


**Diversity impact assessment (DIA) screening and initial assessment pro forma**
**Title of policy, function or project:**

The licensing of taxis function as undertaken by Norwich City Council, and in particular its Hackney Carriage Vehicle Specification

**What are the aims and objectives?**

- To protect the interests of the public through the administration of the function
- To stipulate a detailed criteria that vehicles should meet before being licensed as hackney carriages
- To provide access to a wide range of groups within the travelling public
- To ensure that vehicles are 'purpose built' to be used as hackney carriages

**Who are the key stakeholders?**

- Differing groups within the travelling public, e.g. wheelchair users, the ambulant disabled, passengers with visual and hearing impairments
- Members of the Public
- Licensed hackney carriage vehicle proprietors and drivers
- Hackney carriage vehicle manufacturers
- Norwich City Council as a licensing authority

**What evidence has been used for this initial screening? (e.g. complaints/place survey results)**

- 1991 - Norwich City Council current hackney carriage vehicle specification
- 2005 - Survey of occupied wheelchairs and scooters conducted on behalf of Mobility and Inclusion Unit of the Department for Transport
- November 2007 - Results of consultation on amending the hackney carriage vehicle specification considered by the council's regulatory committee
- [2009] EWHC2356 [ADMIN] (1)Alma Lunt (2)Allied Vehicles v Liverpool City Council, with the Equality and Human Rights Commission as intervener.
- Vehicle manufacturers technical specification brochures
- Comments, Compliments and Complaints

**Do different groups have different needs in relation to this policy?**

	Yes	No	Not known
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Racial group	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Religion or belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Please elaborate:**

**Yes**

The specifications limiting types of vehicles licensed as hackney carriage taxis have been in place since 1991. In the time since it has been possible to understand the requirements of different user groups as outlined below. It is evident that the most vulnerable user groups in terms of health and safety, and dignity and respect are disabled people whose mobility would be compromised significantly without intervention from authorities on the accessibility of taxis and the training and knowledge of their drivers. It is therefore likely that this assessment will closely review the needs of passengers with disabilities or impairments

**Age**

It may be that older people who may not have access to cars and may be on low or fixed income could be reliant on taxis for their transportation needs. For those older people with reduced mobility the safety and appropriateness of ramp access is therefore a consideration.

**Disability**

People with visual impairment may benefit from contrasting colours or lighting to assist with access into, and travelling within, the vehicle; for example brightly coloured door grab handles and seat edges, floor, puddle and door handle lights. For those passengers with hearing or speech impairments, communication with the driver needs consideration as the separate passenger compartment is divided from the driver by fixed floor to roof screening.

Under the current specifications, suitable access to the vehicle for both the ambulant disabled and wheelchair user is required. However, those passengers whose wheelchairs are longer in length may be unable to manoeuvre within the vehicle into a safe position. This could result in such passengers being carried either partially or totally unrestrained. Additionally, wheelchair users may prefer to be carried in a forward facing position as opposed to the current situation where the only option is to be restrained facing rearwards. Passengers may also wish to travel with a companion, and therefore the availability of other passenger seats is also a consideration.

**Gender**

Licensed vehicles that currently meet the specification are commonly recognisable as taxis due to their distinctive appearance. This can be an important safety aspect for women travelling alone, especially at night as it reduces the risk of hiring a 'bogus' taxi.

**No**

**Not known (is this due to a lack of data?)**

There is a lack of data to establish whether these groups have different needs in relation to the policy

**Is there an opportunity to promote equality of opportunity or good relations amongst different groups?**

	Yes	No	Not known
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Racial group	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Religion or belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Please elaborate:**

Yes

### Age and Disability

There is an opportunity to promote equality of opportunity for disabled and older passengers to enjoy a comfortable, safe and accompanied journey comparable to non – disabled peers. The specifications as reviewed in 2007, and bearing in mind the response from disabled passengers which was mixed, satisfied the organisation that disabled and ambulant disabled passengers were receiving a reasonable service (please see further details below). It is unlikely that community cohesion will be impacted greatly, other than ensuring that disabled people are able to actively participate in civic activities with decent transportation provided.

No

### Not known (is this due to a lack of data?)

#### Gender

If the policy specification is amended and vehicles are licensed that are not as distinctive in appearance as those currently approved, it is unknown whether the 'recognisability factor' could be addressed by some other method, e.g. colour or signage.

#### Racial group / Religion or belief / Sexual orientation

Lack of data to establish what opportunities would be applicable

### Have any concerns been highlighted by the following stakeholders (e.g. complaints or consultations)?

	Yes	No	Not known
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Racial group	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Please elaborate:

Yes

No

### Age and Disability

The council's hackney carriage vehicle specification policy was last reviewed in 2007 following an application to licence the Peugeot E7 model current at the time. A total of thirty six responses were received.

The majority of comments (64%) were received from the hackney trade and their representative groups. Out of these responses 61% were against amending the policy to allow the E7 to be licensed mainly due to issues surrounding the turning circle, purpose built 'fitness' and recognition.

Although the remaining 39% in support of the E7 cited easier access and manouverability for wheelchair users as one of the reasons to support its licensing, there was insufficient evidence from consultation with disabled passengers that the current specifications did not meet requirements or that the E7 was a preferred vehicle. Overall, 11% of the responses came from members of the public who were evenly split in their views. One electric wheelchair user stated that they found the E7 "very awkward to get in and out of". Another respondent with reduced mobility cited problems in accessing vehicles that were currently licensed due to the

high step up.

No concerns were raised by other key stakeholders in the consultation

Not known (is this due to a lack of data?)

Is there any evidence that different groups could potentially be or are affected adversely by the policy?

	Yes	No	Not known
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Racial group	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Religion or belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please elaborate:

Yes

Age

Older people with reduced mobility may have difficulty in accessing vehicles that meet the current specifications due to the step height from the kerbside into the vehicle as identified by the consultation in 2007. There have not been any complaints received, however we must consider what options are available to improve the experience and avoid potential hazards. Therefore the specifications should ensure that the angle of any ramp provided is not too steep and that retractable steps can be secured and non-slip.

Disability

Currently there is some reasonably robust provision in the specifications for taxi licensing as outlined earlier, and no complaints or negative feedback have been received from disabled rights access groups or individuals regarding the licensing of taxis. However it is recognised that the specifications have been in place for some 18 years and are ready to receive scrutiny and amendment in line with appropriate guidance.

Although Norwich City Council's current hackney carriage vehicle specification policy requires all vehicles to be wheelchair accessible there are many differing makes, designs and sizes of wheelchairs, some of which may not be able to be restrained in the rearward facing position correctly. It is important that the wheelchair and its occupant can be securely restrained to ensure passenger safety when travelling in the vehicle. Those vehicles currently licensed can carry, in the correctly restrained position, differing types of wheelchairs. However, it would not be possible to carry some of the larger wheelchairs in the correct position, usually of the electric variety, because of the difficulty in manoeuvring the wheelchair within the passenger compartment.

Since the 2007 review a new Peugeot E7 taxi model has been produced; this has received favourable reviews from disability rights advocates. The Disability Discrimination Act 2005 provisions regards paying due regard to the needs of disabled people has also been tested in Liverpool.

This particular judgement in the recent High Court case against Liverpool City Council highlighted that despite consultees struggling to use the current licensed taxis, it was decided not to license the vehicle in question. One of the claimants could not access vehicles licensed under the policy in her manual powered wheelchair because she could not turn her chair, due to its size, to face the rear and be secured by the straps and seat-belts provided for disabled use in such a taxi. That meant that if she had to travel in the vehicles licensed at that time, she could only do so in a diagonal or sideways position unsecured by a seat-belt or a strap on the wheelchair itself. The judgement stated that this would create an uncomfortable ride in the vehicle if it braked or turned corners sharply, is an unsafe position and a breach of the local regulations

governing the conveyance of wheelchair users.

It should also be noted that a policy specification relating to the turning circle of the vehicle currently restricts the choice of vehicles available. Any review of the specifications should robustly investigate arguments in favour of the turning circle defence and weigh it against the needs, safety and legal duties regarding disabled passengers.

No

**Not known (is this due to a lack of data?)**

No evidence to suggest that the remaining groups are adversely affected by the policy.

**Please outline any action points committed to in the future:**

	<b>Action</b>	<b>Review date</b>
<b>Data collection</b>	<b>In accordance with court order, obtain information from five other local authorities on experience of licensing the Peugeot E7</b>	<b>October 2009</b>
<b>Consultation</b>	<b>Undertake consultation with stakeholders regarding application to licence Peugeot E7</b>	<b>November 2009</b>
<b>Age</b>	<b>No</b>	
<b>Disability</b>	<b>Report to Regulatory Committee asking members to review existing hackney carriage vehicle specification policy</b> <b>-to improve communication between passengers and drivers through requiring vehicles to be fitted with a voice intercom and hearing loop</b> <b>-to consider applications from vehicles with larger passenger compartment sizes resulting in wheelchair users being able to travel with companions.</b> <b>-to stipulate that all door grab handles and seat edges are brightly coloured</b>	<b>November 2009</b>
<b>Gender</b>	<b>No</b>	
<b>Racial group</b>	<b>No</b>	
<b>Religion or belief</b>	<b>No</b>	
<b>Sexual orientation</b>	<b>No</b>	

**Any other comments on the policy and/or screening exercise:**

The most significant area of the current policy which the Peugeot E7 fails to comply with is the 'turning circle'. If this requirement is removed or reduced then vehicles other than the E7 could be licensed.

**On the basis of this assessment should there be a full impact assessment carried out?**

Yes  No

**Please elaborate:**

Since the last consultation, it is recognised that the requirements for accessible taxis for larger wheelchairs needs greater consideration. Therefore a further consultation is required in order to inform members reviewing practice at to Regulatory Committee in November 2009. A full impact assessment will allow the opportunity to further investigate the views of disabled passengers, as well as how to mitigate against

potential negative impacts identified in this initial screening.

**Lead review manager name:** Ian Streeter  
**Job title:** Senior Licensing Officer  
**Date:** 13 November 2009