

Customer Service and Operational Performance Panel

Date: 4 October 2023

Item: Taxi and Private Hire Vehicle Complaints Update

This paper will be considered in public

1. Summary

1.1 The purpose of this paper is to provide the Panel with an update on volume and trends in complaints received regarding taxi and private hire vehicle (PHV) services.

2. Recommendation

2.1 The Panel is asked to note the paper.

3. Background

3.1 Transport for London (TfL) is the licensing authority and regulator for taxi and PHV services in London. Our ambition is to ensure London has a safe, secure, accessible, world-class taxi and PHV service with opportunity for all providers to flourish.

3.2 The primary focus of our regulatory functions is to ensure public safety.

3.3 We license almost 18,000 taxi drivers and over 106,000 PHV drivers, setting safety standards and ensuring passenger safety. We also licence approximately 1,600 PHV operators, 15,000 taxi vehicles and 90,000 PHVs. In total, we are responsible for licensing and regulating almost a quarter of a million licensees and are the largest licensing authority in England, responsible for over a third of all taxi and private hire licensees.

3.4 There are a number of channels available to customers to make a complaint about taxi and PHV services. Customers can report feedback or complaints:

(a) directly to licensed PHV operators;

(b) to TfL, as the licensing authority; or

(c) Other channels such as taxi booking apps and card payment device providers

3.5 Complaints or feedback, particularly where it is safety related, may also be made directly to the Police.

3.6 In the interests of safety of the travelling public, we work in partnership with the Metropolitan Police Service and other law enforcement agencies to share and receive intelligence and information as appropriate regarding taxi and PHV drivers, vehicles and operators in London. In addition, we conduct our own investigations, which may result in formal licensing action being taken against a licensee.

3.7 Complaints and enquiries made directly to TfL about taxi and PHV drivers, vehicles and PHV operators are handled by our Contact Centre Operation (CCO). Taxi and private hire customers and members of the public can provide feedback by phone or submission of a form via the TfL website.

3.8 Complaints made directly to TfL our CCO team represent a very small volume of customer feedback because the vast majority go directly to PHV operators. , which is largely provided directly to PHV operators or via other means as above, through whom passengers will have booked their journeys. In 2022/23, we received just over 5,000 contacts in relation to taxi and PHV drivers.

4 Complaint Volumes and Themes

4.1 Complaint volumes received directly to TfL significantly decreased dropped off during the pandemic, which is expected given the vast majority of taxi and PHV drivers didn't work. However, in the last year but taxi and PHV services report that there is increased demand, even when compared with pre-pandemic levels, and complaint volumes have therefore also increased. are seeing increased demand since then, which is reflected in the number of complaints received and the increased number of trips.

4.2 As shown in Appendix 1, driver behaviour, dangerous driving and fare complaints are the most common themes for customer complaints about both taxi and PHV services. There are a broad range of complaints raised by customers who contact us

in relation to dangerous driving or driver behaviour, but these are often due to external conditions such as braking or swerving to avoid other drivers, cyclists or pedestrians or due to weather conditions.

4.3 Although reports of dangerous driving have accounted for 23 per cent of the complaints received in Quarter 1 of 2023/24; safety-related complaints overall have decreased. Both taxi and PHV complaint numbers have decreased in Quarter 1 of 2023/24, when compared to Quarter 4 of 2022/23, with the percentage of complaints across the most common themes remaining consistent.

4.4 Driver behaviour is the most common complaint for both taxi and PHV services, but this is closely followed by allegations of dangerous driving. We are seeing a general increase in actionable complaints, where sufficient detail is provided by the complainant, enabling us to investigate and identify the licensee concerned and take the appropriate action. As a result, more advisory notices have been issued to PHV operators.

5 Complaint Investigations and Outcomes

5.1 All complaints received are taken seriously and investigated to: , with investigations aiming to:

(a) ensure the safety and confidence of passengers; and service users;

(b) provide feedback to service providers enabling them to take corrective action; and

(c) ensure the appropriate licensing action is taken, including licensing action in cases of safety-related complaints. in cases of safety-related complaints.

5.2 Just over half of the complaints received by TfL by CCO are either not safety related; cannot be investigated due to lack of detail or participation by the complainant; or fall outside the remit of TfL. For complaints that fall outside of our regulatory remit, we ensure that the customer is advised of the relevant Local Authority or entity and, where possible, we provide information on who might be that is best placed to assist them.

5.3 In any instance where a licensed PHV operator dismisses a PHV driver, due to their unsatisfactory conduct in connection with the driving of a PHV, they are required to notify TfL as soon as it is practically possible with the full complaint history and the

circumstances of the case. Regulation 9 of the Private Hire Vehicles (London) (Operators' Licences) Regulations 2000 (as amended) requires an operator to make this report to TfL within 14 days of the dismissal. However, TfL recommends that a licensed operator provides the information within 48 hours. PHV operators can also provide TfL with details of complaints or any other information, regardless of whether they dismiss the driver. On receipt of any information from a PHV operator regarding a driver we will investigate the full complaints history of the driver and determine the most appropriate action. TfL has an agreed processes in place to investigate this information, consider the complaints history from any other PHV operators who the driver works for and to undertake a review of a driver's fitness to hold a licence.

5.4 For complaints handled by TfL CCO, we have seen there has been an increase in the numbers of upheld complaints and the number of advisory or warning letters issued to drivers. , as well as an increase in the number of advisory and warning letters issued to licensees. In addition, there has been a number of cases escalated for licensing action, which could include the revocation of a licence. Details of these outcomes are shown in Appendix 2 and 3.

5.5 The increase in action taken reflects the diligence of the investigation work undertaken by TfL to improve performance by making drivers aware of all but trivial complaints. However, even where formal action is not taken, a note of the complaint will be added to the licence holders record and will be considered if any further complaints are received. should the driver come to TfL's attention again. For example, where a similar complaint is received in the future.

5.6 Any safety related complaint is prioritised, involving the police where necessary, and appropriate licensing action is taken depending on the outcome of the investigation. all cases that raise safety concerns are thoroughly investigated with appropriate licensing action taken.

5.7 The impact of CCO investigations and actions can be seen in the increase in advisory and warning notices.

6 Our Work to ensure Safety of our Passengers

6.1 In July 2020, the Department for Transport (DfT) published Statutory Standards for taxi and PHV licensing. The focus of the Standards is on protecting children and vulnerable adults, and by extension the wider public and the DfT expects the Standards to be implemented by all licensing authorities "unless there is a compelling local reason not to".

6.2 One of the standards requires that “Ways to make complaints to the authority should be displayed in all licensed vehicles. Licensing authorities must ensure that drivers are aware of a requirement to display information on how to complain and take appropriate sanctions against those that do not comply with this requirement.”

6.3 Between February and May 2023 we consulted on proposals for how we intend to implement the few remaining Statutory Standards we are not already complaint with. Our consultation included proposals to:

- (a) require all taxis and PHVs to display signage that will include information on how to make a complaint to TfL alongside other statutory and important safety information;
- (b) prescribe a condition that will require every taxi driver to ensure that the taxi they are driving is displaying the signage. This prescribed condition would apply to all licensed taxi drivers with immediate effect; and
- (c) attach a condition to every PHV driver licence issued on or after the implementation date that the PHV they are driving is displaying the signage.

6.4 Our consultation also included a call for evidence on how we could improve taxi passenger safety (Part Two) as well as additional proposals for licensed PHV operators aimed at further enhancing the safety of PHV passengers and improving PHV services (Part Three).

6.5 We have chosen to prioritising e the proposals in Part One of the consultation to ensure that the remainder of the DfT that will implement the remaining DfT Statutory Standards are implemented as soon as possible. (as above). This will ensure that we meet all the outstanding recommendations in the Statutory Standards at the earliest opportunity.

6.6 We will then consider the responses to part three of the consultation where there. There were several proposals in Part Three which are relevant to complaints including a proposal that PHV operators should, within 48 hours of receiving a safety related complaint, assess whether to suspend or remove the driver; and notify TfL. We anticipate giving these proposals, and the responses to the consultation, in Spring 2024. s:

- (a) Option 2: Within 48 hours of receiving a safety related complaint about a PHV driver, a PHV operator should:

- (i) Assess whether it is necessary to suspend or remove that driver account pending further inquiries
- (ii) Notify us if they have suspended or removed a PHV driver
- (b) Option 4: Booking confirmations from PHV operators will have to include information on how passengers can make a complaint to TfL and the operator.
- (c) Option 6: PHV operators will have to retain complaints records for three years instead of 12 months

6.7 The responses to the proposals in Parts Two and Three, along with any next steps, will be considered in Spring 2024.

6.8 We have considered the consultation responses to Part one and will confirm the outcome and our next steps to deliver the remaining Statutory Standards, including proposals to introduce new customer complaint signage in taxis and PHVs, in the coming months, near future.

6.9 Subject to approval, If approved, the proposed new signage in taxis and PHVs could include:

- (a) information about how to make a complaint to TfL;
- (b) no-smoking sign;
- (c) cycle safety sign;
- (d) card payment information (taxis only);
- (e) information for wheelchair users (taxis only);
- (f) pre-booked only sign (PHVs only);

- (g) seatbelt sign; and
- (h) message advising passengers that abuse of drivers is unacceptable.

6.10 If approved, it is likely that the new signage will lead to an increase in the number of complaints received directly by TfL. No decision had been made regarding this recommendation, therefore it is still subject to change. If approved, it is likely that the new signage would lead to an increase in the number of complaints received by TfL. The impact of these changes is being considered by the CCO team.

Next steps

6.11 We intend to amend some of the categorisation of complaints to ensure there is a more targeted approach to analysing intelligence and ensuring the appropriate action is taken, including, where appropriate, licensing action. The proposed implementation of measures from the TfL consultation¹ on Safety Standards will be considered in more detail in Autumn 2023, along with the potential impact on TfL resources. likely see an increase in the total volume of complaints received.

List of appendices to this report

Appendix 1: Taxi and PHV Complaints received by TfL 2022/2023 – Volumes and Main Themes

Appendix 2: Taxi and PHV Complaints received by TfL in 2022/2023 – Outcomes and Actions (total)

Appendix 3: Taxi and PHV Complaints received by TfL 2022/2023 – Outcomes and Actions (by service)

List of Background Papers:

None

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Appendix A – Taxi and PHV Complaints received by TfL 2022/2023 – Volumes and Main Themes

Complaints	22/23					23/24					Percentage of total				
	Q1	Q2	Q3	Q4	Q1	Q1	Q2	Q3	Q4	Q1	Q1	Q2	Q3	Q4	Q1
All	677	791	801	868	857	62.1	60.6	63.2	58.3	58.2					
Taxi	414	515	466	620	615	37.9	39.4	36.8	41.7	41.8					
PHV	1,091	1,306	1,267	1,488	1,472										
Total															

Main themes

Taxi	22/23					23/24					Percentage of Taxi total				
Behaviour			224	276	258	295	254				33.1	34.9	32.2	34.0	29.6
Dangerous driving			120	135	124	165	188				17.7	17.1	15.5	19.0	21.9
Overcharge			105	85	108	105	109				15.5	10.7	13.5	12.1	12.7
Fare Refusal			68	92	109	79	86				10.0	11.6	13.6	9.1	10.0
Devious/Unplanned Route			34	52	45	62	52				5.0	6.6	5.6	7.1	6.1

Private Hire Vehicle							Percentage of PHV total				
Behaviour	93	144	124	193	156		22.5	28.0	26.6	31.1	25.4
Dangerous driving	71	98	92	125	150		17.1	19.0	19.7	20.2	24.4
Operator complaint	84	84	63	83	74		20.3	16.3	13.5	13.4	12.0
Compliance with TFL Procedures	25	18	38	47	47		6.0	3.5	8.2	7.6	7.6
Fare complaint	29	38	18	31	28		7.0	7.4	3.9	5.0	4.6

