assessment should also include techniques to reduce emissions when driving and cycle safety awareness.

Ealing strongly agreed with the proposal to display customer contact information, cycle safety information and also signage advising passengers to wear their seatbelt inside PHVs. They neither agreed nor disagreed with combining the messages in one sign.

Ealing strongly agreed with the proposal to change the colour of the PHV licence disc annually and that PHVs should be more identifiable.

They felt that PHVs should be more clearly identifiable, have “advance booking only” wording, as they have in some other parts of the country, and that this would help

customers and enforcement authorities. They disagreed that exemptions should be considered on a case by case basis.

Ealing neither agreed nor disagreed that the information on the PHV driver ID card should be visible from outside of PHVs but strongly agreed that with the proposal for a version of the PHV driver ID card to be displayed in the top corner of the front windscreen.

Ealing felt that changes were needed to the existing PHV hire or reward insurance requirements. They felt that hire or reward insurance should be in place at all times a vehicle is licensed as a PHV and that PHV operators should be required to have hire or reward insurance in place covering all of the drivers and vehicles available to them. They felt that drivers should be required to produce evidence that the PHV they are using is covered by hire or reward insurance and this should be in the form of an electronic copy of the original certificate. They felt that these changes would help prevent unlicensed drivers from using PHVs.

Ealing said that employment history, criminal record checks and address checks should be performed to help best establish background character information for people who have lived for an extended period outside the UK or come to the UK from another country.

### **London Borough of Enfield**

Enfield stated that they remain generally supportive of any measures which improve the safety of the travelling public and lead to a better level of customer service. They did mention that in the near term the proposals may lead to a fall in the number of available PHV drivers, that TfL should monitor this and take action if there is an impact on availability in outer London, particularly late at night, where public transport provision is not as good. They also acknowledged that the short-term impacts may be offset by future benefits in terms of improved passenger safety and service quality.

### **London Borough of Harrow**

Harrow agreed with the proposals to introduce an advanced driving test assessment for new PHV drivers and existing PHV drivers. They mentioned that they use PHV services to transport passengers with special needs to schools, colleges or day centres and receive complaints about drivers driving too fast, being unable to read the road ahead, having near misses or hitting the kerb. They welcomed a driving assessment and suggested that it could include elements of basic knowledge and understanding of English, as this is an area where they also receive regular complaints.

Harrow strongly agreed with the proposal to introduce a wheelchair assessment for the drivers of wheelchair accessible PHVs and that only drivers who had completed the assessment should be allowed to drive wheelchair accessible PHVs.

Harrow agreed customer contact information and cycle safety information should be displayed inside PHVs. They strongly agreed that that signage advising passengers to wear their seatbelt should be displayed and agreed that the signage should be combined. They also suggested that a dedicated website/call centre could be set up which would allow passengers to log issues and help identify PHV operators or drivers who require retests or additional training.

Harrow agreed that the colour of the PHV licence disc should be changed on an annual basis and that PHVs should be more identifiable. Harrow also said that the current plate system does allow easy identification of PHVs but that they would like to see the name of the PHV operator the driver works for displayed although acknowledged that this may not be practical as some drivers work for more than one operator or move between operators. They said that this is a concern for them when they request that a particular driver is not used because of complaints and the driver changes operators and starts working on a different route. Harrow disagreed that exemptions from displaying signage should be considered on a case by case basis.

Harrow agreed that the information on the PHV driver ID card should be visible from outside of PHVs that this should be displayed in the top corner of the front windscreen.

Harrow agreed that changes were needed to the existing PHV hire or reward requirements and stated that PHV operators should be required to have hire or reward insurance in place covering all of the drivers and vehicles available to them.

Harrow felt that PHV drivers should be required to produce evidence to confirm that the PHV they are using is covered by hire or reward insurance and that this should be in the form of a photocopy of the original certificate.

Harrow suggested obtaining references from community groups, churches or voluntary groups for PHV driver applicants from overseas or who have lived outside of the UK for an extended period.

### **London Borough of Redbridge**

Redbridge agreed with the proposals to introduce an advanced driving test assessment for new PHV drivers and existing PHV drivers as PHV driving is a profession and should have high standards. They suggested that an advanced driving test should be taken when the first licence is applied for and then repeated every 10 years. They felt that the proposal should ensure greater safety for passengers.

Redbridge strongly agreed with the proposal to introduce a wheelchair assessment for the drivers of wheelchair accessible PHVs and that only drivers who had completed the assessment should be allowed to drive wheelchair accessible PHVs. They felt that this would make it safer for wheelchair users and that the effect on



wheelchair users must be considered. They stated that the advanced driving test and wheelchair assessment should be linked.

Redbridge strongly agreed with displaying customer contact and cycle safety information inside PHVs and agreed that signage advising passengers to wear their seatbelt should also be displayed inside PHVs. However, they disagreed that that it should be combined in one sign and suggested that some information could be displayed on-street. They also said that young people want to know who they can contact if they are concerned about a driver, that the legal aspects of not wearing a seatbelt or being involved in a collision with a cyclist should be considered and that for signage plain English, visibility and additional languages all need to be taken into consideration.

Redbridge agreed that the colour of the PHV licence disc should be changed on an annual basis and strongly agreed that PHVs should be more identifiable. They felt that the general public, including adults at risk and young people need to be able to identify PHVs and not be misled by unlicensed drivers. They felt that PHVs being clearly identifiable would be beneficial for all agencies and the general public. They also stated that making PHVs easier to identify would make enforcement and focussing on offences easier and that the points raised were safety issues with insurance implications.

They neither agreed nor disagreed that exemptions should be considered on a case by case basis.

Redbridge strongly agreed that the information on the PHV driver ID card should be visible from outside of PHVs but neither agreed nor disagreed on this being displayed in the top corner of the front windscreen.

Redbridge felt that hire and reward insurance should be in place at all times a vehicle is licensed as a PHV and that PHV operators should be required to have hire and reward insurance in place covering all of the private hire drivers and vehicles available to them. They asked who would enforce this and said the practicalities of it would need to be considered. They also felt that drivers should be required to produce evidence of hire and reward insurance and this should be in the form of the original certificate. They felt that having the correct insurance in place and operators and drivers being easily identifiable would help stop 'rogue' operators or drivers, leading to improved public safety.

Redbridge asked the question of whether anything similar to DBS checks was available internationally. They also suggested having a qualifying period of residency so as non-family references would be available and suggested that the Roads Traffic Policing Command have arrangements in place which may be relevant.

## **London Borough of Southwark**

Southwark strongly agreed with the proposals to introduce an advanced driving test assessment for new PHV drivers and existing PHV drivers. Southwark welcomed the inclusion of the Safe and Fuel Efficient scheme in the advanced driving assessment. They suggested that the assessment should also include the drivers' knowledge and behaviour with regards to vehicle idling, including when picking up, setting down and waiting. They also suggested that Highway Code questions should be asked to test the drivers' knowledge about offences and penalties for idling. Southwark agreed with the proposal to require all existing PHV drivers to take the advanced driving assessment when they renew their PHV driver's licence as they want to ensure that all PHV drivers are aware of the air quality issues and how to mitigate these.

## **London Assembly Transport Committee**

The London Assembly Transport Committee said it is right that Londoners expect the skills of private hire drivers to be on a par with licensed taxi drivers. Passengers place their trust in these services to provide safe journeys and all reasonable steps should be taken to ensure this. They supported TfL's proposal to join neighbouring licensing authorities in requiring PHV drivers to undertake an advanced driving assessment, designed to reflect the specific challenges of driving in London.

The Committee noted that TfL is proposing to introduce a wheelchair assessment for drivers of wheelchair accessible PHVs, but there are no proposals to improve the service received by passengers with other forms of disability.

They said they have previously recommended that all PHV drivers should be required to undertake disability awareness training. There is, for instance, an ongoing problem with some PHV drivers illegally refusing to carry passengers with assistance dogs. They understood TfL is seeking to enforce the requirement to carry assistance dogs, but better training up front should be part of this effort. Disability awareness training should be added to the advanced driving training that all PHV drivers undertake.

The Committee believed that TfL should be working with partners to introduce fixed, licence plate-based signage for PHVs as this is the best way for passengers to know they are getting into a legitimate vehicle. Other measures to ensure licence information is displayed are welcome, but all are open to abuse and are not sufficient.

They opposed the suggestion that any TfL branding, including the roundel, should appear in PHV signage. TfL branding is easy for unlicensed drivers to replicate, but conversely its presence could give passengers a false sense of reassurance that the vehicle and driver are licensed and approved by TfL for unbooked journeys.

The Committee stated that the proposal to have coloured licence discs is inappropriate on the grounds that there is no reason to assume passengers will

become familiar with what colour up-to-date licence discs are supposed to be and that unlicensed drivers will easily be able to replicate the approved colour.

The Committee supported the proposal to have the PHV driver ID displayed on the front windscreen of the vehicle, which should be double-sided so passengers inside the vehicle can also see it. It also needs to be large enough for the information to be viewed at a glance.

The Committee responded that the consultation document lacks clarity in relation to the insurance proposals. They thought that TfL had previously implemented the Committee's recommendation that hire or reward insurance be in place at all times for the duration of a PHV licence.

They continued that TfL is proposing to weaken this requirement in light of the role played by the Motor Insurers' Bureau (MIB), adding that TfL has not set out what role the MIB plays or why TfL think this changes the necessity for hire or reward insurance to be in place at all times.

The Committee stated that even where the MIB provides protection for uninsured losses, this should be seen as a backup, not a substitute for the requirement to make sure all PHVs have appropriate insurance at all times.

### **Theresa Villiers MP**

Theresa Villiers said that PHV drivers should be obliged to undertake disability equality training in the same way licensed taxi drivers are and is pleased to note the proposal to introduce a wheelchair assessment for all PHV drivers who drive a wheelchair accessible PHV

She supported the proposal to introduce an advanced driving assessment for PHV drivers and shares TfL's view that a PHV driver carrying fare paying passengers in an urban environment should be able to demonstrate a higher standard of driving than that required for a standard driving licence.

She supported the proposal to investigate the possibility of introducing a minimum three-year enhanced Disclosure and Barring Service check as part of the vetting procedure

Theresa Villiers also added that consideration should be given to asking the PHV trade to start moving to cleaner greener vehicles.

### **Association of British Insurers (ABI)**

The ABI responded to part two of the consultation and specifically the questions regarding insurance.

The ABI did not think that any changes were needed to the existing PHV hire or reward insurance requirements.

The ABI stated that their understanding of the reason for potentially requiring hire or reward insurance to be in place at all times is because of the perception that there are a significant number of PHV drivers without insurance but that they were not aware of evidence that shows that a large number of PHV drivers are failing to comply with the law or TfL's requirements.

The ABI did state that there was some anecdotal evidence that some PHV drivers may not have adequate cover in place when their vehicle is being used as a PHV and requiring hire or reward insurance at all times when the vehicle is licensed may improve compliance and make enforcement easier. However, they also stated that they were not aware of any conclusive evidence that would justify changes to the current regime and these may be disproportionate to the risk posed by uninsured PHV drivers.

The ABI also felt that it was important that any regulations do not inhibit innovation in the insurance market as this would be detrimental to PHV drivers and customers. They felt that the range of different policy options available is necessary to reflect the different working patterns of PHV drivers. They also noted that drivers' working patterns, vehicles and claims history will determine the assessment of risk and that a 'one size fits all' approach would not benefit drivers or their customers.

The ABI felt that requiring PHV operators to have fleet insurance may have a negative impact on the market as a whole by restricting the availability of operators to get cover. Although they were not in principle opposed to operators being obliged to ensure that their drivers have the appropriate cover, they felt that the regulatory regime would need to be sufficiently robust to ensure that operators adequately meet these requirements. They asked for more information on how the enforcement regime would function to address a number of challenges.

The ABI mentioned the role of the Motor Insurers' Bureau (MIB), the MIB providing compensation to the victims of uninsured drivers but this not being a substitute for having the appropriate cover in place. The ABI felt that the best way to tackle uninsured drivers is to work closely with the MIB to ensure that the mechanisms in place to enforce the PHV insurance requirements are effective.

The ABI did not foresee any significant challenges for insurers relating to a requirement for drivers to carry proof of insurance whilst using a vehicle as a PHV but did question the value of displaying a certificate at all times.

They highlighted the change in the Deregulation Act 2015 which removed the legal requirement for an insurer to seek the surrender of the insurance certificate in order to cancel a policy. This means that drivers could possess what looks like a valid certificate despite cancelling the policy. The ABI felt that relying on paper certificates was an outdated approach and instead strongly encouraged working with the MIB and making use of the Motor Insurance Database.

## **Plan Insurance**

Plan Insurance strongly disagreed with the proposals to introduce an advanced driving test assessment for new or existing PHV drivers or a wheelchair assessment for the drivers of wheelchair accessible PHVs. They did not feel that it is TfL's responsibility to assess the driving skills of PHV drivers and that this should be done by the DVLA and MoT. They also felt that the additional cost would be an unnecessary burden on some drivers.

They also strongly disagreed with the proposal that only PHV drivers who had completed the wheelchair assessment should be allowed to drive wheelchair accessible PHVs as they felt that disabled passengers would complain about anyone who could not operate their vehicle properly and the market would regulate itself in this regard, as long as suitable rules exist and these are adhered to.

Plan Insurance strongly disagreed with displaying signage inside PHVs which had customer contact information, cycle safety information and a message advising passengers to wear their seatbelt. They also strongly disagreed with combining this information into one sign and did not feel that the signage was required as drivers can advise passengers accordingly.

They disagreed with colour coding the PHV licence disc as making the public aware of this would be too onerous. They did state that it could help enforcement officers but that there could be more advanced ways using technology to achieve this.

They agreed with the proposal that licensed PHVs should be more identifiable. They felt that the rules regarding exterior signage needed clarifying, as certain operators have exemptions, and allowing more of operators' individual branding could be beneficial for passengers.

They strongly agreed that exemptions from displaying signage should be considered on a case by case basis.

Plan Insurance strongly disagreed with PHV driver ID being visible from the outside of PHVs or this being in the top corner of the front windscreen as they didn't feel that it was fair for drivers' personal information to be on display to the general public and the VRM should be used to report any problems with poor driving or antisocial behaviour to the operator.

Plan Insurance felt that no changes were needed to the existing PHV hire or reward insurance requirements. They did feel that the enforcement systems could be greatly improved to automate the detection of uninsured/inappropriately insured vehicles.

They stated that having hire or reward insurance at all times would be unworkable for some drivers and operators as they only use their vehicles for PHV purposes at certain times of the year. Plan Insurance said that these drivers and operators only

take out short term cover but requiring hire or reward insurance at all times would increase their costs.

Plan Insurance felt that the proposal for PHV operators to cover all PHVs available to them at all times was unjustified. They mentioned that an operator cannot insure a vehicle on the driver's behalf as a vehicle cannot be insured twice and so operators would need to take out what is known as a contingency liability policy. They felt that this was unnecessary, as the MIB's compensation scheme already covers 3<sup>rd</sup> party claim costs involving uninsured drivers, and it would also be quite costly. They thought that there would also be issues with costs if a PHV driver works for several operators.

Plan Insurance did feel that when working PHV drivers should be required to produce evidence that the PHV they are using has hire and reward insurance and that this could be in the form of an electronic copy of the original certificate.

### **Zego Insurance**

Zego said that hire or reward insurance should be in place at all times the vehicle is operating as a PHV.

They supported the proposal that when working should PHV drivers be required to produce evidence to confirm that the PHV they are using is covered by hire or reward insurance and this should be in the form of an electronic copy of the original certificate.

Zego commented that the 2016 amendments to the PHV requirements for hire or reward insurance were implemented in order to remove any ambiguity as to what exact level of cover is required of a private hire operator at any given time. Zego continued that these measures forced those applying for a PHV licence to obtain a full traditional insurance policy that would cover them on a fixed-term basis, regardless of the actual working patterns of the holder.

Zego believed that this has created a situation where a part-time PHV driver may seek to avoid having hire or reward insurance or is forced into working full-time to cover the fixed cost of an inappropriate annual policy.

Zego continued that for the PHV applicant who has made the decision to obtain their PHV driver's licence, this has often been done on the premise of the work offered being flexible and thus matching their required hours in a given week, month or year. For the individual driver looking to work flexibly alongside another job, the need to purchase a traditional insurance policy and thus make a significant upfront investment does not match the reality of their planned income. These significant upfront costs increase the barriers to obtain a PHV licence. Zego said that this could be seen as financial discrimination against those who wish to enter this market on a flexible working basis.

They believed the recent emergence of platform PHV operators has allowed for the ease of movement for PHV drivers to choose as and when they accept a job from a specific operator. PHV drivers have the ability to register with multiple PHV operators and have the flexibility to accept or decline jobs.

They added that the flexible nature of PHV operator platforms means that a blanket PHV fleet policy would not be the most suitable way to meet the requirement. Fleet policies would be drawn up for each PHV operator by a traditional, annual insurance provider that will need to create a policy based upon vehicle, applicant and business criteria.

Zego said that fleet policies do not incentivise responsible driving for the individual as they are not directly impacted financially by their driving behaviour and one of the underlying inputs of creating such policies would be the forecasted aggregate working hours of the driver fleet for the year. This would be a key factor in estimating the premium of the policy.

Zego believed that a move towards fleet insurance could unjustly target those operating in a part-time/flexible capacity.

### **Better Bankside Business Improvement District (BID)**

Better Bankside BID agreed with proposals to introduce an advanced driving assessment for new and existing PHV drivers commenting that this works to ensure the enhanced safety of passengers, drivers and other road users. They stated that the test is especially important for new PHV drivers and they would like to see PHV drivers who have been involved in a vehicle accident of any type be required to re-take the advanced driving assessment prior to being allowed to return to work.

They agreed with the proposals to introduce a wheelchair assessment for all drivers of all accessible vehicles and that only PHV drivers that have completed the TfL wheelchair assessment should be allowed to drive wheelchair accessible PHV's.

They strongly agreed with the proposals to introduce additional signage in PHVs which will display customer contact information and a message advising passengers to wear a seatbelt. They agreed with cycle safety information signage being displayed, though strongly disagreed that these messages should be displayed in one combined sign.

Better Bankside BID felt all relevant signage should be placed in the appropriate location within the vehicle and should be accessible to all passengers, as information in appropriate locations will ensure passengers are able to access this without having to ask the driver or search around the vehicle.

Further, they recommended that the information is provided in a range of accessible formats, including large print.

Better Bankside BID supported the proposal that licensed PHVs should be more identifiable and requested that TfL provide additional information on how identifying vehicle operating status will be monitored and enforced.

They disagreed with the proposal that exemptions from displaying signage should be considered by TfL on case by case basis.

Better Bankside BID agreed with the proposal that information contained on the PHV driver ID card should be visible from outside of PHVs, and the proposal that it is displayed on the nearside of the PHV on the front windscreen in the top corner.

They did not consider any changes were needed to the existing PHV hire or reward insurance requirements.

Better Bankside BID said that PHV drivers should be required to produce evidence to confirm that the PHV they are using is covered by hire or reward insurance.

They added that appropriate evidence of insurance should be displayed clearly and at all times within the vehicle. This would ensure that passengers are provided with an additional level of safety, as well as reassure passengers that should an accident occur the appropriate channels are in place to move forward with a complaint.

Better Bankside BID recommended that it be mandatory for all drivers to register for the DBS Update Service and that the results of the DBS be clearly displayed within the vehicle.

Better Bankside BID felt that a Certificate Of Good Conduct (COGC) should be included at the time of the PHV driver's licence application though appreciate that for certain individuals a COGC may be difficult to provide. As such, they recommended that these applicants provide certified evidence from a trusted source (i.e. Embassy, etc.) verifying the reliability of the applicant's non-criminal claims. Further, after reviewing the consultation document, Better Bankside BID felt that additional clarification is needed regarding exemptions from the COGC.

## **Victoria BID**

Victoria BID strongly agreed with the proposals that new and existing PHV drivers should take an advanced driving test.

They also strongly agreed with proposals to introduce a wheelchair assessment for all drivers of all accessible vehicles and the proposal that only PHV drivers that have completed the TfL wheelchair assessment should be allowed to drive wheelchair accessible PHV's.

They asked whether the assessments would be outsourced and if they are how the quality of the assessments would be checked.



Victoria BID strongly agreed with displaying signage inside PHVs which had customer contact information, cycle safety information and a message advising passengers to wear a seatbelt.

They added that whilst it may make sense to have signs regarding cycle 'dooring' on the offside, other signs may be best placed on the rear of the head rests.

Victoria BID agreed with changing the colour of the PHV licence disc on an annual basis on the grounds that it would make it simpler for members of the public to identify a vehicle that has a valid licence, although it only works if members of the public are informed of what colour indicates a valid licence. Further to this they asked what communications were planned to ensure members of the public know what coloured PHV licence disc to look out for and they stated that a robust, ongoing communications plan will be needed.

Victoria BID agreed with the proposal that licensed PHVs should be more identifiable and strongly agreed with the proposal that exemptions from displaying signage should be considered by TfL on a case by case basis

Victoria BID agreed with the proposal for the information contained on the PHV driver ID card to be visible from outside of PHVs and that it should be displayed on the nearside of the PHV on the front windscreen in the top corner.

Victoria BID stated that hire or reward insurance should be in place at all times the vehicle is licensed as a PHV and that PHV operators should be required to have hire or reward insurance in place covering all of the private hire drivers and vehicles available to them.

They said that that when working PHV drivers should be required to produce evidence to confirm that the PHV they are using is covered by hire or reward insurance in the form of a photocopy of the original certificate.

Victoria BID said a number of steps could be considered to address the issue of how background checks can best be established, including self-declaration of criminal convictions by applicants, references from professionals or those of standing in the country of origin or a minimum residency in the UK requirement for example. Self-declaration seems open to abuse. References from professionals or those of standing in the country of origin appears partly suitable but may also be open to abuse. They said that a minimum residency in the UK is perhaps the most suitable of the three options TfL has provided, but backed up by no criminal behaviour or cautions having being evidenced during that period together with references from professionals or those of standing in the country of origin.

## **20's Plenty for Us**

20's Plenty for us indicated that they had no opinion on the individual proposals though wished to raise the following point.

They were concerned that consideration had not been given in the Taxi and Private Hire Action Plan in regard to encouraging compliance with speed limits. They continued that taxis and PHVs are over-represented in the casualty statistics and the Vision Zero Action Plan seeks to focus on vehicle speed. They said they have been pressing TfL and the GLA to take its role as regulator seriously and, as is being undertaken with London buses, to ensure in the longer term compliance with speed limits across London. 20's Plenty for Us stated they don't seek to impose additional costs on the taxi and PHV fleet but feel it appropriate as technology advances, to set a date by which all new taxis or PHV vehicles need to be fitted with a mandatory speed limiter. They wished to see a date (e.g 2021) for the introduction of mandatory Intelligent Speed Assistance and from then on all new vehicles would need to comply with the regulation.

### **The Royal Society for the Prevention of Accidents (RoSPA)**

The society stated that their response had been produced following consultation with RoSPA's National Road Safety Committee. They provided comments for consideration on specific technical aspects of the proposal.

RoSPA strongly agreed with the proposals to introduce an advanced driving assessment for new and existing PHV drivers.

The society said PHV drivers are professional drivers who carry fare paying passengers. They said it is essential that they demonstrate a higher standard of driving than that required for a standard driving licence. They said passengers and other road users have a right to expect an enhanced level of safety from PHV drivers. They said taxi drivers are required to take and pass an advanced driving assessment, and it is fair and sensible for PHV drivers to do the same, especially given the evidence of poor driving standards by some licensed PHV drivers. They stated that the proposed PHV driving assessments should be based on the previous Driver and Vehicle Standards Agency (DVSA) taxi driving assessment, and be specific to London, reflecting the challenges of driving in London and include role specific questions on driving a taxi or PHV in the capital.

They said that existing PHV drivers should be required to take the advanced driving assessment on the next renewal of their licence. They said they welcomed this way of managing the number of drivers who would need to take a test. They said it would also help to ensure that existing PHV drivers meet the same standards as new PHV drivers and new and existing taxi drivers. They said this would provide a consistent level of driving skills assessment of all licensed taxi and PHV drivers.

The society strongly agreed with the proposal to introduce a wheelchair assessment for the drivers of all wheelchair accessible PHVs and for the assessment to be similar to that taken by taxi drivers. They said this would help drivers to meet their obligations under the Equality Act and ensure consistency across the taxi and PHV industry to improve the service to wheelchair users

RoSPA agreed with the proposals to introduce signage displaying customer contact information saying it would be useful to have clear information for passengers on how to contact TfL if they want to comment on a private hire journey. This feedback should help TfL and PHV companies and drivers to improve passenger safety.

RoSPA welcomed the requirement for the signs to advise passengers to wear their seatbelt and to look out for cyclists when getting out of the vehicle. They said taxis and PHVs are involved in about 10 per cent of serious cyclist accidents in London where the door of a vehicle had been opened into the path of an oncoming cyclist.

RoSPA agreed that the PHV driver's ID card should be more visible from outside of the vehicle saying it made sense for the proposed version to be displayed on the windscreen. They said it would help passengers to be sure that the right person was driving the vehicle, before they get in it. They said given that the current PHV driver ID card is credit-card sized, it is difficult for many passengers to see the information clearly, especially in the dark or poor weather.

The society agreed with the proposal to require hire or reward insurance cover to be in place at all times. They said this would make clear that such cover was in place, even if it was claimed that the vehicle was in personal use, at the time. They said they did not have enough information or understanding of the operation of the fleet hire or reward insurance cover in the private hire vehicle industry to comment on the detail of the proposals.

They were not in a position to respond to the question about background character checks.

### **Leonard Cheshire**

The charity strongly supported the elements of the consultation that benefited people with a disability, strongly agreeing with the proposal to introduce a wheelchair assessment for the drivers of all wheelchair accessible PHVs. They also strongly agreed with the proposal that only drivers who have completed the TfL wheelchair assessment should be allowed to drive wheelchair accessible PHVs.

### **Suzy Lamplugh Trust (SLT)**

The SLT strongly agreed with the proposals to introduce an advanced driving test assessment for new or existing PHV drivers. They also strongly agreed with the proposals to introduce a wheelchair assessment for the drivers of PHVs which are wheelchair accessible and for only PHV drivers who had completed the assessment being allowed to drive wheelchair accessible PHVs.

The SLT strongly agreed with displaying signage inside PHVs which had customer contact information, cycle safety information and a message advising passengers to wear their seatbelt. They neither agreed nor disagreed with combining this

information into one sign but did say that the contact information should include several options including phone and email.

The SLT neither agreed nor disagreed with changing the colour of the PHV licence disc on an annual basis but strongly agreed that PHVs should be more identifiable to enable passengers to better distinguish between taxis and PHVs. SLT said that whether exemptions are considered on a case by case basis would depend on the terms of the exemption.

The SLT strongly agreed that the information displayed on the PHV driver ID card should be visible from the outside of PHVs and that a version of the ID card should be displayed on the front windscreen in the top corner.

The SLT said that PHV drivers should be required to produce evidence that the PHV they are using is covered by hire or reward insurance and that this should be in the form of a photocopy of the original certificate.

The SLT suggested looking at the processes used for other professions (e.g. teachers, care workers) in order to establish background character information for people who have lived overseas for an extended period or come from another country.

### **NHS North West London Collaboration of Clinical Conditioning Groups - Patient Transport team**

The NHS North West London strongly agreed with proposals to introduce an advanced driving test assessment for new and existing PHV drivers.

They also strongly agreed with the proposals to introduce a wheelchair assessment for the drivers of PHVs which are wheelchair accessible and for only PHV drivers who had completed the assessment being allowed to drive wheelchair accessible PHVs.

NHS North West London strongly agreed with displaying signage inside PHVs which had customer contact information, cycle safety information and a message advising passengers to wear their seatbelt. They did not support the proposal that messages should be combined in one sign.

They strongly agreed with changing the colour of the PHV licence disc on an annual basis and that licensed PHVs should be more identifiable.

They strongly agreed that the information displayed on the PHV driver ID card should be visible from the outside of PHVs and that a version of the ID card should be displayed on the front windscreen in the top corner.

They also strongly agreed that exemptions from displaying signage should be considered on a case by case basis.

They said hire or reward insurance should be in place at all times the vehicle is licensed as a PHV and PHV operators should be required to have hire or reward insurance in place covering all of the private hire drivers and vehicles available to them.

They felt that drivers should be required to produce evidence that the PHV they are using is covered by hire or reward insurance and this should be in the form of an original certificate.

### **VIP Systems**

VIP Systems submitted a comprehensive response covering vehicle and driver signage and identification options.

They agreed with the proposal to introduce signage inside PHVs with contact information, cycle safety information and information advising passengers to wear their seatbelt. They agreed that this should be combined with the no-smoking signage, double-sided and displayed on the passenger door windows.

VIP Systems did not agree with changing the colour of the PHV licence disc on an annual basis as there would be two different colours in use. They also highlighted that fluorescent signage would not be permitted.

They felt that the statement in the consultation about PHVs outside of London displaying certain signs was disingenuous and it would be more accurate to say that outside of London hardly any PHVs did not have a front and rear licence plate and also door signs. They enclosed a number of different vehicle signage options including signage using digital technology, a variety of brackets and fixings, variable information and features for visually impaired passengers. Examples of signage from other parts of Europe were also included in their response. Information about driver identification was enclosed too.

### **Private Hire News**

Private Hire News strongly disagreed with the proposals to introduce an advanced driving test assessment for new or existing PHV drivers. They felt that an advanced driving assessment could be useful in some ways but could not understand why the requirement would be mandatory as opposed to optional. They thought that PHV drivers already performed to a high standard. Private Hire News stated that if the requirement was essential then it should be low cost and drivers should be incentivised to undertake the test.

Private Hire New disagreed with the proposal to introduce a wheelchair assessment for the drivers of wheelchair accessible PHVs and strongly disagreed with the proposal that only PHV drivers who had passed the assessment should be allowed to drive wheelchair accessible PHVs. They felt that an advanced wheelchair

assessment sounded too excessive but that it would be good to give guidance on how to assist wheelchair users.

Private Hire News neither agreed nor disagreed with displaying contact information or cycle safety information inside PHVs but strongly disagreed with displaying signage advising passengers to wear a seatbelt, although they did agree with signage being combined and in just one place.

They felt that signage on cycle safety or wearing seatbelts was over the top and that PHV drivers should check that their passengers are wearing their seatbelt. They also mentioned that PHV drivers could offer to open the door for them or warn them to be careful when opening the door. They did not feel that seatbelt signage would make a difference as to whether passengers wore a seatbelt.

Private Hire New strongly disagreed with the proposal to change the colour of the PHV licence disc on an annual basis but strongly agreed that PHVs should be more identifiable. They felt that changing the colour of the PHV licence disc each year could become tedious and confuse the general public. They felt that it was useful for passengers to be texted information about their PHV and driver. They also suggested that a small sign inside each PHV could provide TfL's contact details so as passengers could call TfL to check if a driver is licensed.

They neither agreed nor disagreed with exemptions continuing to be considered on a case by case basis.

Private Hire News neither disagreed nor agreed that information contained on the PHV driver ID card should be visible from outside of PHVs or that a version of the ID card should be displayed in the top corner of the front windscreen. They did feel that ID cards should be both inside and outside of the vehicle but not excessively large. They thought that exemptions may not be needed if the signage is sensible but would be required if it was excessive and over the top.

Private Hire News did not feel that any changes were needed to the existing PHV hire or reward insurance requirements. They felt that the requirements for producing evidence should be the same as they are for normal drivers. They didn't feel that requiring copies of insurance certificates to be carried in vehicles was of much use.

Private Hire News felt that enhanced DBS check information should be shared with authorities inside and outside of the UK.

### **Professional Driver Magazine**

Professional Driver Magazine strongly disagreed with the proposals to introduce an advanced driving test assessment for new or existing PHV drivers. They felt that the cost and administration of the proposals would be a burden on the private hire sector and that thorough checks of driving licences as part of the application process should be sufficient.

They disagreed with the proposal to introduce a wheelchair assessment for the drivers of wheelchair accessible PHVs and the proposal that only PHV drivers who had passed the assessment should be allowed to drive wheelchair accessible PHVs. Professional Driver Magazine felt that if a driver has invested in a wheelchair accessible PHV then it should be assumed that they know what they are doing.

Professional Driver Magazine strongly disagreed with proposals to display contact information, cycle safety information or signage advising passengers to wear their seatbelt inside PHVs and for signage to be combined. They felt that this was a ridiculous proposal, that passengers would not pay attention to the signs and that the private hire industry did not want PHVs plastered with health and safety related signage.

Professional Driver magazine strongly disagreed with the proposal to change the colour of the PHV licence disc on an annual basis. They also strongly disagreed that PHVs should be more identifiable and felt that if PHVs were more identifiable people would assume they are taxis and would attempt to hail them. They also felt that executive chauffeur cars do not require any signage at all but that if some operators did want to display signage then it should be up to them and not mandated by TfL. They also disagreed that exemptions from displaying signage should be considered on a case by case basis.

Professional Driver Magazine strongly disagreed that the information on the PHV driver ID card should be visible from outside of PHVs or that a version of the driver ID card should be displayed in the top corner of the front windscreen. They felt that this was pointless bureaucracy, that nobody would read it and that many operators provide driver information using apps or text messages.

Professional Driver Magazine felt that changes were needed to the existing PHV hire or reward insurance requirements. They felt that hire or reward insurance should be in place at all times a vehicle is licensed as a PHV and that PHV operators should be required to have hire or reward insurance in place covering all of the drivers and vehicles available to them. They stated that different operators use different business models, including part-time sub-contractors and responsibility should sit with both independent drivers and operators. They also felt that TfL should focus on checking insurance rather than drivers' skills or language ability.

Professional Driver Magazine felt that drivers should be required to produce evidence that the PHV they are using is covered by hire or reward insurance and this should be in the form of an electronic copy of the original certificate.

Professional Driver Magazine didn't understand what was meant by "character information" but did suggest extending the DBS check to uncover criminal activity.

## **5. Next steps**

We are now reviewing the responses to the consultation and comments made and will publish our response to the issues raised.

Any recommended changes to the private hire licensing requirements will be carefully considered and details of approved changes will be published.



## Appendix A: Detailed analysis of comments

Summary of responses to Question 3: Please let us have any comments about the proposal to introduce an advanced driving assessment for all PHV drivers and for existing PHV drivers to take the assessment when they renew their licence

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
<b>Base</b>	<b>3488</b>		<b>160</b>		<b>558</b>		<b>1,571</b>		<b>532</b>	
	Count	%	Count	%	Count	%	Count	%	Count	%
<b>Overall Acceptance (Net)</b>	<b>1,694</b>	<b>49%</b>	<b>84</b>	<b>53%</b>	<b>304</b>	<b>54%</b>	<b>821</b>	<b>52%</b>	<b>283</b>	<b>53%</b>
Yes/should be a requirement/advanced testing/ driving skills are needed	860	25%	23	14%	69	12%	163	10%	139	26%
No/should not be a requirement/drivers are already licenced/current standards are sufficient	719	21%	52	33%	208	37%	586	37%	125	23%
Should be done immediately/as soon as possible/do not wait for renewal period	29	1%	0	0%	0	0%	4	0%	2	0%
Should be a one-time occurrence/not at each licence renewal	23	1%	3	2%	9	2%	20	1%	6	1%
Should be a training course/not an assessment	19	1%	3	2%	4	1%	15	1%	3	1%
Depends on the components of the assessment	11	0%	2	1%	5	1%	8	1%	2	0%
Should be ongoing/at renewals/repeat	10	0%	0	0%	2	0%	6	0%	1	0%
Other overall acceptance mentions	86	2%	8	5%	18	3%	52	3%	15	3%
<b>Driver Qualifications/ Requirements (Net)</b>	<b>1,073</b>	<b>31%</b>	<b>63</b>	<b>39%</b>	<b>214</b>	<b>38%</b>	<b>608</b>	<b>39%</b>	<b>163</b>	<b>31%</b>
All drivers should have to have a UK driving licence/pass a UK driving test	231	7%	12	8%	32	6%	101	6%	42	8%
Should only be required for new drivers/not current drivers	225	6%	23	14%	70	13%	194	12%	29	5%
Should be required for drivers with points/accidents/poor driving history only	132	4%	10	6%	49	9%	103	7%	27	5%
Dependent on circumstances/certain	125	4%	16	10%	45	8%	105	7%	23	4%

experienced drivers should be exempt											
Taxi drivers should have advanced testing	114	3%	6	4%	28	5%	85	5%	24	5%	
Should have good awareness of London/be tested on London knowledge	79	2%	5	3%	10	2%	18	1%	8	2%	
PHV drivers should be held to the same standards as taxi drivers	76	2%	1	1%	3	1%	8	1%	9	2%	
English language required/tested for English language	54	2%	1	1%	4	1%	20	1%	5	1%	
Should have an understanding of road signs	52	1%	1	1%	2	0%	3	0%	8	2%	
Minimum time period/residency requirement to be licenced	36	1%	1	1%	4	1%	21	1%	2	0%	
English language test is unnecessary/unfair	34	1%	2	1%	3	1%	11	1%	1	0%	
Should have background check completed	12	0%	0	0%	0	0%	3	0%	0	0%	
Other driver qualifications/requirements mentions	92	3%	4	3%	16	3%	46	3%	14	3%	
<b>Safety (Net)</b>	<b>1,393</b>	<b>40%</b>	<b>23</b>	<b>14%</b>	<b>53</b>	<b>9%</b>	<b>170</b>	<b>11%</b>	<b>184</b>	<b>35%</b>	
PHV drivers lack good/standard driving skills/are dangerous	965	28%	14	9%	21	4%	75	5%	125	23%	
It would make the roads safer/less accidents/injuries/deaths	299	9%	1	1%	6	1%	25	2%	39	7%	
PHV drivers are unfamiliar with area/roads and too focused on sat-navs causing accidents/dangerous conditions	182	5%	4	3%	6	1%	12	1%	14	3%	
It would ensure safety/safety first	156	4%	1	1%	1	0%	14	1%	21	4%	
It would ensure safety for the passenger/customer	147	4%	3	2%	9	2%	26	2%	18	3%	
It would ensure safety for PHV drivers	30	1%	3	2%	6	1%	18	1%	4	1%	
It would ensure safety for women	5	0%	0	0%	0	0%	0	0%	0	0%	
It would ensure safety for disabled passengers	4	0%	0	0%	1	0%	1	0%	0	0%	

It would ensure safety for children	2	0%	0	0%	1	0%	1	0%	0	0%
It would ensure safety of elderly passengers	2	0%	0	0%	0	0%	1	0%	0	0%
Other safety mentions	94	3%	2	1%	11	2%	32	2%	13	2%
<b>Financial Responsibility (Net)</b>	<b>500</b>	<b>14%</b>	<b>35</b>	<b>22%</b>	<b>147</b>	<b>26%</b>	<b>378</b>	<b>24%</b>	<b>75</b>	<b>14%</b>
Costly/concerned about the expense for the drivers	255	7%	18	11%	87	16%	201	13%	44	8%
TfL seeking to make money	165	5%	10	6%	41	7%	129	8%	23	4%
It should be free/no cost to drivers	69	2%	6	4%	26	5%	60	4%	15	3%
Other financial responsibility mentions	91	3%	7	4%	19	3%	52	3%	8	2%
<b>Convenience/Usefulness (Net)</b>	<b>223</b>	<b>6%</b>	<b>15</b>	<b>9%</b>	<b>74</b>	<b>13%</b>	<b>179</b>	<b>11%</b>	<b>36</b>	<b>7%</b>
A waste of time/money	103	3%	7	4%	34	6%	88	6%	15	3%
Would be an inconvenience	99	3%	9	6%	30	5%	74	5%	19	4%
It is pointless/won't make a difference	24	1%	0	0%	12	2%	21	1%	4	1%
Other convenience/usefulness mentions	11	0%	1	1%	4	1%	7	0%	2	0%
<b>Miscellaneous (Net)</b>	<b>523</b>	<b>15%</b>	<b>31</b>	<b>19%</b>	<b>112</b>	<b>20%</b>	<b>342</b>	<b>22%</b>	<b>74</b>	<b>14%</b>
Biased/unfair/discrimination to PHV drivers	305	9%	18	11%	74	13%	231	15%	50	9%
Unhappy with Mayor/feel this is a political move by the Mayor	56	2%	4	3%	9	2%	33	2%	12	2%
Too many PHVs/regulate number of PHV	40	1%	0	0%	5	1%	18	1%	3	1%
Undermines licensing authority	38	1%	4	3%	9	2%	30	2%	5	1%
Will ruin the industry	31	1%	1	1%	5	1%	15	1%	3	1%
Consultation is pointless/will not yield results	11	0%	0	0%	0	0%	2	0%	0	0%
TfL should not have the responsibility of handling the assessment	9	0%	1	1%	2	0%	6	0%	1	0%
Should be conducted by TfL/not a private/3rd party company	9	0%	1	1%	0	0%	2	0%	1	0%
Will cause fraud/corruption	7	0%	0	0%	0	0%	4	0%	0	0%
Other miscellaneous mentions	96	3%	3	2%	23	4%	41	3%	15	3%
No opinion	51	1%	3	2%	15	3%	37	2%	9	2%

**Summary of responses to Question 6: Comments on wheelchair assessment for the drivers of all wheelchair accessible PHVs**

	All respondents		Private hire operator/ driver/ vehicle owner		PHV users	
<b>Base</b>	<b>820</b>		<b>507</b>		<b>148</b>	
	Count	%	Count	%	Count	%
<b>Overall Acceptance (Net)</b>	<b>558</b>	<b>68%</b>	<b>332</b>	<b>65%</b>	<b>104</b>	<b>70%</b>
No, this should not be a requirement/drivers are already licensed/current standards are sufficient	234	29%	174	34%	35	24%
Yes, this should be a requirement/assessment is needed for all drivers	145	18%	62	12%	33	22%
All PHVs should be wheelchair accessible	42	5%	10	2%	9	6%
This should only be a requirement for drivers who have a wheelchair accessible vehicle	41	5%	30	6%	10	7%
Private hire drivers should not have more assessments than taxi drivers	32	4%	20	4%	6	4%
Private hire drivers should be held to the same standards as taxi drivers	20	2%	5	1%	3	2%
Should be an awareness/training course/not an assessment	12	1%	10	2%	3	2%
Need to provide services equally to all passengers	10	1%	3	1%	2	1%
Assessment should only apply to new drivers	8	1%	5	1%	2	1%
Certain percentage of fleet should be wheelchair accessible	8	1%	3	1%	4	3%
PHVs should not be wheelchair accessible/only taxis should carry disabled passengers	7	1%	3	1%	0	0%
Operators should be responsible for training their fleet/drivers	5	1%	4	1%	1	1%
Other overall acceptance mentions	49	6%	27	5%	8	5%
<b>Safety (Net)</b>	<b>67</b>	<b>8%</b>	<b>23</b>	<b>5%</b>	<b>9</b>	<b>6%</b>
It would ensure safety for the passenger	37	5%	14	3%	5	3%
It would ensure public safety/safety first (Unspecified)	12	1%	3	1%	1	1%
It would make the roads safer/less accidents	10	1%	3	1%	1	1%
It would ensure driver's safety	7	1%	2	0%	1	1%

Other safety mentions	18	2%	7	1%	2	1%
<b>Convenience/Financial Responsibility (Net)</b>	<b>208</b>	<b>25%</b>	<b>133</b>	<b>26%</b>	<b>36</b>	<b>24%</b>
Costly/concerned about the expense for the drivers	58	7%	36	7%	6	4%
Will limit availability of wheelchair accessible vehicles/cause a wait	30	4%	19	4%	11	7%
TfL seeking to make more revenue/money	25	3%	20	4%	4	3%
Not all vehicles have wheelchair accessibility	21	3%	18	4%	3	2%
Would be an inconvenience	20	2%	14	3%	2	1%
A waste of time/money	16	2%	9	2%	3	2%
Not enough demand for wheelchair services	13	2%	7	1%	3	2%
Would deter drivers from purchasing an accessible vehicle if they knew they had to complete an assessment	10	1%	4	1%	3	2%
Is it free/it should be free	8	1%	8	2%	1	1%
PHV do not have wheelchair accessible vehicles (e.g., ramps)	8	1%	2	0%	3	2%
Costly/more expensive for wheelchair users due to supply and demand	5	1%	4	1%	2	1%
Other convenience/financial responsibility mentions	29	4%	11	2%	1	1%
<b>Miscellaneous (Net)</b>	<b>123</b>	<b>15%</b>	<b>72</b>	<b>14%</b>	<b>19</b>	<b>13%</b>
PHVs are going to lose business/will destroy this industry	30	4%	13	3%	3	2%
Drivers should have a choice	21	3%	20	4%	5	3%
Need for training	21	3%	13	3%	4	3%
Need better English language skills/should be required to take English test	14	2%	2	0%	1	1%
Unfair against PHV drivers	8	1%	4	1%	2	1%
Clarification sought whether it is just one time or ongoing	2	0%	2	0%	0	0%
Other miscellaneous mentions	52	6%	22	4%	5	3%
No opinion	66	8%	48	9%	12	8%

**Summary of responses to Question 11: Do you have any alternative suggestions to ensure that passengers are aware of the contact information or any comments on these PHV signage proposals?**

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
<b>Base</b>	2,448		127		385		993		361	
	Count	%	Count	%	Count	%	Count	%	Count	%
<b>Overall Acceptance (Net)</b>	<b>1,193</b>	<b>49%</b>	<b>76</b>	<b>60%</b>	<b>169</b>	<b>44%</b>	<b>411</b>	<b>41%</b>	<b>160</b>	<b>44%</b>
Yes, it's a good idea/much needed	736	30%	12	9%	22	6%	53	5%	81	22%
No, it is not needed/necessary/fine as it is now	434	18%	60	47%	138	36%	338	34%	74	20%
Other overall acceptance mentions	33	1%	7	6%	15	4%	27	3%	8	2%
<b>Placement/ Visibility (Net)</b>	<b>262</b>	<b>11%</b>	<b>11</b>	<b>9%</b>	<b>37</b>	<b>10%</b>	<b>91</b>	<b>9%</b>	<b>52</b>	<b>14%</b>
It should be clearly displayed/easy to see/ read	100	4%	4	3%	5	1%	14	1%	19	5%
It should be inside of car	44	2%	-	0%	8	2%	17	2%	8	2%
It should be on the seats/head rests	37	2%	3	2%	6	2%	18	2%	7	2%
Tinted windows cause visibility issues	33	1%	-	0%	-	0%	2	0%	7	2%
It should be displayed on window/windscreen	23	1%	1	1%	2	1%	6	1%	7	2%
It should be outside of car	19	1%	-	0%	2	1%	4	0%	5	1%
It should be displayed on doors/sides	17	1%	-	0%	1	0%	1	0%	3	1%
It should be displayed on the dashboard	10	0%	-	0%	1	0%	3	0%	1	0%

Other placement/visibility mentions	82	3%	7	6%	22	6%	45	5%	25	7%
<b>Information Displayed (Net)</b>	<b>424</b>	<b>17%</b>	<b>22</b>	<b>17%</b>	<b>74</b>	<b>19%</b>	<b>194</b>	<b>20%</b>	<b>84</b>	<b>23%</b>
Should include company (land line) phone number/for complaints/compliments/lost property	136	6%	11	9%	22	6%	48	5%	29	8%
Should include driver ID/ including photo/badge number	91	4%	5	4%	12	3%	29	3%	17	5%
People will not read/pay attention to the signage	52	2%	1	1%	19	5%	36	4%	8	2%
Should include contact info directly to TfL/authorities	48	2%	4	3%	11	3%	18	2%	12	3%
Should include insurance certificate/information	27	1%	1	1%	1	0%	2	0%	7	2%
Should include no smoking	26	1%	4	3%	11	3%	22	2%	8	2%
Should include "Pre-booked only" sign	22	1%	2	2%	3	1%	5	1%	1	0%
Should have plate/license plate attached to car with information	21	1%	-	0%	4	1%	9	1%	4	1%
Should include no food/drink	13	1%	-	0%	2	1%	12	1%	3	1%
Should include language(s) spoken by driver	9	0%	-	0%	3	1%	5	1%	1	0%
A lit/ light up sign	5	0%	1	1%	-	0%	3	0%	-	0%
Other information displayed mentions	88	4%	4	3%	10	3%	51	5%	19	5%
<b>Safety/Security (Net)</b>	<b>263</b>	<b>11%</b>	<b>23</b>	<b>18%</b>	<b>72</b>	<b>19%</b>	<b>174</b>	<b>18%</b>	<b>48</b>	<b>13%</b>
Should include warning about cyclists/		3%		3%		4%		4%		5%

watch for cyclists when opening door	72		4		17		42		17	
Should include warning to wear seat belts/information about seatbelts	60	2%	9	7%	24	6%	38	4%	16	4%
To ensure safety for the passenger/customer	44	2%	4	3%	10	3%	29	3%	10	3%
To ensure safety for the driver	31	1%	3	2%	10	3%	27	3%	4	1%
To ensure public safety/safety first	23	1%	2	2%	1	0%	9	1%	4	1%
Invasion of driver privacy	15	1%	2	2%	5	1%	15	2%	1	0%
Other safety/security mentions	94	4%	7	6%	26	7%	67	7%	12	3%
<b>Financial Responsibility (Net)</b>	<b>45</b>	<b>2%</b>	<b>2</b>	<b>2%</b>	<b>14</b>	<b>4%</b>	<b>34</b>	<b>3%</b>	<b>8</b>	<b>2%</b>
Waste of money	17	1%	-	0%	4	1%	14	1%	4	1%
Other financial responsibility mentions	28	1%	2	2%	10	3%	20	2%	4	1%
<b>Information already provided (Net)</b>	<b>226</b>	<b>9%</b>	<b>18</b>	<b>14%</b>	<b>71</b>	<b>18%</b>	<b>159</b>	<b>16%</b>	<b>46</b>	<b>13%</b>
Information provided on phone/app	97	4%	6	5%	28	7%	68	7%	22	6%
Information given when booked/by licensed office	70	3%	7	6%	29	8%	52	5%	16	4%
Information provided in email/text	51	2%	7	6%	12	3%	30	3%	15	4%
Other information already provided mentions	37	2%	3	2%	14	4%	30	3%	2	1%
<b>Taking Responsibility (Net)</b>	<b>196</b>	<b>8%</b>	<b>25</b>	<b>20%</b>	<b>84</b>	<b>22%</b>	<b>156</b>	<b>16%</b>	<b>37</b>	<b>10%</b>
It should be the driver's responsibility to		6%		17%		16%		11%		7%



inform passengers	135		22		62		108		25	
Passengers should take responsibility/it's common sense	55	2%	2	2%	18	5%	45	5%	10	3%
Other taking responsibility mentions	22	1%	2	2%	9	2%	16	2%	6	2%
<b>Miscellaneous (Net)</b>	<b>230</b>	<b>9%</b>	<b>28</b>	<b>22%</b>	<b>62</b>	<b>16%</b>	<b>152</b>	<b>15%</b>	<b>46</b>	<b>13%</b>
Make them similar to taxi/other PHV/authorities as done in the rest of the UK/world	55	2%	3	2%	11	3%	24	2%	15	4%
Signs/stickers ruins the appearance of vehicles	45	2%	9	7%	23	6%	40	4%	10	3%
Should not apply to executive vehicles/chauffeurs	30	1%	14	11%	19	5%	25	3%	5	1%
Advertising/TV campaign/advertising	23	1%	1	1%	5	1%	15	2%	6	2%
Signs may increase risk of touting/plying for hire	10	0%	-	0%	1	0%	4	0%	1	0%
Other miscellaneous mentions	95	4%	10	8%	22	6%	68	7%	21	6%
No opinion	445	18%	8	6%	51	13%	165	17%	43	12%

**Summary of responses to Question 14: Please state either why you support the proposal that PHVs should be more identifiable, and what additional signage should be considered, or why you do not support this proposal. Please also include any other ideas for how expired PHV licences can be identified.**

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
<b>Base</b>	2,385		120		416		1,099		421	
	Count	%	Count	%	Count	%	Count	%	Count	%
<b>Overall Acceptance (Net)</b>	<b>887</b>	<b>37%</b>	<b>67</b>	<b>56%</b>	<b>232</b>	<b>56%</b>	<b>601</b>	<b>55%</b>	<b>167</b>	<b>40%</b>
No, the information/signage is fine as it is	639	27%	48	40%	186	45%	497	45%	123	29%
Yes, the information/signage should be more identifiable	217	9%	6	5%	29	7%	80	7%	37	9%
Not appropriate for executive vehicles/chauffeurs	53	2%	22	18%	30	7%	44	4%	11	3%
<b>Placement/Visibility of signage (Net)</b>	<b>924</b>	<b>39%</b>	<b>30</b>	<b>25%</b>	<b>99</b>	<b>24%</b>	<b>230</b>	<b>21%</b>	<b>166</b>	<b>39%</b>
Should be clearly displayed/easy to see/read	389	16%	13	11%	38	9%	93	8%	66	16%
Tinted windows cause visibility issues/should not be permitted in PHVs	294	12%	1	1%	5	1%	13	1%	42	10%
Should be coloured/colour coded/changing colours yearly	195	8%	11	9%	39	9%	88	8%	39	9%
Should be displayed in the rear of the car	162	7%	7	6%	16	4%	26	2%	30	7%
Current identifiers too small/need larger identifiers	121	5%	1	1%	7	2%	19	2%	22	5%
Should be displayed in the front of the car	75	3%	3	3%	11	3%	20	2%	11	3%
Should be displayed on the outside of car/so everyone can see it	73	3%	3	3%	5	1%	12	1%	19	5%
Should be displayed on doors/side/both		3%		2%		1%		1%		3%

sides	65		2		4		12		13	
Should be displayed on window/windscreen	52	2%	2	2%	9	2%	16	1%	9	2%
Should be displayed inside of car/only for passengers to see	40	2%	1	1%	4	1%	9	1%	10	2%
Should be displayed on roof/lit sign on roof	20	1%	1	1%	6	1%	11	1%	5	1%
Other placement/visibility of signage mentions	80	3%	4	3%	18	4%	37	3%	15	4%
<b>Suggestions for information that should be displayed (Net)</b>	<b>496</b>	<b>21%</b>	<b>21</b>	<b>18%</b>	<b>51</b>	<b>12%</b>	<b>148</b>	<b>13%</b>	<b>91</b>	<b>22%</b>
Licence expiration date	156	7%	9	8%	30	7%	68	6%	44	10%
Driver ID/including photo/badge number	133	6%	5	4%	13	3%	31	3%	16	4%
"Pre-booked only" should be displayed on vehicle	79	3%	2	2%	3	1%	7	1%	16	4%
Insurance certificate (valid)/information	29	1%	1	1%	1	0%	3	0%	7	2%
TfL/contact details/instructions for complaints/emergencies	29	1%	-	0%	1	0%	3	0%	2	0%
Company name/logo/details	22	1%	1	1%	2	0%	8	1%	4	1%
Company phone number for complaints/compliments/lost property	21	1%	-	0%	2	0%	3	0%	3	1%
"Pre-booked only, if not this vehicle is uninsured" displayed	15	1%	-	0%	1	0%	1	0%	5	1%
Contact details/numbers/information (unspecified)	15	1%	1	1%	-	0%	3	0%	1	0%
Vehicle details (not specific)	14	1%	-	0%	3	1%	6	1%	3	1%
Certificate stating 'Advanced Driver		0%		0%		0%		0%		0%

Testing' completed	1		-		-		-		1	
Other suggestions for information that should be displayed mentions	92	4%	4	3%	7	2%	41	4%	15	4%
<b>Vehicle Identification (Net)</b>	<b>591</b>	<b>25%</b>	<b>42</b>	<b>35%</b>	<b>121</b>	<b>29%</b>	<b>252</b>	<b>23%</b>	<b>116</b>	<b>28%</b>
Should have plate/licence plate attached to car with information	178	7%	4	3%	12	3%	33	3%	27	6%
Should be similar to taxi/other PHV/authorities as done in the rest of the UK/world	132	6%	4	3%	12	3%	29	3%	26	6%
Additional identifiers would ruin the look of the car/not be discreet anymore	82	3%	20	17%	34	8%	61	6%	22	5%
We use same car for personal use as well/don't want signage displayed for personal use	72	3%	5	4%	24	6%	65	6%	11	3%
Have a special identifier indicating the car as a PHV	61	3%	4	3%	9	2%	26	2%	14	3%
No need for special identifiers showing the car as PHV	59	2%	5	4%	21	5%	42	4%	14	3%
Should have sticker signage	42	2%	2	2%	16	4%	24	2%	8	2%
PHV cars should be a certain/specific colour/make/model	26	1%	1	1%	4	1%	10	1%	5	1%
Should be removable signage	24	1%	1	1%	11	3%	24	2%	4	1%
Would reduce sharing/lending of PHV licences/vehicles	22	1%	-	0%	-	0%	1	0%	3	1%
Would reduce PHV vehicles being sold with PHV licence included	13	1%	-	0%	-	0%	-	0%	4	1%
Should have magnetic signage	13	1%	1	1%	4	1%	7	1%	3	1%
Other vehicle identification mentions		2%		3%		4%		3%		1%

	53		4		18		28		6	
<b>Safety (Net)</b>	<b>384</b>	<b>16%</b>	<b>16</b>	<b>13%</b>	<b>52</b>	<b>13%</b>	<b>140</b>	<b>13%</b>	<b>76</b>	<b>18%</b>
It would ensure safety for the passenger/customer	112	5%	4	3%	11	3%	27	2%	18	4%
It would ensure public safety/safety first (Unspecified)	89	4%	1	1%	5	1%	22	2%	20	5%
It would reduce unlicensed drivers	67	3%	2	2%	7	2%	15	1%	15	4%
It would ensure safety for the driver	33	1%	4	3%	8	2%	26	2%	5	1%
It will increase attacks/crimes/hate crimes/threats against driver/car	32	1%	1	1%	9	2%	28	3%	7	2%
It would make the roads safer/less accidents/injuries/deaths	22	1%	-	0%	-	0%	5	0%	3	1%
Increase control checks/TfL enforcement officers	13	1%	1	1%	-	0%	5	0%	3	1%
Other safety mentions	80	3%	6	5%	18	4%	40	4%	15	4%
<b>Miscellaneous (Net)</b>	<b>622</b>	<b>26%</b>	<b>28</b>	<b>23%</b>	<b>124</b>	<b>30%</b>	<b>312</b>	<b>28%</b>	<b>121</b>	<b>29%</b>
Text message/app with car/driver information is sufficient/provides everything necessary before the ride	134	6%	9	8%	36	9%	97	9%	30	7%
It would increase touting/ illegal work/ply for hire	116	5%	3	3%	8	2%	16	1%	24	6%
Waste of time/money	62	3%	2	2%	14	3%	48	4%	12	3%
Additional identifiers/colour changes will confuse/ distract customers	56	2%	7	6%	14	3%	34	3%	13	3%
It would help stop touting/hailing of PHV	46	2%	1	1%	2	0%	6	1%	6	1%

Has a negative financial impact on/punishes PHV drivers	38	2%	1	1%	14	3%	32	3%	5	1%
Need to educate the customers/public	31	1%	2	2%	3	1%	16	1%	7	2%
Need to apply fines/penalties/pressure to follow the guidelines	30	1%	-	0%	10	2%	19	2%	7	2%
Should be automatically detected/reported when licence expires	27	1%	2	2%	6	1%	17	2%	2	0%
PHV do not pay congestion charge/register as a PHV to avoid paying congestion charge	18	1%	-	0%	2	0%	4	0%	3	1%
Important for police monitoring/compliance checks	14	1%	-	0%	1	0%	3	0%	2	0%
Will increase public confidence	13	1%	-	0%	2	0%	4	0%	2	0%
Should be standardised guidelines	12	1%	2	2%	2	0%	2	0%	3	1%
PHVs should have bus lane access	7	0%	1	1%	3	1%	7	1%	-	0%
Important for increased accountability	7	0%	-	0%	1	0%	1	0%	2	0%
Reduce/restrict the number of PHV licences	6	0%	-	0%	-	0%	2	0%	1	0%
Drivers should speak English/have good command of English	5	0%	-	0%	-	0%	2	0%	-	0%
Use of technology should be able to track vehicles	5	0%	-	0%	2	0%	3	0%	1	0%
Fingerprint technology to identify driver to reduce badge sharing	4	0%	-	0%	-	0%	-	0%	2	0%
Other miscellaneous mentions	97	4%	3	3%	27	6%	64	6%	16	4%
No opinion		5%		7%		5%		7%		4%

	117		8		21		77		15	
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**Summary of responses to Question 18: If you do not agree that the information contained on PHV driver ID cards should be more visible from outside of PHVs or agree with our proposal please specify why?**

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
<b>Base</b>	2,246		143		503		1,295		374	
	Count	%	Count	%	Count	%	Count	%	Count	%
<b>Overall Acceptance (Net)</b>	<b>855</b>	<b>38%</b>	<b>74</b>	<b>52%</b>	<b>259</b>	<b>51%</b>	<b>615</b>	<b>47%</b>	<b>167</b>	<b>45%</b>
Not necessary/needed/the current set up/ information is fine as it is	411	18%	38	27%	139	28%	351	27%	84	22%
Customer already receives this information through the app	178	8%	19	13%	66	13%	153	12%	36	10%
The information is/only needs displayed inside/to the customer	165	7%	9	6%	59	12%	139	11%	34	9%
Agree/current signage insufficient/should be more identifiable	136	6%	3	2%	4	1%	16	1%	22	6%
Not appropriate for executive vehicles/chauffeurs	25	1%	11	8%	16	3%	20	2%	4	1%
A PHV can only be pre-booked so all information is already known	22	1%	3	2%	12	2%	18	1%	4	1%
Other overall acceptance mentions	56	2%	3	2%	15	3%	36	3%	11	3%
<b>Placement/Visibility of signage (Net)</b>	<b>660</b>	<b>29%</b>	<b>34</b>	<b>24%</b>	<b>82</b>	<b>16%</b>	<b>166</b>	<b>13%</b>	<b>82</b>	<b>22%</b>
Tinted windows cause visibility issues/should not be permitted in PHVs	338	15%	-	0%	2	0%	6	0%	34	9%
It should be clearly displayed/easy to see/read	199	9%	5	3%	14	3%	25	2%	15	4%
It should be displayed on rear/back of car	181	8%	2	1%	5	1%	11	1%	19	5%

Should not be put on window/windscreen/cluttering and restricting view for driver	63	3%	7	5%	22	4%	53	4%	11	3%
Current identifiers too small/need larger identifiers	60	3%	4	3%	6	1%	9	1%	4	1%
It should be displayed on window/windscreen	35	2%	4	3%	11	2%	20	2%	9	2%
Signs/stickers ruin/clutter the appearance of vehicles	34	2%	7	5%	15	3%	28	2%	6	2%
It should be colour coded disc/sticker/label/different colour for different year	33	1%	3	2%	4	1%	6	0%	5	1%
It should be displayed on front of car	30	1%	-	0%	2	0%	6	0%	2	1%
It should be displayed on doors/sides	25	1%	1	1%	1	0%	1	0%	2	1%
It should be removable	20	1%	1	1%	9	2%	17	1%	7	2%
Other placement/visibility of signage mentions	71	3%	12	8%	22	4%	34	3%	16	4%
<b>Information Displayed (Net)</b>	<b>358</b>	<b>16%</b>	<b>27</b>	<b>19%</b>	<b>90</b>	<b>18%</b>	<b>211</b>	<b>16%</b>	<b>56</b>	<b>15%</b>
Drivers wear their ID/badges around the neck/customers can ask for more info	148	7%	16	11%	55	11%	121	9%	26	7%
Driver ID should be displayed in car and not worn by driver around the neck	42	2%	3	2%	9	2%	21	2%	11	3%
Should contain licence expiration date	40	2%	2	1%	5	1%	7	1%	2	1%
Customers do not look at ID/licence/only at registration number	30	1%	4	3%	8	2%	25	2%	6	2%
Should say "Pre-booked only"	21	1%	2	1%	3	1%	3	0%	6	2%



Should contain insurance information	19	1%	-	0%	-	0%	1	0%	2	1%
Other information displayed mentions	92	4%	2	1%	15	3%	43	3%	8	2%
<b>Vehicle Identification (Net)</b>	<b>280</b>	<b>12%</b>	<b>14</b>	<b>10%</b>	<b>23</b>	<b>5%</b>	<b>46</b>	<b>4%</b>	<b>22</b>	<b>6%</b>
Should have plate/licence plate attached to car with information	241	11%	1	1%	6	1%	19	1%	19	5%
Luxury/executive/chauffeur cars should be excluded/not discreet anymore	30	1%	12	8%	15	3%	24	2%	3	1%
Other vehicle identification mentions	11	0%	1	1%	2	0%	3	0%	-	0%
<b>Safety/ Security (Net)</b>	<b>984</b>	<b>44%</b>	<b>75</b>	<b>52%</b>	<b>300</b>	<b>60%</b>	<b>724</b>	<b>56%</b>	<b>194</b>	<b>52%</b>
Invasion of privacy/personal/data protection/especially when I'm not working	477	21%	37	26%	182	36%	425	33%	107	29%
Risk of identity theft/fraud/scams/misuse of information	266	12%	26	18%	86	17%	219	17%	45	12%
The driver safety/security could be at risk	210	9%	20	14%	67	13%	168	13%	41	11%
It would increase risk of car damage/crimes/rude behaviour/discrimination towards PHV vehicles/drivers	68	3%	6	4%	28	6%	54	4%	15	4%
Will increase the safety of the passenger/customer	52	2%	-	0%	3	1%	7	1%	9	2%
It would help prevent unlicensed drivers from driving PHVs	45	2%	-	0%	3	1%	5	0%	6	2%
Could risk the safety of the passenger/customer	31	1%	5	3%	6	1%	10	1%	7	2%
Safety (unspecified)		1%		1%		1%		1%		1%

	28		2		4		7		5	
It would increase false accusations/claims/complaints	24	1%	1	1%	8	2%	21	2%	6	2%
Could increase conflict from taxi drivers	17	1%	2	1%	8	2%	14	1%	7	2%
Will increase public safety	12	1%	-	0%	-	0%	-	0%	3	1%
Other safety mentions	59	3%	4	3%	11	2%	27	2%	13	3%
<b>Miscellaneous (Net)</b>	<b>383</b>	<b>17%</b>	<b>28</b>	<b>20%</b>	<b>87</b>	<b>17%</b>	<b>208</b>	<b>16%</b>	<b>62</b>	<b>17%</b>
Vehicles/IDs/licences are being shared/swapped/rented between drivers	89	4%	11	8%	20	4%	48	4%	16	4%
It would encourage illegal hailing/touting	60	3%	2	1%	6	1%	11	1%	7	2%
Not fair/taxis/bus drivers/other public drivers don't have additional identifiers	53	2%	6	4%	17	3%	45	3%	11	3%
Vehicles are for private use as well/not only for work	40	2%	2	1%	15	3%	36	3%	7	2%
Only the driver number should be visible outside/just like the taxi service	33	1%	1	1%	3	1%	15	1%	2	1%
TfL seeking to make more revenue/money	16	1%	1	1%	6	1%	13	1%	1	0%
A waste of time/money	15	1%	2	1%	6	1%	10	1%	2	1%
Other miscellaneous mentions	95	4%	6	4%	23	5%	46	4%	22	6%
No opinion	64	3%	6	4%	12	2%	45	3%	13	3%

### Summary of 'Other (specify)' responses to Question 20

	All respondents		Private hire operator/ driver/ vehicle owner		PHV users	
<b>Base</b>	<b>1,154</b>		<b>326</b>		<b>166</b>	
	Count	%	Count	%	Count	%
<b>Insurance Coverage/Requirements (Net)</b>	379	<b>33%</b>	175	<b>54%</b>	81	<b>49%</b>
All PHVs should be required to carry/display hire or reward insurance certificate at all times	173	15%	36	11%	36	22%
Should purchase yearly/not monthly/so it can't be cancelled after purchase	64	6%	13	4%	17	10%
Current insurance is sufficient/insurance is a requirement/you can't license a vehicle without it	55	5%	44	13%	8	5%
Should be flexible/pay as you use/insurance only when working/not pay when on holiday/sick	45	4%	38	12%	13	8%
Can be checked through database/should have login system/database linked to insurance to check if insured	22	2%	17	5%	2	1%
Should regularly conduct independent checks and auditing	13	1%	4	1%	2	1%
I have an insurance certificate in my car/my operator also holds a copy	11	1%	8	2%	1	1%
Other insurance coverage/requirement mentions	52	5%	33	10%	15	9%
<b>Taking Responsibility (Net)</b>	710	<b>62%</b>	76	<b>23%</b>	83	<b>50%</b>
Company should cover every driver/ mentions taxi company arrangements	642	56%	47	14%	70	42%
Enforce penalty/punishment system/ fines for those that are not in compliance	34	3%	13	4%	2	1%
Need to prevent drivers from switching policy to 3rd party insurance/less than full		2%		2%		3%

comprehensive H&R insurance after testing/ licensing/ registration	22		7		5	
TfL should be informed/notified when policy ends/is cancelled/insurance companies/operators should be compelled to inform/notify TfL	13	1%	2	1%	2	1%
Other taking responsibility mentions	21	2%	14	4%	5	3%
<b>Expense (Net)</b>	<b>126</b>	<b>11%</b>	<b>113</b>	<b>35%</b>	<b>24</b>	<b>14%</b>
Reduce/ regulate the price of insurance	55	5%	52	16%	14	8%
Insurance is already expensive/you are trying to increase PHV driver costs	54	5%	51	16%	10	6%
Other expense mentions	28	2%	21	6%	4	2%
<b>Safety/ Security (Net)</b>	<b>29</b>	<b>3%</b>	<b>4</b>	<b>1%</b>	<b>7</b>	<b>4%</b>
It would make passengers feel safe knowing PHV is insured	12	1%	1	0%	5	3%
It would ensure public safety/safety first	7	1%	1	0%	1	1%
Other safety/security mentions	12	1%	2	1%	1	1%
<b>Bias/ Discrimination (Net)</b>	<b>26</b>	<b>2%</b>	<b>19</b>	<b>6%</b>	<b>4</b>	<b>2%</b>
This is biased/discrimination against PHV drivers/stop favouring taxis	17	1%	13	4%	2	1%
Other bias/discrimination mentions	9	1%	6	2%	2	1%
<b>Miscellaneous (Net)</b>	<b>24</b>	<b>2%</b>	<b>13</b>	<b>4%</b>	<b>2</b>	<b>1%</b>
Other miscellaneous mentions	24	2%	13	4%	2	1%
No opinion		3%		8%		3%

	29		27		5	
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### Summary of 'Other (specify)' responses to Question 22

	All respondents		Private hire operator/ driver/ vehicle owner		PHV users	
	Count	%	Count	%	Count	%
<b>Base</b>	<b>621</b>		<b>298</b>		<b>116</b>	
<b>Overall Acceptance (Net)</b>	<b>26</b>	<b>4%</b>	<b>19</b>	<b>6%</b>	<b>6</b>	<b>5%</b>
No, it is not needed/unnecessary/fine as it is now	23	4%	18	6%	6	5%
Other overall acceptance mentions	3	0%	1	0%	-	0%
<b>Placement/Visibility of Signage (Net)</b>	<b>173</b>	<b>28%</b>	<b>34</b>	<b>11%</b>	<b>36</b>	<b>31%</b>
Should be displayed at all times	69	11%	7	2%	12	10%
Should be displayed inside vehicle/on dashboard	56	9%	6	2%	10	9%
Should be displayed on window/windshield	24	4%	6	2%	7	6%
Should be carried on driver	21	3%	9	3%	7	6%
Should be kept in car/in glove box/at all times	8	1%	6	2%	1	1%
Should be displayed/visible from the outside	4	1%	-	0%	1	1%
Other placement/visibility of signage mentions	10	2%	1	0%	3	3%

<b>Information Displayed (Net)</b>	<b>289</b>	<b>47%</b>	<b>165</b>	<b>55%</b>	<b>57</b>	<b>49%</b>
Electronic/online/picture on phone/laptop/tablet	132	21%	105	35%	28	24%
Original certificate	118	19%	51	17%	22	19%
Picture/photo copy	76	12%	53	18%	19	16%
Letter from the insurer	36	6%	25	8%	10	9%
Email copy	19	3%	16	5%	5	4%
Driver ID/including photo/badge number of driver	18	3%	4	1%	5	4%
Sticker/disc (Unspecified)	13	2%	8	3%	3	3%
Vehicle registration number	12	2%	6	2%	1	1%
Insurance start/expiration date	11	2%	3	1%	4	3%
Card/small plastic card	5	1%	4	1%	-	0%
Colour-coded disc/sticker/ label/different colour for different year	4	1%	-	0%	3	3%
QR/bar code	4	1%	2	1%	-	0%
Other information displayed mentions	20	3%	9	3%	5	4%
<b>Safety (Net)</b>	<b>28</b>	<b>5%</b>	<b>6</b>	<b>2%</b>	<b>7</b>	<b>6%</b>
It would ensure public safety/safety first	24	4%	4	1%	6	5%

Other safety mentions	4	1%	2	1%	1	1%
<b>Taking Responsibility (Net)</b>	<b>129</b>	<b>21%</b>	<b>42</b>	<b>14%</b>	<b>17</b>	<b>15%</b>
It should be the responsibility of the operators	74	12%	31	10%	11	9%
Should prevent PHV drivers from cancelling insurance after licencing/ producing their certification	54	9%	3	1%	5	4%
Other taking responsibility mentions	18	3%	9	3%	4	3%
<b>Miscellaneous (Net)</b>	<b>167</b>	<b>27%</b>	<b>88</b>	<b>30%</b>	<b>35</b>	<b>30%</b>
Should already be in the database/ no need for other form of insurance	65	10%	37	12%	12	10%
Same as others/taxis	48	8%	10	3%	9	8%
We already have/carry documents/copies of insurance	40	6%	36	12%	9	8%
Unfair to PHV as other taxis/bus drivers/public drivers don't have additional identifiers	7	1%	5	2%	3	3%
Other miscellaneous mentions	18	3%	9	3%	4	3%
No opinion	20	3%	14	5%	1	1%

**Summary of responses to Question 23: Please let us know of any evidence you have to support any proposed changes or why you feel this proposal will enhance public safety?**

	All respondents		Private hire operator/ driver/ vehicle owner		PHV users	
Base	2,244		653		314	
	Count	%	Count	%	Count	%
<b>Overall Acceptance (Net)</b>	<b>455</b>	<b>20%</b>	<b>223</b>	<b>34%</b>	<b>89</b>	<b>28%</b>
No, I don't support/agree with proposed changes/existing regulations fine as is	105	5%	97	15%	23	7%
All other public drivers have to follow insurance requirements, so should PHV drivers	83	4%	10	2%	20	6%
Operator should handle the insurance issues/be held accountable for its fleet	62	3%	23	4%	14	4%
Proof of insurance can be verified online/ through MID	45	2%	34	5%	9	3%
Yes, I support/agree with proposed changes	42	2%	3	0%	8	3%
Evidence of rape/sexual assault by PHV drivers	23	1%	3	0%	2	1%
Evidence of PHV drivers causing accidents/collisions	22	1%	4	1%	2	1%
Evidence of PHV drivers fleeing accident scenes when uninsured/underinsured	7	0%	-	0%	1	0%
Other overall acceptance mentions	99	4%	62	9%	16	5%
<b>Placement/Visibility of signage (Net)</b>	<b>161</b>	<b>7%</b>	<b>38</b>	<b>6%</b>	<b>25</b>	<b>8%</b>
Should be clearly visible/on display at all times	92	4%	8	1%	14	4%



Should be displayed inside the vehicle/for passenger to see	26	1%	8	1%	3	1%
Should be on/carried with driver	23	1%	14	2%	4	1%
Tinted windows should not be permitted in PHVs	9	0%	1	0%	2	1%
Other placement/visibility of signage mentions	20	1%	10	2%	3	1%
<b>Information Displayed (Net)</b>	<b>901</b>	<b>40%</b>	<b>126</b>	<b>19%</b>	<b>98</b>	<b>31%</b>
Original insurance certificate	700	31%	41	6%	69	22%
Photocopy of original certificate	75	3%	41	6%	8	3%
Electronic copy of original certificate	72	3%	24	4%	13	4%
Driver's licence/photo ID	24	1%	2	0%	2	1%
Letter from insurer/insured person	12	1%	2	0%	2	1%
Other information displayed mentions	46	2%	26	4%	10	3%
<b>Safety/ Security (Net)</b>	<b>538</b>	<b>24%</b>	<b>191</b>	<b>29%</b>	<b>105</b>	<b>33%</b>
It would ensure/prove driver is insured/minimises uninsured drivers	187	8%	21	3%	36	11%
It would ensure safety/enhance public safety	128	6%	39	6%	25	8%
It will prevent fraud/illegal activity	93	4%	13	2%	14	4%
It would ensure safety for passengers	79	4%	19	3%	11	4%

It will not enhance public safety	74	3%	64	10%	23	7%
It would ensure driver safety	48	2%	40	6%	13	4%
It will stop drivers from sharing/swapping cars/ licences	22	1%	3	0%	5	2%
Other safety/security mentions	55	2%	36	6%	12	4%
<b>Miscellaneous (Net)</b>	<b>308</b>	<b>14%</b>	<b>104</b>	<b>16%</b>	<b>50</b>	<b>16%</b>
Drivers not currently being insured/purchase insurance and then cancel	73	3%	6	1%	13	4%
Gives customers/passengers peace of mind/confidence	51	2%	11	2%	11	4%
It would cover the passenger if there is an accident	47	2%	5	1%	11	4%
Insurance is expensive for drivers	37	2%	19	3%	4	1%
Waste of time/money	14	1%	11	2%	2	1%
Biased/discrimination against PHV drivers	6	0%	5	1%	2	1%
Other miscellaneous mentions	97	4%	51	8%	13	4%
No opinion	352	16%	106	16%	32	10%

**Summary of responses to Question 24: Please provide your views on how TfL can best establish background character information for persons who have lived for an extended period outside the UK or come to the UK from another country? Please provide any evidence to support your comments.**

	All respondents		PHV operators		PHV owners		PHV drivers		PHV users	
<b>Base</b>	2,537		125		440		1,177		451	
	Count	%	Count	%	Count	%	Count	%	Count	%
<b>Overall Acceptance (Net)</b>	<b>648</b>	<b>26%</b>	<b>34</b>	<b>27%</b>	<b>96</b>	<b>22%</b>	<b>263</b>	<b>22%</b>	<b>121</b>	<b>27%</b>
Is needed/don't issue without proof of good standing	296	12%	9	7%	33	8%	94	8%	58	13%
Needed for safety public safety	210	8%	7	6%	18	4%	44	4%	37	8%
Not needed/okay as is/current background check is sufficient	103	4%	10	8%	28	6%	90	8%	15	3%
It can't be done/and that's the reason there are so many assaults/attacks	70	3%	5	4%	15	3%	29	2%	16	4%
Should pass an advanced driving test to be licenced	8	0%	1	1%	1	0%	4	0%	3	1%
Other overall acceptance mentions	54	2%	5	4%	9	2%	26	2%	13	3%
<b>Criminal Records/Background Checks (Net)</b>	<b>1,382</b>	<b>54%</b>	<b>66</b>	<b>53%</b>	<b>250</b>	<b>57%</b>	<b>633</b>	<b>54%</b>	<b>250</b>	<b>55%</b>
DBS/CRB Checks (Subnet)	1,050	41%	50	40%	198	45%	493	42%	183	41%
There should be DBS/CRB checks/proof of no criminal record/ convictions	589	23%	29	23%	102	23%	254	22%	104	23%
There should be DBS/CRB checks/proof of no criminal record/ convictions overseas/in country of origin	449	18%	21	17%	97	22%	234	20%	75	17%
There should be DBS/CRB checks/proof of no criminal record/convictions in UK	52	2%	2	2%	7	2%	18	2%	9	2%

Other DBS/CRB checks mentions	26	1%	5	4%	7	2%	11	1%	6	1%
<b>General Background Check (Subnet)</b>	<b>351</b>	<b>14%</b>	<b>22</b>	<b>18%</b>	<b>64</b>	<b>15%</b>	<b>157</b>	<b>13%</b>	<b>84</b>	<b>19%</b>
Must provide references/character references	83	3%	8	6%	19	4%	37	3%	27	6%
Need to be able to determine/prove if driver is of good character	69	3%	3	2%	9	2%	18	2%	15	3%
There should be previous employment checks/verifications	58	2%	5	4%	13	3%	25	2%	15	3%
Should be passport/immigration checks/see where they have been	55	2%	3	2%	13	3%	35	3%	14	3%
Should have clean driving record	21	1%	-	0%	-	0%	6	1%	5	1%
Conduct an interview/one on one meeting	16	1%	2	2%	5	1%	7	1%	5	1%
Other general background checks mentions	94	4%	3	2%	16	4%	50	4%	18	4%
<b>Frequency/Length of Background Checks (Subnet)</b>	<b>200</b>	<b>8%</b>	<b>5</b>	<b>4%</b>	<b>30</b>	<b>7%</b>	<b>72</b>	<b>6%</b>	<b>38</b>	<b>8%</b>
There should be background checks of the past 5 years	79	3%	3	2%	20	5%	27	2%	18	4%
There should be background checks of the past 3 years	46	2%	1	1%	5	1%	16	1%	8	2%
There should be background checks every 3 years	3	0%	-	0%	-	0%	1	0%	-	0%
Other frequency/length of background checks mentions	76	3%	1	1%	6	1%	29	2%	13	3%
<b>UK Licensing (Net)</b>	<b>124</b>	<b>5%</b>	<b>8</b>	<b>6%</b>	<b>23</b>	<b>5%</b>	<b>60</b>	<b>5%</b>	<b>27</b>	<b>6%</b>
Need to be familiar with UK driving standards/take UK driving test	50	2%	3	2%	9	2%	22	2%	12	3%

Should hold a valid UK driving licence	29	1%	3	2%	4	1%	15	1%	6	1%
Should hold a valid UK driving licence for a minimum of 3 years	23	1%	-	0%	3	1%	10	1%	6	1%
Should hold a valid UK driving licence for a minimum of 5 years	18	1%	-	0%	5	1%	11	1%	1	0%
Should hold a valid UK driving licence for a minimum of 1 year	2	0%	-	0%	-	0%	-	0%	-	0%
Other UK licensing mentions	19	1%	2	2%	4	1%	13	1%	7	2%
<b>Length of Residency (Net)</b>	<b>831</b>	<b>33%</b>	<b>29</b>	<b>23%</b>	<b>91</b>	<b>21%</b>	<b>259</b>	<b>22%</b>	<b>156</b>	<b>35%</b>
There should be minimum 5 year waiting period/residency in the UK to be licenced	329	13%	9	7%	29	7%	99	8%	51	11%
There should be minimum 3 year waiting period/residency in the UK to be licenced	284	11%	6	5%	23	5%	71	6%	57	13%
There should be a minimum waiting period/residency in the UK to be licenced	88	3%	6	5%	12	3%	31	3%	20	4%
There should be minimum 10 year waiting period/residency in the UK to be licenced	57	2%	5	4%	11	3%	29	2%	14	3%
There should be minimum 2 year waiting period/residency in the UK to be licenced	40	2%	-	0%	8	2%	14	1%	9	2%
There should be minimum 1 year waiting period/ residency in the UK to be licenced	18	1%	2	2%	3	1%	6	1%	4	1%
Must be a UK citizen	13	1%	2	2%	2	0%	7	1%	2	0%
There should be minimum 7 year waiting period/residency in the UK to be licenced	12	0%	-	0%	-	0%	4	0%	3	1%
There should be a minimum 6 year waiting period/residency in the UK to be	6	0%	-	0%	1	0%	1	0%	-	0%

licenced										
Other length of residency mentions	32	1%	1	1%	5	1%	10	1%	3	1%
<b>Miscellaneous (Net)</b>	<b>448</b>	<b>18%</b>	<b>24</b>	<b>19%</b>	<b>72</b>	<b>16%</b>	<b>165</b>	<b>14%</b>	<b>87</b>	<b>19%</b>
There should be a similar process to taxi drivers/others who work with the public	63	2%	3	2%	3	1%	13	1%	10	2%
This is TfL's responsibility	52	2%	2	2%	8	2%	16	1%	8	2%
Need to have learned/be able to speak English	50	2%	3	2%	11	3%	22	2%	12	3%
Certification/process that cannot be forged/faked	48	2%	-	0%	6	1%	12	1%	10	2%
Insurance certificate/copy on display at all times/in vehicle	47	2%	1	1%	2	0%	3	0%	7	2%
Driver's responsibility to provide the documentation	37	1%	2	2%	7	2%	10	1%	10	2%
Don't accept/issue them a licence	28	1%	1	1%	4	1%	6	1%	4	1%
Do not discriminate/single out immigrants/treat all drivers equally	18	1%	1	1%	4	1%	13	1%	6	1%
Expensive/time-consuming for driver	11	0%	-	0%	5	1%	9	1%	3	1%
Done through TfL/no third-party involvement	9	0%	-	0%	1	0%	3	0%	1	0%
Any/all of the above (not specific)	9	0%	2	2%	3	1%	6	1%	3	1%
Should also create standards to protect drivers	7	0%	1	1%	1	0%	6	1%	1	0%
Other miscellaneous mentions	95	4%	9	7%	19	4%	52	4%	17	4%
Not sure		0%		0%		0%		0%		0%

	2		-		1		2		1	
No opinion	181	7%	14	11%	47	11%	135	11%	26	6%

**Summary of responses to Question 36: What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?**

	All respondents	
<b>Base</b>	<b>719</b>	
	<b>Count</b>	<b>%</b>
<b>Positive (Net)</b>	<b>124</b>	<b>17%</b>
<b>Overall Acceptance (Subnet)</b>	<b>85</b>	<b>12%</b>
Necessary/long overdue	44	6%
Need safety standards in place	44	6%
<b>Survey (Subnet)</b>	<b>44</b>	<b>6%</b>
Good consultation/information/material	25	3%
Okay consultation/information/material	9	1%
Clear/simple/easy to understand	3	0%
Other positive mentions	7	1%
<b>Negative (Net)</b>	<b>490</b>	<b>68%</b>
<b>Overall Acceptance (Subnet)</b>	<b>153</b>	<b>21%</b>
Taxi drivers should be treated the same as PHV/ comply the same rules	58	8%
Proposals should cover drivers' safety/ well-being	42	6%
Need to regulate the operators/operators' responsibility for their fleet	33	5%
No changes needed	23	3%
CCTV/camera/recording needed for safety	10	1%
Other negative overall acceptance mentions	11	2%
<b>Survey (Subnet)</b>	<b>347</b>	<b>48%</b>
TfL needs to listen to the survey results/do their job to correct the issues	94	13%
Biased/discriminatory against PHV drivers	93	13%
Pointless/irrelevant	44	6%
Not clear/simple/easy to understand	34	5%
Waste of time/money	28	4%
Need better presentation of the questions/method of delivery/accessibility	25	3%



Unaware of/not well-advertised/not well-distributed	23	3%
Lack of topics/questions covered	20	3%
Too long/ wordy/too much to read	15	2%
Should provide evidence/details	13	2%
Should not allow taxi drivers/public to respond/should only survey PHV drivers	7	1%
Need to differentiate chauffeur/professional drivers from PHV drivers	6	1%
Biased/discriminatory in favour of PHV drivers	3	0%
Other negative survey mentions	3	0%
<b>Miscellaneous</b>	<b>87</b>	<b>12%</b>
Cost/money concern for drivers/money making scheme	33	5%
Cap/limit the number of PHVs/taxi drivers	28	4%
Get rid of PHV/revoke their licence	16	2%
Other negative mentions	22	3%
No opinion	152	21%

# Appendix B: Consultation questions

## Driving test for private hire drivers

1 Do you agree or disagree with the proposal to require all existing PHV drivers to take the advanced driving assessment on the next renewal of their licence?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

No opinion

2 Do you agree or disagree with the proposal to introduce an advanced driving assessment for all PHV drivers?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

No opinion

3 Please let us have any comments about the proposal to introduce an advanced driving assessment for all PHV drivers and for existing PHV drivers to take the assessment when they renew their licence.

4 Do you agree or disagree with the proposal to introduce an enhanced wheelchair assessment for the drivers of all wheelchair accessible PHVs?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

No opinion

5 Do you agree or disagree with the proposal that only PHV drivers who have completed the TfL wheelchair assessment should be allowed to drive wheelchair accessible PHVs?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

No opinion

6 If you do not agree, please explain why.

**Private hire vehicle signage**

7 Do you agree or disagree with the proposal to introduce additional signage in PHVs which will display customer contact information?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

No opinion

8 Do you agree or disagree with the proposal to introduce additional signage in PHVs advising passengers to look out for cyclists when opening the vehicle doors and getting out?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

No opinion

9 Do you agree or disagree with the proposal to introduce additional signage in PHVs which will advise passengers to wear their seatbelt?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

No opinion

10 Do you agree or disagree that these messages should be displayed in one combined sign?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

No opinion

11 Do you have any alternative suggestions to ensure that passengers are aware of the contact information or any comments on these PHV signage proposals?

Comments

12 Do you agree or disagree with the proposal to change the colour of the PHV licence disc on an annual basis?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

No opinion

13 Do you agree or disagree with the proposal that licensed PHVs should be more identifiable?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

No opinion

14 Please state either why you support the proposal that PHVs should be more identifiable, and what additional signage should be considered, or why you do not support this proposal. Please also include any other ideas for how expired PHV licences can be identified.

15 Do you agree or disagree with the proposal that exemptions from displaying signage should be considered by TfL on case by case basis?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

No opinion

16 Do you agree or disagree that the information contained on the PHV driver ID card should be visible from outside of PHVs?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

No opinion

17 Do you agreed or disagree with our proposal that a version of the PHV driver's ID card should be displayed on the nearside of the PHV on the front windscreen in the top corner?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

No opinion

18 If you do not agree that the information contained on PHV driver ID cards should be more visible from outside of PHVs or agree with our proposal please specify why?

19 Do you consider any changes are needed to the existing PHV hire or reward insurance requirements?

Yes

No

Don't know

No opinion

20 If you answered yes what changes do you think are needed? (tick all that apply)

Hire or reward insurance should be in place at all times the vehicle is licensed as a PHV

PHV operators should be required to have hire or reward insurance in place covering all of the private hire drivers and vehicles available to them

Other (please specify)

21 When working should PHV drivers be required to produce evidence to confirm that the PHV they are using is covered by hire or reward insurance?

Yes

No

Don't know

No opinion

22 If you answered yes, what form should the evidence they produce take?

Original certificate

Photocopy of original certificate

Letter from insurer or insured person

Electronic copy of original certificate

Other (please specify)

23 Please let us know of any evidence you have to support any proposed changes or why you feel this proposal will enhance public safety?

Comments

About you

**Privacy notice:**

TfL, its subsidiaries and service providers will use your personal information for the purpose of administering this consultation and assessing the responses. If you provide your email address, TfL may send you updates about this consultation and the proposed scheme. Your personal information will be properly safeguarded and processed in accordance with the requirements of the Data Protection Act 1998.

Responses to the consultation may be made publicly available, but any personal information will be kept confidential. You do not have to provide any personal information, but this information may help TfL to understand the range of responses. For example, responses may be analysed by postcode to help identify local issues.

Please note: Cookies are essential for this survey (for more information on cookies, please click on the following link: [https://consultations.tfl.gov.uk/cookie\\_policy](https://consultations.tfl.gov.uk/cookie_policy))

24 Please provide your views on how TfL can best establish background character information for persons who have lived for an extended period outside the UK or come to the UK from another country? Please provide any evidence to support your comments.

25 Are you responding as (please tick all that apply):

A private hire operator

A private hire driver

A private hire vehicle owner

A taxi (black cab) driver

A taxi (black cab) owner

A private hire/minicab user

A representative of an organisation

*Please select all that apply*

26 If responding on behalf of an organisation, business or campaign group, please provide us with the name:

Please note: If you are responding on behalf of an organisation it should be in an official capacity.

Organisation

27 If you are a London licensed private hire/minicab driver, how many years have you been licensed?

Less than 3 years

3-5 years

6-10 years

11-15 years

16-20 years

Over 20 years

28 If you are a London licensed private hire operator, how many years have you been licensed?

Less than 3 years

3-5 years

6-10 years

11-15 years

16-20 years

Over 20 years

29 If you are a licensed private hire operator how many private hire drivers do you have available to you normally:

0-10

11-20

21-50

51-100

101-500

501-1,000

1,001-10,000

10,001+

30 If you are a licensed private hire operator how many PHVs do you have available to you normally:

0-10

11-20

21-50



51-100

101-500

501-1,000

1,001-10,000

10,001+

31 If you are a London licensed taxi (black cab) driver, are you?

An All London driver

A Suburban driver

32 As a private hire/minicab user, how often do you use PHVs/minicabs?

Daily

2-3 times a week

Background information

3-4 times a month

Once a month

Less often

Don't know

33 What is your postcode?

You do not have to provide your postcode, but it is useful for analysis purposes. All personal details will be kept confidential.

Postcode

34 What is your email address?

This is optional, but if you enter your email address then you will be able to return to edit your response at any time until you submit it.

You will also receive an acknowledgement email when you complete the consultation.

We will contact you to let you know when the results of the consultation are published and may use your details to update you on any future developments with the proposals.

35 How did you find out about this consultation?

Received an email from TfL

Received a letter from TfL

Read about in the press

Saw it on the TfL website

Social media

Other (please specify)

### **Equality Monitoring**

Please tell us about yourself in this section. All information will be kept confidential and used for analysis purposes only. We are asking these

questions to ensure our consultations reach all sections of the community and to improve the effectiveness of the way we communicate with our customers. You do not have to provide any personal information if you don't want to.

Other

36 What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?

Very good

Good

Acceptable

Poor

Very poor

*Please select only one item*

Do you have any further comments about the quality of the consultation material?

37 Gender:

Male

Female

Trans female

Trans male

Gender neutral

Prefer not to say

38 Ethnic Group:

Asian or Asian British – Bangladeshi

Asian or Asian British – Chinese

Asian or Asian British – Indian

Asian or Asian British – Other

Asian or Asian British – Pakistani

Black or Black British – African

Black or Black British – Caribbean

Black or Black British – Other

Mixed – Other

Mixed – White and Asian

Mixed – White and Black African

Mixed – White and Caribbean

Other Ethnic Group

Other Ethnic Group – Arab

Other Ethnic Group – Kurdish

Other Ethnic Group – Latin American

Other Ethnic Group – Turkish

White – British

White – Irish

White – Other

Prefer not to say

39 Age:

Under 15

16-20

21-25

26-30

31-35

36-40

41-45

46-50

51-55

56-60

61-65

66-70

71+

Prefer not to say

40 Sexual Orientation:

Heterosexual

Bisexual

Gay man

Lesbian

Other

Prefer not to say

41 Religious faith:

Buddhist

Christian

Hindu

Muslim

Sikh

Jewish

Other

No religion

Prefer not to say

42 Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? (Please include problems related to old age)

Yes, limited a lot

Yes, limited a little

No

Prefer not to say

# Appendix C: Stakeholders consulted

Stakeholders the consultation was sent to included:

## Private Hire licensees and trade associations

- Private Hire Operators
- Private Hire Drivers
  
- Chauffeur and Executive Association
- GMB (Greater London Private Hire Drivers Branch)
- Institute of Professional Drivers and Chauffeurs
- Licensed Private Hire Car Association
- Private Hire Board
- Driver Guides Association
- British Bangladesh Minicab Drivers Association

## Taxi driver associations

- Heathrow Airport Taxi Drivers United
- Licensed Taxi Drivers Association
- London Cab Drivers Club
- London Suburban Taxi Drivers Coalition
- RMT Cab Trade Section
- Unite the Union Cab Trade Section
- United Cabbies Group

## Other licensing authorities

- National Association of Licensing and Enforcement Officers
- Senior Traffic Commissioner
- Institute of Licensing

## User groups and other stakeholders

- Action on Hearing Loss
- Age UK
- City of London Police
- Department for Transport
- Disabled Persons Transport Advisory Committee
- Equality and Human Rights Commission
- Guide Dogs
- Heart of London
- Heathrow Airport Ltd
- Inclusion London
- Living Streets
- London Accessible Transport Alliance
- London Assembly Members
- London Chamber of Commerce and industry
- London City Airport Ltd
- London Councils
- London Cycling Campaign
- London First
- London local authorities
- London MPs
- Home Counties MP's
- London TravelWatch
- Metropolitan Police Service
- Network Rail
- New West End Company
- Passenger Focus
- People 1<sup>st</sup>
- RNIB
- Society of West End Theatres
- Suzy Lamplugh Trust
- Transport for All
- Visit London (London & Partners)

# Appendix D Consultation Material

Tweets sent out from [@TfLTPH](#).

 **TfL Taxi & Private Hire**   
@TfLTPH Follow 

Have your say on our consultation on how to improve safety in private hire vehicles. The consultation closes on 25 June 2018. Read details of our proposals and how to respond here: [consultations.tfl.gov.uk/taxis/improvin...](https://consultations.tfl.gov.uk/taxis/improvin...)



8:00 am - 13 Jun 2018

1 Retweet 1 Like 

 1  1  1

 **TfL Taxi & Private Hire**   
@TfLTPH Follow 

Private hire safety consultation: deadline to respond has been extended to 25 June. We've published an independent Integrated Impact Assessment to look at the equality, health, environmental & business impacts of the proposals. Read it & give your views: [consultations.tfl.gov.uk/taxis/improvin...](https://consultations.tfl.gov.uk/taxis/improvin...)



4:30 am - 21 Jun 2018

1 Retweet 

  1 

## TPH weekly bulletin



Here is your weekly taxi and private hire travel update. This email sets out changes and events that could affect your journeys, as well as essential licensing information.

### News update

#### **New consultation to further improve safety for private hire passengers**

We've launched a consultation to further improve safety for private hire passengers. We're seeking views on better signage in private hire vehicles, enhancements to background checks for applicants, an advanced driving test and more. [You can respond until 18 June 2018](#)

#### **Using a mobile device while driving**

It is illegal to use a hand-held mobile phone or electronic device when driving. Read guidance about hand-held and hands-free devices, including rules on mounting the cradle for your hands-free device, [on this web page](#). Motorists caught using a hand-held phone while driving will receive six points on their licence and a £200 fine. The relevant legislation can be found [here](#).

#### **Signage and advertising**

Please make sure you only display approved signage on, and inside, your private hire vehicle. The same applies to taxis and this includes advertising. Read our guidelines [here](#).

#### **Fighting terrorism**

Find out what the police are doing to keep London safe, how you can spot possible terrorist activity and how to report anything suspicious that you've seen or heard. [Read more about how you can help here](#)

### Roads update

#### **Waterloo Station**

From 20:00 tonight, Thursday 29 March until 20:00 on Monday 2 April, Station Approach Road will be closed to all vehicles. This is for a crane operation. Taxis to use Spur Road for access and egress to the taxi rank.

#### **Blackwall Tunnel bus lanes**

Taxis can use the southbound Blackwall Tunnel bus lane between 9pm and 5am. Taxis cannot use the northbound Blackwall Tunnel bus lane.

#### **North London**

From 22:00 today Thursday 29 March, until 05:00 on Tuesday 03 April, Camden High Street (northbound) between Inverness Street and Britannia Junction (Camden Town) will be closed. This is for London Underground works.

#### **Central London**

From 08:00 on Friday 30 March until 20:00 on Monday 2 April 2018, the A201 Farringdon Street will be closed in both directions between Ludgate Circus and Charterhouse Street. A signed diversion route will be provided. This is while we work to extend the North-South Cycle Superhighway from Stonecutter Street to King's Cross.

#### **Central London**

From 09:00 on Friday 30 March until 22:00 on Monday 2 April 2018, Clerkenwell Road, including Clerkenwell Bridge, will be closed to eastbound traffic between Grays Inn Road and Farringdon Lane. Westbound traffic will operate as normal. A signed diversion route will be provided for Eastbound traffic. This is while we work to extend the North-South Cycle Superhighway from Stonecutter Street to King's Cross.

### Events



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**Printworks**

From 12:00 until 23:00 on Saturday 10 March there will be a marshalled taxi rank in operation.

**Tobacco Dock**

From 21:00 until 23:00 on Friday 30 and Saturday 31 March there will be a marshalled taxi rank in operation.

**Westminster**

From 11:30 until 14:00 on Friday 30 March, there will be short traffic holds on roads between Victoria Street and Westminster Abbey. This is for a procession.

**Westminster**

From 13:00 until 17:00 on Saturday 31 March, there will be traffic holds and road closures on the following roads: Oxford Street, Regent Street, Piccadilly Circus, Haymarket, Cockspur Street, Trafalgar Square, Whitehall and Parliament Square. This is due to a march.

**Central London**

From 09:30 until 13:00 on Sunday 1 April, there will be short traffic holds on the following roads: Sardinia Street, Kingsway southbound and Aldwych. This is for a procession.

**Olympia**

- Until Monday 2 April between 10:00 and 18:00 for Ideal Home Show 2018 (capacity 30,000)

**O2 Arena**

- Saturday 31 March between 18:30 and 22:30 for Fall Out Boy (capacity 15,000)
- Friday 6 April between 18:20 and 22:30 for Sam Smith (capacity 15,000)

**Wembley Arena**

- Sunday 1 April between 19:00 and 22:30 for Harbhajan Mann (capacity 10,000)

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**Rank suspensions**

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The following ranks will be out of service:

- 5455, Grays Inn Road from 08:00 on Saturday 31 March until 18:00 on Sunday 1 April. This is for a crane operation
- 4859, Strand (Clement Danes Church) from 08:00 until 14:00 on Sunday 1 April. This is due to a parade
- 5672, Seymour Street between 20:00 and 05:00 each night from Tuesday 3 until Thursday 5 April. This is for carriageway works
- 5666, Harrington Road (South Kensington Station) from 08:30 on Saturday 7 until 18:30 on Sunday 8 April. This is for carriageway works. The feeder rank will be available at all times
- 5468, Wardour Street (Hummus Bros) from Tuesday 3 until Friday 12 April. There is a full road closure in place between Hollen Street and Oxford Street. This is for carriageway works
- 5863, Dover Street from 08:00 until 20:00 on Saturday 7 April. There is a road closure in place from Piccadilly to Stafford Street. This is for a crane operation
- 5000, Grosvenor Crescent from 05:00 on Saturday 7 until 20:00 on Sunday 8 April. This is for a crane operation
- 5434, South Wharf Road (St. Mary's Hospital) from Sunday 8 until Monday 30 April. This is at the request of the Metropolitan Police for security reasons

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**Consultations**

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**Taxi fares and tariffs**

We're consulting on potential changes to taxi fares and tariffs. The consultation closes on 27 April and details of the potential changes can be found [here](#)

**St. James's Palace Forecourt**

Westminster are consulting on introducing loading restrictions in the vicinity of St. James's Palace. The consultation closes on 10 April and details of the proposals can be found [here](#)

**St. Thomas Street, London Bridge proposals**

We're consulting on proposals to make St. Thomas Street one-way only. The consultation closes on 10 April and details of the proposals can be found [here](#)

**Electric vehicle charging points in Tower Hamlets**

Tower Hamlets is consulting on locations for electric vehicle charging points. The consultation closes on 31 December and more information can be found [here](#)

For the latest updates please follow us on Twitter [@TfLTPH](#)

Yours sincerely,



Graham Robinson,  
Interim General Manager of Taxi & Private Hire

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Monday 26 Mar 2018

**TfL Press Release - TfL launches consultation to further improve safety for private hire passengers**



**PN-051**

- **Consultation seeks views on better signage in private hire vehicles and enhancements to background checks for applicants**
- **Views sought on an advanced driving test that would boost passenger safety**
- **Proposals build on previous regulatory changes that have driven up standards across the industry**

Transport for London (TfL) has today (26 March) launched a consultation seeking views on how to improve safety for private hire passengers.

The 12-week consultation is the latest phase of an ambitious programme that is raising standards across the private hire industry. The consultation invites views on an advanced driving test for private hire drivers, providing passengers with clear information on who to contact to provide feedback or to raise a complaint, and whether more robust background checks could be introduced for drivers. TfL is also seeking views on whether changes are needed to insurance arrangements for private hire services.

**Helen Chapman, TfL's Interim Director of Licensing, Regulation and Charging, said:** "The experiences of passengers and their safety is at the heart of everything we do. We've worked hard to drive up the standards of the industry, from significantly increasing the number of compliance officers to ensuring passengers know who their driver is and what the vehicle details are. With the dramatic recent changes in the private hire industry transforming passengers' experiences we need to go further. This consultation demonstrates our clear commitment to keeping passengers safe and our proposals would be pivotal in protecting the public and giving them the reassurances they need while out and about in our city."

**Val Shawcross, Deputy Mayor for Transport, said:** "Keeping Londoners safe is our number one priority, and since Sadiq took over as Mayor we've been determined to drive up standards across the private hire industry. We've pushed ahead with quadrupling the number of Compliance Officers and plans for a more advanced driving test, but there's much more we can do. Whether through more comprehensive insurance requirements or more advanced background checks we must ensure every Londoner feels safe getting around our city at all times of day and night."

As set out in the Mayor's Transport Strategy, TfL is committed to ensuring that a Vision Zero approach – which eradicates all deaths and serious injuries on the capital's roads – applies to all aspects of London's transport system. Private hire vehicles play an important role in London and, as such, have a part to play in delivering this vision. To ensure private hire services remain safe and secure, TfL is seeking views on the following:

- An advanced driving test for private hire drivers, which could include accessibility training
- New, clear signage displayed in private hire vehicles to make it easier for customers to raise concerns about the driver's behaviour and driving as well as the condition and accessibility of the vehicle
- How TfL could improve the vetting of private hire driver applicants to ensure a fuller and more comprehensive period of criminal history is available for consideration as part of the licensing
- Whether changes need to be made to insurance arrangements for private hire services

This consultation builds on the improvements to standards and safety set out in the Mayor's Taxi and Private Hire Action Plan. This includes significantly increasing the number of Compliance Officers and requiring both driver and vehicle details to be provided to passengers before the start of a journey.

The next phase of the programme to improve standards and security will be a consultation on proposals for regulations to cover new, novel or ridesharing services, as described in TfL's recent policy paper. The paper sets out TfL's position on how such services might operate in the future and ensures TfL remains the world leader in regulating private hire services. TfL is also conducting research on the impact of removing the Congestion Charge exemption for private hire vehicles. Depending on the outcome of this work a consultation could take place at a later date.

#### Contact

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#### Notes to editors

- More details on TfL's policy paper on how private hire and ride sharing services could operate in the future can be found here: <https://tfl.gov.uk/info-for/media/press-releases/2018/february/tfl-to-ensure-private-hire-remains-safe-secure-and-convenient>
- The consultation closes on Friday 15 June 2018 and can be accessed here: <https://consultations.tfl.gov.uk/>



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