**Appendix 3** 

#### Taxi Fares and Tariffs Review Equality Impact Assessment (EQIA)

Enclosed is the EQIA that was published with the consultation<sup>1</sup>.

Following the close of the consultation and a review of all of the consultation responses the EQIA has been updated. The dates when the EQIA was updated have been included to make it clear what information was included in the EQIA published with the consultation and what has been added after the consultation closed.

Printed copies of this document are uncontrolled. Page 1 of 29



<sup>&</sup>lt;sup>1</sup> 2022 Review of taxi (black cab) fares and tariffs in London, EQIA, <u>https://haveyoursay.tfl.gov.uk/19789/widgets/56152/documents/33681</u>

# **Customer Equality Impact Assessment (EQIA) Form**

The Equality Impact Assessment (EQIA) is a means by which we can demonstrate how we have considered inclusion and put people at the heart of the decisions and changes we make It is a tool to explore the potential for a service, project, programme, or business plan to have an impact on a particular protected characteristic, inclusion groups, or community. This includes the impact on one or more of these groups:

- Protected characteristic groups (as outlined in the Equality Act 2010)
- Disadvantaged or marginalised groups or communities
- Deprivation and socio-economic disadvantage within local communities

#### Please note:

To comply with our agreed policy on completing Equality Impact Assessment (EQIA) and meet our requirements under legislation, all new strategies, policies, business plans, change programmes or projects must be impact assessed before being introduced. Within this document, you will need to provide evidence to demonstrate:

- Consideration of the impact of your initiative for each protected characteristic and other disadvantaged groups and communities
- Assessment of the impact you have identified and a clear action plan to mitigate the issues and concerns which arise from this.

#### The steps for completing EQIA are:

- Introduction of aims/objectives/focus
- Gather evidence in relation to all relevant protected characteristics and inclusion groups
- Engagement and consultations consult and engage with relevant stakeholders/inclusion groups/communities and seek feedback
- Assess or identify potential impacts
- Act on the results including planning actions to mitigate potential negative impact
- Monitoring and evaluation
- Make the right decision based on the evidence and findings from the assessment
- Sign-off

Draft or completed customer EQIA should be submitted to Customer EQIA <u>inbox</u> and a superuser or member of the customer D&I team will be allocated to review the document. Please ensure you have read the customer EQIA guidance before using this form.

Printed copies of this document are uncontrolled. Page 2 of 29



# 1. Key information and clarifying aims

ПКбуштогша		<u> </u>						
Title of strategy, service, business plan, programme, or project	Taxi (Black Cab) Fares and Tariffs Review 2022						Unique ID No. (To be assigned by the D&I team)	D&IC/22/429
Team/Department/ Directorate	Transport for London (TfL), Licensing and Regulation							
EQIA author	Darren Crov	vson, TfL	Taxi and Priva	te Hire Policy Ma	anager			
Senior accountable person								
Date EQIA started	11 October	2022			Date E compl		08 November 202 prepared 24 February 2023 following close of for submission to Committee meetin 2023	<ul> <li>EQIA updated consultation and Finance</li> </ul>
Project Stage	Preparing p	ublic cons	sultation for lau	nch on 11 Nover	mber 20	22		
	Service	Project	Programme	Strategy or busine	ess plan	Others (please stat	e below)	
What is the focus of this EQIA? (Please tick which is appropriate)						tariffs 2. Public consu	✓ anges to taxi (black Iltation on taxi fares ation is accessible	s and tariffs and

Printed copies of this document are uncontrolled. Page 3 of 29



Who would benefit or be impacted by your strategy, service, business plan, programme, or project (Please provide details of below)					
Customer	<ul> <li>Taxi passengers</li> <li>Taxicard members</li> <li>Taxi drivers</li> </ul>				
Employee (for workforce or employee <u>only</u> impact assessment, please email the D&I workforce team at <u>EQIA@tfl.gov.uk</u> )	None				

Printed copies of this document are uncontrolled. Page 4 of 29



If they think there are any additional impacts on people with protected characteristics (e.g. older
people, disabled people, etc.) that may be affected by our proposals and possible ways these could
be mitigated

## 2. The Evidence Base

Consider evidence in relation to all relevant protected characteristics and inclusion group listed in the table below. Please note that change always disproportionately impacts all protected characteristics, so there should be no blank boxes. Consideration should be given not just to the proposal impact but how you intend to communicate and engage on the proposed change.

The separate evidence base document contains information to support the EQIA for the taxi (black cab) fares and tariffs review 2022.

Information included in the evidence base document covers:

- Taxi users London residents
- Travel in London: Understanding our diverse communities 2019
- Taxicard journeys and members
- Disability and mobility data for Londoners
- Income and poverty amongst Londoners
- UK lesbian, gay, bisexual and transgender (LGBT) survey
- Taxi and Private Hire Driver Diary Survey
- Travel in London report
- Use of wheelchair accessible taxis
- Designated wheelchair accessible taxis and private hire vehicles (PHVs) in London
- Carers in London
- Visitors to London
- Licensed taxi drivers
- Use of smartphones and other devices

Printed copies of this document are uncontrolled. Page 5 of 29



# Engagement and consultation

Outline how engagement and consultation with inclusion groups, people who share a protected characteristic, and other project teams have informed your work

	Yes	No	Don't Know	Comments
Has there been any engagement or consultation activity relating to this strategy, service, business plan, programme, or project? List the relevant stakeholders and inclusion group Please include any relevant consultation or engag		<ul> <li>There has been pre-consultation engagement the main taxi trade associations</li> <li>Potential changes to taxi fares and tariffs here discussed with TfL's Assisted Transport Services Team and London Councils</li> </ul>		<ul> <li>There has been pre-consultation engagement with the main taxi trade associations</li> <li>Potential changes to taxi fares and tariffs have been discussed with TfL's Assisted Transport Services Team and London Councils</li> <li>A full public consultation will be carried out</li> </ul>
protected characteristic and inclusion group.		Date		Feedback comments / issues raised
Stakeholders and inclusion groups consulted/engaged with		Date		reedback comments / issues raised
<ul> <li>Taxi Fares Working Group – this includes</li> <li>representatives from: <ul> <li>Licensed Taxi Drivers Association (LTDA)</li> <li>London Cab Drivers Club (LCDC)</li> <li>RMT</li> <li>Unite the Union</li> <li>United Cabbies Group (UCG)</li> </ul> </li> </ul>		Mon	nthly meetings	<ul> <li>They support using the Cost Index</li> <li>They support taxi fares and tariffs increasing as taxi drivers' operating costs have increased, taxi drivers are also experiencing the cost of living crisis and costs for other items (e.g. utility bills) increasing</li> <li>They want changes to be implemented in April 2023</li> </ul>
Although changes to taxi fares and tariffs were not covered, taxi services in general and proposals to		22 Se	<ul> <li>The main comments were about:         <ul> <li>Issues with the Taxicard service</li> <li>Issues with taxis and PHVs being able to passengers and problems being caused streetscape changes</li> </ul> </li> </ul>	

Printed copies of this document are uncontrolled. Page 6 of 29



		<ul> <li>Training for taxi drivers</li> <li>Taxi vehicle accessibility</li> <li>Issues for people with assistance dogs</li> <li>Complaints information needing to be accessible or in an accessible format</li> </ul>
<ul> <li>The consultation will be promoted to:</li> <li>Passengers</li> <li>Accessibility and disability organisations</li> <li>Older people's groups</li> <li>Women's safety groups</li> <li>Business groups</li> <li>Tourism and travel groups</li> <li>Night-time economy</li> <li>Lesbian, gay, bisexual and transgender (LGBT+) groups</li> <li>London boroughs</li> <li>London MPs and Assembly Members</li> <li>Licensed taxi drivers</li> <li>Taxi vehicle owners</li> <li>Taxi trade associations</li> <li>Taximeter companies</li> </ul>	11 November 2022	<ul> <li>All consultation responses will be reviewed and a consultation report will be prepared</li> <li>This will be used to inform recommendations</li> </ul>
<ul> <li>To help ensure that the consultation is accessible and inclusive we will do the following:</li> <li>Prepare an EasyRead version of the consultation material and consultation questions</li> <li>Prepare a British Sign Language video on the consultation</li> </ul>	11 November 2022	<ul> <li>All consultation responses will be reviewed and a consultation report will be prepared</li> <li>This will be used to inform any recommendations we make</li> <li>If people submit a response through the TfL Consultation Portal then demographic information</li> </ul>

Printed copies of this document are uncontrolled. Page 7 of 29



<ul> <li>Provide options (online survey, email, post, phone) for submitting a response</li> <li>TfL's Stakeholder, Advocacy and Engagement (SAE) Team will help promote the consultation to a wide audience</li> <li>The consultation will be featured in the Metro newspaper and in the TfL accessibility newsletter</li> <li>Review whether Disability Horizons can assist us with promoting the consultation to disabled people</li> </ul>				(age, gender, etc.) will be collected when they registered and created an account
and groups representing them	Yes	No	Don't Know	<b>Comments</b> (state clearly what this engagement or consultation will be and how it will be organised)
Does there need to be any further engagement or consultation? If yes, please add this as an action to the action planning section below. Please note that in some circumstances your work may require formal consultation				A full public consultation will be launched on 11     November 2022

## 3. Impact assessment – Protected characteristics and inclusion groups

Given the evidence listed in section 2 and 3, consider and describe the potential impacts this work could have on people with protected characteristics and other inclusion groups.

We normally review taxi fares and tariffs annually and aim to implement changes in April of each year. Taxi fares and tariffs were last updated by TfL in April 2022.

When we review taxi fares and tariffs we try to strike an appropriate balance between drivers being fairly paid and taxi users getting fair and affordable fares.

Printed copies of this document are uncontrolled. Page 8 of 29



Listed below are:

- Potential positive and negative impacts that could affect all taxi passengers, Taxicard members and taxi drivers
- Potential positive and negative impacts that could affect taxi passengers, Taxicard members and taxi drivers with protected characteristics or who are in other inclusion groups

# Taxi passengers

There are some negative impacts that could affect all taxi passengers, including Taxicard members:

- \* They would be negatively impacted by increases to the minimum fare or tariff rates as the fares passengers pay could increase
- They would be negatively impacted by increases to some of the fares for the fixed-fare, shared taxi scheme that operates during the Wimbledon Tennis Championships. If they use shared taxis during the Championships then the fares they pay could increase
- \* They would experience a negative impact if the total number of licensed taxi drivers reduces because no increase to fares is made, drivers cannot cover increased operating costs and so stop being a taxi driver. This could mean increased wait times for taxi passengers or taxis not being available when they want to travel
- \* They will also be negatively impacted if the total number of licensed taxi drivers reduces because no increase to fares is made and people are deterred from applying to become a licensed taxi driver. This could also mean increased wait times for taxi passengers or taxis not being available when they want to travel

There are some positive impacts that could affect all taxi passengers, including Taxicard members:

- Taxi passengers would experience a positive impact if there are increases to the minimum fare or tariffs and taxi drivers can cover operating costs and remain in the taxi trade. This in turn will help ensure that a certain level of taxi availability is maintained and passengers can still access taxi services. However, taxi passengers would still be negatively impacted by the fares increasing
- ✓ If freezing the minimum fare and tariffs increases the number of people using taxis this could encourage more people to apply to become a licensed taxi driver, as they consider this a viable career. This could have a positive impact on taxi passengers as it could increase the availability of taxis or reduce wait times

There may be some neutral impacts:

- □ If passengers use taxis for short journeys the impact on them may be neutral if the minimum fare or tariffs are frozen as the fares will not increase
- □ Some taxi passengers may prefer to use taxis because they feel less safe using public transport. The impact on them may be neutral if the minimum fare or tariffs are frozen and fares do not increase

Printed copies of this document are uncontrolled. Page 9 of 29



## Taxi drivers

- \* All taxi drivers will be negatively impacted if:
  - \* No change to the minimum fare or tariffs is made and they cannot cover increased operating costs
  - \* Any increase is less than the increase to operating costs and they cannot cover increased operating costs
  - Increases to the minimum fare or tariffs result in fewer people using taxis or a decline in the number of taxi journeys and drivers' incomes reducing
- ✓ All taxi drivers will experience a positive impact if:
  - Freezing the minimum fare and tariffs results in the number of taxi journeys or people using taxis increasing and drivers' incomes increase
  - ✓ The minimum fare or tariffs are increased and there is no decline in the number of taxi journeys or people using taxis as this could mean drivers' incomes increase

## **Race and ethnicity**

#### Taxi passengers

- The poverty rate for Black, Asian and minority ethnic people is 38 per cent in London and 21 per cent for white groups
- Black, Asian and minority ethnic people may experience and perceive higher levels of crime on public transport and so for some journeys may choose to use taxis
- Some Black, Asian and minority ethnic taxi passengers and Taxicard members may prefer to use taxis because they feel less safe using public transport. They may experience a negative impact if the minimum fare or tariffs are increased and fares increase. This could mean they are not able to travel as often, have to use public transport despite not feeling safe when doing so, or may be more likely to consider using an unbooked PHV, unlicensed vehicle or walking when this is a less safe option
- Some Black, Asian and minority ethnic taxi passengers and Taxicard members may prefer to use taxis because they feel less safe using public transport. The impact on them may be neutral if the minimum fare or tariffs are frozen and fares do not increase

#### Taxi drivers

\* The number of Black, Asian and minority ethnic taxi drivers is low and not representative of the capital's population. A perception that being a taxi driver is not an attractive career could deter Black, Asian and minority ethnic people from applying to become a taxi driver. Not increasing any of the tariffs despite drivers' operating costs increasing could deter Black, Asian and minority ethnic people from applying to become a licensed taxi driver. They could also be deterred from applying to become a taxi driver if the minimum fare or tariffs are increased and this results in the number of taxi journeys or people using taxis declining

Printed copies of this document are uncontrolled. Page 10 of 29



## Sex (male, female, non-binary and other identities)

#### Taxi passengers

- Twenty-eight per cent of women and 27 per cent of men in London are living in poverty
- Female taxi passengers may be disproportionately impacted if they have concerns about the safety of using certain modes of transport or walking or cycling at certain times and use taxis more often. If the minimum fare or tariffs are increased the fares they pay will increase
- Female taxi passengers who are older may be disproportionately impacted if they have greater concerns about safety and so are more likely to want to use a taxi. As they are older they may also face barriers with using some other modes of transport (e.g. buses, Tube) or not being able to consider walking or cycling as an alternative. If the minimum fare or tariffs are increased the fares they pay will increase
- The impact may be positive for female taxi passengers if the minimum fare or, tariffs are frozen and this makes them more likely to use taxis at night and instead of using an unlicensed vehicle or unbooked PHV, or choosing to walk when this is a less safe option

#### Taxi drivers

- Female taxi drivers who are also carers may be disproportionately impacted if no change to the minimum fare or tariffs is made, any increase is less than the increase to operating costs, or increases to the minimum fare or tariffs result in fewer people using taxis or a decline in the number of taxi journeys. They may be unable to increase the number of hours they work as a result of having caring responsibilities
- \* The number of female taxi drivers is extremely low and not representative of the capital's population. A perception that being a taxi driver is not an attractive career could deter women from applying to become a taxi driver. Not increasing any of the tariffs despite drivers' operating costs increasing could deter women from applying to become a licensed taxi driver. They could also be deterred from applying to become a taxi driver if the minimum fare or tariffs are increased and this results in the number of taxi journeys or people using taxis declining

## **Gender reassignment**

#### Taxi passengers

Taxi passengers and Taxicard members whose gender identity is different from the gender assigned to them when they were born may be disproportionately impacted if they have concerns about the safety of using certain modes of transport or walking at certain times and so use taxis more often. If the minimum fare or tariffs are increased the fares they pay will increase

> Printed copies of this document are uncontrolled. Page 11 of 29



The impact may be positive for taxi passengers whose gender identity is different from the gender assigned to them when they were born if the minimum fare or, tariffs are frozen and this makes them more likely to use taxis at night and instead of using an unlicensed vehicle or unbooked PHV, or choosing to walk when this is a less safe option

#### Taxi drivers

\* The number of taxi drivers whose gender identity is different from the gender assigned to them when they were born is low. A perception that being a taxi driver is not an attractive career could deter people whose gender identity is different from the gender assigned to them when they were born from applying to become a taxi driver. Not increasing any of the tariffs despite drivers' operating costs increasing could deter people whose gender identity is different from the gender assigned to them when they were born from applying to become a taxi driver. Not increasing any of the tariffs despite drivers' operating costs increasing could deter people whose gender identity is different from the gender assigned to them when they were born from applying to become a licensed taxi driver. They could also be deterred from applying to become a taxi driver if the minimum fare or tariffs are increased and this results in the number of taxi journeys or people using taxis declining

## Age

#### Taxi passengers

- Younger and older taxi passengers may be disproportionately impacted by increases to taxi fares as they may be less able to respond to taxi fare increases, pay more and continue to use taxis as frequently as they did before any increases
- Some children may use taxis to travel to or from school or college. They may be disproportionately negatively impacted by any increase in taxi fares
- Older taxi passengers may also be disproportionately impacted by increases to taxi fares as they may be more reliant on taxis, need an
  accessible vehicle or a door to door service
- The majority (70.79%) of Taxicard members are over 61 and so Taxicard members may be disproportionately impacted by increases to taxi fares. They may be more reliant on taxis and may not be able to consider using some other modes of transport (e.g. buses, Tube). They may also not be able to consider walking or cycling as an alternative
- Taxi passengers and Taxicard members who make short journeys would experience a negative impact if the minimum fare increases.
   Older taxi passengers and Taxicard members may be disproportionately impacted as they may rely on taxis to make short journeys
- Although smartphone usage appears to be increasing amongst older people, they are still less likely to have a smartphone. Taxi passengers will be negatively impacted by increases to the minimum fare or tariffs but may have fewer alternative options, such as app based PHV services, they can use. Older taxi passengers may be disproportionately impacted as they may be less likely to have a smartphone

Printed copies of this document are uncontrolled. Page 12 of 29



- Some older people may be able to use a bus instead of a taxi for all or part of their journey but they may be disproportionately impacted if the bus services they would use are reduced or withdrawn as part of the Central London Bus Review<sup>2</sup>
- Single pensioners may be more likely to own a car so they may be able to use a car for some or all journeys instead of a taxi<sup>3</sup>. However, they will be negatively impacted if they travel in the Congestion Charging Zone (CCZ)<sup>4</sup> when this is in operation or travel in the Ultra Low Emission Zone (ULEZ) and need to pay the ULEZ charge.<sup>5</sup> They will also have to cover parking and fuel costs if they use a car instead of taking a taxi
- Above the age of 70 car ownership starts to decline considerably and taxi passengers and Taxicard members who are over 70 may be disproportionately impacted by increases to taxi fares as they are less likely to own a car and so may be more reliant on taxis. They may be unable to switch to using a car if taxis become unaffordable
- Some older people with mobility issues or who cannot walk very far may be unable to use a car if they cannot park close to their destination and so a taxi may still be needed as it can provide a door to door service in most areas
- Just over one fifth (21 per cent) of all Londoners aged 16 or more had a 'DDA' disability (a physical or mental impairment or an impairment that has a substantial and long-term adverse effect on their ability to perform normal day-to-day activities
- Londoners aged 60 or more may be disproportionately impacted as they are more likely than younger Londoners to be a wheelchair user, have walking difficulties or have other disabilities. They may be more reliant on taxis, as these are fitted with a wheelchair ramp, and may face barriers with using other forms of transport and not able to consider walking or cycling as an alternative. They may also find it more difficult to use a PHV instead of a taxi as only 459 PHVs are designated wheelchair accessible vehicles, this is only 0.55 per cent of the total PHV fleet in London
- Just under one quarter (24 per cent) of pensioners in London are in poverty and they may be disproportionately impacted by increases to taxi fares and may be unable to afford to travel, although being older they may be more reliant on taxis and may face barriers with using other forms of transport and not able to consider walking or cycling as an alternative
- Younger London residents may be disproportionately impacted by increases to taxi fares as they may travel at night more. They may be more likely to consider using taxis as other modes of transport may not be available or it may be less safe to walk
- The impact may be neutral for some older taxi passengers if the minimum fare or tariffs are frozen and they use taxis for short journeys as the fares will not increase



<sup>&</sup>lt;sup>2</sup> TfL Central London bus Review Consultation, 1 June 2022, <u>https://haveyoursay.tfl.gov.uk/busreview</u>

<sup>&</sup>lt;sup>3</sup> Travel in London Report 12, TfL, 2019, <u>http://content.tfl.gov.uk/travel-in-london-report-12.pdf</u>

<sup>&</sup>lt;sup>4</sup> The Congestion Charge is an £11.50 daily charge for driving a vehicle within the charging zone between 07:00 and 18:00, Monday to Friday, https://tfl.gov.uk/modes/driving/congestion-charge

<sup>&</sup>lt;sup>5</sup> ULEZ) operates 24 hours a day, 7 days a week, every day of the year, except Christmas Day, within the same area of central London as the Congestion Charge. The charge is £12.50 for most vehicle types, including cars, <u>https://tfl.gov.uk/modes/driving/ultra-low-emission-zone?intcmp=26434</u>

The impact may be neutral for some children if they use taxis to travel to or from school or college and the minimum fare or tariffs are not increased. This would mean taxi fares do not increase and this could increase the availability of taxis if drivers have to work more to cover increased operating costs

#### Taxi drivers

- Older taxi drivers may be disproportionately impacted if they cannot work longer to try and maintain their income or cover increased operating costs. Older taxi drivers may be less likely to have a smartphone and may also be disproportionately impacted if they cannot access work through an app
- \* Taxi drivers who are London residents and are aged 60 or more may be disproportionately impacted as they are more likely than younger Londoners to be a wheelchair user, have walking difficulties or have other disabilities. They may be disproportionately impacted if they cannot work longer to try and maintain their income or cover increased operating costs if increases to the minimum fare or tariffs result in fewer people using taxis and drivers' incomes reducing
- Sust under one quarter (24 per cent) of pensioners in London are in poverty<sup>6</sup>. Fourteen per cent of taxi drivers are aged 65 or older.<sup>7</sup> Taxi drivers are asked what their annual household income is in the annual Taxi and Private Hire Licensee Customer Satisfaction Survey (CSS).<sup>8</sup> Just under half (49 per cent) preferred not to say what it was but 11 per cent said it was £20,000 or lower. Taxi drivers who are pensioners and live in London may be disproportionately impacted if they cannot work longer to try and maintain their income or cover increased operating costs if:
  - \* No increase to the minimum fare or tariffs is made despite their operating costs increasing
  - \* Increases to the minimum fare or tariffs result in fewer people using taxis and drivers' incomes reducing
- The number of younger taxi drivers is extremely low and not representative of the capital's population. Not increasing any of the tariffs despite drivers' operating costs increasing could deter young people from applying to become a licensed taxi driver. They could also be deterred from applying to become a taxi driver if the minimum fare or tariffs are increased and this results in the number of taxi journeys or people using taxis declining

Printed copies of this document are uncontrolled. Page 14 of 29



<sup>&</sup>lt;sup>6</sup> Trust for London, London's Poverty Profile, 2020, <u>https://www.trustforlondon.org.uk/publications/lpp2020/</u>

<sup>&</sup>lt;sup>7</sup> TfL licensing data, 1 August 2022

<sup>&</sup>lt;sup>8</sup> Taxi and Private Hire Licensee CSS 2021/22, Kantar

## **Religion and belief**

#### Taxi passengers

 Taxi passengers and Taxicard members with religious or other beliefs may be disproportionately impacted if they have concerns about the safety of using certain modes of transport and use taxis more often. If the minimum fare or tariffs are increased the fares they pay will increase

## Disability (please consider all forms of disabilities)

#### Taxi passengers

- \* Disabled taxi passengers and Taxicard members may be disproportionately impacted:
  - From taxi fares increasing as they may rely on taxis or use them more often. They may also face barriers with using some other modes of transport (e.g. buses, Tube) or not be able to consider walking or cycling as an alternative
  - If they require a door to door service or use the accessibility features in taxis but cannot use alternative modes of transport if taxis become too expensive
- \* Taxi passengers and Taxicard members who are wheelchair users may be disproportionately impacted by increases to taxi fares as they may be more likely to use a taxi because all taxis are fitted with a wheelchair ramp. They may also find it more difficult to use a PHV instead of a taxi as only 459 PHVs are designated wheelchair accessible vehicles, this is only 0.55 per cent of the total PHV fleet in London
- Taxi passengers and Taxicard members who have an assistance dog may be disproportionately impacted by increases to taxi fares if they prefer to use taxis for some journeys instead of public transport due to overcrowding or access issues
- \* Taxi passengers and Taxicard members will be negatively impacted by increases to the minimum fare or tariffs but some may have fewer alternative services, such as app based PHV services, they can consider instead of using a taxi. Disabled taxi passengers and Taxicard members may be disproportionately impacted as they may be less likely to have a smartphone and so may be unable to use app based services
- People in a family with at least one disabled member are more likely to be in poverty and so they may be disproportionately impacted by increases to taxi fares
- Taxicard members will be negatively impacted by increases to the minimum fare or tariffs as this would mean taxi fares increasing for journeys where the fare is still below the capped Taxicard fare level
- Taxicard members will be negatively impacted if taxi drivers are more reluctant to accept Taxicard fares. The risk of taxi drivers not
  accepting Taxicard capped fares could increase if taxi drivers feel the capped Taxicard fares are too low or they are not willing to accept
  less than the full metered fare

Printed copies of this document are uncontrolled. Page 15 of 29



The impact may be neutral for some disabled taxi passengers and Taxicard members, plus those who are carers if the minimum fare or, tariffs are frozen and they use taxis for short journeys as the fares will not increase

#### Taxi drivers

- Disabled taxi drivers may be disproportionately impacted if there is a decline in the number of taxi journeys or people using taxis as they
  may be unable to increase the number of hours they work
- Taxi drivers who provide care may be disproportionately impacted if there is a decline in the number of taxi journeys or people using taxis as they may be unable to increase the number of hours they work
- The number of disabled taxi drivers is extremely low and not representative of the capital's population. A perception that being a taxi driver is not an attractive career could deter disabled people from applying to become a taxi driver. Not increasing any of the tariffs despite drivers' operating costs increasing could deter disabled people from applying to become a licensed taxi driver. They could also be deterred from applying to become a taxi driver if the minimum fare or tariffs are increased and this results in the number of taxi journeys or people using taxis declining

## **Sexual orientation**

#### Taxi passengers

- LGB taxi passengers and Taxicard members may be disproportionately impacted as LGB Londoners are amongst the groups most likely to be 'worried' about the safety of public transport (31%)<sup>9</sup> and so could potentially use taxis more often. If fares increase they may be unable to afford to use taxis and so may need to use other forms of transport despite not feeling safe
- □ Some LGB taxi passengers or Taxicard members may prefer to use taxis because they feel less safe using public transport. The impact on them may be neutral if the minimum fare and tariffs are frozen and fares do not increase

#### Taxi drivers

\* The number of LGB taxi drivers is very low and not representative of the capital's population. A perception that being a taxi driver is not an attractive career could deter LGB people from applying to become a taxi driver. Not increasing any of the tariffs despite drivers' operating costs increasing could deter LGB people from applying to become a licensed taxi driver. They could also be deterred from applying to become a taxi driver if the minimum fare or tariffs are increased and this results in the number of taxi journeys or people using taxis declining

Printed copies of this document are uncontrolled. Page 16 of 29



<sup>&</sup>lt;sup>9</sup> TfL (2015): 'Travel in London: Understanding our diverse communities'

## Marriage or civil partnership

#### Taxi passengers

• No impacts on taxi passengers who are married or in a civil partnership have been identified

#### Taxi drivers

• No impacts on taxi drivers who are married or in a civil partnership have been identified

# Pregnancy and maternity

## Taxi passengers

Taxi passengers who are pregnant or have recently given birth would be negatively impacted from the minimum fare or, tariffs increasing and may be disproportionately impacted if they have concerns about the safety of using certain modes of transport and use taxis more often. If the minimum fare or tariffs are increased the fares they pay will increase

## Taxi drivers

 Taxi drivers who are pregnant or who have recently given birth may be disproportionately impacted as they may be unable to work or drive for long periods and respond to any reduction in the usage of taxis or their income

## Disadvantaged, inclusion groups and communities e.g. carers, refugees, low income, homeless people etc.

#### Taxi passengers

Some taxi passengers may already be experiencing financial problems as a result of rising inflation, the cost of living crisis and costs increasing for a range of items (e.g. food, utility bills). They would experience a negative impact if the minimum fare or tariffs increase, and taxi fares increase. This could mean that they are not able to travel as often or are unable to make some journeys

## Taxi drivers

- Some taxi drivers will be negatively impacted if they are experiencing financial problems because of rising inflation, the cost of living crisis, operating costs increasing or other items (e.g. food, utility bills, etc.) increasing. If increases to the minimum fare or tariffs result in a decline in the number of taxi journeys or people using taxis this could result in drivers' incomes reducing. They may also experience a negative impact if no change is made to the minimum fare or tariffs and they are struggling to cover increased costs
- Taxi drivers on a low income may be less likely to have a smartphone and may be disproportionately impacted if they cannot access work through an app or if the proportion of taxi work from apps increases

Printed copies of this document are uncontrolled. Page 17 of 29



# Deprivation and socio-economic disadvantage of local communities e.g. people with lack of access to housing, education, social resources, geographic location, and income

#### Taxi passengers

\* Taxi passengers and Taxicard members may experience a negative impact if they use taxis in the suburban licence areas and the number of licensed suburban taxi drivers reduces because no increase to fares is made, suburban taxi drivers cannot cover increased operating costs and so stop being a taxi driver

#### Taxi drivers

- The demand and usage of taxis in suburban areas is generally lower and so the income of suburban taxi drivers may be lower and there may be fewer opportunities to increase the number of taxi journeys they do. Suburban taxi drivers may be disproportionately impacted if they cannot work longer to try and maintain their income or cover increased operating costs if:
  - \* No increase to the minimum fare or tariffs is made despite their operating costs increasing
  - \* Increases to the minimum fare or tariffs result in fewer people using taxis and drivers' incomes reducing

## People who share more than one protected or other characteristic

Some taxi passengers, Taxicard members and taxi drivers may share more than one protected or other characteristic and the severity of the potential negative impacts identified may be greater on them.

Taxi passengers, Taxicard members and taxi drivers may share any combination of protected or other characteristics including:

- Age and Disability
  - The severity of the negative impacts on older, disabled taxi passengers and Taxicard members may be greater. They may be more reliant on taxis or use taxis for a greater proportion of their journeys. They may also be less able to use other forms of transport (e.g. bus, Tube, cycle, car) or walk
  - Children may be entitled to free transport if they cannot walk to school because of their special educational needs and disabilities (SEND) or if they have a mobility impairment. Some 16-19 year olds in education may also be eligible for travel to school sixth form or college. The severity of some of the negative impacts on them may be greater if they use taxis to travel to or from school or college
  - The severity of the negative impacts on older, disabled taxi drivers may be greater as they may be less able to increase the hours they work if their operating costs increase, or the number of taxi journeys or people using taxis declines

Printed copies of this document are uncontrolled. Page 18 of 29



- Age and Gender
  - The severity of the impacts on older, female taxi passengers and Taxicard members may be greater. They may be more reliant on taxis or use taxis for a greater proportion of their journeys and also have concerns about the safety of using other modes of transport (e.g. bus or Tube) or walking, particularly late at night
  - The severity of the impacts on older, female taxi drivers may be greater as they may have more concerns about working increased hours or at night, or other issues (e.g. caring responsibilities) prevent them from being able to work longer hours
- Gender and Disability
  - The severity of the impacts on disabled, female taxi passengers and Taxicard members may be greater. They may be more reliant on taxis or use taxis for a greater proportion of their journeys and also have concerns about the safety of using other modes of transport (e.g. bus or Tube) or walking, particularly late at night
  - The severity of the impacts on disabled, female taxi drivers may be greater as they may have more concerns about working increased hours or at night, or other issues (e.g. caring responsibilities) prevent them from being able to work longer hours
- Age, Gender and Disability
  - The severity of the impacts may be even greater on older, female, disabled taxi passengers and Taxicard members. They may be even more reliant on taxis or use taxis for a greater proportion of their journeys and also have concerns about the safety of using other modes of transport (e.g. bus or Tube) or walking, particularly late at night
  - The severity of the impacts on older, female, disabled taxi drivers may be even greater as they may have more concerns about working increased hours or at night, or other issues (e.g. caring responsibilities) prevent them from being able to work longer hours

The severity of the potential positive impacts identified may not be affected as a result of people sharing more than one protected or other characteristic.

## Removing the requirement for the booked taxi extra to be added to the taximeter

 No negative or positive impacts on taxi passengers, Taxicard members or taxi drivers sharing one or more protected or other characteristics have been identified

## Amending the authorised place where the fixed-fare, shared-taxi scheme operates from

• No negative or positive impacts on taxi passengers, Taxicard members or taxi drivers sharing one or more protected or other characteristics have been identified

Printed copies of this document are uncontrolled. Page 19 of 29



## TfL employees

• No negative or positive impacts on TfL employees sharing one or more protected or other characteristics have been identified

#### Update – 24 February 2023

Following the close of our consultation and a review of all of the responses we are recommending the changes below:

- Increasing Tariffs 1, 2 and 3 by 7.61 per cent
- Removing the requirement for the extra charge for taxi hirings arranged by telephone, mobile phone, smart phone, mobile application, any application software and by use of the internet to be added to the taximeter
- Increasing some of the fixed-fares for shared-taxis that operate during the Wimbledon Tennis Championships
- Amending one of the authorised places where the fixed-fare, shared-taxi scheme operates from during the Wimbledon Tennis Championships

If the recommendations are approved, there will be a negative impact on taxi passengers and Taxicard members as:

- It will mean taxi fares increase at all times
- The fixed-fares for some shared-taxi journeys from the Wimbledon Tennis Championships will increase

There could also be a negative impact on taxi drivers if the recommended increases to Tariffs 1, 2 and 3 are approved and this results in fewer people using taxis or a decline in the number of taxi journeys and drivers' incomes reducing.

We have sought to reduce these negative impacts on taxi passengers and drivers, in particular those from protected groups, by recommending:

- No increase to the Minimum Fare
- an increase to tariffs which is lower than the Cost Index figure of 11.64%
   Increasing tariffs 1, 2 and 3 in line with operating costs, in an effort to ensure drivers continue to view taxi driving as a viable career and the supply of taxis, particularly at night, remains sufficient for those with protected characteristics who need them.

Following the close of the consultation it has been suggested that removing the requirement for taxi drivers to add the extra charge for booked taxis to the taximeter could have a negative impact on some taxi users as it might make it harder for some taxi users to see what they are liable for at the end of the journey and they might have to speak to the driver to confirm whether the extra charge is being added to the fare. It was suggested that this might make things more difficult for persons in some groups.

Printed copies of this document are uncontrolled. Page 20 of 29



The applicable terms and conditions of the person arranging the hiring must already make provision to levy an extra charge for the arrangement of a hiring by mobile application, any application software and by the use of the internet. No change to this requirement is proposed and so taxi users will be able to see from the terms and conditions if there is an extra charge when booking a taxi.

The majority of booked taxi journeys are now booked using an app rather than by telephone and the apps include the extra charge in the total fare and can be set at any amount up to the maximum allowed. The taxi booking companies who currently provide app based services for booking taxis provide an estimate when a journey is being requested and in this they show what extra charges users will be charged.

No change to the maximum amount that can be charged is being recommended and this will remain at £2.00. This will continue to be displayed on the taxi fare card in the passenger compartment of every licensed taxi and also on the taxi fares page on the TfL website.

Transport for All (TfL) raised concerns about amending one of the authorised places where the Wimbledon Tennis Championships fixedfare, shared-taxi scheme operates from and said:

"Furthermore, we are concerned at the consultation proposal to amend the authorised place for pickup during the shared taxi, fixed fare scheme. We feel that if this authorised space is the most convenient place for pickup, and if changes are not appropriately or adequately communicated, disabled people's taxi journeys could potentially be negatively impacted. It can be extremely stressful not knowing exactly where the taxi will be able to pick you up, whether the taxi can come directly to your location, etc.; if the authorised place in its current form mitigates those stress factors, any changes must first be directly consulted on with disabled people, and communicated in a variety of formats (including BSL, large print, Easy Read, etc.)."

Agreeing the new location for one of the Wimbledon Tennis Championships taxi ranks was outside the scope of this consultation, as this only proposed changes to the London Taxi Sharing Order and was not proposing where the rank should be moved to or how this should be designed and operate. We are working with the London boroughs, the All England Lawn Tennis and Croquet Club and the taxi trade to try and agree on the best location for the taxi rank. We will also work to ensure that there is an accessible pick-up and drop-off point.

Travel information, including the locations of the taxi ranks that operate during the Championships, is published by the All England Lawn Tennis and Croquet Club. Stewards at the ground during the Championships provide guidance and assistance to visitors, including on where to get a taxi. The taxi ranks are normally marshalled by taxi marshals working on behalf of the All England Lawn Tennis and Croquet Club during the Championships and if required the marshals provide assistance to disabled passengers.

> Printed copies of this document are uncontrolled. Page 21 of 29



Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)

ltem	Potential mitigations			
The minimum taxi fare or taxi tariffs are	- Capped fares have been introduced for Taxicard members and these help partly			
increased	mitigate the impact on them from increases to the minimum fare or tariffs			
- This would mean fares increase for Taxicard	- We are continuing to work with City Fleet, who have the contract to provide the			
members and other taxi passengers	Taxicard service, and London Councils to explore measures to improve the			
- It could mean they have to pay higher fares	availability of taxis for Taxicard members, reduce wait times and help ensure that			
- It could also mean they cannot travel as often	members can make a Taxicard journey by increasing the number of taxi drivers			
or cannot make certain journeys	who can access and accept Taxicard bookings			
- If some taxi passengers cannot travel as	- We promote the Taxicard service to taxi drivers to try and increase the number of			
often or make certain journeys this could:	taxi drivers available to accept Taxicard jobs and improve the service for members			
<ul> <li>Increase the risk of them feeling</li> </ul>	<ul> <li>Increasing the number of taxi drivers who can access and accept Taxicard</li> </ul>			
isolated or being unable to get out	bookings may also mitigate some of the potential negative impacts on taxi drivers			
<ul> <li>Mean they cannot access education or</li> </ul>	as they will have the opportunity to access more work and increase their income			
work	- Some people may be able to use a PHV instead of a taxi and information about			
<ul> <li>Mean they cannot attend medical</li> </ul>	licensed PHV operators in London, the services they offer, areas they cover, times			
appointments	they operate and contact details is available on our <u>website</u> . Some PHV operators			
<ul> <li>There could also be an increased risk that</li> </ul>	may offer fares that are cheaper than taxis, although there have been reports of			
some passengers consider using an	the fares for some PHV journeys being more expensive than taxis			
unbooked PHV, unlicensed vehicle or	- New PHV applications for some designated wheelchair accessible vehicles that do			
choosing to walk when this is less safe	not meet the zero emissions capable (ZEC) emissions licensing requirements for			
instead of using a taxi	PHVs will be considered on a case by case basis			
<ul> <li>Although increasing the minimum fare or</li> </ul>	- Some taxi passengers may have a Freedom Pass and be able to travel for free on			
tariffs could mean taxi drivers' incomes	the bus, tram, Tube, Docklands Light Railway (DLR), London Overground and			
increase, it could mean they decline if	Elizabeth line. They may be able to use these services instead of a taxi for all or			
increased fares result if fewer people using	part of their journey			
taxis or the number of taxi journeys falling	- Some people may require step free access and so choose to use a taxi however,			
	they may be able to use the Tube, DLR, London Overground or tram for all or part			
	of their journey. Currently 91 Tube stations, 60 London Overground stations and			

Printed copies of this document are uncontrolled. Page 22 of 29



Item	Potential mitigations
	27 stations served by TfL Rail have step-free access. All DLR stations and tram stops are step-free. All stations on the Elizabeth Line have step-free access. In some places portable ramps or platform humps are being made available to help ensure a full step-free route from the street to the train
	Update – 24 February 2023
	Our recommendation to the finance committee is to increase tariffs 1, 2 and 3 by 7.61% in line with taxi driver operating costs, as determined by the Cost Index. We have tried to mitigate the negative impacts of this increase by recommending: (a) no increase to the minimum fare; and (b) increases to Tariffs 1, 2 and 3 that are lower than the total Cost Index figure (11.64 per cent).
<ul> <li>No change is made to the minimum taxi fare or taxi tariffs</li> <li>This could mean that taxi drivers cannot cover their operating costs and stop being a taxi driver or people are deterred from applying to become a taxi driver</li> <li>This could reduce the availability of taxis for passengers or increase wait times</li> </ul>	- We promote the Taxicard service to taxi drivers to try and increase the number of taxi drivers available to accept Taxicard jobs. This may also mitigate some of the potential negative impacts on taxi drivers as they will have the opportunity to access more work and increase their income
Making the consultation accessible and	- An EasyRead version of the consultation document and questions will be provided
<ul> <li>If the consultation is not accessible and inclusive then it may mean that some taxi passengers or taxi drivers are not able to respond and let us know their views</li> </ul>	<ul> <li>A British Sign Language (BSL) video of the consultation will be provided</li> <li>The consultation will be promoted to a wide range of groups, this includes:         <ul> <li>Passenger groups</li> <li>Accessibility and disability organisations</li> <li>Older people's groups</li> <li>Women's safety groups</li> <li>LGBT+ groups</li> </ul> </li> <li>We will work with Disability Horizons to promote the consultation to disabled people and groups who represent them</li> </ul>

Printed copies of this document are uncontrolled. Page 23 of 29



Item	Potential mitigations		
	<ul> <li>We will provide options (online survey, email, post, phone) for how people can submit a response</li> </ul>		

## 4. Action planning

List all planned actions - actions which could help mitigate any potential negative impacts. Additionally, please remember to include in your plan any 'positive action'.

	Actions	Owner	Deadline
1	Carry out a full public consultation on the fares and tariffs options, changes to the extra charge for booked taxi and changes to the Wimbledon Tennis Championships fixed-fare, shared-taxi scheme		The consultation is due to launch on 11 November 2022
	Following the close of the consultation and a review of the responses the TfL Finance Committee will be asked to consider recommendations and take into account the positive and negative impacts identified	TfL Licensing and Regulation	Recommendations will be submitted to the Finance Committee meeting on 8 March 2023
2	Continue to review taxi fares and tariffs to see if changes can be made which achieve the balance of ensuring drivers can continue to cover their costs and maintain a certain income but also avoiding fares being excessively high or a barrier to people using taxis This will involve meetings with the trade associations and taxi booking companies plus	TfL Licensing and Regulation	Ongoing

Printed copies of this document are uncontrolled. Page 24 of 29



	Actions	Owner	Deadline
	research (Taxi and Private Hire Customer Satisfaction Surveys) amongst taxi users and taxi drivers		
3	Continue working with the Assisted Transport Services Team, London Councils and Computer Cab (who have the Taxicard contract) to discuss and implement actions to improve the Taxicard service for members and improve the supply of taxis	TfL Licensing and Regulation	Ongoing
4	<ul> <li>Promote the consultation to a wide range of stakeholders so their views can be taken into consideration. This will include:</li> <li>Emailing details of the consultation to all licensed taxi drivers and taxi vehicle owners</li> <li>Advising the taxi trade of the consultation so as they can respond and make their members aware of it</li> <li>Promoting the consultation in the weekly email updates sent to taxi and private hire licensees and on the TfL Taxi and Private Hire Twitter account</li> <li>Making taxi users, accessibility groups and passenger groups aware of the consultation</li> <li>Using the TfL page in the Metro to promote the consultation to the general public</li> </ul>	TfL Licensing and Regulation	Promotion of consultation – during consultation period Review of consultation responses – after close of consultation

Printed copies of this document are uncontrolled. Page 25 of 29



Actions	Owner	Deadline
We will contact London Tr	avelWatch to inform	
them of the consultation a	nd seek their views	
The taxi fares and tariffs of	onsultation will be sent	
to accessibility and disabi	ity groups we hold	
email addresses for (e.g.	Age UK, Guide Dogs,	
RNIB, etc)		

## 5. Monitoring and evaluation

Detail how you will or plan to monitor and evaluate the success of the mitigation actions and the overall impact of your decision or proposal

1.	How would you monitor and evaluate the success of the mitigating actions once your proposal has been implemented?	<ul> <li>These will both be monitored through a combination of ways including:</li> <li>Stakeholder feedback</li> <li>Asking taxi users about taxi fares in the annual user customer satisfaction survey</li> </ul>
2.	How would you monitor the actual impact of your proposal or decision once your proposal has been implemented?	Asking taxi drivers about taxi fares in the annual licensee customer satisfaction survey



## 6. Decision-Making

Based on the above assessment, please select one of the options below that describe what you propose to do next. It is important that you provide the reason(s) for your decision and the evidence that supported these reasons.

1	Continue with your work because the assessment demonstrates that the work will have no potential negative or adverse impact on equality and inclusion groups.	
2	Justify and continue with your work despite negative equality impacts, and because there are other factors which make it reasonable for you to decide to continue with your work.	<ul> <li>We're planning to proceed with the consultation</li> <li>Once the consultation ends, we will review and consider all the responses received and the impacts identified. These will inform our recommendations for any changes to taxi fares and tariffs</li> <li>TfL's Finance Committee is authorised to approve proposed changes to fares for taxis. Once the Finance Committee have reached a decision, we will publish the outcome, consultation report and the response to the issues raised during the consultation</li> <li>If we decide to make any changes, these would normally be implemented between six to eight weeks after being approved by the Finance Committee. This is to allow time for the taximeters and fares information to be updated</li> </ul>
		<ul> <li>Update – 24 February 2023</li> <li>Following the close of our consultation and a review of all of the responses we are recommending the changes below:</li> <li>Increasing Tariffs 1, 2 and 3 by 7.61 per cent</li> <li>Removing the requirement for the extra charge for taxi hirings arranged by telephone, mobile phone, smart phone, mobile</li> </ul>

Printed copies of this document are uncontrolled. Page 27 of 29



		<ul> <li>application, any application software and by use of the internet to be added to the taximeter</li> <li>Increasing some of the fixed-fares for shared-taxis that operate during the Wimbledon Tennis Championships</li> <li>Amending one of the authorised places where the fixed-fare, shared-taxi scheme operates from during the Wimbledon Tennis Championships</li> <li>These recommendations will be considered by the TfL Finance</li> </ul>
		Committee at its meeting on Wednesday 8 March 2023.
3	Change or adapt your work to ensure it does not adversely or disproportionately impact certain groups of people, communities, or miss opportunities to affect them positively	
4	Stop your work because there is a high probability of noticeable discrimination and negative impacts which cannot be objectively justified. Further research work may be needed.	

# 7. Sign off

EQIA author		
Name:	Darren Crowson	
Title:	Taxi and Private Hire Policy Manager	
Date:	08 November 2022	
Signature		
EQIA reviewer (superuser or D&I team)		
Name:	Natalie Doig	

Printed copies of this document are uncontrolled. Page 28 of 29

Title:	Member of TfL's Independent Disability Advisory Group	
	(IDAG)	
Date review completed:	08 November 2022	
Signature		
D&I team representative		
Name:		
Title:		
Date:		
Signature		
EQIA signed off by (Senior accountable person)		
The EQIA should be signed off by a senior accountable manager or senior project sponsor. They are		
ultimately responsible for ensuring that the EQIA requirements are taken onboard and delivered as part of		
the project deliverables and/or escalated to the decision-makers where necessary. By signing, they are		
confirming that the equality impacts have been identified, understood, and considered; those affected by the		
proposal/decision have been involved or consulted; and there are plans to mitigate any potential negative		
impact and monitor the actual impact of the proposal/decision after implementation.		
Name:		
Title:		
Date:		
Signature		

# 8. Document history and version control

Document	Version	Date	Summary of changes
history	0.1	17/10/2022	First draft
	0.2	28/10/2022	Second draft
	1.0	08/11/2022	Final version for publication with consultation
	2.0	24/02/2023	EQIA updated

Printed copies of this document are uncontrolled. Page 29 of 29

