

Operator's name: HOPP OPERATIONS LIMITED
Reference: 010088
Date: 28 May 2019

HOPP OPERATIONS LIMITED
10 NOEL ROAD
LONDON
N1 8HA

Dear Mr Pleeth,

Issue of London Private Hire Operator Licence

Your application for a London private hire operator licence has now been processed and I am pleased to confirm that your licence has been granted. You are now licensed to carry out private hire bookings as a licensed London private hire operator.

This pack includes:

- Your private hire operator licence
 - Part A – there should be one copy of this part of the licence
 - Part B – there should be a licence for every operating centre that has satisfied the criteria in order to be licensed
- Summary of the conditions attached to every operator's licence
- Handbook for London licensed private hire operators
- Policy statement on private hire services in London

For general guidance and information on our policy and private hire law in London, you are advised to review the policy guidelines and the Notices that have been issued. These can be found within the Policies section on our website www.tfl.gov.uk/tph. It is recommended that you review our website on a regular basis as it is frequently updated.

Licence duration

We understand that your operating model is proposing a private hire service in London. The proposed service would initially be for an immediate and exclusive private hire service only. The service would be offered through a Smartphone app only.

We consider that a 15 month licence is appropriate in the particular circumstances of the case in order to allow TfL to monitor the service being provided in the interests of public safety. You will be sent a reminder about the need to renew your licence at the appropriate time in advance of the expiry of your licence.

Licence conditions

The granting of this PHV operator's licence is subject to the conditions which are set out in Appendix A of this letter, which is stipulated on the licence as follows:

- **Subject to the conditions listed in Appendix A of the licence issue letter**

It is important that you review the conditions and ensure that any relevant action is taken with respect to demonstrating and maintaining compliance with them.

Operator licence tier

It is a condition of the licence issued that you do not have **any more than** [REDACTED] private hire vehicles available to carry out bookings at all operating centres specified in the licence.

If you are eligible to pay the fee for the grant of your licence in annual instalments and you have indicated to TfL that you wish to do this, it is a condition of your licence that you pay each annual licence fee instalment at latest 14 days before the end of each year (commencing on the day your licence was granted). Failure to do so may result in licensing action, including the suspension or revocation of your licence.

Condition	Status	Start Date	Expiry Date
Subject to the conditions listed in Appendix A of the licence issue letter	Active	28 May 2019	27 August 2020
Subject to No Public Access	Active	28 May 2019	27 August 2020

Please read the important information at the end of this letter about your licence condition(s)

- **Private hire operator licence** - make sure all details on your licence are correct. If any of the details are incorrect, please contact us immediately at **TPH.Operators@tfl.gov.uk**
- Part A of licence - A copy of this part of your licence document should be displayed in every operating centre detailed on your licence
- Part B of licence - The relevant Part B licence document should be displayed at the operating centre to which it relates
- If your licence document is lost or stolen, you must:
 - Report it to the police and obtain a crime reference number; and then
 - provide TfL with the details so that a replacement can be issued

Note: Frequent loss of or damage to licence document may result in you being charged for replacements in the future.

The licence document remains the property of Transport for London (TfL) and must be surrendered should you no longer wish to carry out private hire bookings or if your licence is suspended or revoked. It must be produced on demand to the police or a TfL Compliance Officer.

Operator Upload - Online process

All licensed operators are required to provide TfL, with the details of the vehicles and drivers that have been used to fulfil bookings or that have been available to fulfil bookings. This information must be provided on a weekly basis

The Nominated Representative is now required to upload the organisations data using our online process which is:

- **Easy to access** – Visit [REDACTED] to log in
- **Quicker** – Once logged in, your upload takes less time to complete
- **Easier** – Available user guides with templates to guide you through the process
- **Safe and secure** - Your account is only accessible via your personalised account details

The Nominated Representative will need to use the online registration details below to register for uploading information; please visit [REDACTED] to create an online account

Customer online reference number:	[REDACTED]
Additional Identifier:	Operator Licence
Licence Number:	[REDACTED]

This will allow all operators to upload vehicle and driver data every week, securely and on time

For instructions and user guides on how to upload your vehicle and driver data as per the conditions of your licence, visit [REDACTED] or contact us on **0343 222 4444**

To discuss any changes to your role, please contact us at tph.operators@tfl.gov.uk **A separate PHV/103 Personal Declaration application form is required for each individual associated with your licence**

Reporting Changes in Circumstances

Please remember that you are required to inform us in advance of any material changes to the operating model that may affect your compliance with private hire vehicle legislation and regulations or with the conditions of your licence. Please inform us of such differences from what was stated in your application. This will help ensure that the changes are compliant with private hire legislation, in the interests of passenger safety and customer care.

Operating your business with more than the permitted maximum number of private hire vehicles available to accept bookings is a breach of a licence condition and may lead to licensing action. This may include suspension and/or revocation of your licence.

We strongly recommend you inform TfL well in advance if you anticipate operating your business with more than the permitted maximum number of private hire vehicles available to accept bookings. TfL will be able to consider and assist with an application for a new licence with an appropriate permitted maximum number of vehicles.

You must submit a PHV/106 application form if you wish to add or remove an operating centre to your licence. This will need to be approved before you change your address.

You are required to **immediately** (i.e. within 14 days) notify us of **any other material changes** to the following:

- If you, or anyone associated with the licence, makes any changes to their personal details e.g. name change, change of home address. If the person who has changed address is also a PHV driver or owns a PHV, then they must return their driver and vehicle licences to us for amendment
- If you, or anyone associated with the licence, has any changes to their personal details e.g. if you are made bankrupt
- If you, or anyone associated with the licence, are charged with, convicted of, or receive a police caution for any criminal offence, including any road traffic offences
- If there is any change that affects your company e.g. name change, the liquidation, dissolution etc. of the company, any appointments to, or resignations from, the company
- If there are any changes that affect your business e.g. the adoption of a new trading name

Failure to immediately notify us about any of the above changes could result in a review of your suitability to remain licensed.

There are limitations to the wording that you can use as part of your signage or advertisements that invites bookings at a particular address or using a particular telephone number registered to that address. You are not permitted to use any of the following words: 'taxi', 'taxis', 'cab' or 'cabs', or any word so closely resembling any of those words as to be likely to be mistaken for it (whether alone or as part of another word), unless the vehicles offered for hire are London taxis (black cabs). The words 'minicab', 'mini-cab' or 'mini cab' (whether in the singular or plural), are acceptable.

Please note the following:-

- You must not have **more than** [REDACTED] private hire vehicles available to you to carry out bookings accepted by you.
- If you are eligible and have chosen to pay the fee for the grant of your licence by annual instalments, you must pay the annual instalment each year or you may be subject to licensing action.
- A record of all bookings must be retained.

- You must only use TfL licensed private hire drivers to undertake private hire bookings.
- You must only use a TfL licensed private vehicle to undertake private hire bookings, which must be covered by hire and reward insurance at all times while the private hire vehicle is in use as such.
- Change of address of any of your operating centre(s). You **must** submit a PHV/106 variation form if you wish to change any address on your licence
- Your drivers are not entitled to 'ply for hire' – pick up passengers from the side of the road – or 'tout' – approach passengers directly. All bookings **must** be made through a licensed London private hire operator. **Please note:** Should a licensed operator, or an individual associated with an operator's licence, be convicted for illegally plying for hire or touting, the operator licence could be revoked.
- If any of an operator's drivers or other employees are convicted or cautioned for illegally plying for hire or touting and they were found to be acting under the operator's instructions at the time, the fitness of an operator to remain licensed may be considered.
- Unlike licensed taxis, private hire vehicles are not entitled to drive in bus lanes,.
- Private hire vehicles are not allowed to park, wait, drop off or collect passengers on a taxi rank.
- Your drivers cannot automatically drop off and pick up on Red Routes – this requires an application and exemption for the vehicle.

Your drivers cannot drive within the Congestion Charging area without paying the charge. Their exemption only relates to when their vehicle is being used to carry out a booking.

Congestion Charge

Most private hire vehicles will no longer be exempt from the Congestion Charge. This means that private hire vehicles will be subject to the Congestion Charge if they travel within the zone during charging hours which are 7am to 6pm every Monday to Friday.

Private hire vehicles which are designated wheelchair accessible and are being used to fulfil a private hire booking will retain an exemption to the Congestion Charge. Some private hire vehicles may also be eligible for one of the Congestion Charge discounts or exemptions. For more information, please visit:

<https://tfl.gov.uk/modes/driving/congestion-charge/discounts-and-exemptions>.

Ultra Low Emission Zone (ULEZ)

All private hire vehicles travelling within the ULEZ must meet certain emissions standards or pay a £12.50 charge per day.

In order to avoid paying the £12.50 daily charge, vehicles will need to meet the following minimum standards:

- petrol private hire vehicles will need to meet Euro 4 emissions standards

- diesel private hire vehicles will need to meet Euro 6 emission standards

Designated Wheelchair-Accessible private hire vehicles

Designated wheelchair-accessible private hire vehicles will be given a grace period, which means they will be exempt from the ULEZ daily charge until 26 October 2025. These vehicles will only be exempt when carrying out a private hire booking for a TfL-licensed private hire operator.

The paper copy of the private hire vehicle licence will indicate whether a vehicle is designated as wheelchair accessible.

For further information and to check whether specific vehicles meet the ULEZ standards, please visit: <http://tfl.gov.uk/ulez>.

Therefore, private hire vehicles that do not meet ULEZ emission standards will be liable to pay the ULEZ daily charge in addition to the Congestion Charge if it is driven in the zone during charging hours, unless otherwise eligible for an exemption or other discount.

Equality Act 2010

The Equality Act 2010 includes some provisions relating specifically to taxis and private hire vehicles and disabled passengers. The information below sets out what your duties are and provides advice on how to comply with the law.

Wheelchairs

Section 165 of the Equality Act places duties on drivers of designated wheelchair-accessible taxis and private hire vehicles.

The duties are:

- To transport the passenger while in the wheelchair;
- Not make any additional charge for doing so;
- If the passenger chooses to sit in a passenger seat, to transport the wheelchair;
- Take such steps as are necessary to ensure that the passenger is transported in safety and reasonable comfort;
- Give the passenger such mobility assistance as is reasonably required - which the Act defines as:
 - To enable the passenger to get into or out of the vehicle;
 - If the passenger wishes to remain in the wheelchair, to enable the passenger to get into and out of the vehicle while in the wheelchair;
 - If the passenger does not wish to remain in the wheelchair, to load the wheelchair into or out of the vehicle;
 - To load the passenger's luggage into or out of the vehicle.

We would always expect drivers to provide assistance such as installing the boarding ramp, or securing a wheelchair within the passenger compartment. Depending on the weight of the wheelchair and the capability of the driver, reasonable mobility assistance

also includes pushing a manual wheelchair or light electric wheelchair up a ramp.

The requirement not to charge a wheelchair user extra means that, in practice, a meter should not be left running while the driver performs duties required by the Act, or the passenger enters, leaves or secures their wheelchair within the passenger compartment.

Drivers who fail to comply with these duties are liable to prosecution and fines of up to £1,000. The driver's continued fitness to hold a licence may also be reviewed.

The only grounds for exemption are medical, or that a physical condition makes it impossible or unreasonably difficult for a driver to comply with these duties. Applications for exemptions must be made to TfL. Exempt drivers must display the exemption notice and carry their exemption certificate with them in order for the exemption to be valid.

A taxi or private hire vehicle is 'designated' as wheelchair-accessible for the purposes of section 165 of the Equality Act 2010 if it appears on a list maintained under section 167. All licensed London taxis are designated by default. The list of designated private hire vehicles is available on our website.

Assistance Dogs

Sections 168 and 170 of the Equality Act require taxis and private hire vehicles to carry all assistance dogs accompanying disabled people and to do so without any additional charge.

You should note that:

- Taxi and private hire vehicle drivers cannot refuse a passenger because they have an assistance dog;
- Passengers cannot be charged more for a taxi or private hire journey because they have an assistance dog;
- Assistance dogs must be seated with their owners at all times.

Drivers who fail to comply with the Act are liable to prosecution and fines of up to £1,000. The driver's continued fitness to hold a licence may also be reviewed.

There are different types of assistance dogs providing a wide range of support to older and disabled people. Further information on different types of assistance dogs can be found on the taxi and private hire pages of the TfL website. Taxi and private hire vehicle drivers should be aware that some passengers may have a health condition that is not obvious or visible but will still have an assistance dog.

The only grounds on which drivers can be exempted from these duties are medical. Applications for exemptions must be made to TfL. Exempt drivers must display the exemption notice and carry their exemption certificate with them in order for the exemption to be valid.

Equality Obligations

- Your drivers are legally required to carry disabled passengers where they have an assistance dog, or are a wheelchair user and to do so at no extra cost.
- If your drivers are found to have refused a journey, or charged a passenger more, because they have an assistance dog or are a wheelchair user, you (and your driver) may be prosecuted and may lose your private hire licence.

Important Changes to Private Hire Regulation

A number of TPH Notices ([Notice 07/16](#), [Notice 10/16](#), [Notice 03/18](#)) have been issued in regards to notifying you that the TfL Board had approved new regulatory changes to raise standards in London's private hire industry, improving safety and convenience for customers. All TPH Notices are available on the taxi and private hire pages of the TfL website.

New Requirements for Private Hire Operators
Operators must provide a booking confirmation to a passenger before their journey starts. This must include the first name of the driver, their licence number, vehicle registration mark and – where the passenger can receive it - a photo of the driver.
Operators must inform TfL of any material changes to the operating model of their business that may affect their compliance with the Private Hire Vehicles (London) Act 1998, the Private Hire Vehicles (London) (Operators' Licences) Regulations 2000, or the operator's licence conditions before they are made. This will help ensure that the changes are compliant with private hire legislation, in the interest of passenger safety and customer care.
Operators must ensure that all staff who have face-to-face contact with the public (for example, in a minicab office that is open to the public) have, or have proof they have applied for, a basic disclosure check – available through Disclosure Scotland. This is in addition to the requirement for private hire drivers to have an enhanced Disclosure and Barring Service check.
All Operators are required to email TfL on a weekly basis the details of the drivers and vehicles they have used to fulfil bookings, or have had available to them to fulfil bookings. Email TPH.Operators@tfl.gov.uk with any questions
Operators must provide their customer with an accurate fare estimate before the journey starts (unless the fare has been pre-agreed).
Operators must keep records for a minimum of 12 months. This includes records for bookings, complaints and lost property, as well as driver and vehicle records.
Operators must record the main destination of the customer's journey, before the journey starts.
Operators are limited to having no more than five business names attached to their operator's licence.
Operators are required to provide TfL with relevant National Insurance details when applying for or renewing their licence.
Operators are to make someone available for passengers to speak to during their hours of business and at all times during a journey if passengers want to make a complaint or discuss other matters relating to their booking.

What TfL will do next:-

A TfL Compliance Officer will contact you in approximately 6-8 weeks time to arrange the first compliance inspection for this licence. As with any subsequent inspections, the licence holder will, on that occasion, be required to demonstrate that the respective private hire business is being run in a safe and compliant manner. We will require the production of accurate and up to date records, which show that all bookings are being properly discharged and in accordance with the licence terms and conditions.

What you should do next:-

- Ensure that the appropriate procedures and/or systems are put in place to ensure that you can fully demonstrate that you can meet all of the new requirements.
- Ensure that all of your records are maintained and are made available for inspection when requested.
- If you have not already done so, you will need to apply for a basic disclosure check, Once submitted, the details of the applicant will be checked against the Police National Computer for details of all current convictions the applicant has. You will need to submit a basic disclosure check application for all employees that will have face to face contact with the public. For further guidance please go to tfl.gov.uk/ph-regulations and www.disclosurescotland.co.uk
- As an organisation that processes personal data you are legally obliged to register with the Information Commissioner's Office (ICO). The ICO is the independent regulator for information rights and maintains a national register of data controllers. Please go to <https://ico.org.uk/for-organisations/register/> to register. **Please note:** It is a criminal offence if you don't.
- More information on your obligations are available at www.tfl.gov.uk/privacy. We also recommend that you read 'Privacy and data protection – A guide for private hire operators' which is available at

General information:-

You can contact us on 0343 222 4444 between the hours of 8.00am to 6.00pm Monday to Friday (excluding bank holidays). You can write to us at the address above or e-mail to **TPH.Operators@tfl.gov.uk**

Please quote your licence number in any correspondence.

TfL reserves the right to share your data with organisations such as the National Fraud Initiative to confirm the accuracy of the data provided; for the prevention and detection of crime and protection of public funds. TfL randomly selects and monitors applicants to identify possible fraudulent use.

Yours sincerely,



Helen Chapman

General Manager, London Taxi & Private Hire | Transport for London (TfL)

Enc:

1. Copy of the licence
2. Summary of the conditions attached to every operator's licence;
3. Handbook for licensed operators
4. Appendix A – licence conditions

Summary of the conditions attached to every London PHV Operator's licence

A London licensed PHV Operator:

- 1) shall maintain public liability insurance cover, which has a minimum indemnity of £5m in respect of any one event, for any of the operating centres specified in his licence that is accessible to members of the public;
- 2) shall agree the fare for the journey booked or provide an accurate estimate of that fare;
- 3) who is convicted of an offence must, within 14 days, inform TfL of the details of the conviction. This applies to all persons associated with the licence (e.g. all of the directors of a limited liability company);
- 4) shall notify TfL of any material change to its operating model that may affect the operator's compliance with the Private Hire Vehicles (London) Act 1998, the Private Hire Vehicles (London) (Operators' Licences) Regulations 2000 or its licensing conditions;
- 5) shall notify TfL of any material changes to the information provided in the application for his licence, or any application to vary that licence, within 14 days of the change;
- 6) who dismisses a driver for unsatisfactory conduct in connection with the driving of a private hire vehicle must inform TfL of the name of the driver and the circumstances of the case, within 14 days of the driver's dismissal;
- 7) shall not use CB apparatus in connection with his private hire business;
- 8) must have and maintain effectively, a procedure for dealing with complaints. As part of this obligation, the operator must record and retain the prescribed particulars of any complaints he receives;
- 9) must have and maintain effectively, a procedure for dealing with property left behind by customers in his cars or operating centres. As part of this obligation, the operator must record and retain the prescribed particulars of any property that is found or reported missing to him;
- 10) must charge a fare in accordance with his fare structure for PHVs when using a London licensed taxi to carry out a booking, unless the fare shown on the taxi's meter is less;
- 11) must provide TfL with such particulars of drivers and vehicles as may be required by TfL from time to time;
- 12) must not have more than the maximum number of vehicles available to them to carry out bookings accepted by him at all the operating centres specified in the licence. The maximum condition will not apply to operators who hold a licence for

██████████ or more vehicles; and

- 13) if eligible and have opted to pay the grant of licence fee by annual instalments, the annual licence fee must be paid not later than 14 days before the end of the one-year period from when the licence was granted.

Operator Upload Information Sheet

Following amendments to the Private Hire Regulations, as a licensed private hire operator you are now required to provide us details of the drivers and vehicles you have used to fulfil private hire bookings, or have had available to you to fulfil bookings on a weekly basis. We will use the information provided for data analysis.

PROCESS

Follow our simple process in order to provide the correct data to us, in the correct format, at the right times.

Why?

- Easy to access – Visit our web site to log in or to create an account
- Quicker – Once logged in, your upload takes less time to complete
- Easier – Available user guides with templates to guide you through the process
- Safe and secure - Your account is only accessible via your personalised account details

Who?

- The Nominated Representative will need to login to their online account to upload driver and vehicle data every week, securely and on time.

Where?

- TfL Website - www.tfl.gov.uk/ph-operators

When?

- On the Monday of every week we require you to upload two separate reports

What information to declare?

- **Driver** data report
 - Drivers, you have used to fulfil private hire bookings AND
 - Drivers, you have had available to you to fulfil bookings in the previous week
- **Vehicle** data report
 - Vehicles, you have used to fulfil private hire bookings AND
 - Vehicles, you have had available to you to fulfil bookings in the previous week

For further information regarding operator upload, visit www.tfl.gov.uk/ph-operators or contact us on 0343 222 4444 (options 1-1-3-2)

More detailed information regarding Private Hire Regulations and all requirements can be found on our website at tfl.gov.uk/ph-regulations

Please read the following information to check which specific condition(s) relates to your licence:

Condition	What this means	What happens next
Restricted to work in term-time (20 hours per week) only and Self-employment prohibited	Your licence was issued with the condition that it was <i>restricted work in term-time (20 hours per week)</i> .	In order to give us every opportunity to ensure we keep you continually licensed, you must submit confirmation of your current leave status and right to take employment in the UK in support of your renewal application. Failure to do so could lead to delays and may lead to your licence expiring, as we are unlikely to issue a further licence until your right to work and reside in the UK has been confirmed.
Restricted to work in term-time (10 hours per week) only and Self-employment prohibited	Your licence was issued with the condition that it was <i>restricted work in term-time (10 hours per week)</i> .	In order to give us every opportunity to ensure we keep you continually licensed, you must submit confirmation of your current leave status and right to take employment in the UK in support of your renewal application. Failure to do so could lead to delays and may lead to your licence expiring, as we are unlikely to issue a further licence until your right to work and reside in the UK has been confirmed.
Subject to continued leave to work and reside in the UK	Your licence was issued with the condition that it was <i>subject to continued leave to work and reside in the UK</i> .	In order to give us every opportunity to ensure we keep you continually licensed, you must submit confirmation of your current leave status and right to take employment in the UK in support of your renewal application. Failure to do so could lead to delays and may lead to your licence expiring, as we are unlikely to issue a further licence until your right to work and reside in the UK has been confirmed.
Subject to planning permission being approved	Your licence was issued with the condition that it was <i>subject to planning permission being approved</i> for an operating centre specified on your licence.	In order to give us every opportunity to ensure we keep you continually licensed, you must submit confirmation that (a) planning permission has been granted or (b) an application for planning remains ongoing for the relevant centre. Failure to do so could lead to delays and may lead to your licence expiring, as we are unlikely to issue a further licence until the required proof of planning permission has been confirmed.
Subject to the restrictions of the approved planning permission	Your licence was issued with the condition that it was <i>subject to the restrictions of the approved planning permission</i>	In order to give us every opportunity to ensure we keep you continually licensed, you are required to notify us of any changes in your circumstances which may affect this condition being renewed.
Subject to installation of a fixed, landline telephone number for bookings	Your licence was issued with the condition that it was <i>subject to installation of a fixed, landline telephone number for bookings</i> .	In order to give us every opportunity to ensure we keep you continually licensed, you must submit confirmation that a fixed, landline telephone number for bookings has been installed. Failure to do so could lead to delays and may lead to your licence expiring, as we are unlikely to issue a further licence until the required landline number has been confirmed.
Subject to conditions listed in Appendix A of the licence issue letter	Your licence was issued with the conditions listed in Appendix A which was provided within the licence issue letter.	In order to give us every opportunity to ensure we keep you continually licensed, you are required to provide evidence that you are complying with the conditions in Appendix A.
Subject to No Public Access	Your licence was issued with the condition that it was <i>subject to no public access</i> .	In order to give us every opportunity to ensure we keep you continually licensed, you are required to notify us of any changes in your circumstances which may affect this condition being renewed.

Operator's name: BOLT SERVICES UK LIMITED
Reference: 010088
Date: 27 August 2020

Doctor Michael Sangster Galvin
BOLT SERVICES UK LIMITED
2 BATH PLACE
2 RIVINGTON STREET
HACKNEY
EC2A 3DR

Dear Doctor Galvin,

Issue of London Private Hire Operator's Licence

Your application for a London private hire operator's licence has now been processed and I am pleased to confirm that your licence has been granted. You are now licensed to carry out private hire bookings as a licensed London private hire operator.

This pack includes:

- Your private hire operator licence
 - Part A – there should be one copy of this part of the licence
 - Part B – there should be a licence for every operating centre that has satisfied the criteria in order to be licensed
- Summary of the conditions attached to every operator's licence

For general guidance and information on our policy and private hire law in London, you are advised to review the policy guidelines and the Notices that have been issued. These can be found within the Policies section on our website www.tfl.gov.uk/tph. It is recommended that you review our website on a regular basis as it is frequently updated.

Licence duration

The decision has been made to grant Hopp Operations Limited a PHV operator's licence for a period of 15 months, ending on 27 November 2021. The reasons for this are as set out in the decision letter that will be sent under separate cover.

You will be sent a reminder about the need to renew your licence at the appropriate time in advance of the expiry of your licence.

Licence conditions

The PHV operator's licence has been granted subject to conditions which are set out in the Appendix to the licence and in Appendix A of this letter.

Condition	Status	Start Date	Expiry Date
Subject to the conditions listed in Appendix A of the licence issue letter	Active	28 August 2020	27 November 2021
Subject to No Public Access	Active	28 August 2020	27 November 2021
Subject to No Public Access	Active	7 June 2019	27 August 2020
Subject to the conditions listed in Appendix A of the licence issue letter	Active	28 May 2019	27 August 2020
Subject to No Public Access	Active	28 May 2019	27 August 2020

Please read the important information at the end of this letter about your licence condition(s)

Operator licence tier

It is a prescribed condition of the licence that you do not have **more than** [REDACTED] private hire vehicles available to carry out bookings at all operating centres specified in your licence. Should you wish to change the number of vehicles available, you will need to make a fresh application.

Your Licence

- **Private hire operator licence** - make sure all details on your licence are correct. If any of the details are incorrect, please contact us immediately at tph.operators@tfl.gov.uk
- Part A of licence - A copy of this part of your licence document should be displayed in every operating centre detailed on your licence
- Part B of licence - The relevant Part B licence document should be displayed at the operating centre to which it relates
- If your licence document is lost or stolen, you must:
 - Report it to the police and obtain a crime reference number; and then
 - provide TfL with the details so that a replacement can be issued

Note: Frequent loss of or damage to licence document may result in you being charged for replacements in the future.

The licence document remains the property of Transport for London (TfL) and must be surrendered should you no longer wish to carry out private hire bookings or if your licence is suspended or revoked. It must be produced on demand to the police or a TfL Compliance Officer.

Operator Upload - Online process

All licensed operators are required to provide TfL, with the details of the vehicles and drivers that have been used to fulfil bookings or that have been available to fulfil bookings. This information must be provided on a weekly basis

The Nominated Representative is now required to upload the organisations data using our online process which is:

- **Easy to access** – Visit www.tfl.gov.uk/ph-operators to log in
- **Quicker** – Once logged in, your upload takes less time to complete
- **Easier** – Available user guides with templates to guide you through the process
- **Safe and secure** - Your account is only accessible via your personalised account details

The Nominated Representative will need to login to their existing online account where they will see the options to upload vehicle and driver data.

This will allow all operators to upload vehicle and driver data every week, securely and on time

For instructions and user guides on how to upload your vehicle and driver data as per the conditions of your licence, visit www.tfl.gov.uk/ph-operators or contact us on **0343 222 4444**

To discuss any changes to your role, please contact us at tph.operators@tfl.gov.uk

A separate PHV/103 Personal Declaration application form is required for each individual associated with your licence

Reporting Changes in Circumstances

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Operating your business with more than the permitted maximum number of private hire vehicles available to accept bookings is a breach of a licence condition and may lead to licensing action. This may include suspension and/or revocation of your licence.

We strongly recommend you inform TfL well in advance if you anticipate operating your business with more than the permitted maximum number of private hire vehicles available to accept bookings. TfL will be able to consider and assist with an application for a new licence with an appropriate permitted maximum number of vehicles.

You must submit a PHV/106 application form if you wish to add or remove an operating centre to your licence. This will need to be approved before you change your address.

You are required to **immediately** (i.e. within 14 days) notify us of **any other material changes** to the following:

- If you, or anyone associated with the licence, makes any changes to their personal details e.g. name change, change of home address. If the person who has changed address is also a PHV driver or owns a PHV, then they must return their driver and vehicle licences to us for amendment
- If you, or anyone associated with the licence, has any changes to their personal details e.g. if you are made bankrupt
- If you, or anyone associated with the licence, are charged with, convicted of, or receive a police caution for any criminal offence, including any road traffic offences
- If there is any change that affects your company e.g. name change, the liquidation, dissolution etc. of the company, any appointments to, or resignations from, the company
- If there are any changes that affect your business e.g. the adoption of a new trading name

Failure to immediately notify us about any of the above changes could result in a review of your suitability to remain licensed.

There are limitations to the wording that you can use as part of your signage or advertisements that invites bookings at a particular address or using a particular telephone number registered to that address. You are not permitted to use any of the following words: 'taxi', 'taxis', 'cab' or 'cabs', or any word so closely resembling any of those words as to be likely to be mistaken for it (whether alone or as part of another word), unless the vehicles offered for hire are London taxis (black cabs). The words 'minicab', 'mini-cab' or 'mini cab' (whether in the singular or plural), are acceptable.

Please note the following:-

- You must not have **more than** [REDACTED] private hire vehicles available to you to carry out bookings accepted by you if you are eligible and have chosen to pay the fee for the grant of your licence by annual instalments, you must pay the annual instalment each year or you may be subject to licensing action.
- A record of all bookings must be retained.
- You must only use TfL licensed private hire drivers to undertake private hire bookings.
- You must only use a TfL licensed private vehicle to undertake private hire bookings, which must be covered by hire and reward insurance at all times while the private hire vehicle is in use as such.
- Change of address of any of your operating centre(s). You **must** submit a PHV/106 variation form if you wish to change any address on your licence

- Your drivers are not entitled to 'ply for hire' – pick up passengers from the side of the road – or 'tout' – approach passengers directly. All bookings **must** be made through a licensed London private hire operator. **Please note:** Should a licensed operator, or an individual associated with an operator's licence, be convicted for illegally plying for hire or touting, the operator licence could be revoked.
- If any of an operator's drivers or other employees are convicted or cautioned for illegally plying for hire or touting and they were found to be acting under the operator's instructions at the time, the fitness of an operator to remain licensed may be considered.
- Unlike licensed taxis, private hire vehicles are not entitled to drive in bus lanes,.
- Private hire vehicles are not allowed to park, wait, drop off or collect passengers on a taxi rank.
- Your drivers cannot automatically drop off and pick up on Red Routes – this requires an application and exemption for the vehicle. Your drivers cannot drive within the Congestion Charging area without paying the charge. Their exemption only relates to when their vehicle is being used to carry out a booking. If you have yet to return your old licence to us, you should return all copies of that licence within seven days of the expiry of your existing licence.

Congestion Charge

Most private hire vehicles will no longer be exempt from the Congestion Charge. This means that private hire vehicles will be subject to the Congestion Charge if they travel within the zone during charging hours which are 7am to 10pm every day except Christmas day.

Private hire vehicles which are designated wheelchair accessible and are being used to fulfil a private hire booking will retain an exemption to the Congestion Charge. Some private hire vehicles may also be eligible for one of the Congestion Charge discounts or exemptions. For more information, please visit:

<https://tfl.gov.uk/modes/driving/congestion-charge/discounts-and-exemptions>.

Ultra Low Emission Zone (ULEZ)

All private hire vehicles travelling within the ULEZ must meet certain emissions standards or pay a £12.50 charge per day.

In order to avoid paying the £12.50 daily charge, vehicles will need to meet the following minimum standards:

- petrol private hire vehicles will need to meet Euro 4 emissions standards
- diesel private hire vehicles will need to meet Euro 6 emission standards

Designated Wheelchair-Accessible private hire vehicles

Designated wheelchair-accessible private hire vehicles will be given a grace period, which means they will be exempt from the ULEZ daily charge until 26 October 2025. These vehicles will only be exempt when carrying out a private hire booking for a TfL-licensed private hire operator.

The paper copy of the private hire vehicle licence will indicate whether a vehicle is designated as wheelchair accessible.

For further information and to check whether specific vehicles meet the ULEZ standards, please visit: <http://tfl.gov.uk/ulez>.

Therefore, private hire vehicles that do not meet ULEZ emission standards will be liable to pay the ULEZ daily charge in addition to the Congestion Charge if it is driven in the zone during charging hours, unless otherwise eligible for an exemption or other discount.

Equality Act 2010

The Equality Act 2010 includes some provisions relating specifically to taxis and private hire vehicles and disabled passengers. The information below sets out what your duties are and provides advice on how to comply with the law.

Wheelchairs

Section 165 of the Equality Act places duties on drivers of designated wheelchair-accessible taxis and private hire vehicles.

The duties are:

- To transport the passenger while in the wheelchair;
- Not make any additional charge for doing so;
- If the passenger chooses to sit in a passenger seat, to transport the wheelchair;
- Take such steps as are necessary to ensure that the passenger is transported in safety and reasonable comfort;
- Give the passenger such mobility assistance as is reasonably required - which the Act defines as:
 - To enable the passenger to get into or out of the vehicle;
 - If the passenger wishes to remain in the wheelchair, to enable the passenger to get into and out of the vehicle while in the wheelchair;
 - If the passenger does not wish to remain in the wheelchair, to load the wheelchair into or out of the vehicle;
 - To load the passenger's luggage into or out of the vehicle.

We would always expect drivers to provide assistance such as installing the boarding ramp, or securing a wheelchair within the passenger compartment. Depending on the weight of the wheelchair and the capability of the driver, reasonable mobility assistance also includes pushing a manual wheelchair or light electric wheelchair up a ramp.

The requirement not to charge a wheelchair user extra means that, in practice, a meter should not be left running while the driver performs duties required by the Act, or the passenger enters, leaves or secures their wheelchair within the passenger compartment.

Drivers who fail to comply with these duties are liable to prosecution and fines of up to £1,000. The driver's continued fitness to hold a licence may also be reviewed.

The only grounds for exemption are medical, or that a physical condition makes it impossible or unreasonably difficult for a driver to comply with these duties. Applications for exemptions must be made to TfL. Exempt drivers must display the exemption notice and carry their exemption certificate with them in order for the exemption to be valid.

A taxi or private hire vehicle is 'designated' as wheelchair-accessible for the purposes of section 165 of the Equality Act 2010 if it appears on a list maintained under section 167. All licensed London taxis are designated by default. The list of designated private hire vehicles is available on our website.

Assistance Dogs

Sections 168 and 170 of the Equality Act require taxis and private hire vehicles to carry all assistance dogs accompanying disabled people and to do so without any additional charge.

You should note that:

- Taxi and private hire vehicle drivers cannot refuse a passenger because they have an assistance dog;
- Passengers cannot be charged more for a taxi or private hire journey because they have an assistance dog;
- Assistance dogs must be seated with their owners at all times.

Drivers who fail to comply with the Act are liable to prosecution and fines of up to £1,000. The driver's continued fitness to hold a licence may also be reviewed.

There are different types of assistance dogs providing a wide range of support to older and disabled people. Further information on different types of assistance dogs can be found on the taxi and private hire pages of the TfL website. Taxi and private hire vehicle drivers should be aware that some passengers may have a health condition that is not obvious or visible but will still have an assistance dog.

The only grounds on which drivers can be exempted from these duties are medical. Applications for exemptions must be made to TfL. Exempt drivers must display the exemption notice and carry their exemption certificate with them in order for the exemption to be valid.

Equality Obligations

- Your drivers are legally required to carry disabled passengers where they have an assistance dog, or are a wheelchair user and to do so at no extra cost.

- If your drivers are found to have refused a journey, or charged a passenger more, because they have an assistance dog or are a wheelchair user, you (and your driver) may be prosecuted and may lose your private hire licence.

Important Changes to Private Hire Regulation

A number of TPH Notices ([Notice 07/16](#), [Notice 10/16](#), [Notice 03/18](#)) have been issued in regards to notifying you that the TfL Board had approved new regulatory changes to raise standards in London's private hire industry, improving safety and convenience for customers. All TPH Notices are available on the taxi and private hire pages of the TfL website.

New Requirements for Private Hire Operators
Operators must provide a booking confirmation to a passenger before their journey starts. This must include the first name of the driver, their licence number, vehicle registration mark and – where the passenger can receive it - a photo of the driver.
Operators must inform TfL of any material changes to the operating model of their business that may affect their compliance with the Private Hire Vehicles (London) Act 1998, the Private Hire Vehicles (London) (Operators' Licences) Regulations 2000, or the operator's licence conditions before they are made. This will help ensure that the changes are compliant with private hire legislation, in the interest of passenger safety and customer care.
Operators must ensure that all staff who have face-to-face contact with the public (for example, in a minicab office that is open to the public) have, or have proof they have applied for, a basic disclosure check – available through Disclosure Scotland. This is in addition to the requirement for private hire drivers to have an enhanced Disclosure and Barring Service check.
All Operators are required to email TfL on a weekly basis the details of the drivers and vehicles they have used to fulfil bookings, or have had available to them to fulfil bookings. Email tph.operators@tfl.gov.uk with any questions
Operators must provide their customer with an accurate fare estimate before the journey starts (unless the fare has been pre-agreed).
Operators must keep records for a minimum of 12 months. This includes records for bookings, complaints and lost property, as well as driver and vehicle records.
Operators must record the main destination of the customer's journey, before the journey starts.
Operators are limited to having no more than five business names attached to their operator's licence.
Operators are required to provide TfL with relevant National Insurance details when applying for or renewing their licence.
Operators are to make someone available for passengers to speak to during their hours of business and at all times during a journey if passengers want to make a complaint or discuss other matters relating to their booking.

What TfL will do next:-

A TfL Compliance Officer will attend your operating centre(s) at frequent intervals to conduct a compliance inspection for this licence. The licence holder will be required to demonstrate that the respective private hire business is being run in a safe and compliant manner. This is achieved through the production of accurate and up to date records, which show that all bookings are being properly discharged and in accordance with the licence terms and conditions.

What you should do next:-

- Ensure that the appropriate procedures and/or systems are put in place to ensure that you can fully demonstrate that you can meet all of the new requirements.
- Ensure that all of your records are maintained and are made available for inspection when requested.
- If you have not already done so, you will need to apply for a basic disclosure check. Once submitted, the details of the applicant will be checked against the Police National Computer for details of all current convictions the applicant has. You will need to submit a basic disclosure check application for all employees that will have face to face contact with the public. For further guidance please go to tfl.gov.uk/ph-regulations and www.disclosurescotland.co.uk
- As an organisation that processes personal data you are legally obliged to register with the Information Commissioner's Office (ICO). The ICO is the independent regulator for information rights and maintains a national register of data controllers. Please go to <https://ico.org.uk/for-organisations/register/> to register. **Please note:** It is a criminal offence if you don't.
- More information on your obligations are available at www.tfl.gov.uk/privacy. We also recommend that you read 'Privacy and data protection – A guide for private hire operators' which is available at

General information:-

You can contact us on 0343 222 4444 between the hours of 8.00am to 6.00pm Monday to Friday (excluding bank holidays). You can write to us at the address above or e-mail to tph.operators@tfl.gov.uk

Please quote your licence number in any correspondence.

TfL reserves the right to share your data with organisations such as the National Fraud Initiative to confirm the accuracy of the data provided; for the prevention and detection of crime and protection of public funds. TfL randomly selects and monitors applicants to identify possible fraudulent use.

Yours sincerely,



Helen Chapman

Director

Licensing, Regulation & Charging | Transport for London (TfL)

Enc:

1. Copy of the licence
2. Summary of the conditions attached to every operator's licence;
3. Appendix A conditions

Summary of the conditions attached to every London PHV Operator's licence

A London licensed PHV Operator:

- 1) shall maintain public liability insurance cover, which has a minimum indemnity of £5m in respect of any one event, for any of the operating centres specified in his licence that is accessible to members of the public;
- 2) shall agree the fare for the journey booked or provide an accurate estimate of that fare;
- 3) who is convicted of an offence must, within 14 days, inform TfL of the details of the conviction. This applies to all persons associated with the licence (e.g. all of the directors of a limited liability company);
- 4) shall notify TfL of any material change to its operating model that may affect the operator's compliance with the Private Hire Vehicles (London) Act 1998, the Private Hire Vehicles (London) (Operators' Licences) Regulations 2000 or its licensing conditions;
- 5) shall notify TfL of any material changes to the information provided in the application for his licence, or any application to vary that licence, within 14 days of the change;
- 6) who dismisses a driver for unsatisfactory conduct in connection with the driving of a private hire vehicle must inform TfL of the name of the driver and the circumstances of the case, within 14 days of the driver's dismissal;
- 7) shall not use CB apparatus in connection with his private hire business;
- 8) must have and maintain effectively, a procedure for dealing with complaints. As part of this obligation, the operator must record and retain the prescribed particulars of any complaints he receives;
- 9) must have and maintain effectively, a procedure for dealing with property left behind by customers in his cars or operating centres. As part of this obligation, the operator must record and retain the prescribed particulars of any property that is found or reported missing to him;
- 10) must charge a fare in accordance with his fare structure for PHVs when using a London licensed taxi to carry out a booking, unless the fare shown on the taxi's meter is less;
- 11) must provide TfL with such particulars of drivers and vehicles as may be required by TfL from time to time;
- 12) must not have more than the maximum number of vehicles available to them to carry out bookings accepted by him at all the operating centres specified in the licence. The maximum condition will not apply to operators who hold a licence for

██████ or more vehicles; and

- 13) if eligible and have opted to pay the grant of licence fee by annual instalments, the annual licence fee must be paid not later than 14 days before the end of the one-year period from when the licence was granted.

Operator Upload Information Sheet

Following amendments to the Private Hire Regulations, as a licensed private hire operator you are now required to provide us details of the drivers and vehicles you have used to fulfil private hire bookings, or have had available to you to fulfil bookings on a weekly basis. We will use the information provided for data analysis.

PROCESS

Follow our simple process in order to provide the correct data to us, in the correct format, at the right times.

Why?

- Easy to access – Visit our web site to log in or to create and account
- Quicker – Once logged in, your upload takes less time to complete
- Easier – Available user guides with templates to guide you through the process
- Safe and secure - Your account is only accessible via your personalised account details

Who?

- The Nominated Representative will need to login to their online account to upload driver and vehicle data every week, securely and on time.

Where?

- TfL Website - www.tfl.gov.uk/ph-operators

When?

- On the Monday of every week we require you to upload two separate reports

What information to declare?

- **Driver** data report
 - Drivers, you have used to fulfil private hire bookings AND
 - Drivers, you have had available to you to fulfil bookings in the previous week
- **Vehicle** data report
 - Vehicles, you have used to fulfil private hire bookings AND
 - Vehicles, you have had available to you to fulfil bookings in the previous week

For further information regarding operator upload, visit www.tfl.gov.uk/ph-operators or contact us on 0343 222 4444 (options 1-1-3-2)

More detailed information regarding Private Hire Regulations and all requirements can be found on our website at tfl.gov.uk/ph-regulations

Please read the following information to check which specific condition(s) relates to your licence:

Condition	What this means	What happens next
Restricted to work in term-time (20 hours per week) only and Self-employment prohibited	Your licence was issued with the condition that it was <i>restricted work in term-time (20 hours per week)</i> .	In order to give us every opportunity to ensure we keep you continually licensed, you must submit confirmation of your current leave status and right to take employment in the UK in support of your renewal application. Failure to do so could lead to delays and may lead to your licence expiring, as we are unlikely to issue a further licence until your right to work and reside in the UK has been confirmed.
Restricted to work in term-time (10 hours per week) only and Self-employment prohibited	Your licence was issued with the condition that it was <i>restricted work in term-time (10 hours per week)</i> .	In order to give us every opportunity to ensure we keep you continually licensed, you must submit confirmation of your current leave status and right to take employment in the UK in support of your renewal application. Failure to do so could lead to delays and may lead to your licence expiring, as we are unlikely to issue a further licence until your right to work and reside in the UK has been confirmed.
Subject to continued leave to work and reside in the UK	Your licence was issued with the condition that it was <i>subject to continued leave to work and reside in the UK</i> .	In order to give us every opportunity to ensure we keep you continually licensed, you must submit confirmation of your current leave status and right to take employment in the UK in support of your renewal application. Failure to do so could lead to delays and may lead to your licence expiring, as we are unlikely to issue a further licence until your right to work and reside in the UK has been confirmed.
Subject to the conditions listed in Appendix A of the licence issue letter	Your licence was issued with the condition that it was <i>subject to Appendix A of the licence issue letter</i> .	In order to give us every opportunity to ensure we keep you continually licensed, you are required to adhere to the conditions as listed in Appendix A, and notifying us of any changes in your circumstances which may affect this condition being renewed.
Subject to planning permission being approved	Your licence was issued with the condition that it was <i>subject to planning permission being approved</i> for an operating centre specified on your licence.	In order to give us every opportunity to ensure we keep you continually licensed, you must submit confirmation that (a) planning permission has been granted or (b) an application for planning remains ongoing for the relevant centre. Failure to do so could lead to delays and may lead to your licence expiring, as we are unlikely to issue a further licence until the required proof of planning permission has been confirmed.
Subject to the restrictions of the approved planning permission	Your licence was issued with the condition that it was <i>subject to the restrictions of the approved planning permission</i>	In order to give us every opportunity to ensure we keep you continually licensed, you are required to notify us of any changes in your circumstances which may affect this condition being renewed.
Subject to installation of a fixed, landline telephone number for bookings	Your licence was issued with the condition that it was <i>subject to installation of a fixed, landline telephone number for bookings</i> .	In order to give us every opportunity to ensure we keep you continually licensed, you must submit confirmation that a fixed, landline telephone number for bookings has been installed. Failure to do so could lead to delays and may lead to your licence expiring, as we are unlikely to issue a further licence until the required landline number has been confirmed.
Subject to No Public Access	Your licence was issued with the condition that it was <i>subject to no public access</i> .	In order to give us every opportunity to ensure we keep you continually licensed, you are required to notify us of any changes in your circumstances which may affect this condition being renewed.

Appendix A – Non-prescribed licence conditions for Bolt Services UK Limited

The following conditions are to be applied to the London private hire vehicle (PHV) operator's licence of Bolt Services UK Limited.

References used:

“the 1998 Act” is the Private Hire Vehicles (London) Act 1998 ;

“the 2000 Regulations” is the Private Hire Vehicles (London) (Operators' Licences) Regulations 2000;

“PHV” is private hire vehicle;

“Licensing Authority” and “TfL” are Transport for London;

“the operator” is Hopp Operations Limited;

the “MPS” is the Metropolitan Police Service;

reference to “days” means calendar days; and

the “Licence Checker” is a page on TfL's website ([link](#)) which operators can use to confirm the licensed status of London PHVs and London PHV drivers.

Where any correspondence is required to be sent by the operator to TfL in order to comply with these conditions, then it is expected that the operator will include its licence number in any such correspondence.

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
1	Independent Assurance procedure	The operator shall maintain an independent assurance procedure designed to review and validate the effectiveness of its systems, policies, procedures and oversight mechanisms for promoting compliance with its obligations as a licensed operator in accordance with the relevant legislation as well as	This condition applied to the operator's licence issued by the licensing authority on 28 May 2019. TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.	<p>As the operator provided a previous assurance report in May 2020, the next report will be required in November 2020.</p> <p>The report is to be provided to TfL every six months from the date of licence grant together with a summary of actions the operator proposes to take in response to that report, and timescales for implementation.</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.		<p>these conditions.</p> <p>The operator shall provide TfL with details about all existing and new customer and/or driver safety and security initiatives, safety and security related products and the independent assurance procedure shall also include a review of these safety and security initiatives, safety and security related products and services.</p> <p>The independent assurance procedure shall include a review of all failures to comply with its obligations as a licensed operator and identify how the operator will address and remedy any such failures.</p> <p>The independent assurance procedure shall include an</p>	<p>It has been updated to include additional information that strengthens the condition and the manner in which compliance failures and complaints should be identified and brought to TfL's attention.</p> <p>The addition of those obligations will give TfL greater visibility.</p> <p>TfL considers that the provision of an independently verified assurance report by the operator in May 2020 has been helpful to assist us in understanding the operator's operations and in assessing their fitness to be licensed.</p> <p>TfL seeks assurance that the operator meets and continues to meet all of the legal obligations which apply to it as a London PHV</p>	<p>Evidence of assurance should be in the form of a written report which focusses on key areas of concern identified by TfL, regulatory compliance and any processes or procedures to ensure the safety of both passengers and drivers including any action to be taken in response. Examples of areas to be covered include:</p> <ul style="list-style-type: none"> - record keeping; - driver and vehicle licence validation; - compliance with data protection legislation <p>The raw data supporting the contents of the report should also be provided.</p> <p>The preparation of the report should be independent in the sense that:</p> <ol style="list-style-type: none"> a) All figures and data should be independently verified. b) The completeness of all data provided should be independently verified (where possible). <p>Reports are to be sent to TfL by email to TPH.Operators@tfl.gov.uk and to the Director of Licensing, Regulation and Charging, General</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.		<p>update on the effectiveness of its complaints handling process, as well as up-to-date figures concerning the number of reports made to the police within each relevant period.</p> <p>The operator shall provide TfL with a copy of an independently verified assurance procedure report produced every six (6) months from the date of this Licence together with a summary of actions the operator proposes to take in response to that report, and timescales for implementation.</p>	operator.	Manager, and Head of Licensing unless notified otherwise.
2	Notification of significant / material changes	In addition to and without derogation from its obligations under regulation 9(13) of the 2000 Regulations, the operator shall give TfL at least 28 days' advance notice of any material	This condition applied to the operator's licence issued by TfL on 28 May 2019. It has been updated to include specific examples where this condition is applicable (but is not limited to only these	<p>TfL has published guidance on Regulation 9(13) of the 2000 regulations which is available via this link.</p> <p>The guidance explains what we consider an "operating model" and a "material change" to be and it provides examples of changes which we consider warrant notification (and those we don't).</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.		<p>change that it intends to make to its operating model, systems or processes, that may affect compliance with the 1998 Act, 2000 Regulations or other licence conditions, including but not limited to:</p> <p>a) Any material proposed changes to the way in which the operator collects and holds passengers' and drivers' data;</p> <p>b) Any material proposed changes concerning the operator's booking systems and arrangements for making bookings;</p> <p>c) Any material proposed changes relating to the safety and security of passengers and drivers;</p>	<p>examples). TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.</p> <p>This condition ensures that the licensing authority is given sufficient time to consider material changes to the operator's operating model, in advance of them being made.</p> <p>The operator has, throughout the course of its licence, notified TfL of material changes to its operating model in certain respects. However there are occasions where the operator has failed to notify TfL of material changes to the driver registration / verification process (onboarding) process.</p> <p>The condition also requires notification of any boundary</p>	<p>By "public safety" we are referring to the safety of passengers, drivers, other road users and the public more generally.</p> <p>Risk assessments should cover any risk arising as a consequence of the change, identify who is at risk and any measures to minimise, mitigate and, where possible, remove the risk identified.</p> <p>Notifications and risk assessments are to be sent to TfL by email to TPH.Operators@tfl.gov.uk and to the Director of Licensing, Regulation and Charging, General Manager, and Head of Licensing unless notified otherwise.</p> <p>The operator should include evidence of its compliance with this condition via the independent assurance process in condition 1 as appropriate.</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.		<p>d) any proposed changes related to the boundary in which the operator allocates bookings to TfL licensed drivers; and</p> <p>e) any material proposed changes to driver and vehicle registration and / or verification ('onboarding') processes.</p> <p>Any notice provided must be full, detailed and transparent. Such notice should be made in writing and shall include details of the risk assessments carried out and the impact on the safety of passengers and drivers. Such risk assessments will identify and address the possibility that the changes proposed could lead to unintended exploitation of the operator's technical systems which could affect the</p>	<p>changes that the operator may make as it operates in areas outside of the London licensing area.</p> <p>The condition also requires the risk assessment for changes to fully consider and address the potential for unintended consequences and/or exploitation of any vulnerabilities that follow from the changes.</p> <p>For the avoidance of doubt, the operator may adopt whatever changes it sees fit without waiting for formal authorisation or approval from TfL and operators remain responsible for their compliance with all applicable legal requirements.</p> <p>TfLhas also issued guidance about Regulation 9(13) of the 2000</p>	

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
		<p>safety of passengers.</p> <p>The operator shall have regard to any response raised by TfL in respect of any such changes so notified.</p> <p>In the event that the operator is unable to comply with the notice requirements in this condition because immediate or faster change is required in order to comply with a Court order or other legal obligation or to address an actual or potential emergency, the operator will give the greatest notice reasonably practicable.</p>	Regulations which the operator is encouraged to consider.	
3	Reporting of breaches to TfL, law enforcement and regulatory	The operator shall, to the extent permitted by law, provide a written report to any relevant regulatory and law enforcement authority in the United Kingdom, and to the extent permitted by	Subject to two additions, this condition applied to the operator's licence issued by TfL on 28 May 2019.	Reports are to be made without undue delay and, where feasible, no later than 72 hours after an operator becomes aware of a data breach, material

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.	authorities	<p>law, to TfL of all data breaches, material data losses or infringements of data protection law affecting the data of UK drivers and/or customers, whether those incidents occur in the United Kingdom or elsewhere.</p> <p>This requirement to notify includes but is not limited to all investigations in which a Relevant Person (see below) has been implicated in, or found personally culpable for, such a data loss.</p> <p>Following any report made, the operator shall co-operate fully, openly and transparently with any investigation conducted by any regulatory or law enforcement authority and/or by TfL.</p> <p>In addition, the operator shall, to the extent permitted by law, provide written notification to TfL of the outcome of all investigations, in the United Kingdom or elsewhere,</p>	<p>This condition has been effective and TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.</p> <p>Operators handle substantial quantities of data, much of which contain sensitive personal data (related to customers, drivers and/or vehicle owners). This data can be held in different locations, it is easily transferable, and a data breach, material data loss or infringement of data protection law could cause distress, harm or other detriment to the customer or driver and reputational harm to the operator and TfL.</p> <p>We consider it vital that operators report any such incident to the responsible regulatory and law enforcement authorities as well as</p>	<p>data loss or infringement of data protection law.</p> <p>The operator may also have to contact the individuals affected to let them know.</p> <p>The operator is also strongly encouraged to notify TfL regardless of whether the breach affects the customers of the operator or its drivers and vehicles.</p> <p>TfL has published data protection guidance for operators which is available via this link.</p> <p>Reports are to be sent to TfL by email to TPH.Operators@tfl.gov.uk and to the Director of Licensing, Regulation and Charging, General Manager, and Head of Licensing unless notified otherwise.</p> <p>The operator should include evidence of its compliance with this condition via the independent assurance process in condition 1 as appropriate.</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.		<p>concerning data breaches, material data losses or infringements of data protection law affecting the data of drivers and/or customers.</p> <p>In this condition:</p> <ul style="list-style-type: none"> - a "Relevant Person" means any person who during the term of this Licence is, or has been, employed or engaged by the operator as a Senior Manager and/or Director. - a "data breach" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed in particular. 	<p>TfL, and that any such incident is properly investigated with the outcome of any such investigation being made known to TfL including any remedial steps to prevent any recurrence.</p> <p>Responsible regulatory and law enforcement authorities in the UK include the Information Commissioner's Office, the Metropolitan Police Service and other UK police services.</p>	

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
		<p>- a “material data loss” means the loss of control over a person’s personal data or identity theft or fraud, financial loss, damage to reputation, loss of confidentiality of personal data protected by professional secrecy or any other significant economic or social disadvantage to the person concerned as a result of the data breach in particular.</p> <p>- "Data breaches, material data losses or infringements of data protection law" means any such incident that:</p> <p>(i) is, or</p> <p>(ii) would, if UK law were to</p>		

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.		apply, be required by law to be notified to a regulator or law enforcement authority.		
4	Arrangements with the Metropolitan Police Service (MPS)	<p>The operator shall, unless the MPS lawfully requires or agrees otherwise, implement and maintain the following arrangements with the MPS:</p> <ul style="list-style-type: none"> a. for the reporting of passenger complaints alleging behaviour that may be criminal; b. consult the MPS at least every calendar year as to whether the operator's policy relating to criminal reporting remains fit for purpose; c. notify TfL of any updates to this policy that are agreed with the MPS; and d. comply with any guidance about reporting criminal behaviour issued by the licensing authority. 	<p>This condition is new.</p> <p>TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.</p> <p>The implementation of a formalised arrangement between the operator and the MPS will give confidence to TfL that the operator is acting appropriately and reporting serious criminal behaviour to the MPS. This contributes to the safety of passengers and drivers.</p> <p>The operator is a large operator with a second-tier licence meaning they are permitted to operate up to [REDACTED] vehicles at any one time. The operator therefore handles a significant number of passenger-carrying bookings in</p>	<p>Notifications are to be sent by email to TPH.Operators@tfl.gov.uk and to the Director of Licensing, Regulation and Charging, General Manager, and Head of Licensing unless notified otherwise.</p> <p>The operator should include evidence of its compliance with this condition via the independent assurance process in condition 1 as appropriate.</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.			<p>London.</p> <p>To aid the prevention and detection of crime, it is necessary and appropriate that an operator the size of the operator has formal reporting policies and procedures in place with the MPS and acts appropriately in the reporting of serious criminal behaviour.</p>	
5	Criminal Reporting Policy	The operator shall liaise with and seek to establish and maintain appropriate arrangements for the reporting of passenger complaints alleging behaviour that may be criminal with any other relevant police force, and notify TfL of any such arrangements	<p>This is a new condition.</p> <p>TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.</p> <p>This condition ensures that similar arrangements for the reporting of passenger complaints are in place with forces outside of the MPS's jurisdiction, but within the boundaries of the operator's operations.</p>	<p>Information on the arrangements the operator has put in place with police forces other than the MPS should be sent to TfL by email to TPH.Operators@tfl.gov.uk and to the Director of Licensing, Regulation and Charging, General Manager, and Head of Licensing unless notified otherwise.</p> <p>The operator should include evidence of its compliance with this condition via the independent assurance process in condition 1 as appropriate.</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.			<p>The operator is a large operator with a second-tier licence meaning they are permitted to operate up to [REDACTED] vehicles. The operator therefore handles a significant number of passenger-carrying bookings in London. To aid the prevention and detection of crime it is necessary and appropriate that an operator of this size has formal reporting policies and procedures in place with all relevant police forces and acts appropriately in the reporting of serious criminal behaviour.</p>	
6	Complaints handling	<p>The operator shall, within 48 hours of receiving a safety related complaint concerning a driver:</p> <p>a) assess whether it is necessary to suspend or remove that driver account pending further inquiries;</p> <p>b) notify any such decision to suspend or remove the driver to</p>	<p>This is a new condition.</p> <p>TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.</p> <p>The safety and security of passengers travelling in licensed private hire services is paramount. The operator has identified a case in which it was presented with</p>	<p>Notifications should be sent to the Licensing Authority via the existing operational processes, via email to TPHLicensingSupport@tfl.gov.uk</p> <p>Issues which need to be escalated should be sent to the Director of Licensing, Regulation and Charging, General Manager, and Head of Licensing as well as to TPH.Operators@tfl.gov.uk</p> <p>The operator should include evidence of its compliance with this condition via the independent assurance process in condition 1 as appropriate.</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.		<p>TfL, including specifying the details of the driver and the allegation.</p> <p>c) provide a report to TfL and the relevant police force even in the event that the driver is unlicensed</p> <p>The operator shall, on a monthly basis, provide a report to TfL, confirming the current status of all outstanding safety related complaints and the action to be taken.</p> <p>The operator shall, upon conclusion of each investigation into a safety related complaint, notify TfL of the outcome of the investigation and any resulting action taken.</p> <p>Notwithstanding the obligation above, the operator shall ensure that all serious safety related incidents or other non-safety allegations that require wider awareness are escalated to TfL senior management through an agreed escalation process in addition to the operational</p>	<p>fraudulent documentation by an unlicensed individual. However, notification of this matter to TfL was not made in a timely manner. Incidents of this kind present public safety concerns.</p> <p>The operator is a large operator with a second-tier licence meaning they are permitted to operate up to [REDACTED] vehicles at any one time. The operator therefore handles a significant number of passenger-carrying bookings in London.</p> <p>To ensure swift action is taken in the event of a safety related complaint or the identification of a safety related incident, it is considered necessary and appropriate that any such incident is quickly assessed by the operator and notified to the relevant authorities, including TfL, so that appropriate action can be taken.</p>	–

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.		notification process. This will include, but is not limited to, any issue that may indicate a wider safety concern or breach of the operator's legal obligations		
7	Ride-sharing – training	Where the operator offers ride-sharing services, the operator shall provide training to all drivers to ensure that any advanced bookings of private hire vehicles at separate fares are carried out safely.	<p>This condition applied to the operator's licence issued by TfL on 28 May 2019. TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.</p> <p>New developments in technology have resulted in important changes in the way that private hire services are delivered in London. One such change is the expansion of ride-sharing services in which passengers share vehicles and pay separate fares.</p> <p>Strangers sharing a vehicle can create risks to safety which do not arise in exclusive hires. A booking at separate fares may lead to up to eight strangers sharing a vehicle. Drivers need training on how to adapt their approach depending on the number of passengers sharing</p>	<p>Should driver training only be provided at the point of registration for new drivers, then existing drivers should be provided with refresher training on a regular basis as deemed appropriate by the operator.</p> <p>The operator is requested to provide to TfL copies of all course material(s) delivered to new drivers as part of the registration process and to existing drivers within three months of licence grant.</p> <p>Further information related to the training delivery methods (face to face, online tutorial or a combination of the two), duration, location, possible outcomes and benchmarks and whether completion is mandatory, should be made clear to drivers in the course material and prior to attendance.</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.			<p>a trip.</p> <p>The requirement for driver training will enable ongoing management, monitoring and maintenance of driver and passenger safety and welfare. Drivers should know what action to take in different situations including when to call the police or the operator and how to appropriately manage a situation without putting themselves at risk e.g. how to deal with abusive or aggressive behaviour by a passenger (either towards a fellow passenger or the driver), unwanted sexual behaviour or any general instances of anti-social behaviour.</p> <p>We have sought assurances from operators of ride-sharing services regarding driver training and an incident involving three sharing passengers still occurred and the reports indicated that the driver felt insufficiently prepared to deal with the situation. This demonstrates the importance of ensuring that drivers are comprehensively trained to appropriately deal with</p>	<p>TfL may request access to the operator's training programme as part of evidence of compliance with this condition.</p> <p>Course materials are to be sent to TfL by email TPH.Operators@tfl.gov.uk.</p> <p>The operator should include evidence of its compliance with this condition via the independent assurance process in condition 1 as appropriate.</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.			incidents.	
8	Ride-sharing - insurance	Where the operator offers ride-sharing services, the operator shall ensure that appropriate insurance is held for private hire vehicles carrying out bookings accepted at separate fares	<p>This condition applied to the operator's licence issued by TfL on 28 May 2019. TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.</p> <p>The sharing of vehicles by strangers creates risks which may not arise in exclusive hirings e.g. if there is an altercation between passengers or if there is a theft or damage to property.</p> <p>It is permissible under the Transport Act 1985 for PHVs to be hired at separate fares but PHVs must hold the applicable insurance policies which cover this specific form of private hire service so as to be sure that the liabilities arising are appropriately insured against.</p>	<p>Compliance with this condition could include the provision of:</p> <ul style="list-style-type: none"> - a written statement from the relevant insurer(s) that ride sharing is covered within the terms of the applicable policy; - confirmation by reference to the terms of the individual policy; and/or - a declaration by the insured person that ridesharing is covered. <p>The written statement (or other evidence) shall be made available as part of the standard inspection process carried out by TfL Compliance Officers (carried out every six months at least) or in the event of an unannounced inspection.</p> <p>Any such evidence provided at the time of the inspection should also be made available to TfL's Head of Licensing following the inspection.</p> <p>Evidence is to be sent to TfL by email</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.				TPH.Operators@tfl.gov.uk The operator should include evidence of its compliance with this condition via the independent assurance process in condition 1 as appropriate.
9	Ride-sharing – risk assessments	Where the operator offers ride-sharing services, the operator shall ensure that risk assessments are carried out for services in which passengers travel at separate fares insofar as this is not required to comply with another licence condition,	<p>This condition applied to the operator’s licence issued by TfL on 28 May 2019. TfL considers that it is necessary and appropriate for this condition to apply to the operator’s next licence.</p> <p>Strangers sharing a vehicle can create risks to the safety of passengers which do not arise in exclusive hires.</p> <p>While reports of incidents in ride sharing services have been limited in recent years, our research has indicated that passengers (particularly those deemed vulnerable) feel less safe to travel</p>	<p>The risk assessments may be general and address the overall safety of service delivery covering issues such as the needs and behaviour of passengers, driver supervision, the selection and review of pick-up and drop-off points, journey planning etc.</p> <p>Individual risk assessments may also be appropriate in some circumstances depending on the nature of the service being offered, for example for unusual or non-routine journeys or where a passenger has special accessibility requirements.</p> <p>A risk assessment should identify:</p> <ul style="list-style-type: none"> • Hazards; • The likelihood of a hazard occurring; • The likely severity of any injury or property damage; • Who might be affected; • Existing safety measures; • New safety measures that might be needed; • How safety measures are implemented; and

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.			<p>in shared services.</p> <p>We consider that the process of identifying and mitigating risks which may arise in shared services is a worthwhile exercise not only to ensure that shared services are safe but that they are perceived to be safe by London's travelling public.</p>	<ul style="list-style-type: none"> Emergency procedures. <p>Risks assessments should be revisited or repeated at regular intervals to ensure continued safety of ride-sharing service delivery.</p> <p>Risk assessments are to be provided to TfL at the end of six (6) months from the date of licence grant and each six months thereafter. TfL may request that the frequency be reviewed, where appropriate.</p> <p>The operator is asked to confirm who is undertaking the risk assessment(s) including the competency of that person to perform the role.</p> <p>Risk assessments are to be sent to TfL by email TPH.Operators@tfl.gov.uk:</p> <p>The operator should include evidence of its compliance with this condition via the independent assurance process in condition 1 as appropriate.</p>
	Document			

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
10	checks	<p>The operator shall ensure that it has in place, and makes use of, appropriate checks to verify that all documentation provided by a driver is legitimate and that it relates to that driver. This will include, but is not limited to, use of online tools such as TfL Licence Checker, the DVLA and Home Office websites as well as direct contact with insurance companies.</p> <p>In the event that the operator identifies a potentially fraudulent document, the operator shall ensure that no further bookings are undertaken by the driver (or vehicle) pending further inquiries; and</p> <p>a) The operator shall, on a weekly basis, provide a report to TfL, specifying all of the potentially fraudulent documents</p>	<p>This is a new condition.</p> <p>TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.</p> <p>The operator should have in place robust systems and processes to ensure that fraudulent documents are identified and not accepted. This prevents trips being allocated to drivers that have provided fraudulent documents, and unlicensed trips being undertaken.</p> <p>The operator has identified several cases in which it has been presented with fraudulent documentation. Incidents of this kind present public safety concerns as trips maybe allocated to unlicensed and uninsured drivers.</p> <p>The establishment and application of appropriate checks is essential in protecting passengers and the public.</p> <p>Where identified, TfL will require the operator to investigate these cases in order to understand the root causes and identify ways in</p>	<p>TfL will confirm compliance with this condition as part of the regular inspection process.</p> <p>The operator will be required to provide evidence of the checks that have been carried out, when reviewing documents, during the licence period, including prior to any inspection.</p> <p>If a fraudulent document is identified, the operator should initiate an internal investigation.</p> <p>Full details should be provided to TfL immediately or within 72 hours of finding out by email to TPHLicensingSupport@tfl.gov.uk</p> <p>The operator should include evidence of its compliance with this condition via the independent assurance process in condition 1 as appropriate.</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.		<p>identified and the action taken.</p> <p>b) The operator shall, upon conclusion of each investigation into a potential fraudulent document, notify TfL of the outcome of the investigation and any resulting action taken.</p>	<p>which it can prevent such behaviour. Swift action in reporting any such incidents to TfL and other relevant authorities is also essential.</p>	
11	Driver and vehicle licence checks	<p>The operator shall confirm the validity of both:</p> <ul style="list-style-type: none"> • The London PHV driver's licence; and • The London PHV licence before making that driver and that vehicle available to carry out private hire bookings using TfL's Licence Checker. 	<p>This condition applied to the operator's licence issued by TfL on 28 May 2019. TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.</p> <p>The operator should have in place robust systems to identify fraudulent documents. This will prevent trips being allocated to drivers that have provided fraudulent documents, and unlicensed trips being undertaken. The establishment and application of appropriate checks protects passengers and the public.</p>	<p>The operator should check all available resources which include TfL's Licence Checker and other TfL data sources should be used to check all the particular details of the licensed driver and vehicle.</p> <p>TfL will seek to confirm compliance with this condition as part of the regular inspection process. By this, we require the operator to provide evidence of the checks that have been carried out for each period.</p> <p>If a fraudulent licence or any other documentation is identified, the operator should initiate an internal investigation and provide full details to TfL</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
				<p>immediately or within 72 hours of finding out.</p> <p>Reports are to be made by email to tphlicensingssupport@tfl.gov.uk</p> <p>The operator should include evidence of its compliance with this condition via the independent assurance process in condition 1 as appropriate.</p>
12	Operational reporting	The operator shall provide a monthly report to TfL including any cases in which any kind of fraud has been identified.	<p>This is a new condition. TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.</p> <p>As above, the operator should have in place robust systems to ensure that regular checks are carried out throughout the period that a driver or vehicle remains available to the operator. These checks and the frequency of them shall ensure that fraudulent documents are identified at the earliest opportunity. This prevents trips being allocated to drivers that</p>	<p>The report to be provided by the operator should include the:</p> <ul style="list-style-type: none"> - Number of drivers that have been registered by the operator; - Number of driver applications that the operator has declined and the reason for refusal in each case; - Number of applicants detected by the operator who do not hold a valid London PHV driver's licence and the actions taken by the operator; - Number of drivers that have left by mutual consent; - Number of drivers that have been dismissed by the operator;

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.			<p>have provided fraudulent documents, and unlicensed trips being undertaken.</p> <p>The provision of a regular report will assist TfL in understanding the effectiveness of the driver and vehicle documentation processes the operator has in place.</p>	<ul style="list-style-type: none"> - Number of drivers that have had their access to the operator's booking platform temporarily suspended and the conclusion of that suspension; - Evidence of and details of any issues identified regarding the validity of any documentation presented for the purposes of being available to The operator; - Number of checks conducted of London PHV licences and any associated vehicle documentation (e.g. insurance, MOT, V5C), along with the frequency of those checks; and - Number and details of any issues identified regarding the validity of a London PHV licence or any associated documentation. <p>Where any drivers are dismissed, the operator should also provide further details including:</p> <ul style="list-style-type: none"> • Summary of the PHV/105's dismissal notifications submitted & platform suspensions • The reason for dismissal per driver • All trip data per driver, including initial and final dates available to the operator, total trips undertaken, complaints history etc • Highlight any incidents that are a serious public safety concern and/or involve any fraudulent activity, such as, but not limited to: <ul style="list-style-type: none"> ○ Any alleged serious violent and/or indecent offences;

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.				<ul style="list-style-type: none"> ○ Any fraudulent behaviour exhibited by drivers; ○ Any issues identified with the veracity of required documentation (e.g. TfL issued licence documents, MOT, insurance) <p>The report is to be provided to TfL at the end of each month from the date of licence grant (and no later than 7 days after the end of each month).</p> <p>The report should cover data for the previous month (e.g. by no later than 7 October 2020, provide data for 1 – 30 September 2020 and so on).</p> <p>Monthly reports should be provided to TPHLicensingSupport@tfl.gov.uk and to the Director of Licensing, Regulation and Charging, General Manager, and Head of Licensing unless notified otherwise.</p> <p>The operator should also provide each report submitted for each period via the independent assurance process in condition 1 as appropriate.</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
13	Basic Disclosure and Barring Service (DBS) checks for existing directors and office holders	The operator shall ensure that a basic Disclosure and Barring Service check is conducted for all directors and office holders every twelve (12) months.	<p>This condition applied to the operator's licence issued by TfL on 28 May 2019. TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.</p> <p>A related company, Taxify LDN Ltd, previously applied for an operator's licence and TfL prosecuted it in December 2018 for launching PHV services in London without having been granted a licence.</p> <p>One of the criteria to be licensed as a London PHV operator is that TfL is satisfied that the applicant is a 'fit and proper person' to hold such a licence.</p> <p>Where a company is applying for a licence, TfL needs to be satisfied that the people who make up that</p>	<p>As the operator provided relevant documentation in May 2020, the next submission is required in May 2021.</p> <ul style="list-style-type: none"> • To apply for a basic DBS check, applicants will need to provide details of where they have lived over the last 5 years, their National Insurance number, passport and driving licence. • A company secretary is an example of an "office holder". • Further information on how to apply for a DBS check is available via this link <p>The operator is expected to provide to TfL the DBS disclosure certificates securely. Should an electronic format be preferred, the submission should be password protected. If provided via post, then the submission should be sent by recorded delivery.</p> <p>The DBS disclosure certificates are to be sent by the operator's Nominated Representative.</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
			<p>company are fit and proper.</p> <p>This condition will help TfL to continue to ensure that the people who make up the company remain fit and proper for the duration of the licence.</p>	<p>The information is to be provided to TfL as soon as possible and without undue delay following twelve months of licence grant.</p> <p>The DBS disclosure certificates are to be sent to TfL by email TPH.Operators@tfl.gov.uk</p> <p>The operator should include evidence of its compliance with this condition via the independent assurance process in condition 1.</p>
14	Criminal record checks for any new appointments – directors or office holders	<p>The operator shall ensure that a basic Disclosure and Barring Service check is conducted where a new director or office holder is appointed.</p> <p>The operator shall also ensure that a Certificate of Good Conduct is conducted where that individual has lived outside of the United Kingdom for a period of more than three</p>	<p>This condition applied to the operator's licence issued by TfL on 28 May 2019. TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.</p> <p>Where a company is applying for a licence, TfL needs to be satisfied that the people who make up that company are fit and proper.</p>	<p>The operator is expected to provide to TfL the certificates securely. Should an electronic format be preferred, the submission should be password protected. If provided via post, the submission should be sent by recorded delivery.</p> <p>Any DBS disclosure certificates or certificate of good conduct are to be sent by the operator's Nominated Representative.</p> <p>The information is to be provided to TfL as soon as</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
		continuous months..	<p>Where the operator has carried out basic Disclosure and Barring Service (DBS) checks for all current directors and office holders, TfL needs to be satisfied that the same process will be applied to all new staff members.</p> <p>The DBS cannot access criminal records held overseas. We therefore consider it appropriate to seek criminal records information from overseas in appropriate cases to support the decision-making process.</p>	<p>possible and without undue delay following twelve months of licence grant.</p> <p>Reports are to be sent to TfL by email TPH.Operators@tfl.gov.uk</p> <p>The operator should include evidence of its compliance with this condition via the independent assurance process in condition 1.</p>
15	Transparency during any investigations	<p>The operator shall, to the extent permitted by law, provide written notification to TfL of the outcome of:</p> <p>a) all investigations concerning any regulatory breaches or infringements of law by the</p>	<p>This is a new condition.</p> <p>TfL considers that it is necessary and appropriate for this condition to apply to the operator's next licence.</p>	<p>Compliance with this condition should include the provision of:</p> <ul style="list-style-type: none"> - a written statement from the operator that provides the details, current status and outcome of any and all investigations concerning any regulatory breaches or infringements of law by the operator or any

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.		<p>operator or any affiliated company (such as Taxify OU, Taxi LDN Limited, the operator (Hopp Operations Limited), or Bolt Services UK Limited), to the extent that any Relevant Person has been implicated in such conduct or found to be personally culpable for such breach or infringement;</p> <p>b) all civil or criminal proceedings, in the United Kingdom or elsewhere, against the operator or any affiliated company, or against any driver(s) or vehicle licensee(s) delivering services for them; and</p> <p>c) all investigations, whether criminal or civil, in the United Kingdom or elsewhere, that any Relevant Person has been implicated in or found to be personally culpable.</p> <p>In this Condition, a "Relevant Person" means any person who</p>	<p>The operator has notified the outcomes of investigations conducted in relation to data breaches and fraudulent documentation cases (albeit in some cases TfL considers that it could have done so sooner).</p> <p>This condition will strengthen TfL's confidence in the operator's governance and culture of transparency and effective working with TfL as its regulator. It will allow TfL to be better informed of any such matters and consider whether any further appropriate action is required to be taken.</p>	<p>affiliated company, to the extent that any Relevant Person has been implicated in such conduct or found to be personally culpable for such breach or infringement;</p> <ul style="list-style-type: none"> - a written statement from the operator that provides the details, current status and outcome of any civil or criminal proceedings, in the United Kingdom or elsewhere, against the operator or any affiliated company, or against any driver(s) or vehicle licensee(s) delivering services for them - a written statement from the operator that provides the details, current status and outcome of all investigations, whether criminal or civil, in the United Kingdom or elsewhere, that any Relevant Person has been implicated in or found to be personally culpable <p>Notification by way of a written statement (and other evidence) shall be sent by email to TPH.Operators@tfl.gov.uk, the Director of Licensing, Regulation and Charging, General Manager, and Head of Licensing unless notified otherwise</p> <p>The operator should include evidence of its</p>

No	Title	Condition	Why is this condition required?	What we expect by way of compliance
.		during the term of this Licence is, or has been, employed or engaged by the operator as a Senior Manager, office holder and/or Director.		compliance with this condition via the independent assurance process in condition 1.



Reference: 010088
Date: 26 November 2021

Tom Tuxworth
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Grant of a London Private Hire Vehicle Operator's Licence to Bolt Services UK Limited

Dear Tom,

We advised you on 26 November 2021 of Transport for London's decision to grant Bolt Services UK Limited a London Private Hire Vehicle (PHV) Operator's Licence subject to conditions for a duration of 30 months ending on 27 May 2024.

This decision has been taken by reference to Bolt's current operating model. TfL will remain in dialogue with Bolt in relation to its proposed future changes to that model. It will take a view on those changes, if and when Bolt decides to amend its operating model.

You should be aware that TfL considers Bolt Services UK Limited to be a fit and proper person at this time, however, the grant of a licence does not prevent TfL from looking at Bolt's record in any future assessment of its fitness and propriety and we will take appropriate action if Bolt falls below the standards we require.

We set out the reasons for TfL's decision below for your reference.

1. INTRODUCTION AND BACKGROUND

1. On 7 December 2020, Bolt Services UK Limited (previous company names were Hopp Operations Limited and Taxify Operations UK Limited) applied for a higher tier London private hire vehicle (PHV) operator's licence to increase the number of vehicles that can be available to them. Bolt currently operates in London under the "Bolt" name and we refer to the operator as such in this Note. Bolt is a subsidiary of an Estonian incorporated company named Taxify OU which is also the parent company of Hopp Operations Ltd.

2. On 28 August 2020 TfL granted Bolt its current licence to operate with between [REDACTED] and [REDACTED] available vehicles for a 15-month duration, following a thorough assessment of its fitness and propriety. This licence expires on 27 November 2021.

3. If an operator wishes to have more private hire vehicles available to it than the operator's current permitted maximum, they need to apply for a new licence in the higher tier. Bolt has stated that it is seeking a higher tier licence following continued growth in the number of vehicles available to them which peaked at [REDACTED] in October 2020.

4. The number of vehicles an operator has "available" refers to the number of private hire vehicles that the operator can call upon at any one time to carry out a private hire booking. It is a licence condition for operators to ensure that the number of private hire vehicles they have available at any time does not exceed the maximum number for which they were granted a licence.

5. If an operator wishes to have more private hire vehicles available to accept bookings than the permitted maximum, they will need to apply for a new licence in the higher tier. As such, consideration of Bolt's pending application will focus on whether the operator is fit and proper for a licence, taking into account the higher tier licence applied for, the changes since our most recent licensing decision, historic issues of relevance and adherence to the current licence conditions.

6. It was not possible to complete the processing of the higher tier application until further information was provided by Bolt and issues related to the existing licence had been resolved. Bolt liaised with TfL regarding the submission of a renewal application in a meeting on 25 August 2021. 7. It was agreed between both parties that the higher tier application could be treated as a renewal application also for a higher tier licence.

8. Before granting Bolt an operator's licence, TfL will need to be satisfied that it is a fit and proper person to hold a PHV operators' licence (s.3(3) of the Private Hire Vehicles (London) Act 1998 or "1998 Act"). When determining whether an applicant is a fit and proper person, licensing authorities may take into account "anything which a reasonable and fair-minded decision maker, acting in good faith and with proper regard to the interest both of the public and the applicant, could properly think it right to rely on." That includes evidence of past conduct, where relevant.

9. In this process of considering whether Bolt is a fit and proper person to hold a PHV operator's licence, TfL will consider, amongst other things:

- a) The Independent Assurance Reports provided by Bolt to TfL;

- b) Bolt's record of compliance with the conditions of its licence;
- c) Bolt's ability to remain fit and proper if operating with a higher tier licence;
- d) Issues and failures within Bolt's systems and processes that have resulted in non-compliance breaches with its licence conditions;
- e) The fact that Bolt has applied for a licence in a higher tier;
- f) The feedback and outcome of various compliance inspections and investigations of Bolt's records and operations which took place between 4 and 6 May 2021; and
- g) Any changes to Bolt's operating model since the last licensing decision.

2. RELEVANT LEGISLATION

10. The 1998 Act is the primary legislation that applies to the licensing of PHVs, drivers and operators in London. It covers a vehicle constructed or adapted to seat eight or fewer passengers that is made available for hire with a driver to carry passengers, apart from public service vehicles and taxis (s. 1(1)). PHVs in London are subject to a regime that is distinct from black taxis or "hackney carriages" and is distinct from the regime that regulates PHVs and hackney carriages in the rest of England and Wales.

11. Section 2(1) of the 1998 Act provides that no person shall make provision for the invitation or acceptance of, or accept, private hire bookings unless he is the holder of a London PHV operator's licence. A person who makes provision for the invitation or acceptance of private hire bookings, or who accepts such a booking, in contravention of section 2 of the 1998 Act is guilty of a criminal offence (s. 2(2)).

12. Section 4 of the 1998 Act provides that the holder of a London PHV operator's licence shall not in London accept a private hire booking other than at an operating centre specified in his licence. A London PHV operator that contravenes that provision is guilty of an offence (section 4(5)).

13. TfL is empowered by ss. 3, 7 and 13 (read together with s. 32(1)) of the 1998 Act) to issue private hire vehicles, drivers and operators' licences and to

prescribe licence conditions by way of regulations in addition to those contained in the 1998 Act.

- a) The regulations that prescribe those additional licence conditions are for vehicle licences, the Private Hire Vehicles (London PHV Licences) Regulations 2004;
- b) for driver's licences, the Private Hire Vehicles (London PHV Driver's Licences) Regulations 2003 ("the 2003 Regulations"); and
- c) for operators' licences, the Private Hire Vehicles (London) (Operators' Licences) Regulations 2000 (SI 2000/3146) (the "Operators' Licences Regulations").

14. The relevant regulations for the purposes of this Note are the Operators' Licences Regulations, as amended from time to time.

15. Section 3(3) of the 1998 Act sets out the requirements that must be satisfied before TfL can (and must) grant a licence. This provides that TfL shall grant an operator's licence where it is satisfied that the applicant is a "fit and proper person" to hold such a licence.

16. The phrase "fit and proper" is used in a number of statutory contexts, but its meaning is context-specific: a person who may be "fit and proper" for the purposes of one licensing regime may not be for the purposes of another. The Courts have confirmed that licensing authorities may take into account "anything which a reasonable and fair-minded decision maker, acting in good faith and with proper regard to the interests both of the public and the applicant, could properly think it right to rely on."

17. TfL publishes a guide for applicants who are applying for a London PHV operator's licence and Part 4 refers to the statutory requirement that the applicant is a fit and proper person. The guide sets out the process that TfL will follow in reaching decisions on applications for operator's licence(s). It also clarifies that TfL may impose bespoke conditions on individual licences in particular circumstances. Amongst the criteria for assessing operator's licence applications are:

"Section 3(3) (a) - the applicant must be a "fit and proper" person. In order to be considered as such, applicants will be expected to demonstrate that they have complied with other legal requirements connected with running a business. Failure to do so could result in the refusal of an application."

18. The guide also sets out the other factors that TfL will consider when determining whether a person is fit and proper to hold a licence including the requirement for applicants to declare any prior convictions, bankruptcy, director disqualification orders, requirements relating to health and safety, accounts and insurance, proof that the operating centre complies with local planning regulations, supply evidence of their right to work and reside in the UK and provide details of any prior licence refusals, revocations or suspensions. It also explains in part 4b that part of the consideration of an operator's licence application is an inspection of any operating centre(s) named in the application form, and applicants must show that they comply with all of the administrative obligations listed in Part 4.

19. Section 3(5) of the 1998 Act provides that “a London PHV operator’s licence shall be granted for five years or such shorter period as the licensing authority may consider appropriate in the circumstances of the case”. This confers a broad discretion on TfL to decide the duration of any particular licence. The discretion must be exercised for proper and rational reasons, but there are no constraints imposed in the legislation on the kind of factors that might justify the grant of a licence for less than five years in any particular case.

20. As set out in the Statutory Standards, licences may not be granted on a probationary basis. A licence of a shorter duration should not be granted as a means for an operator to demonstrate that they are fit and proper to hold a licence: if they are not fit and proper the application should be refused.

21. Section 3(4) of the 1998 Act also provides a wide discretion for TfL to impose specific conditions on individual licences: “A London PHV operator’s licence shall be granted subject to such conditions as may be prescribed and such other conditions as the licensing authority may think fit.” Once again, Parliament has conferred a broad discretion on TfL to impose conditions on an operator’s licence, as long as those conditions are rational and otherwise lawful. Section 3(7) provides that an applicant for a London PHV operator’s licence may appeal a decision to impose a condition on a licence to the Magistrates’ Court.

22. Section 3(7) of the 1998 Act also provides that an applicant for a PHV operator’s licence may appeal to the magistrates’ court against a decision not to grant such a licence. The provisions of sections 25 and 26 apply to any such appeal.

3. SUMMARY OF PROPOSED SERVICE



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27. Within the UK, Bolt currently hold private hire operator's licences in Birmingham, Peterborough, Bath and North East Somerset, Wolverhampton, Bristol City, and Royal Borough of Windsor and Maidenhead. Outside of the UK Bolt continues to offer app-based services to customers in over 300 cities within Europe, Africa, North and South America and Asia.

4. TECHNICAL SOLUTION

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5. POSITIVE FACTORS THAT SUPPORT BOLT's APPLICATION

Communication with TfL

42. Since its initial licence on 28 May 2019, Bolt has continued to write to TfL about matters concerning its operations. Since the issue of its current licence, Bolt has continued to communicate regularly with TfL, to notify of service updates, personnel changes and operating centre closures due to the pandemic. The most recent meetings have taken place on 11 February, 25 August and 16 November 2021 with workshops on 28 April, 7 May and 12

October 2021 to address issues with Bolt's compliance with Condition 6 of its licence.

43. TfL has met with Bolt regularly throughout the period of the current licence. The regular stakeholder meetings attended by Bolt and other large PHV operators occurred more frequently during the coronavirus pandemic to ensure a collaborative approach to driver and passenger safety.

44. Bolt has provided TfL with a number of formal notifications during its licence. A recent example is a charitable initiative that took place between 25 August and 12 September 2021 when Bolt notified TfL of its partnership with London's Air Ambulance Charity. Bolt customers could book a London's Air Ambulance ride category (not a real helicopter ride) and donate a nominal sum to the charity. A total of £51,000 was raised for London's Air Ambulance Charity.

45. Overall, Bolt has adopted a positive approach in its interactions with TfL and has proactively engaged with us as the regulator in London.

Independent Assurance Reports

46. In accordance with Condition 1 of their operator licence, on 25 November 2020 Bolt provided TfL with its second independently verified assurance report produced by PA Consulting. The report covers activity between May and October 2020.

November 2020 Independent assurance report

47. The report covers activity between May and October 2020 and assesses the adequacy of Bolt's systems, processes and policies in meeting TfL's regulatory requirements. The report focuses on the following four areas:

- a) How Bolt is meeting the requirements of its new operator's licence which was issued on 28 August 2020;
- b) Assuring whether processes identified in the previous report are being followed and reported against;
- c) Reflecting on any improvements have been made to Bolt's processes in the past six months; and
- d) Identifying what actions have been taken to address observations identified in the previous report.

48. In carrying out its evaluation, PA Consulting interviewed owners from relevant operational and management departments to ascertain progress since the last report and requested data to support evidence of progression in

identified areas of improvement. They also reviewed the data provided by process owners to assess and validate the reliability of processes.

49. The previous May 2020 report, PA Consulting made ten 'observations' that, whilst not representing any areas of major concern, identified areas in which Bolt could improve the efficiency of its operational practices. The November 2020 report confirmed that six out of ten of these recommendations have since been addressed, with the remaining four no longer required or longer-term ambitions following review. It is encouraging to see that Bolt has acted upon PA's recommendations, evidencing that it is committed to continuous improvement.

50. In the November 2020 report, PA Consulting flagged one new area of 'minor concern' that occurred during the reporting period. This related to an incident where a driver's company addresses became visible to customers. The cause of the issue was found to be human error resulting from a configuration change within the app. A driver flagged the issue and a fix was issued within 24 hours and, as company information is publicly available, it was determined there had been no breach of GDPR. As part of their response to this issue, Bolt is in the process of hiring a Quality Assurance Manager to strengthen its internal quality assurance functions, to implement processes to identify and thus prevent similar occurrences.

51. Consideration was given as to whether this should be seen as a breach of Condition 3 of Bolt's licence. As this was public data, and therefore not a breach of GDPR, Bolt did not believe it was necessary to disclose the data loss to TfL. However, it has been made clear to Bolt that any data loss should be reported to TfL as per the obligation of Condition 3. Taking all of the circumstances into account it has been concluded that no further action was required.

52. Overall, PA Consulting concluded, in the review shared in November 2020, that Bolt do have the necessary processes and policies in place to meet their existing and new licence conditions. They believe that Bolt have evidenced that processes and policies that were in place during the previous assurance report are now fully embedded within the organisation and the associated governance is also in place. They also determined that Bolt is making efforts to continuously improve the way they operate.

53. It is reassuring to TfL that PA Consulting has provided confidence in Bolt's current systems, policies and procedures, as well as indicating they are fostering a culture of continuous improvement.

May 2021 Independent assurance report

54. On 27 May 2021, Bolt provided TfL with its third independently verified assurance report produced by PA Consulting, covering the period between

November 2020 – April 2021. TfL has received all reports from Bolt in a timely manner.

55. This May 2021 report covers the period between November 2020 – April 2021 and continued to assess the adequacy of Bolt's systems, processes and policies in meeting TfL's regulatory requirements. Bolt made a positive change in the approach to this report, focusing on whether suggested improvements and new processes outlined in previous reports are now 'embedded'. The report focuses on the following areas:

- a) Reviewing Bolt's ability to meet the requirements of its operator's licence which was issued in August 2020;
- b) Re-affirming that processes identified in previous reports are embedded within the organisation and being followed;
- c) Understanding any changes to processes and improvements which have been taken forward since the last assurance report.

56. PA Consulting undertook a mix of qualitative and quantitative analysis which involved: receiving data and coordinating with Bolt's management team to identify gaps in information; reviewing the data and conducting interviews with relevant process owners to ascertain progress since the last report; and analysing the results of the performance procedures. Following this, PA Consulting provided further recommendations to improve where necessary.

57. Again, no major concerns were raised within the report. PA Consulting concluded that Bolt continues to have the necessary policies and operating procedures in place to meet their licence requirements. Three of the six outstanding observations that were made in previous reports have been closed, with three ongoing. This demonstrates that Bolt continue to take into account the suggested improvements that are put forward as part of the assurance report process.

58. In the report, PA Consulting have no major or minor concerns. They do suggest two 'observations' to improve current processes which are to begin automatically recording Bolt's learnings and actions within their incident and problem management processes and a recommendation to include risk assessments within the notifications to TfL on operational changes highlighting any impact on the safety of passengers and drivers.

59. In the November 2020 report, it was highlighted that Bolt had identified eight police forces other than the Metropolitan Police Service that may fall within their operational boundaries. In their subsequent report PA highlight that in the previous six months, letters have only been sent to five of these forces. Bolt has since confirmed that they have contacted the three remaining forces but, due to time factors on the police forces side, they have not been able to establish a

formal sharing protocols with them. Bolt have committed to continued to work with the police forces to establish robust communication channels.

60. Overall, PA Consulting maintain that Bolt has the necessary processes and policies in place to meet their licensing obligations. They state that the latest report builds on the foundations of the previous two reports and includes more details on how Bolt is meeting its licence conditions. They note that Bolt is putting in place measures to ensure continuous improvement and to enable sustainable scalability over the next few years in line with their ambitions for growth which is reflected in their application for a licence at a higher tier.

61. It is reassuring that for a third time PA Consulting has expressed its confidence in Bolt's systems, policies and procedures as well as their ability to scale their solution. It is also positive to see that the observations and recommendations made by PA Consulting have been implemented, suggesting an openness to continual process improvement.

62. The May 2021 report builds on the insight of the previous two reports, showing a continual pattern of improvement, and a reduction in 'concerns' flagged by PA Consulting. We expect future reports to continue monitoring against previous commitments, as well as assessing any new operational processes.

[REDACTED]

64. TfL and Bolt are in regular communication with regard to the format and content of any future reports. Bolt has been receptive to the guidance TfL has provided and recognises the need to ensure visibility over Bolt's operational performance and compliance with its obligations as an PHV operator in London.

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Lessons learnt from Bolt's previous breaches of the licensing framework

106. It is clear from the improvements made to Bolt's systems and processes that they have made changes in order to address all of the concerns TfL that questioned whether Bolt was a fit and proper person to hold a licence. These changes have also been by CPOS to ensure they are embedded within Bolt's internal systems and processes.

107. The above factors all support the conclusion that Bolt is fit and proper to hold a London PHV operator's licence.

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[REDACTED] concluded that it Bolt was making efforts to comply with the condition and appropriate changes were being made to address each of the issues TfL has raised.

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142. It was explained to Bolt that TfL ordinarily carries out its first compliance inspection within six to eight weeks of a licence being granted. Thereafter, TfL will carry out announced and / or unannounced compliance inspections of licensed PHV operators and their premises from time to time. An unannounced inspection may be carried out as a result of intelligence received or the identification of non-compliance when carrying out on-street checks of drivers and vehicles.

143. In making this decision, we have had due regard to TfL's obligations under equalities legislation including the public sector equality duty in section 149 of the Equality Act 2010. TfL is obliged to have due regard to:

- a) The need to eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Equality Act;
- b) Advance equality of opportunity between people who share a protected characteristic and those that do not; and
- c) Foster good relations between people who share a protected characteristic and those that do not.

144. We have carefully considered the obligation to advance equality of opportunity between persons who share a protected characteristic and those who do not. A full assessment has been undertaken to fully understand the positive and negative equality impacts for each protected characteristic with respect to the granting of a higher tier licence to Bolt. Please see Annex A for detailed evidence of the consideration given.

145. In making this decision, we have had due regard to TfL's obligations to avoid any disproportionate adverse effect on groups of people who share protected characteristics.

TfL considers that the decision to award this licence, and to subject that licence to conditions, will not have a disproportionate adverse effect on groups of people who share protected characteristics, as elaborated on in the impact assessment. When reaching this decision, the specific operating model already available, the current number of available drivers and drivers and its market share was taken into consideration as well as the proposed increase in size to its current operation as well as the overall service already being provided.

10. CONCLUSION

146. The statute requires TfL to be satisfied that an applicant is 'fit and proper' before granting that applicant a licence. For the reasons set out above, TfL concluded that Bolt is 'fit and proper' following full consideration of all of the points that have been identified.

147. There have been no significant changes to Bolt's current operating model since the initial application and technical demonstration.

148. This decision has been taken – for the reasons set out above – by reference to Bolt's current operating model. TfL will remain in dialogue with Bolt in relation to its proposed future changes to that model. It will take a view on those changes, if and when Bolt decides to amend its operating model.

149. We have determined that a licence of shorter than five years is appropriate, for the reasons set out below.

11. TfL'S CONCLUSION AS TO LICENCE LENGTH AND CONDITIONS

Length of licences

150. Following determination that an applicant is fit and proper to be licensed as a London PHV operator, TfL must then consider the duration of licence to be granted.

151. Section 3(5) of the PHV Act provides that TfL shall grant an operator's licence for five years or such a shorter period as TfL may consider appropriate in the circumstances of the case. The PHV Act does not say which circumstances might justify the grant of a licence for less than five years, therefore, TfL has broad discretion to take into account all factors that are legally relevant.

152. In accordance with the PHV Act and the Statutory Standards, TfL will take into account the specific circumstances of the individual case when determining the appropriate duration of an operator's licence. Examples of factors that TfL may consider when determining whether a particular applicant should be granted a short-term licence include (but are not limited to):

- The compliance history of the applicant, in particular where the applicant wishes to renew their licence;
- Rapid and/or ongoing changes to an operator's operating model, or business methodology;
- Evidence that the applicant's technological offering and solutions have or will evolve and/or change; and

- New operators offering novel, innovative or unproven delivery systems and processes.

153. Taking account of these factors, TfL may consider that a short-term licence is appropriate so that it can reassess the applicant's systems, operations and performance in the round before five years have passed.

154. When considering the appropriate duration of any licence, TfL will also take into account the period of time that is necessary properly to consider any renewal application. It is TfL's experience that consideration of applications for operators' licences can take up to six months.

155. In accordance with Regulation 5 of the Operators' Regulations, an applicant will be advised of the grounds for a decision to grant a licence for a shorter period than five years.

156. There is no statutory right of appeal against a decision by TfL to grant a licence for a period shorter than five years (unlike a decision to refuse a licence or a decision to impose a licence condition). However, the decision is open to challenge by way of judicial review on the ordinary basis.

157. Taking into consideration all of the points raised in this Note, both positive and negative, TfL has determined that a licence length of thirty months is appropriate.

Consideration of Statutory Standards

158. In making this recommendation, we have had regard to all of the Statutory Standards which are relevant to a decision to license Bolt as a London PHV operator at a higher tier in accordance with the applicable legislation (s.177 of the Policing and Crime Act 2017).

159. Consideration of each of the Statutory Standards can be found at Annex B to this Note which lists the measures identified and the impact of them in respect to Bolt's application for a licence. As the Statutory Standards cover a number of areas of licensing activity and regulation, it is the case that not all are relevant to Bolt as an operator, whereas some are relevant, some examples of which are listed below:

- Criminality checks for private hire vehicle operators. This being that licensing authorities should request a basic disclosure from the DBS and that a check is undertaken annually (para. 8.2 - 8.6 of the Standards);

- Booking and dispatch staff. This being that licensing authorities should, as a condition of granting an operator licence, require a register of all staff that will take bookings or dispatch vehicles is kept (8.7 - 8.12); and
- Record keeping. This being that licensing authorities should as a minimum require private hire vehicle operators to record specific information for each booking. (8.13 - 8.15)

160. As an example, consideration has been given as to whether TfL has confidence that Bolt will be able to meet the new requirements relating to the following:

- Criminality checks for private hire vehicle operators – It is noted that Bolt has complied with the requirement to provide a self-declaration form for all personnel to be associated with the licence and in doing so have needed to declare if they have previously been convicted of any criminal offence; received a caution or warning or are subject to any ongoing investigation(s) or criminal prosecution(s) in the UK or any other country. Confirmation was received from Bolt to this effect in May 2021 with annual updates due as per the specific licence condition.

161. When considering the impact of this requirement being introduced, it is noted that Bolt already has a similar requirement under conditions 13 and 14. Therefore it is anticipated that any impact would be minimal; and

- Booking and dispatch staff and Record keeping

162. It is noted that Bolt has been fully compliant with the current record keeping requirements. Given the sophistication of the current IT system, it is anticipated that the impact of such a requirement would be minimal.

163. TfL is currently considering whether it is necessary to consult on any of the measures before they are introduced in order to understand the likely impact of any of the measures on licensees in London. This is in line with DfT's expectation that all licensing authorities consult on proposed changes in licensing rules that may have significant impacts on passengers and/or the trade. As a result, as TfL is in the process of formulating its approach to the Statutory Standards for all operators and when they will be implemented, it is not considered appropriate or fair to apply any of the specific Statutory Standards to Bolt at this time and before we know whether to apply them to other operators and what form they will take should we do so.

164. As and when TfL's implementation of the Statutory Standards is effective, Bolt would then be required to meet those standards the same as any other operator granted a licence in London.

165. Bolt have been made aware of the Statutory Standards and have confirmed their commitment to adhere, once implemented.

12. RECOMMENDATIONS

166. Positive factors that support the recommendation made:

- Bolt's understanding of their role as an operator to ensure the safety of the travelling public through the PHV services they intend to provide;
- Bolt's demonstration of its ability to review, understand and prevent previous non-compliant incidents by implementing specific preventative measures;
- Engagement with TfL throughout the application and compliance processes
- The outcome of all inspections during the course of its licence;
- Demonstrable confidence in the ongoing use of driver and vehicle licence status validity checks via TfL's Licence Checker and daily download data reports;
- Evidence of continuous improvements to systems and processes as evidenced within Independent Assurance Reports received in May and November 2020 and May 2021;
- [REDACTED]
- [REDACTED]
- The move to automate driver insurance checks via access to MIB data to allow for more regular checks;
- Recognition of the need to be able to scale its operations to manage the additional resource needs required with a higher tier licence;
- Continued demonstration of an understanding of the expected requirements of a licensed operator;
- Awareness and understanding of their role and obligations as an operator in respect to GDPR;
- Awareness of the need to adhere to any Statutory Standards requirements that are implemented,
- Confirmation of its awareness of the Supreme Court ruling and associated litigation currently; and
- No repeat of the adverse matters identified in previous licence decisions that resulted in the issuance of a warning for failure to comply with the conditions on the licence.

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

168. Considering the guidance available to me, and for the reasons set out above, I recommend that a licence is granted for thirty months in this case. A licence of this duration, is in recognition of the concerns raised above but is also a sufficient period that will enable TfL to continue to closely review Bolt's processes, systems and record of regulatory compliance with its obligations as a licensed operator and any non-prescribed licence conditions in as it scales up its operations to exceed 10,001 vehicles at any one time.

169. This period will also allow TfL to engage Bolt in continual dialogue whilst assessing aspects of its proposed operating model changes to ensure swift and compliant implementation if deemed lawful.

170. For the avoidance of doubt, Bolt is not being granted a probationary licence as explained above. I recommend that TfL finds that Bolt is fit and proper on the basis of the totality of the evidence currently available. Bolt is not being granted a shorter licence in order to prove its fitness.

Proposed non-prescribed conditions

171. I also recommend that TfL imposes the non-prescribed licence conditions set out in the attached Appendix A on the licence granted to Bolt. The justification for the condition(s) being proposed is based on consideration of the existing conditions and their continued appropriateness, the increased licence tier application and the requirement to continue to assess and be assured of the robustness of Bolts systems and processes. Each of the conditions will assist in demonstrating to TfL that Bolt has the capacity and capability to manage an exponential growth in all aspects of its operations, including drivers, vehicles, bookings, complaints, lost property. The main purpose of these conditions is to enable TfL to continue to carefully scrutinise Bolt's operations and its ongoing compliance with its regulatory obligations and responsibility to protect the safety of the travelling public in its next licence round over the coming thirty months.

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- [REDACTED]
[REDACTED]
- [REDACTED]
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[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]

13. TfL's DECISION

173. As the decision maker, I confirm that I do not have a prejudicial interest in the consideration of Bolt's application for a licence, whether that be financial or a personal relationship with those involved in the operation.

174. I have fully considered the contents of this Note, including the recommendations made and all of the documentation annexed to this Note. Pursuant to the general delegation given to the Director of Licensing, Regulation and Charging by the General Counsel's written consent made under TfL Standing Order 131A to discharge any function of TfL relating to private hire vehicles, and taking into account the above, my decision is to grant Bolt a London PHV operator's licence for a duration of thirty months and impose the non-prescribed conditions attached at Appendix A.

Next steps

We are aware of your next operational meeting on Tuesday 21 December 2021. However, we will contact you in advance of this to arrange a focused operational meeting to discuss TfL's decision and the mainly practical issues arising from this. Details about that meeting will be sent to you separately with an agenda following confirmation of the attendees at this meeting.

Right of Appeal

You may appeal our decision, information on how to do this is enclosed with this letter, please read the notice entitled 'Right of Appeal'.

Yours sincerely,



Graham Robinson

General Manager - Taxi and Private Hire

[London Taxi and Private Hire | Transport for London](#)

ENC: Additional Information Sheet and Appeals Process

Private Hire Vehicle Operator Licence Application Additional Information Requirements

Under Section 3(3)(a) of the Private Hire Vehicles (London) Act 1998, Transport for London may grant a London PHV Operator's licence to an applicant if TfL is satisfied that the applicant is a fit and proper person to hold such a licence.

In determining whether an applicant is fit and proper, TfL takes account of information provided on:

- The PHV/101 Application Form;
- The PHV/103 Self Declaration form for each person associated with the application;
- The PHV/108 Operating Centre Details form for every proposed operating centre on the application;

as well as any previous history as a licensed operator and any other relevant information provided by the police, other licensing authorities, etc.

Please note: Further information on our policies and guidelines can be found on our website at www.tfl.gov.uk/tpb

Right of Appeal

If you wish to appeal against the decision, you may appeal to the Westminster Magistrates' Court **within 21 days** from the date of receipt of this letter. Please find enclosed with this notice a copy of Section 25 of the Private Hire (Vehicles) Act 1998 which applies to any appeal against a decision of Transport for London in relation to a licence. In order to lodge an appeal, please refer to the enclosed guidelines which have been issued by the court.

Private Hire Vehicles (London) Act 1998 (as amended) Section 25 - Appeals

(1) This section applies to any appeal which lies under this Act to a magistrates' court against a decision of the licensing authority, a constable or an authorised officer in relation to, or to an application for, a licence under this Act.

(2) If the licensing authority has exercised the power to delegate functions under section 24, such an appeal shall be heard by the magistrates' court for the petty sessions area in which the person to whom the functions have been delegated has his office or principal office.

(3) Any such appeal shall be by way of complaint for an order and the Magistrates' Courts Act 1980 shall apply to the proceedings.

(4) The time within which a person may bring such an appeal is 21 days from the date on which notice of the decision appealed against is served on him.

(5) In the case of a decision where an appeal lies, the notice of the decision shall state the right of appeal to a magistrates' court and the time within which an appeal may be brought.

(6) An appeal against any decision of a magistrates' court in pursuance of an appeal to which this section applies shall lie to the Crown Court at the instance of any party to the proceedings in the magistrates' court.

(7) Where on appeal a court varies or reverses any decision of the licensing authority, a constable or an authorised officer, the order of the court shall be given effect to by the licensing authority or, as the case may be, a constable or authorised officer.

If you intend to appeal against the decision of Transport for London (TfL) to revoke, vary, suspend, or refuse to grant you a private hire licence you must carry out the following procedure.

You must apply to Westminster Magistrates' Court for a summons against TfL within 21 days of receiving the written notice of the decision.

- You should write to Westminster Magistrates' Court, applying for a summons against TfL. (Please note: there are no official forms for this procedure, you will have to write a letter stating that you wish to appeal against the decision). The address of the court is 181 Marylebone Road, London NW1 5BR, telephone contact 0300 303 0645. Email address southlondonmc@justice.gov.uk

- You should enclose the notice of: -refusal/revocation/suspension/variation from TfL, and any other relevant correspondence with the envelope showing the postal date.

- The cost of the application is £60.00. This can be paid via the LMAC team at Westminster Magistrates Court. (The fee may be waived if you produce documentary evidence of receiving Income Support/ Jobseekers Allowance) LMAC contact number 0203 126 3040 email address, lmac1@justice.gov.uk

IF THE APPLICATION IS GRANTED: a summons will be issued against TfL for hearing at a later date. This date will be an effective date and you will be required to attend on this and any further dates. You must inform the court in advance of any dates that are not suitable for you to attend for the hearing.

You MUST attend on the hearing date. The District Judge or Justices sitting will hear evidence from both parties and then decide whether or not to uphold the original decision. If the original decision is upheld, costs may be awarded against you (approx. £600.00). Likewise, if you do not attend the appeal, it may be dismissed and costs awarded against you.

If you wish to withdraw your appeal you must inform the court and TfL in writing before the hearing date. If you do not give prior notice of your withdrawal you may incur costs. The fee of £60.00 payable to the court via LMAC may not be refunded.

Please note that, as this is a civil matter, the court will not provide interpreters in these cases, although a list of qualified interpreters can be obtained from the court if you wish to book and pay for one yourself. The services of an interpreter must be arranged by you before the date of your appeal.