

Sir Peter Hendy CBE  
Commissioner  
Transport for London  
Windsor House  
42-50 Victoria Street  
London  
SW1H 0TL

12 March 2015

Dear Sir Peter,

I am writing to follow up on a number of issues arising from our investigation into taxi and private hire services and TfL's response to our report *Future Proof: taxi and private hire services in London*.

The Committee welcomes TfL's commitment to implement many of the recommendations in our report. We would be grateful if you could provide more details and clarification on a number of points as set out below.

#### Strategy

We are pleased that you have committed TfL to the development of an over-arching strategy for the taxi and private hire trades. We hope this will draw together the numerous sub-strategies and policy strands set out in the response and provide a clearer vision for the future development of both industries.

We note that the press release which accompanied your appearance before the Committee on 25 February referred to the creation of 'a new Taxi and Private Hire Terms of Reference Group [which] will be created to consider the future developments of both the taxi and private hire trades'. We are surprised that this information was not included in either your written response to the Committee or in your oral evidence. We would therefore be grateful if you could confirm the following information in relation to this proposed group:

- Which organisations and individuals will be represented on this group
- The intended frequency of meetings of this group including the date of the first meeting
- That the minutes and actions of the working group will be published in accordance with TfL's ongoing commitment to improve transparency.

We note from your response that many of the actions you propose are predicated upon the outcome a review of private hire regulations due to take place by summer 2015. We welcome this review, which we trust will provide some much needed clarification on a number of the key governance issues facing the trades. The Committee would welcome further details on the process and timescales for this review.

#### Enforcement

The Committee remains deeply concerned about the level of dedicated resources available to tackle enforcement in London. It is clear from our investigation that police resources remain absolutely critical to the success of these operations since the powers of TfL's own compliance officers are extremely limited. We are therefore surprised that further consideration has not previously been

given to exploring the views of licensees on increasing their financial contribution to the operation of the Cab Enforcement Unit. Taxi trade representatives at our September meeting suggested that this would be one avenue worth investigating to raise funds for additional enforcement, which they feel is badly needed. At £1 million per year, TfL has not increased this aspect of the contribution to the Cab Enforcement unit through licensing fees since 2011/12, representing a real terms funding cut of 10 per cent to 2015/16. This has happened despite a significant rise in the number of licensees. We strongly urge TfL to fully explore options to increase its contribution to the Cab Enforcement Unit, in consultation with the trades.

The Committee is concerned to hear that, in your view, police Borough Commanders in some key locations do not view enforcement against touts as a priority. In your oral evidence you specifically mentioned Romford, Kingston and Croydon as areas of concern. The Police and Crime Committee will be looking at the issue of transport policing in more depth and we would welcome any additional information you can provide on locations of concern.

We are also concerned by evidence given both by TfL and the Met themselves, that police officers are not familiar enough with existing legislation to carry out enforcement activity properly. We therefore ask you to set out the actions you intend to take to try and help the Met improve its enforcement, including increasing awareness of the existing powers available to the police in regard to on-street enforcement.

#### Public awareness and signage

The Committee is supportive of the efforts undertaken through the Safer Travel at Night programme. However, we draw your attention again to the results of our passenger survey, which found that, while 85 per cent of taxi and private hire passengers feel it is important to know if a taxi or minicab is licensed to feel safe travelling in it, less than half of minicab passengers, and only two thirds of black cab passengers know how to identify whether a vehicle is licensed. We would therefore urge TfL to explore the specific issue of vehicle identification in its proposed partnership working with the tourism industry.

The Committee is pleased to note TfL's renewed commitment to pursuing appropriate signage and welcome the announcement of a trial of proposed new signage in Autumn 2015. We will be writing to the Department for Transport and the DVLA to support this proposal.

The Committee welcomes TfL's commitment to improving passenger-facing information on how to give feedback and make complaints about both taxi and private hire services. We urge TfL to work with trade and passenger representative groups to ensure that this information is widely accessible to passengers.

#### Incentives for cashless payment options

The Committee remains of the opinion that widening payment options has benefits for both passengers and drivers and we are encouraged by your commitment to work with card payment providers and trade associations to seek lower charges for taxi drivers when processing payments. However, we are unclear why the action date for this proposal is not scheduled until December 2015. We are aware that TfL has already worked alongside card providers in its development of contactless payment solutions for other transport modes, and believe that action on this issue may encourage behaviour change among drivers as well as benefitting those who have already moved to take card payments.

### Analysing supply and demand

We welcome TfL's commitment to undertake tailored research to understand supply and demand for taxi and private hire services across London. However, we are concerned that TfL is not harnessing the potential of data and technology at its disposal to enhance this process and intends to rely more on driver diary surveys. We note that just over half of taxi drivers recruited returned a completed diary when this exercise was undertaken in 2009 and are concerned that the methodology is potentially flawed and the sample self-selecting. We would encourage TfL to look at wider sources of data, including data received through its cabwise app, to ensure that supply and demand is robustly analysed. We also urge TfL to use the findings from its research to better inform the Ranks Action plan.

We heard from international colleagues at our hearing in July 2014 that it is very difficult to implement policy initiatives unless you have data. We would encourage TfL to look at examples from other cities where on-board technology has been used to provide the regulators with real-time data, which will allow TfL to build up a more comprehensive picture of supply and demand across the city.

### Ranks Action plan

The Committee welcomes the renewed focus on the provision of taxi ranks, especially in suburban areas, where the majority of work is 'off the rank' rather than street hail. We note your commitment to update the Committee on progress in this area after a six month period. The Committee is keen to support TfL in expediting arrangements for new ranks at locations which have already been identified by the boroughs. We would therefore be grateful if you could provide the current prioritised list of rank requests and provide an update on how negotiations are progressing with each of the relevant boroughs. We would also be grateful if you could confirm the date by which TfL's new dedicated ranks page will feature on its website.

We have received further representation from suburban taxi drivers on the issue of island ranks and sector extensions. We would be grateful if you could confirm that a formal policy on the issue of sector extensions will be included as part of the review of island ranks policy.

Your response indicated that an initial review of the current taxi rank provision at stations on the proposed 24 hour Tube network has been concluded. We would be grateful if you could provide the Committee with the results of this review. Our report also called for the prioritisation of rank spaces at transport interchanges, including National Rail stations. We would be grateful if you could provide an update on this element of our recommendation.

### Entry requirements into the market

To clarify our recommendation, the Committee seeks assurances that completion of the Knowledge of London is not unduly delayed by procedural issues. Specifically, we seek assurances that the methodology of testing does not prevent candidates who have achieved the requisite knowledge from passing out through the system; for example, by lengthening time between appearances due to a lack of examiners. The Committee also notes that TfL has frozen licence applications in some suburban sectors pending the outcome of the suburban review. We would be grateful if you could confirm whether these restrictions will now be lifted and, if not, why the freeze will be maintained.

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### Disabled access

The question of accessibility is linked intrinsically to the issue of continued supply of black taxis across London. The Committee notes that private hire vehicles are increasingly being used to supplement supply for Taxicard and similar door-to-door services. Whilst we acknowledge the private hire trade's view that a quota is not feasible at this point, we support TfL's commitment to encouraging private hire firms to invest in more accessible vehicles.

The Committee welcomes the support from TfL and the private hire trade for mandatory disability awareness training. We believe this should be offered both as a condition of licensing for new applicants and to support continuing professional development of existing licensed taxi and private hire drivers. Our recommendation specifically called for operators, as well as drivers, to be compelled to undertake this training and would welcome clarification that this element of our recommendation will be taken forward.

The Committee is pleased that TfL shares our view that there should be absolutely no tolerance for discrimination against passengers using taxi and private hire services. We therefore urge TfL to ensure that it reviews its complaints procedure for taxi and private hire to ensure that it is fully accessible to people with disabilities and request that TfL provide an update to the Committee on how it intends to monitor and enforce this issue.

### Suburban Action Plan

The Committee is disappointed that, after a review that has taken over two years, the resulting action plan is extremely light on detail. Suburban drivers remain extremely concerned that decisions affecting their livelihoods are taken without due regard for the specific circumstances affecting the trade in the outer boroughs. Moreover, the Committee urges TfL to ensure that decisions on issues such as sector boundaries are based wherever possible on robust analysis of data regarding supply and demand and the needs of passengers, rather than the desire to secure a consensus position.

### Engagement

Our investigation found that many in the trades dispute TfL's claim that its engagement activity 'matches the requirements of passengers and trade'. It is vital that the relationship between TfL as regulator and the trades is improved. To this end, we welcome TfL's commitments to making its decision-making processes more transparent to all drivers, and indeed passengers, by publishing the action trackers from formal engagement meetings. We would be grateful if you could confirm when and where these documents will be published online. We will also be writing to the Mayor to request that the minutes from Cabbies Cabinet meetings are also made publically available.

The Committee concurs with your view that a more coherent and unified position from the trades would be beneficial in creating a climate in which problems can be worked through constructively. We have found throughout the course of our investigation that taxi and private hire representatives share many common goals and we urge TfL to make every effort to facilitate a co-operative and inclusive approach through its engagement activity and indeed in all its dealings with the trades.

### Uber London

We will be writing separately to you regarding the ongoing issues surrounding the decision to licence Uber London, and the legal advice upon which this decision was based. We have already written to you to request the release of the legal advice received from Mark Chamberlain QC, and look forward to receiving this information. We would also be grateful if you would provide the Committee with any additional independent or in-house legal advice relating to this decision.

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The Committee remains united in its position that taxi and private hire services are a vital part of the London's transport network and that more can and should be done to tackle the issues highlighted in our investigation. We look forward to continuing to work with you on these important matters.

We would be grateful if you could respond to the points raised by 12 April 2015.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Caroline Pidgeon', with a long, sweeping horizontal stroke extending to the right.

**Caroline Pidgeon MBE AM**  
Chair of the Transport Committee

