

Equality Impact Assessment: Report and EIA Action Plan

Purpose

What is being reviewed?	Taxi and Private Hire Driver, Vehicle and Operator Policies
Service Lead and Service Unit:	Housing and Public Protection
People involved in EIA process:	Nananka Randle. Trudi Barlow, Sophie Sajic
Date/s EIA started and reviewed:	January 2024, May/June 2025

Background

Taxi Licensing Regime overview

The existing Hackney Carriage (Taxi) and Private Hire Driver, Vehicle and Private Hire Operator policies were introduced in 2021 following the formation of BCP Council. They merged the three legacy licensing regimes into one clear accountable set out standards and requirements for anyone wishing to apply for or maintain existing licences issued under the taxi/private hire regime.

These policies are now being reviewed and updated.

Following the publication of the Department for Transport updated documents Taxi and private hire vehicle (PHV) licensing best practice guidance for licensing authorities in England in November 2023 and Statutory taxi and private hire vehicle standards.

[Taxi and private hire vehicle licensing best practice guidance for licensing authorities in England - GOV.UK](#)
[Statutory taxi and private hire vehicle standards - GOV.UK](#)

Licensing authorities have to ensure that their licensing policy and requirements are proportionate, so that passengers can choose from a wide range of safe services. the **primary function of the licensing regime is public safety**; however, an unduly stringent regime on other issues may restrict the supply of taxi and private hire vehicle services by putting up the cost of operation or otherwise restricting entry to the trade.

BCP Council recognises that too restrictive an approach can be counter-productive, restricting the licensed trade to such an extent that the public resort to the use of unlicensed, unvetted and uninsured drivers and vehicles.

There are also economic benefits in enabling visitors to move quickly and safely through the conurbation. Taxis and PHVs have a particularly important role in the night-time economy, ensuring the public return home safely, and can be helpful in ensuring that people disperse quickly and peacefully after events.

Differences between Taxi (taxis) and PHVs

One of the key differences between the vehicles is that a PHV, unlike a taxi, cannot ply for hire, which means that all journeys must be pre-booked in advance through a licensed operator.

It is an offence for PHVs to pick up passengers from any location unless pre-booked.

	Taxi	Private Hire
Ply for hire	✓	x
Pre booked	✓	✓
Operating from a rank	✓	x
Fare meter required	✓	x
Fare tariff set by council	✓	x
Number of vehicles may be restricted by councils	✓	x
Taxis require two types of licence:		Hackney carriage proprietors (vehicle) licence Hackney carriage drivers licence
The provision of a private hire service requires three types of licence:		Private hire operators licence Private vehicle licence Private hire drivers licence

Licensing Regime overview

The BCP licensing team administer the taxi and private hire licensing regime for :-

- Drivers –1277 – licenced every three years
- Vehicles –924 – annual licence
- Operators –93 – licenced every five years

Proposed changes

In drafting the revised policies workshops took place which included members of the licensing committee, representatives of the taxi trade, licensing officers and legal representatives. Each policy was considered in relation to the following documents

[Statutory taxi and private hire vehicle standards - GOV.UK](#)

[Taxi and private hire vehicle licensing best practice guidance for licensing authorities in England - GOV.UK](#)

Once agreed the revised policies were presented to Licensing Committee for agreement to proceed to consultation.

Driver Policy

Having regard to the Department for Transport Statutory guidance: Statutory taxi and private hire vehicle standards updated in November 2022 it is suggested that the current convictions policy as set out in Appendix C of the current Policy is deleted and replaced with the statutory guidance annexe - assessment of previous convictions.

This will support consistency and transparency in committee decisions on the fitness of licence holders and will keep abreast of changes as they occur without having to amend the policy.

Taxis and private hire vehicles (PHV), drivers and Private Hire Operators are all vital to our communities. As the licensing authority, we are responsible for ensuring the public travel safely and receive a good level of service, and that our systems attract safe and suitable drivers.

Our critical responsibilities in licensing both drivers and vehicles have been highlighted by dreadful examples of licensed vehicle drivers and/or operators being involved in the sexual exploitation of children. [Alexis Jay report - Independent Inquiry into Child Sexual Exploitation in Rotherham 1997 2013.pdf](#)

Taxis are regularly used to transport children during the school run. Elderly and disabled users also rely heavily on the door-to-door services that taxis and PHVs provide, as it is often the only way for many residents to access local services. Clearly, drivers must therefore command the highest level of confidence before they can be entrusted with this responsibility. It is essential that we take seriously our responsibility to determine whether someone is a 'fit and proper' person to hold a licence.

The current policy Chapter 8 sets out stringent driver suitability or fitness criteria for all new and existing drivers to adhere to, which includes enhanced Disclosure and Barring Service (DBS) checks and a requirement to sign up to the DBS update service. This allows us to check the DBS status of all drivers at any time and immediately be made aware if there has been a change that needs to be addressed by officers.

All new and existing drivers have to undertake safeguarding training which covers not only Child Sexual Exploitation but also Criminal exploitation, county lines, cuckooing, how to identify and report general concerns about vulnerable passengers. This training is refreshed every three years prior to licences being reissued.

The revised policy is retaining these driver suitability checks.

The current policy Appendix C sets out criminal conviction guidelines for consideration of the suitability of new and existing drivers. The revised policy has removed this appendix and instead officers will refer to the assessment of previous convictions guidance contained within the [Statutory taxi and private hire vehicle standards - GOV.UK](#) this brings us in line with national standards and supports harmonisation with other local authority decisions based on the statutory standard.

Vehicle Policy

Section 16 of the Transport Act 1985 gives local authorities the power to limit taxi licenses, but they must be satisfied that there's no significant unmet demand in their area.

Previous to the current policy there were limits or quantity restriction on the number of taxi licences issued in the Bournemouth and Poole Zones. These restrictions prevented anyone from applying for a new taxi licence within the zones.

The Policy in 2021 released 15 new licences per year in each zone for wheelchair accessible vehicles only – at that time there was a significant waiting list for new licences in both Bournemouth and Poole.

Since 2021 of the 120 new licences made available, 21 new taxis have been licenced. There is currently no waiting list. All those who had expressed interest in a new licence have been offered the opportunity but there has been a very low take up of this.

The revised policy proposes to remove this quantity restriction on taxis from all zones meaning that anyone who wishes to apply for a new taxi vehicle licence that meets the policy criteria will be able to apply and receive a licence. The vehicle policy criteria require all new licenced taxi vehicles to be wheelchair accessible.

There is no provision within legislation to limit the type of vehicle licenced for private hire journeys in this way. As such it is the only mechanism the council has to encourage the licensing of vehicles able to transport people in wheelchairs.

The [Taxi and Private Hire Vehicles \(Disabled Persons\) Act 2022](#) places specific duties on drivers of designated wheelchair-accessible taxis to carry passengers while in wheelchairs, not to charge extra for doing so, and to ensure the passenger's safety and comfort

The proposed policy retains guidance on these duties and requires proprietors of wheelchair accessible vehicles to provide evidence of suitable driver training at each renewal. (drivers can change regularly so this is asked for as part of the vehicle renewal process)

Appendix D sets out the requirements and use of CCTV and dashcams has been significantly updated to reflect current guidance by the Information Commissioners office. This applies to all and has no equality implications.

Private Hire Operator Policy

There are new requirements contained within Appendix A in relation to safeguarding and reporting of complaints to improve the ability of the Licensing Authority to address concerns about driver behaviours and raising awareness and reporting of safeguarding concerns.

This includes new requirements for safeguarding training and DBS checks of employees of the private hire operator who book and dispatch vehicles. This will raise awareness and reporting of safeguarding concerns which include human trafficking, county lines and child sexual exploitation

Although private hire vehicle operators may not have direct contact with passengers, they are still entrusted to ensure that the vehicles and drivers used to carry passengers are appropriately licensed and so maintain the safety benefits of the driver licensing regime.

Enhanced complaint reporting requirements have been added with the operator required to notify the local authority of serious incidents or complaints including but not limited to:-

- sexual misconduct, sexual harassment, or inappropriate sexual attention
- breaching terms and conditions laid down by the Operator regarding fares and charges including the cancellation of a journey without good reason
- unnecessarily obtaining passengers personal information which includes but not limited to social media contact details and telephone numbers
- racist behaviour
- violence
- dishonesty, including but not limited to theft, touting, incorrect routing to inflate a fare
- breaches of equality (specifically wheelchair and service animal denial)
- road traffic offences including condition of any vehicle and including instances of poor driving standards
- any other act that may bring into question the fitness and propriety of the driver or Operator
- the Operator shall notify the Council in writing (email), within 7 days of any complaints that are of a serious nature, in line with their policy
- any driver that has been removed from the working through the Operator on a permanent basis

This provision will support timely investigations and enforcement action to be taken where breaches have occurred particularly in relation to vulnerable children and adults as well as those people with disabilities who need to travel with passenger assistance animals.

Consultation

The consultation ran between 3 March and 28 April 2025 and was online via the BCP Engagement HG platform and paper surveys were available on request.

A table of changes and the draft policies were provided for ease of reference.

A link to the consultation webpages were emailed to all 2294 licence holders and key stakeholders at the start of the consultation and a further reminders was sent.

Key stakeholders included local BIDS, parish and town councils, trader associations, Police and Crime Commissioner, DOTs disability and Soroptimists (women's group Bournemouth).

The consultation generated 33 responses of which 11 were from current licence holders.

The profile of respondents is as follows:-

General Public Survey

The equalities profile is shown below.

Equalities	Group	Number
Age	16 - 24 years	1
	25 - 34 years	6
	35 - 44 years	1
	45 - 54 years	6
	55 - 64 years	2
	65 - 74 years	3
	75 - 84 years	2
	Prefer not to say	1
Gender	Female	4
	Male	14
Sexual orientation	Prefer not to say	3
	Straight / Heterosexual	17
	All other sexual orientations	1
Disability	Prefer not to say	3
	Yes - limited a little/a lot	5
	No	15
Disability Type	Prefer not to say	1
	Reduced physical capacity	3
	Mobility	2
	Severe disfigurement	1
	Long Term progressive condition	1
Ethnic Group	Other disability	1
	White English / Welsh / Scottish / Northern Irish / British	16
	Other White	1
	BME	1
Religion	Prefer not to say	3
	No religion	8
	Christian	9
	Any other religion	2
Respondent Type	Prefer not to say	12
	BCP resident	20
	BCP Hackney Carriage/Private Hire car user	5
	Other	3
	BCP Hackney Carriage/Private Hire licence holder	1

BCP License Holders Survey

The equalities profile is shown below.

Equalities	Group	Number
Age	35 - 44 years	7
	45 - 54 years	1
	55 - 64 years	1
	Prefer not to say	1
Gender	Male	9
	Prefer not to say	1
Sexual orientation	Straight / Heterosexual	9
	Prefer not to say	1
Disability	Yes - limited a little/a lot	1
	No	8
	Prefer not to say	1
Disability Type	Other disability	1
Ethnic Group	White English / Welsh / Scottish / Northern Irish / British	2
	Other White	2
	BME	4
	Prefer not to say	2
Religion	No religion	2
	Christian	4
	Any other religion	2
	Prefer not to say	2
Respondent Type	BCP Hackney Carriage/Private Hire driver	9
	BCP Hackney Carriage/Private Hire vehicle proprietor	5
	BCP Private Hire Operator	1

Key results from the surveys and Equalities issues raised and considered

General Public Survey

- Most respondents identified as BCP residents.
- Majority found out about the consultation through BCP Council emails.
- Most had taken prebooked journeys via BCP Council operators within the last 12 months.
- Respondents generally agreed with proposed changes to Taxi and Private Hire policies, including those for drivers, vehicles, and operators.
- Concerns raised included:
 - The number of taxis operating within the BCP area but licensed by other councils.
 - Too many Taxi and Private Hire licences being issued locally.

BCP Licence Holders Survey

- Most respondents were Taxi/Private Hire drivers.
- Majority had worked on prebooked journeys via BCP Council operators within the last 12 months.
- Respondents expressed concerns about:
- The impact of taxis licensed by other councils operating in the BCP area.
- The need for clearer policies around enforcement and licensing standards.

Email Responses

- Four email responses raised specific concerns, including:
 - Regulating out-of-area drivers and operators who do not comply with local standards.
 - Issues with Uber drivers operating without BCP Council-approved licences.
 - Suggestions for enhancing equality training and tackling violations of the Equality Act.

Key Themes from Feedback – responses to these in bold

Suggestions

- Amendments to vehicle requirements, including adding step-ups for high-step vehicles and ensuring all vehicles are disability-friendly. **We have included that all new taxis are wheelchair accessible, the legislation does not allow us to make the same provision for private hire vehicles.**
- Recommendations for clearer enforcement procedures and additional training for drivers.

Criticisms

- Concerns about the rising number of taxis in the area and the lack of regulation for out-of-area operators. **Whilst it is recognised this is frustrating for the local trade this is outside the scope of the policy and not within the remit of the local authority to address. The reverse issue is also true, we are aware of BCP vehicles and drivers working on remote operator systems such as Uber n Southampton and Portsmouth.**
- Dissatisfaction with the exclusion of ride-sharing apps like Uber from the BCP area. **This is an incorrect assumption, BCP Council has never excluded any app-based PHO such as Uber. Should an application be submitted, it will be processed and assessed in line with all other such applications.**

Concerns about Specific Groups

- Issues with taxi services for assistance dog owners. **These are addressed with the policies under complaint reporting and the phased approach to enforcement. Also supported by driver training requirements**
- Suggestions for promoting equality and improving service delivery for vulnerable passengers. **Ongoing safeguarding requirements are embedded within the policies for safeguarding training does address most of the concerns raised.**

The consultation revealed support for the proposed changes to Taxi and Private Hire policies, alongside valuable feedback regarding enforcement and equality.

Consideration of the Public Sector Equality Duty

The Public Sector Equality Duty (PSED) requires public bodies, including those involved in taxi and private hire licensing, to consider the impact of their decisions on people with protected characteristics. This means taking steps to eliminate discrimination, advance equality, and foster good relations between people who share and don't share a protected characteristic. Specifically, in the context of taxi policies, the PSED ensures that disabled individuals can access transport services without discrimination and can make use of vehicles and services without additional charges or undue hardship.

Public bodies must ensure that their policies and practices don't discriminate against individuals with protected characteristics, including those with disabilities, when it comes to taxi services.

Public bodies should actively promote equal opportunities and reduce inequalities related to accessing taxi services, particularly for disabled individuals.

Public bodies are expected to make reasonable adjustments to their taxi policies to accommodate the needs of disabled individuals and ensure their access to transportation.

Due regard

To 'have due regard' means that in making decisions and in its other day-to-day activities the council must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations.

How much regard is 'due' will depend on the circumstances and in particular on the relevance of the aims in the general equality duty to the decision or function in question. The greater the relevance and potential impact, the higher the regard required by the duty. The three aims of the duty may be more relevant to some functions than others; or they may be more relevant to some protected characteristics than others.

Collecting and using equality information

The Equalities and Human Rights Commission (EHRC) states that 'Having due regard to the aims of the general equality duty requires public authorities to have an adequate evidence base for their decision making'.

We need to make sure that we understand the potential impact of decisions on people with different protected characteristics. This will help us to reduce or remove unhelpful impacts. We need to consider this information before and as decisions are being made.

Case law principles

A number of principles have been established by the courts in relation to the equality duty and due regard:

- Decision-makers in public authorities must be aware of their duty to have 'due regard' to the equality duty
- Due regard is fulfilled before and at the time a particular policy is under consideration as well as at the time a decision is taken. Due regard involves a conscious approach and state of mind.
- A public authority cannot satisfy the duty by justifying a decision after it has been taken.
- The duty must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- The duty is a non-delegable one. The duty will always remain the responsibility of the public authority.
- The duty is a continuing one.
- It is good practice for those exercising public functions to keep an accurate record showing that they have actually considered the general duty and pondered relevant questions. Proper record keeping encourages transparency and will discipline those carrying out the relevant function to undertake the duty conscientiously.
- The general equality duty is not a duty to achieve a result; it is a duty to have due regard to the need to achieve the aims of the duty.
- A public authority will need to consider whether it has sufficient information to assess the effects of the policy, or the way a function is being carried out, on the aims set out in the general equality duty.
- A public authority cannot avoid complying with the duty by claiming that it does not have enough resources to do so.

Findings

- ***Different Ages***

Positive impacts on safeguarding of both young and older passengers.

The policy retains the requirement for all drivers to undertake enhanced DBS checks including checks for working with young people. Our licence holders fulfil a vital role in transporting children to and from school.

Licence holders are also responsible for transporting vulnerable elderly people to and from hospital appointments. All drivers undertake safeguarding training which includes.

- Understand the need to protect vulnerable adults, young people, and children
- Identify sources of advice and pathways for reporting concerns
- Identify possible victims of abuse or exploitation by understanding indicators of risk
- Understand their roles and responsibilities in relation to personal safety and security

- ***Current/Previous members of the Armed Forces***

No positive or negative impacts

- ***Those with caring responsibilities***

Positive all drivers undertake safeguarding training and often fulfil school contract work for children with special educational needs supporting carers in the knowledge the drivers are fit and proper to transport their children.

- ***Those with physical disabilities***

Positive impact the policy aims to support anyone being able to access a licenced vehicle as needed. The policy continues with the existing requirement for any new taxi to be wheelchair accessible and removing the current restriction on the number of taxi licences issued in Poole and Bournemouth zones, there is no such requirement in Christchurch. The take up of these licences is further supported by removing any age restriction and having a higher mileage limit for new wheelchair accessible vehicles.

[Apply for a new or replacement vehicle licence | BCP](#)

Drivers of wheelchair accessible vehicles are required to be trained in safe loading and unloading techniques which is specific for the vehicle and if they change vehicles, they must undergo further training.

The council publishes a register which lists the licenced wheelchair accessible vehicles with contact details to support bookings [Taxi and private hire registers | BCP](#)

It is a legislative requirement that drivers cannot refuse a fare with an assistance dog and any reported breaches of this legislation are investigated and the appropriate enforcement measures are taken in line with the phased approach of enforcement as set out within the policy.

- ***Those with mental disabilities***

Positive impacts with safeguarding training of drivers to recognise vulnerabilities and how to report concerns

- **Different genders**

The policy has a positive impact in raising awareness of safeguarding concerns around women and girls as part of ongoing training of all drivers every three years. In addition, those dispatching vehicles and drivers to fulfil journeys are obliged by way of revised licence conditions to report issues around safeguarding complaints to the licensing authority who have set out robust enforcement measures.

Taxi drivers are predominantly male (93.6% in 2024 nationally according to the Department of Transport [Taxi and private hire vehicle statistics, England, 2024 \(revised\) - GOV.UK](#) the policy clearly sets out the requirements for all licence holders and allows anyone to apply as long as they meet the criteria. While applications are open to all genders, the nature of the work—such as unsociable hours and safety considerations—may influence the demographic profile of applicants, resulting in a predominance of male drivers. These factors are external to the policy itself.

Feedback, from complaints received by the licensing team and conversations with trade representatives during forum meetings have identified that issues can arise (similar to unconscious bias) relating the cultural views of women by some drivers that can adversely impact on potential passengers. This is addressed by way of proposed changes to driver conditions and robust application of the fit and proper person criteria within the policy which allows licences to be suspended or revoked if behaviours fall short of that expected of licence holders.

- **Those who identify as trans**

No positive or negative impacts

- **Those who are pregnant/on maternity**

No positive or negative impacts

- **Those who are married/in a civil partnership**

No positive or negative impacts

- **People from different ethnic groups**

In 2024 nationally, the two main ethnic groups of drivers were Asian or Asian British, and White. These comprised 50% and 35% of drivers respectively. This compares to 29% and 63% respectively in 2010. [Taxi and private hire vehicle statistics, England, 2024 \(revised\) - GOV.UK](#)

All applicants are dealt with on an individual basis and anyone struggling with applications or understanding requirements is provided with support and guidance if their preferred language on request. However, in recognition of the role of the taxi driver all applicants must hold a NVQ in Introduction to the role of professional private hire and taxi driver which does have a level entry assessment of understanding of English language both verbal and written.

All applications are undertaken online however we do offer an in-house support service for anyone wishing to meet face to face and receive help completing forms and submitting applications – there is a small fee for this to cover additional costs to the service.

- **People with different religions or beliefs**

No positive or negative impacts

- **People with different sexual orientations**

No positive or negative impacts

- **People in different socio-economic groups**

Positive impacts – it is recognised that those in lower socio-economic groups have lower car ownership and rely on alternative transport including taxis our policies ensure that we have vehicles drivers and operators which are safe and reliable meeting high standards for all.

[Future of mobility: inequalities in mobility and access in the UK Transport System](#)

- ***People's human rights***
No positive or negative impacts

Conclusion

Summary of Equality Implications

The revised policies will meet the statutory taxi and private hire vehicle standard published by the DfT which states that licensing authorities must use their licensing powers to protect children and vulnerable adults.

Taxis and private hire vehicles are a high-risk environment. In terms of risks to passengers, this can be seen in abuse and exploitation of children and vulnerable adults and the number of sexual crimes reported which involve taxi and private hire vehicle drivers. Changes to the policy and conditions therefore reflect the importance of safeguarding and promoting the welfare of children and adults and ensure that all passengers are protected.

The importance of providing adequate access to accessible vehicles is recognised and supported by the policies with staff training requirements embedded to reflect the importance of safe transport and assistance into and out of the vehicles as well as support for booking via the public register.

Form Version 1.2

Prepared by:

Date:

Equality Impact Assessment: Report and EIA Action Plan

[This action plan provides a summary of any negative impacts and relevant mitigating actions]

Equality Impact Assessment Action Plan

Please complete this Action Plan for any negative or unknown impacts identified above. Use the table from the Capturing Evidence form to assist.

Issue identified	Action required to reduce impact	Timescale	Responsible officer
<i>e.g. the effect on disabled people is unknown</i>	<i>Undertake research and consultation</i>		

Form Version 1.2

Prepared by:

Date: