

Transport for London response to Assembly Transport Committee report into Taxi and Private Hire Services – ‘Future Proof’

The Mayor and Transport for London (TfL) warmly welcome the Committee’s efforts on this important issue and the attention you have given it. We found the hearings interesting and, together with the written responses, your investigation has elicited a lot of information for our work.

As previously noted, we agree with many of the report’s recommendations. It is reassuring that the general areas the Committee have covered as areas of concern match the areas we are currently focused on addressing. I am therefore pleased to report that several recommendations you have made are already in progress.

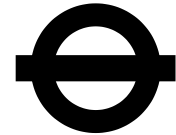
The taxi and private hire trades provide essential services transporting the travelling public, including the business community, visitors to the Capital, passengers who need door-to-door services and those travelling at times when other options are limited. These services are often the first point of contact for many visitors to London and play an important role acting as ambassadors in welcoming people to this diverse city.

Transport for London’s (TfL) purpose in respect of taxi and private hire services is to:

- set appropriate standards for drivers, vehicles and operators to ensure public safety, within the limits of governing legislation;
- provide an effective and efficient licensing service, ensuring driver, vehicle and operator licensees meet TfL’s standards;
- ensure passenger and driver safety through robust enforcement and compliance activities; and
- improve the passenger experience for these services.

Our responsibility as the regulator of taxi and private hire services is to ensure the protection of passengers. Unusually for TfL, we are not responsible for the service provision. As was made clear in the evidence to the Transport Committee, London’s taxi regulation framework is widely recognised as the best in the world. The world-renowned Knowledge of London, coupled with the London Taxi Conditions of Fitness which requires all taxis to be accessible and highly manoeuvrable, ensures TfL sets an exceptionally high standard. In recent years we, along with the Mayor, have worked closely with a number of taxi vehicle manufacturers to encourage the development of the next generation of taxis which will retain accessibility and manoeuvrability features as well as being zero emissions capable and fit for the modern world. Taxis, therefore, do not just play a vital role in door to door transport, they play a major role in improving air quality in London in years to come.

Since 2004 TfL has licensed all private hire services which also play a vital role in transporting Londoners and visitors to the Capital. Licensed and booked private hire vehicles are particularly important at night when other public transport is limited. For those travelling with mobility impairments, heavy luggage or seeking to reach a remote location, PHVs are a good quality, value for money solution. The services are diverse and appeal to many



different target markets with approximately 70 per cent offering traditional minicab services and the remaining 30 per cent offering chauffeur, executive or specialist vehicle services.

On an average day in London there are approximately 185,000 passenger carrying taxi journeys, 154,000 passenger carrying minicab journeys and 34,300 chauffeur journeys. London's Bus network carries an average of 6.5m journeys per day, the Tube network carries 3.4m passengers a day, and on the roads there are around 10m private car journeys and 600,000 cycle journeys a day (source: Travel in London Report – seven day week average journey stages).

TfL's Taxi and Private Hire unit now licenses over 25,000 taxi drivers and 75,000 private hire drivers, 85,000 22,500 taxis and 60,000 private hire vehicles, as well as and 3,000 private hire operators. TfL is the largest licensing authority in England and Wales, responsible for licensing over a third of all services.

RESPONSE TO RECOMMENDATIONS

Recommendation 1

By May 2015, the Mayor should publish a long term strategy for the development of both taxi and private hire industries. The strategy should clearly set out the Mayor's position on the continued role of taxi and private hire services in London, and actions that will improve passenger and driver safety, guarantee a sufficient number of high quality drivers and vehicles across the city, and ensure that all services meet the highest possible standards for accessibility. The strategy should also set out how TfL will strengthen its enforcement and clamp down on illegal activity, within a clear and transparent governance and decision-making framework.

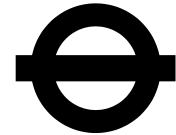
The Mayor's Transport Strategy published in 2010 sets out the pivotal role that taxis and PHVs fulfil in meeting the transport needs of Londoners and visitors to the Capital. The strategy makes clear the world renowned reputation of London's taxi services including the accessibility and manoeuvrability of the vehicles and plans to improve emissions. It also emphasises the value and diversity of private hire services. The Strategy references how 93 per cent of business leaders regarded a good taxi service as being important or very important to the London economy.

TfL already has an extensive number of sub-strategies and policy documents related to taxi and private hire services in place or planned which continue to support the Mayor's Transport Strategy. TfL's website contains a wealth of policy information relating to taxi and private hire vehicles including:

- London Taxi Condition of Fitness;
- Taxi and Private Hire vehicle inspection manual;
- Taxi and Private Hire driver, vehicle and operator licensing guidelines; and
- Taxi ranks suspension policy;

A full list of all policies and guidelines is available at <http://www.tfl.gov.uk/tph>.

Other relevant policy documents and sub-strategies include The Right Direction: the Mayor's strategy for transport safety, security and reliability 2015-18, which is to be published in



January 2015, and includes TfL's commitments on enforcement and tackling illegal cab-related activity, our Single Equality Scheme 2012-2015, the Ultra Low Emission Zone proposals and zero emissions capable consultation (which has recently closed), the forthcoming PHV Regulations Review; as well as the Ranks Action Plan and Suburban Action Plan which were covered in the Committee's September meeting and due to be published in the near future. A copy of the draft Ranks Action Plan and Suburban Action Plan are included for information.

However, the Mayor and TfL are developing a new approach to engagement with the industry to enable strategic discussions to take place and which will consider the future regulation of the trades in the Capital. This initiative will feed into future strategy and the development of a vision for the industries going forward. The response from the industry to this proposal has been positive.

TfL action date: December 2015

Recommendation 2

By May 2015, the Mayor and TfL should develop specific public awareness campaigns which show how to correctly identify whether a driver/vehicle is licensed. TfL should also work with the tourism industry to ensure that visitors arriving in London have access to this information.

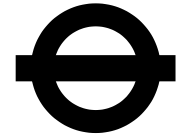
TfL already has a well established Safer Travel at Night (STaN) campaign which started in 2002/3, in collaboration with the Met Police and City of London Police, and focuses on how to book a legal licensed private hire vehicle (PHV), rather than how to identify a licensed driver/vehicle. The reason for this is to prevent people from approaching a licensed PHV on the street, mistakenly believing it is legal and safe to do so. A private hire journey must be pre-booked otherwise the journey is illegal and not insured, even when the driver / vehicle are licensed. We are surprised the Committee made little reference to the comprehensive publicity campaign already in place.

The campaign is informed by detailed research (including focus groups with the target audience) and is refreshed regularly to ensure that it addresses current issues that are identified through our campaign research and evaluation. For example, independent research commissioned by TfL, shows that there is still an issue with members of the public believing it is safe to pick up a minicab off the street if it displays a licence. It is for this reason that the campaign messaging is focussed on how to book a licensed minicab and why this is important.

Typically the campaign each year comprises of:

- Posters which are displayed across London including at bars, restaurants and clubs, Tube and railway stations, hairdressers etc.
- Fold out credit card size "Z-cards"
- TV / cinema adverts
- Information on websites including Visit London

The award winning STaN campaign, which last year won the Safety Campaign award at the Suzy Lamplugh Trust National Personal Safety Awards, has been extremely successful in raising public awareness of the dangers of using unbooked minicabs, improving understanding that any minicab picked up off the street without a booking is dangerous; and



providing information on safer travel options including licensed taxis and legally booked, licensed PHVs.

Since the introduction of STaN our research has revealed that the percentage of Londoners approached by touts has reduced from 66 per cent to 16 per cent and the usage of illegal cabs has fallen from 16 per cent to two per cent.

As part of the STaN we also promote our Cabwise app which is free and available to download on both the Apple AppStore and Google Play. The Cabwise app lets the user book your nearest minicab or black cab. It is available on our website at <http://www.tfl.gov.uk/modes/taxis-and-minicabs/taxi-and-minicab-apps>



TfL already works with the tourism industry to promote safety awareness to visitors to the city and produces information aimed at visitors to London which includes advice on travelling safely in taxi and private hire vehicles in London - <http://www.tfl.gov.uk/cdn/static/cms/documents/london-visitor-guide.pdf>. The information is available to download from the visitor section of the TfL website, which has an average of 100,000 unique visits every month. In addition, TfL produces information aimed at visitors travelling to and from Heathrow which also contains information about travelling in taxis and private hire vehicles.

However, in light of the Committee's recommendation we will investigate further potential ties with colleagues at London & Partners, Heathrow and London City Airport by May 2015. TfL would be happy to consider any further proposals the Committee has for joint working in this area.

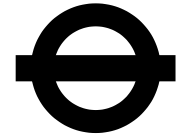
TfL action date: May 2015

Recommendation 3

By May 2015, TfL should further develop the database that links drivers to vehicle and operator information. TfL should work with app developers to produce a tool that will enable passengers to check the status of their driver, vehicle or operator.

We understand and support the principles behind the recommendation to allow private hire operators to link drivers and vehicles through our database; however we are constrained by a series of practicalities including;

- Private hire drivers have the flexibility to work for multiple operators and freely move between operators at any time;
- As with taxis, licensed private hire vehicles can be driven for private purposes by unlicensed drivers or can be driven by multiple private hire drivers through sharing arrangements;
- Strict limitations in the legislation that require private hire drivers, operators and vehicles to be licensed separately;
- Any changes would need to be considered within the legal boundaries of data protection of driver details.



There is currently no requirement for operators to upload details of the drivers and vehicles registered with them to TfL's licensing database. We are already planning to amend our online functionality to include a bulk upload facility for operators to upload details of the drivers and vehicles they are currently using and expect to introduce this by late 2016.

As part of the planned Regulations Review which will take place by summer 2015, we will consult on mandating that operators be required to upload details of their drivers and vehicles to TfL's database, once established, on a regular basis. TfL will also consult on a requirement for all private hire operators to provide a passenger with details of the Vehicle Registration Mark (VRM) and driver ID of their booked vehicle ahead of the passenger entering the vehicle.

We will continue to work with the private hire trade on addressing the practical difficulties of implementing changes in this area.

However, checking that a driver is licensed does not guarantee the legality of a journey. We are concerned that relying on apps confirming a private hire driver is licensed could encourage passengers not to pre-book their journey as well. Confirming a driver is licensed is only half the equation in terms of ensuring a private hire journey is safe and legal.

TfL action date: Summer 2015 (Regulations review)

Recommendation 4

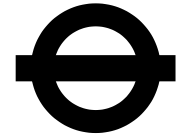
By May 2015, TfL should produce a signage strategy for the licensed taxi and private hire industries, including plans to pilot number plate-based fixed signage.

TfL issued the first private hire vehicle licenses in April 2004. There are now approximately 60,000 licensed PHVs and this continues to grow as the trade expands. Vehicle licences are valid for a year and are inspected annually as well as being subject to two MOTs per annum.

Currently all private hire vehicles must have licence discs in the top nearside corner of the front and rear windscreens unless the owner applies for and is granted an exemption from displaying the licence for business reasons, for example a chauffeur service.

In 2007, traffic orders for the Transport for London Road Network (TLRN) were amended to give an exemption allowing PHVs to pick up and set down passengers on specific red routes. This exemption was on the condition that additional, prominent signage would be displayed on PHVs to assist enforcement, identify PHVs to other road users and ensure continued high compliance with red route stopping controls. Displaying these additional signs is not mandatory but most drivers choose to use them so they are able to set down and pick up on the red route.





TfL is supportive in principle of the private hire trade's proposal on vehicle signage and has in fact been discussing the issue with the Department for Transport for some time, who we believe also see benefits in such an approach. TfL intends to pilot the idea with a separate number plate surround, with a view to eventually securing statutory approval from the DVLA to incorporate the signage into the manufacture of the number plate itself.

Subject to the above, in addition to the proposed number plate identifiers, the signage strategy will include clearer vehicle, driver photo ID to be displayed on the vehicle and a requirement for all private hire operators to provide a passenger with details of the VRM and driver ID of their booked vehicle ahead of the passenger entering the vehicle, as already provided by many operators including Addison Lee and Uber.

TfL action date: Trial to commence autumn 2015

Wider roll out dependent on DfT / DVLA approval

Recommendation 5

By March 2015, The Mayor and TfL should report back to the Assembly on options to incentivise the uptake of cashless payment options, for both the taxi and private hire industries.

At present there is no obligation on taxi drivers to have the facility to accept debit and credit card payments for taxi journeys. Despite this, in recent years there has been a significant expansion of card acceptance in taxis through many suppliers including VISA and Verifone. More recently, taxi booking and hailing applications such as Hailo and Get Taxi have increased this further. Research conducted by TfL in 2013/14 revealed that 49 per cent of taxi drivers now have the facility in their taxis to accept a debit or credit card booking. We are aware the Licensed Taxi Drivers' Association state this has now risen to 58 per cent of drivers.

The same TfL research also revealed that 88 per cent of passengers would like the ability to pay for taxi journeys by card. 83 per cent also said they would be very or quite likely to pay for a taxi journey by card. By contrast, just 42 per cent of taxi drivers felt that passengers should be able to pay for taxi journeys by card. One of the concerns for taxi drivers is the amount of commission charged to them for card payments.

We hope that the Committee agrees with TfL that all taxi and private hire customers should be able to pay for their journey by credit or debit card if they wish to do so. While recognising that drivers are moving towards card acceptance, as they lose jobs if they are unable to take payment by card, as the committee heard from the General Secretary of the LTDA in their hearing on 2 September, the taxi trade has considerable reservations on mandating this. TfL understands that the reasons for this include the cost to drivers of credit / debit card facilities and the risk that some drivers might not be able to secure credit card service agreements and would therefore be prevented from working completely.

In September 2014 the TfL Board agreed that a consultation on mandating card acceptance in taxis should take place. This is planned for summer 2015. TfL will also work with card providers and trade associations to seek lower charges for taxi drivers when processing card payments.



With regard to private hire journeys, all trips are pre-booked via licensed operators, so, passengers already have the choice of a range of service to pay by debit or credit card including app based providers, regular accounts etc.

TfL action date: **Summer 2015 (consultation)**
 December 2015 (seek lower charges for drivers)

Recommendation 6

By May 2015, the Mayor and TfL should set out how they intend to monitor and improve supply and demand, for both taxi and private hire industries, across London. This should include a specific study into potential demand for taxi services in outer London town centre locations.

TfL's role is to regulate and license the taxi and private hire trades, not to manage supply and demand. However, a detailed study of driver working patterns via a driver diary survey will be undertaken this autumn. This follows a previous exercise in 2009. We will explore with the trade the potential to use technology to undertake this survey.

We will also undertake a tailored piece of research to understand supply and demand for taxi and private hire services across London.

Additionally, the Suburban Action Plan considers what action can be taken by TfL and the Mayor to improve the situation for drivers in the outer boroughs of the Capital through other measures.

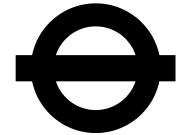
TfL action date: **Autumn 2015**

Recommendation 7

By May 2015, the Mayor and TfL should set out plans to ensure that all Underground stations located on the 24-hour Tube network have a taxi rank in place by the launch of the programme in September 2015, and suburban Underground and National Rail stations have a rank by May 2016. TfL should also prioritise rank provision in outer London town centre locations with unmet demand. Rank locations should be included on TfL journey planning tools and TfL should explore options for increasing the visibility of ranks through distinctive signage. The Mayor and TfL should also set out clear guidance for event planners to ensure that taxi and private hire provision is explicitly contained in transport planning for major events and attractions.

A detailed review of existing rank arrangements is in progress to determine rank requirements for 24-hour Tube stations and Crossrail stations in future.

The Ranks Action Plan is now finalised following comments from the trade and will be published on 25 February. This Plan contains several actions, including a focus on the Night Tube and an action relating to geocoding of rank locations which will allow app developers and TfL to include taxi ranks in journey planning tools. The vast majority of taxi ranks and requests for new taxi ranks are located on borough roads and are therefore remain the responsibility of the relevant local authority to secure the appropriate space and funding. That said, we recognise that funding for ranks in recent years has declined and that's why



we've increased our budget to £600,000 over the next five years to deliver all the proposed actions in the Plan. TfL is significantly increasing resources both in terms of staff and funding, in order to achieve all the actions contained in the Plan.

We also welcome the support of the Assembly, where appropriate, to encourage London boroughs to prioritise road-space for additional taxi ranks to service the public.

We do not license events as this is the responsibility of the local authority and therefore it is not within our gift to insist that taxi and private hire are considered in the final arrangements. However, TfL will develop general advice and guidance which will be provided to event planners and boroughs to encourage the provision of taxi and private hire services at major events and attractions. We will also include the promotion of temporary ranks in TfL Travel Demand Management plans for major events and consideration of temporary ranks requirements for events will be discussed at the GLA's Major Events Oversight Board.

**TfL action date: February 2015 (formal publication of Ranks Action Plan)
 Summer 2015 onwards – delivery of additional ranks /
 amendments to existing ranks at priority night Tube stations**

Recommendation 8

By May 2015, the Mayor and TfL should satisfy this Committee that the entry requirements into each market are fit for purpose. This should include providing evidence that there are no artificial barriers to entry, that the requirements are relevant to the specific demands of each industry and that they ensure protection for passengers, drivers, and other road users.

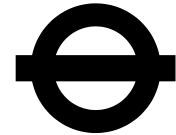
TfL is obliged to issue a licence to any driver, operator or vehicle owner that satisfies the criteria. It would not be legal to withhold licences or refuse an applicant that meets our criteria because of concerns over the number of licensees. It is not within our power to set quotas or a limit to the number of licensees.

We are unclear what artificial barriers to entry the Committee is referring to but assume this is 'The Knowledge of London'.

We believe the Knowledge standards for taxi drivers remain appropriate and do not act as an artificial barrier to entry. The Knowledge process ensures taxis retain their international gold standard and the time taken is roughly equivalent to obtaining a bachelor's degree with the added benefit of a guaranteed job providing they continue to meet medical and character standards. We understand that the taxi trade supports this position.

A breakdown of the total number of licensees each year over the past ten years is provided in appendix A. This demonstrates a stable rate of applications. The Knowledge is also strongly supported by the taxi trade and passengers.

The main licensing requirements for both trades are listed below. We believe they are appropriate for what are open markets operating within a strong licensing and enforcement environment. The planned Regulations Review will be an opportunity to confirm these are appropriate for the private hire trade.



It is worth noting that with the exception of the Knowledge, the requirements for taxi drivers and private hire drivers are largely the same.

Drivers:

- DBS enhanced criminal records check
- Meet DVLA Group II Medical Guidelines
- The Knowledge (taxis)
- Topographical skills assessment (PHV)
- Must have held DVLA licence for minimum of 3 years
- Must have right to reside and work in UK
- Hire and reward insurance required

Vehicles:

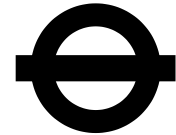
- Subject to an annual licence inspection
- Licence valid for one year
- Two MOTs per annum
- Age limits (15 years for taxis, 10 years for PHVs)
- Conditions of Fitness for taxis (including accessibility and manoeuvrability)

Private Hire Operators:

- TfL need to be satisfied the individual or the individuals who make up the company applying for the licence are 'fit and proper applicant'. This includes taking into consideration any previous convictions, conditions of business repute, previous applications
- Right of abode and to work in the United Kingdom
- Prove they an appropriate radio licence
- At least one 'operating centre' in London. This is the premises where they will take their bookings.
- Proof of planning permission or a certificate of lawful use for their proposed premises from their local authority.
- A fixed landline telephone number.

TfL is happy to review any specific entry barriers the Committee considers exist.

TfL action date: **Spring / Summer 2015 (consultation)**



Recommendation 9

The Mayor and TfL should ensure that disabled taxi and private hire passengers' needs are met by taking steps to incentivise the provision of wheelchair accessible private hire vehicles (for example, through reduced vehicle licensing fees) with a view to reaching 25 per cent wheelchair accessibility across the private hire fleet by 2018. By May 2015, TfL should also introduce requirements for all taxi and private hire drivers and operators to undertake mandatory disability awareness training as part of the licensing process. TfL should also enforce a zero-tolerance approach to drivers and operators across both industries who illegally refuse to carry disabled passengers, and increase the visibility of its complaints process so that disabled passengers can name and shame providers who break the law. Drivers and operators who are found to not comply with these regulations should face suspension of their licences.

We take accessibility seriously; this is why the London Taxi Conditions of Fitness require 100 per cent of the taxi fleet to be wheelchair accessible. We are working with manufacturers of the next generation of taxis to encourage them to investigate what further accessibility features can be introduced. For example, the potential to carry two wheelchairs and carrying wheelchairs forward-facing, swivel seats and a speaking meter.

There are also some 2,500 – 3,000 (around five per cent of the overall private hire fleet) specialist wheelchair accessible private hire vehicles. These are mostly used for fulfilling specialist local authority and schools contracts. We will consider what incentives can be put in place to encourage the take up of more private hire vehicles that are wheelchair accessible.

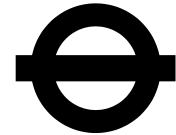
The private hire trade does not support the imposition of quotas for the provision of accessible vehicles. TfL will continue to work with the trade on delivering on the long term ambition of increasing the availability of wheelchair accessible vehicles. However, it should be noted that, as a consequence of the difference in the way the two trades operate, there is not the same need for all private hire vehicles to necessarily be fully accessible. As they are pre-booked only (unlike a hailed taxi), a customer has the ability to request an accessible vehicle from an operator before it turns up and the operator can seek to provide an appropriate vehicle in advance of the journey.

TfL also propose to develop and introduce a training course including disability awareness (this is outlined in more detail in the response to Recommendation 19).

TfL will continue to use all available powers to enforce the law. TfL supports the proposal to take a zero tolerance approach to driver and operators across both industries who illegally refuse to carry disabled passengers. We will investigate all complaints and prosecute where we have the powers to do so. Any licensed driver or operator who is successfully prosecuted, or where there is clear evidence of poor conduct from our investigation, will in future have their licence automatically suspended. In the last eight years we have successfully prosecuted 20 drivers for refusing to carry an assistance dog, who all received criminal convictions and fines of up to £1,000 each.

TfL is also working closely with the Guide Dogs charity to develop a campaign aimed at private hire drivers reminding them of their legal obligations to transport assistance dogs with their owners unless they have a valid exemption document.

TfL action date: May 2015

**Recommendation 10**

By March 2015, the Metropolitan Police should improve the information it collects on cab-related crime, to ensure greater understanding of whether offences are committed by licensed taxis, private hire vehicles and Pedicabs, and by licensed or unlicensed drivers/vehicles.

TfL and the Met Police have put together a bespoke processes to collect and extract information on cab-related crime which we use as intelligence and analysis to improve the effectiveness of TfL and police response and crime reduction activities. We will continue to work together to improve this area.

However, in many cases of cab related crime, especially in cab-related sex offences, a suspect is never identified and it can often be unclear whether the driver was licensed or the private hire vehicle was booked.

TfL has established systems, such as our online reporting tool for touting and other cab-related offences, which help to improve the intelligence picture of cab-related offending in London. Further improvements are currently being made to intelligence systems and processes to target resources more effectively.

2014 saw TfL continue our excellent record of prosecuting rogue minicab drivers, with 38 drivers successfully prosecuted for offences relating to illegal plying for hire or similar.

In 2013/14 the number of cab related sexual offences in London fell by 15 per cent compared to the previous year and over 700 arrests were made for illegal touting for hire, bringing the total to over 8,000 since 2003.

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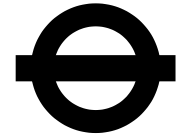
TfL, the Met and City of London Police will continue to work together to improve the collection and analysis of data on cab-related crime, to improve the effectiveness of our response and our joint crime prevention activities.

TfL action date: **This work is ongoing**

Recommendation 11

By May 2015, The Mayor and TfL should provide the Committee with a definitive assessment of the resources currently devoted to enforcement, setting out costed plans to increase these where necessary and address funding gaps. This should include options to increase licence fees to ensure adequate enforcement resources are available.

TfL and the Metropolitan Police Service have over 400 officers available for taxi and private hire compliance and enforcement operations. We directly fund 68 dedicated police cab



enforcement officers, and now have 41 TfL compliance officers (rising to 48 by March this year) and a further 32 vehicle inspection staff. Major operations also use Safer Transport Team officers and a group of 290 female police officers are called upon as part of covert anti-touting operations.

When this is taken into account, we believe these stands us in good stead against any comparable world city, including New York, which according to the Committee transcript is reported to have a total of 189 officers available for similar work.

Taxi and Private Hire License Fees are reviewed annually by TfL and approved by the TfL Board. We will discuss options with the trade for increasing enforcement and compliance officers and the impact this will have on licence fees.

Recommendation 12

By March 2015, The Mayor and TfL and the Metropolitan Police should set out specific steps that will be taken to improve the efficiency and visibility of non-covert night-time operations.

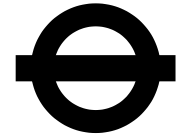
We recognise the importance of high visibility policing and enforcement activities as part of a package of measures to deal with cab-related crime and non compliance issues effectively. We alongside, the Met Police Roads and Transport Policing Command (RTPC) and City of London Police use a broad range of tactics including high visibility roadside driver and vehicle licence checks, ANPR operations, and uniformed and covert patrols in hotspot locations to deter, disrupt and detect illegal cab activity. The examples below demonstrate the use of non covert operations to deal with some of the issues highlighted in the Committee's report.

- High visibility policing activity undertaken by the RTPC targeted at electric pedicabs in September 2014 (and is ongoing);
- Use of our uniformed staff to deal with over ranking and private hire vehicles parked on taxi ranks
- Large scale STaN operation. High visibility tactics are used by the majority of the Safer Transport Teams as part of these operations to deter illegal activity and raise the profile of enforcement activity.

We constantly strive to improve the efficiency and effectiveness of our operations and as part of this tactics and practices are regularly reviewed. For example, we have recently undertaken a business process review of TfL's taxi and private hire compliance activities which has resulted in an action plan for improvements. This includes the implementation of an intelligence-led, risk-based approach to the tasking and deployment of compliance officers,

Furthermore, we are working with the Met Police to ensure there is greater flexibility for the Command's 2,300 Police and Police Community Support officers to work across the Command's objectives. This includes greater flexibility in the future to boost cab enforcement numbers for specific operations and dealing with issues as they arise.

The Committee is invited to attend both a covert and non-covert operation to better understand the issues and the most effective use of tactics to deal with particular offences. Invitations to such operations have proved popular with the media.



Recommendation 13

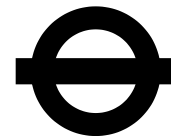
The Mayor and TfL should immediately clarify the policy on destination bookings and reinstate the requirement for private hire drivers and operators to record a destination at time of booking.

Our policy with regards to destination requirements is already clear and we have been consistent in the application of the regulations as they stand.

Particulars of private hire bookings

11. Before the commencement of each journey booked at an operating centre specified in his licence an operator shall enter the following particulars of the booking in the record referred to in regulation 10 –

- (a) the date on which the booking is made and, if different, the date of the proposed journey;
- (b) the name of the person for whom the booking is made or other identification of him, or, if more than one person, the name or other identification of one of them;
- (c) the agreed time and place of collection, or, if more than one, the agreed time and place of the first;
- (d) the main destination specified at the time of the booking;
- (e) any fare or estimated fare quoted;
- (f) the name of the driver carrying out the booking or other identification of him;
- (g) if applicable, the name of the other operator to whom the booking has been sub-contracted, and
- (h) the registered number of the vehicle to be used or such other means of identifying it as may be adopted.



Regulation 11 (d) therefore only requires an operator to record “the main destination specified at the time of the booking”, and even then, only at the commencement of the journey, not at the time of the booking itself. If no destination is specified by the customer (as there is no legal requirement for a customer to specify one) then the operator is under no legal obligation to record one.

The requirements are clear and unambiguous. The purpose of the regulation is to ensure the safety of passengers and drivers by providing a complete and accurate record of the journey. It also allows the driver to plan the route in advance and the operator to accurately quote a fare.

The issue of destination bookings will form part of the planned Regulations Review.

TfL action date: Spring / Summer 2015 (consultation)

Recommendation 14

By March 2015, The Mayor and TfL should conduct a full review of the policy on ‘satellite offices’, identifying and securing the enforcement resources required to regulate these effectively, including plans to clamp down on unlicensed ‘marshals’. Any further satellite office applications should be suspended until this has been achieved.

We have committed to reviewing the policy on ‘satellite offices’ as part of the Regulations Review. We welcome the suggestion to suspend applications for ‘in-venue’ operators pending the outcome of this. We will issue a trade notice advising that all applications for ‘in-venue’ operators received after 25 February 2015 will be placed on hold pending the outcome of the Regulations Review.

**TfL action date: February 2015 (TPH notice suspending applications)
Spring / Summer 2015 (consultation)**

Recommendation 15

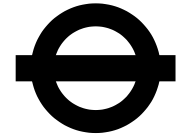
By May 2015, the Mayor and TfL should enable greater joined-up working on enforcement, including working with the private hire trade and boroughs to develop a cohesive, pan-London policy on picking up/setting down arrangements.

We warmly welcome evidence from the private hire trade of locations where boroughs parking enforcement is causing problems. We can then work with the borough and trade representative to address the issue. We have had some success in working with enforcement partners and the trade to address such problems, for example at St Pancras and in Westminster previously.

Recommendation 16

The Government should act upon the findings of the Law Commission Review and propose legislation that introduces stiffer penalties for touting, and greater enforcement powers for borough and police officers, including higher fines and vehicle seizure powers.

This is a matter for Government. Nevertheless, we welcome the Committee’s support on the Law Commission Review and will use this as part of our continued lobbying on the matter.



Note that TfL is supportive of some of the recommendations such as the proposal to give Licensing Authorities greater enforcement powers and the proposal to bring pedicabs into licensing - which would allow TfL to ban them. However, we have concerns about a number of issues, including the setting of any national standards for taxi and private hire.

Recommendation 17

By May 2015, The Mayor's office, TfL and the trades should develop and publish a Memorandum of Understanding which clearly sets out terms of reference and defines the respective roles, responsibilities and expectations of each party. This should include specific service level agreements.

We agree with this recommendation in principle but would propose incorporating the development of this into the Mayor's and TfL's plans to develop a new approach to engagement with the taxi and private hire trades, as outlined in our response to Recommendation 1.

Recommendation 18

By March 2015, TfL should revise its driver engagement activity to ensure that it is as widely representative as possible, and improve the transparency of taxi and private hire policy and decision making processes by routinely publishing the minutes of meetings with the trades. TfL should also provide and publish a detailed breakdown of annual licence fee spending.

We believe our current engagement activity matches the requirements of passengers and the trade. Our Engagement Policy was shared with the Committee and explains the rationale for which trade associations we meet. Since autumn 2014 we have implemented a new action tracker for all formal engagement meetings with trade representatives and will publish these regularly.

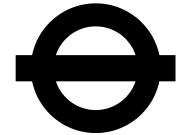
The Mayor and TfL's structured engagement can be summarised as the below.

Quarterly senior meetings:

- Cabbies Cabinet with the LTDA, London Cab Drivers' Club (LCDC) and Unite the Union (those that meet the published engagement policy)
- Deputy Mayor / Private Hire operators with the Licensed Private Hire Car Association (LPHCA) and members, Private Hire Board and members and the Chauffeur and Executive Association

Quarterly topic focussed meetings:

- Taxi Licensing, Compliance and Enforcement meeting (LTDA, LCDC and Unite)
- Private Hire Licensing, Compliance and Enforcement meeting (LPHCA, General, Municipal, Boilermakers and Allied Trade Union (GMB), Private Hire Board and members and the Chauffeur and Executive Association)



Regular and ad hoc meetings between TfL and trade representatives, companies and members including:

- Suburban Taxi Drivers' Coalition
- Uber
- Hailo
- Get Taxi
- Maaxi Taxi
- Transdev / Green Tomato Cars
- Vehicle manufacturers
- Digital Taxi Top Advertising Companies

Trade-led meetings:

- Cabs Ranks Committee

A breakdown of fee spending for the last two financial years is publicly available on the TfL website at <http://tfl.gov.uk/info-for/taxis-and-private-hire/notices-and-consultations#on-this-page-4>

Recommendation 19

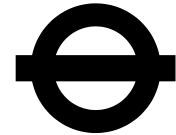
By March 2015, the Mayor and TfL should set out how it will increase the visibility and accessibility of its complaints process, and improve systems for passengers to give feedback and make complaints about both taxi and private hire services. Complaints data should be reported to the TfL Board on a quarterly basis.

We agree completely it is important to have a clear and fair complaints process which can then be measured and reported publicly. As part of the Regulations Review we will consider:

- Private hire operators being required to provide TfL with general information regarding driver related complaints;
- Private hire vehicle owners being required to display the TfL contact details for complaints on public facing material, such as websites to encourage reporting direct to TfL; and
- TfL Taxi and Private Hire public facing literature being reviewed to make clear customers can contact TfL directly to complain about a private hire journey.

We are also considering the merits of introducing a Code of Conduct for all taxi and private hire driver and operator licensees which would be accompanied by a Passenger Leaflet. This Code of Conduct would reinforce the standards of service expected of licensees when engaging with members of the public including passengers, other road users, police and TfL staff. We welcome the support of the Committee in progressing these plans.

The Passenger Leaflet would contain information about acceptable behaviour when using taxi and private hire services. This will include information about having appropriate funds to pay for their journey and what supporting measures are in place for drivers if a passenger attempts to 'bilk' the driver by not paying for their fare.



We are also considering introducing courses for drivers in both trades to help improve the service they provide. This will be the subject of further discussion over the coming months with trade groups. We note the fact that the private hire trade have said to us that they would welcome the introduction of mandatory disability awareness training.

To further improve the service provided to passengers, we also considering the introduction of a tailored training course for taxi and private hire drivers to cover a range of topics to assist them in their roles including:

- An overview of taxi and private hire legislation
- Disability needs of passengers
- Health and Safety and First Aid
- Customer care
- Network developments (e.g. road works, large coordinated events)
- Forthcoming consultations or proposed legal changes that may impact them
- Running a small business
- Developments in the industry
- Q&A

This will be the subject of further discussion with trade groups. We note the fact that the private hire trade have now said to us that they would welcome the introduction of mandatory disability awareness training.

TfL action date: **Summer 2015 (complaints)**
 Summer 2016 (training)