

To: General Purposes Licensing Committee
Date: 10th February 2025
Report of: Deputy Chief Executive for City and Citizens' Services
Title of Report: Hackney Carriage Quantity Control Policy Review

Summary and recommendations	
Purpose of report:	To review and determine retention or removal of the hackney carriage vehicle quantity control policy
Corporate Priority	Strong, fair economy. Thriving communities. Zero carbon Oxford.
Recommendation(s): That the General Purposes Licensing Committee resolves to:	
1.	Remove the Hackney Carriage Vehicle Quantity Control Policy; and recommend the decision for adoption by Full Council.
2.	If the decision is to <u>retain</u> the policy then; Instruct Officers to complete a public impact assessment of the quantity control measures for presentation to GPL Committee who will determine any adjustment to the limit.

Appendices	
Appendix One	Department for Transport (DfT) guidance
Appendix Two	Competition and Markets Authority (CMA) guidance
Appendix Three	Public consultation results and analysis
Appendix Four	Overview of Taxi ranks
Appendix Five	COLTA representation
Appendix Six	Equality impact assessment

Introduction and background

- Oxford City Council currently maintain a limit of 107 hackney carriage vehicle (HCV) licences issued. A limit has been in place since the introduction of the Transport Act in 1985, due to this limit, hackney carriage vehicle licences have increased by approximately 10% in forty years, contrasting with private hire vehicle licences which increased by approximately 500% over the same time.

2. In 2007 the Council's scrutiny committee set out the historical justifications for quantity control, including vehicle standards, traffic congestion, emissions, and quality of service. However, since then the sector has improved through other means such as: statutory vehicle standards, emission standards, new safeguarding and road safety legislation, and updated driver standards/requirements.
3. The General Purposes Licensing (GPL) Committee are required to review the Hackney Carriage Vehicle Quantity Control Policy ('the policy') and determine whether the policy should be removed or retained.

Relevant Legislation

4. Hackney Carriage vehicle licences are issued under S.37 of the Town Police Clauses Act 1847.
5. Quantity control of hackney carriage vehicles is permitted under S.16 of the Transport Act 1985, the Act enables a Licensing Authority to impose a limit and refuse a hackney carriage vehicle licence when there is evidence of no significant unmet demand for their services in an area.
6. The requirement for "unmet demand" has changed over time:
 - with best practice guidance explaining that if there is a limit it should benefit the travelling public; and
 - In 2014 the Law Commission reporting on taxi law reform, stating their view, that the "unmet demand" criterion for determining a quantity control policy is not appropriate, suggesting instead a test based on public interest.
7. The Equality Act 2010 introduced provisions under S.161 to ensure licensing authorities that have relatively few wheelchair accessible taxis operating in their area, do not refuse licences to such vehicles for the purposes of controlling taxi numbers.
8. Oxford City Council requires all 107 hackney carriage vehicles licenced to be wheelchair accessible. The proportion of hackney carriages that are wheelchair accessible is 100% and therefore limiting the number of hackney carriages does not breach this requirement.

Guidance

9. The Department for Transport (DfT) guidance: 'Taxi and private hire vehicle licensing best practice guidance for licensing authorities in England', states that most Licensing Authorities **do not** impose quantity restrictions and that the DfT regard this as best practice.
10. The guidance sets out that where an Authority imposes quantity restrictions, they should be regularly reconsidered by addressing each time whether the

restrictions should continue at all, and the matter should be approached in terms of the interests of the ‘travelling public’ (people who use taxi services):

- What benefits or disadvantages arise for the travelling public as a result of the continuation of controls; and
- what benefits or disadvantages would result for the public if the controls were removed?
- Is there evidence that removal of the controls would result in a deterioration in the amount or quality of taxi service provision?

The DfT Guidance regarding quantity restrictions can be found at **Appendix One**.

11. The DfT Guidance states where there are quantity restrictions in place, vehicle licence plates command a premium, often tens of thousands of pounds. This indicates that there are people who want to enter the taxi market and provide a service to the public, but who are being prevented from doing so by the quantity restrictions.
12. In 2017 the Competition and Markets Authority (CMA) published guidance on Regulation of taxis and private hire vehicles and stated that quantity restrictions can harm passengers by reducing availability, increasing waiting times, and reducing the scope for downward competitive pressure on fares.
13. The CMA took the view that concerns around congestion, air pollution and enforcement costs can generally be addressed through policy measures less harmful to passengers’ interests than quantity restrictions.

The CMA Guidance can be found at **Appendix Two**.

Matters relevant for consideration

14. Impact on the travelling public

The proposed benefits and disadvantages on the travelling public for removing the policy have been listed out for consideration:

Issue	Benefit to travelling public	Disadvantages to travelling public
Emissions	<ul style="list-style-type: none"> HCV emission requirement is more stringent than PHVs. HCV's can ply-for-hire or wait at ranks so less driving empty waiting for booking. Allows for a transition from OOT vehicles (more polluting) to Oxford City Hackney Carriages (ULEV standard). 	Total emissions could be higher if the number of vehicles in the taxi sector surpass current levels. <i>However, it is more likely that an increase in HCV's (ULEV standard) will accompany a decrease in PHVs and OOT vehicles (Lower emission standards).</i>
Safety standards	HCV safety standards have improved through vehicle design and policy changes. PHVs have similar standards.	Historic rationale for a limit was to ensure the sector could be regulated effectively as standards were low. <i>This is no longer the case, and the Competition and Markets Authority state "Quantity restrictions are not necessary to ensure the safety of passengers".</i>
Enforcement	Likely reduction in HCVs licensed by other authorities which cause a safeguarding challenge as they are not regulated by Oxford City Council.	HCVs do not have to log their journeys, removing this as a line of enquiry during an investigation.
Wheelchair Accessible Vehicles (WAV's)	Increases the availability of WAVs as all HCVs must be wheelchair accessible to comply with the Taxis and Private Hire Vehicles (Disabled Persons) Act 2022, and Equality Act 2010.	None
Modernising	New investors in the HCV market may modernise the customer experience, including card payments and booking apps.	None
Diversity and demand	Market will be made more accessible to other Oxford communities or a broader spread of genders, who are currently unlikely to access the trade as an owner or driver. <i>(highlighted in more detail in</i>	None

	<i>Equality Impact Assessment)</i>	
Traffic	All HCV's will have greater access through traffic filters, LTN's and the ZEZ, increasing demand for taxi journeys as private car journeys reduce.	Total traffic congestion could be higher if the total number of vehicles in the taxi sector surpass current levels. <i>However, it is more likely that an increase in HCV's will accompany a decrease in PHVs and OOT vehicles.</i>
Reduction in illegal Plying for Hire	<p>Reduced risk of PHVs or OOT vehicles plying for hire as more HCVs available.</p> <p>Fewer OOT vehicles with a "taxi" sign operating in the city, confusing the customer, and encouraging illegal plying for hire.</p> <p>Those wishing to enter the Hackney trade for the purpose of plying for hire can do so lawfully.</p>	None
Taxi rank capacity	More HCV's available to serve the underused ranks (such as Old Greyfriars Street and New Road).	Congestion may form around most popular ranks when at full capacity. <i>This would require additional enforcement by the Licensing Authority to manage.</i>
Availability and choice	An increase in HCVs or a balancing of the ratios available for HCVs and PHVs provide more availability and choice.	None

15. Public Consultation

A public consultation was held from 04/09/2024 to 27/11/2024. There were 223 responses analysed.

- Over half of responders felt hackney carriage vehicles were available at all times to flag down or hire from a taxi rank.
- 27% of responders had given up trying to hail down a hackney carriage vehicles or stood waiting at a taxi rank, making alternative arrangements for a journey during the day, 34% of responders had done the same during the evening.
- 41% of responders think increasing the number of licenced wheelchair accessible vehicles will have a positive impact and 42% think increasing the number of licensed Ultra Low Emission Vehicles (ULEV) will have a positive impact.
- 41 responders answered that they would apply for a licence if they were made available, half of those expressions of interest were from existing licence holders.

The consultation results are presented in **Appendix Three**.

16. Licensing Authority comparisons

A data comparison of other Licensing Authorities demonstrates the low proportion of hackney carriage vehicles available within Oxford City compared with other authorities.

The comparison also demonstrates how the numbers of hackney carriage vehicles and private hire vehicles in cities without a quantity control policy reflects local need and demand.

Councils with similar populations and 'city' designation				
Authority	Quantity Restriction	Hackney Carriage Vehicle	Private Hire Vehicles	% of HCV
Oxford City Council	Y - 107	107	772	12%
Lancaster City Council	Y - 108	108	229	32%
Cambridge City Council	Y - 321	269	112	71%
Preston City Council	Y - 187	172	407	30%
Canterbury City Council	N	246	721	25%
Gloucester City Council	N	72	240	23%
Chelmsford City Council	N	160	77	68%
Oxfordshire Authorities				
South Oxfordshire District Council	N	447	203	69%
Vale of White Horse District Council	N	289	71	80%
West Oxfordshire District Council	N	105	132	44%
Cherwell District Council	N	120	337	26%

17. Emission standards

Currently all renewal hackney carriage vehicles must meet EURO 4 emission standard or greater and all new hackney carriage vehicles must meet ULEV standard. From 1st January 2026 all new and renewal hackney carriage vehicles must meet ULEV standard. The Council extended this requirement by one year due to the financial burden placed on vehicle proprietors.

The retention of the quantity control policy restricts access and investment into ULEV hackney carriage market by limiting the licences available to those that have the means to invest.

18. Wheelchair accessibility

It is mandatory that all hackney carriage vehicles licenced by Oxford City Council are wheelchair accessible, this is not the case for private hire vehicles.

Wheelchair accessible vehicles – Jan 2025

HCV	107 / 107
PHV	16 / 772

Although 100% of hackney carriage vehicles being wheelchair accessible complies with S.161 of the Equality Act 2010, in total, only 14% of hackney carriage and private hire vehicles licenced by Oxford City Council are wheelchair accessible.

19. Licence plate ‘value’

The DfT guidance states that the existence of a quantity control policy has created an unregulated premium for licence plate transfers.

The ‘value’ of licence plates for transfer in Oxford is thought to be between £50,000 and £100,000 with the Licensing Authority obtaining evidence of a licence transfer in 2024 in which a fifteen-year-old hackney carriage vehicle licence sold for £60,000, and a scrutiny committee in 2007 referencing a transfer of £100,000.

This is indicative of significant interest in entering the hackney carriage trade and willingness to invest a substantial sum to do so.

20. Cross border hiring

Cross border hiring and the operation of out of town (OOT) vehicles is a prevalent safeguarding concern within the Oxford City district. The Licensing Authority has identified more than 400 OOT hackney carriage vehicles which are currently used by Oxford City Operators to facilitate journeys within the City District.

One significant factor that contributes to this high number of OOT vehicles, is that the quantity control policy forces any prospective new hackney carriage vehicle proprietors to apply outside of the City District.

21. Illegal plying for hire

The licensing authority regularly receive complaints of illegal plying for hire within the City District, having received 191 in the last five years. Most of these incidents are opportunistic offences that occur when an OOT vehicle or a private hire vehicle is operating within the City District and is approached by a member of the public seeking a journey.

Removing the quantity control policy may reduce the number of complaints received, as those that wish to lawfully ply for hire within the District would be able to obtain a hackney carriage licence.

22. Taxi ranks

There are 16 Taxi ranks available in Oxford City and 1 unadopted rank at Oxford train station. In total these 17 ranks provide approximately 84 available spaces for hackney carriages (this drops to 73 available spaces during the day).

An overview of taxi ranks, their availability and when they were adopted can be found at **Appendix Four**.

23. Sector Modernisation

The Transport Act 1985 introduced a number of changes to regulation focused on public safety and improved standards; quantity control was one of these changes. Since then, there have been significant changes to the sector that have modernised the public safety objective of licensing and addresses the historic justifications for a quantity control policy:

Historic justifications for policy	
Licensing standards	<p>Previously it was thought that by limiting the number of vehicles, the driver and vehicle standards could be more easily regulated by licensing authorities.</p> <p>In 2022 the DfT published Statutory guidance: Statutory taxi and private hire vehicle standards. These now provide the basis for minimum standards nationally.</p>
Traffic congestion	<p>Historically there were concerns that removal of the limit would create additional traffic congestion in the City. Considering the much higher number of private hire vehicles (772) and OOT vehicles (400) operating within the district since 1985, it is more likely that an increase in hackney carriages would result in a decrease in these other vehicles.</p>
Emissions	<p>Original concerns that more hackney carriage vehicles would negatively impact emissions within the district are no longer relevant, as any new vehicles need to meet ULEV standards and all hackney carriage vehicles will meet ULEV standards from 2026.</p> <p>Removal of the limit may also lead to those operate higher polluting private hire or OOT vehicles to obtain a ULEV standard hackney carriage vehicle.</p>
Quality of service	<p>Previously there were concerns that an increase in licences would negatively impact the authority's ability to manage driver standards, vehicle standards and compliance.</p> <p>The modernisation of technology, and publication of national guidance has improved the authority's capacity and capability to manage standards across the sector.</p> <p>This is demonstrated by the overall number of licenced vehicles successfully regulated by this authority increasing over forty years from approximately 200 to 772.</p>
Taxi ranks	<p>Availability at taxi ranks for new hackney carriages is a legitimate concern, but is not a matter that negatively impacts the travelling public, rather, it increases the likelihood that under-used ranks will be attended.</p> <p>The city council is supportive of proposals for new ranks, as demonstrated by the doubling of ranks in the district since 1985.</p>
Demand	<p>This consideration should only come after the benefits to the travelling public have been identified.</p> <p>A lack of demand has been used historically to justify the quantity</p>

	<p>controls, with the number of hackney carriages only increasing by approximately ten vehicles in forty years.</p> <p>There are factors contrary to this justification:</p> <p style="padding-left: 20px;">Oxford City district population growth of approximately 15,000 over the last fifteen years.</p> <p style="padding-left: 20px;">The increase in private hire vehicle licences by approximately 500% over forty years (150 licences recorded in 1997, 772 licences recorded in 2025).</p> <p style="padding-left: 20px;">The £50,000 to £100,000 ‘value’ attributed to plate transfers in Oxford indicating significant interest to enter the trade.</p>
--	--

24. Trade representation

The City of Oxford Licenced Taxi-cab Association (COLTA) were invited to provide their views regarding the review of the quantity control policy.

The representation includes a number of issues facing the local hackney carriage sector and can be found at **Appendix Five**.

Equality impact assessment

25. An equality impact assessment has been undertaken regarding the review of this policy and its retention or removal. It has identified that the retention of the Quantity Control policy may negatively impact persons with five of the characteristics protected under the Equality Act 2010, and one characteristic voluntarily adopted by Oxford City Council. The removal of the policy has a negative impact (financial burden) on persons with one of the characteristics protected under the Equality Act 2010 and one characteristic voluntarily adopted by Oxford City Council.

When undertaking the the Equality Impact Assessment, the Equality and Human Rights Commission guidance was used with licensing data, legislation, and other relevant guidance to identify if retention or removal of the policy could have a direct or indirect impact on persons with protected characteristics.

Protected Characteristics Impacted	
Age	<p>The majority of current Hackney Carriage Vehicle proprietors fall evenly into the three age brackets 40-49, 50-59, and 60-69.</p> <p>By restricting licences, those from other age brackets wanting to enter the trade could be indirectly prohibited in doing so. This particularly effects the younger generation of prospective licence holders who attempt to enter a market that has already reached its limit.</p> <p>Vehicle licences can be transferred, those that currently hold licences may sell their vehicles and transfer licences to those that fall in other age groups.</p> <p>Consultation responses:</p> <ul style="list-style-type: none"> • 21% 35-44 • 20% 45-54

	<ul style="list-style-type: none"> • 16% 25-34
Disability	<p>The current restriction on Hackney Carriage Vehicles, limits the number of wheelchair accessible vehicles available.</p> <p>All Hackney Carriage Vehicles licenced in Oxford City are wheelchair accessible, however, when counting Private Hire Vehicles, the overall number of licenced vehicles that are wheelchair accessible is 14%.</p> <p>The Equality Act 2010 addresses cases where an authority has a low proportion of wheelchair accessible vehicles, stating that quantity control policies should not apply to wheelchair accessible vehicles in these cases.</p> <p>A policy restricting the number of vehicles may directly discriminate against those with disabilities, by reducing availability and/or choice when travelling.</p> <p>Note: When measuring an authority's proportion of wheelchair accessible vehicles, Section 161 of the Equality Act only refers to 'Taxis'. It is accepted that 'Taxis' only refer to Hackney Carriage Vehicles, therefore the proportion of Taxis that are wheelchair accessible is 100%. (This does not account for Private Hire Vehicles)</p> <p>Consultation responses:</p> <ul style="list-style-type: none"> • 63% No • 16% Prefer not to say
Gender-reassignment	<p>80% of consultation responders answered 'yes', and 1.8% answered 'no' to <i>"Is the gender you identify with the same as your sex registered at birth?"</i>.</p> <p>This is a greater percentage than the national average of 0.5%.</p> <p>The Hackney Carriage Vehicle Quantity Control Policy limits the availability of Hackney Carriage Vehicle licences and may indirectly discriminate against persons with this protected characteristic.</p>
Race, Ethnicity and/or Citizenship	<p>Nearly all the hackney carriage vehicles licensed by Oxford City Council are owned by people of Pakistani heritage.</p> <p>Those from a Pakistani heritage represent 1.5% of the Oxfordshire population.</p> <p>Restricting the number of licences may impact those from other Race, Ethnicity and/or Citizenship backgrounds who wish to enter the hackney carriage trade.</p> <p>Consultation responses:</p> <ul style="list-style-type: none"> • 37% White - English/Welsh/Scottish/Northern Irish/British. • 22% Asian or Asian British – Pakistani. • 15% Prefer not to state.
Sex	<p>0.4% of Oxford hackney carriage drivers are female, while 35% of private hire drivers are female.</p> <p>This indicates that female drivers who want to enter the licenced trade in Oxford are limited to the private hire sector.</p> <p>The retention of this policy directly impacts persons with this protected characteristic.</p> <p>Consultation responses:</p>

	<ul style="list-style-type: none"> • 60% Male • 24% Female
Socio-economic factors	<p>To drive a Hackney Carriage vehicle currently, a prospective driver must either be a vehicle owner, or approach a vehicle owner to use/rent their vehicle.</p> <p>The removal of the policy could financially benefit some drivers, who rather than relying on and paying the rental fees for the use of someone else's licenced vehicle, could licence their own vehicle.</p> <p>Current number of vehicles: 107</p> <p>Current number of drivers: 281</p> <p>If existing private hire drivers obtain a licence to drive hackney carriages, and if more hackney carriage vehicles are available for use, they may increase their earnings by lawfully 'plying-for-hire' anywhere in Oxford at any time, rather than only complete private hire pre-booked journeys from Operators.</p> <p>Existing hackney carriage vehicle licence holders will be negatively impacted financially, due to removal of the transfer 'value' attributed to the licence, more competition, and reduced income from renting a vehicle to multiple drivers.</p>

The Equality Impact Assessment can be found at **Appendix Six**.

Legal implications

26. Should the Council determine to retain the policy, the decision must be well documented, based on evidence, data, consultation responses, all with a focus on the benefits to the travelling public, otherwise the decision may be open to challenge.
27. The Council has a Public Sector Equality Duty under the Equality Act 2010 to have due regard to the need to:
 - Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act;
 - Advance equality of opportunity between people who share a relevant protected characteristic and those who don't share it;
 - Foster good relations between people who share a relevant protected characteristic and those who do not (which involves having due regard, in particular, to the need to tackle prejudice and promote understanding).
28. Other legal implications are contained within the report.

Summary

29. The Transport Act 1985 allows local authorities to restrict the number hackney carriage vehicles. Not restricting the number of vehicles is considered best practice by the Department for Transport, the Law Commission and the Competition and Markets Authority.

30. The Equality Act 2010 has provisions in place to ensure licensing authorities do not refuse licences to wheelchair accessible vehicles for the purposes of controlling taxi numbers. Oxford City Council's hackney carriage and private hire vehicles are 14% wheelchair accessible.
31. The Equality Act 2010 also has provisions in place to protect certain characteristics from negative impacts, the Equality Impact Assessment identified six characteristics negatively impacted by the retention of the policy.
32. The Committee must decide if the existence of the policy benefits the travelling public before it determines if there is any unmet demand, or impact on the existing licenced trade.

Conclusion

If the committee decide to remove the policy:

recommend the decision to remove the policy to Full Council.

If the committee decide to retain the policy:

instruct the Licensing team to undertake a public impact assessment of the quantity control measures and present the findings to the GPL committee for further determination of the limit.

Report author	Joshua Curnow
Job title	Licensing Team Manager
Service area or department	General Licensing
Telephone	01865 252565
e-mail	licensing@oxford.gov.uk

[Home](#) > [Regional and local government](#) > [Local government](#)
> [Taxi and private hire vehicle licensing: best practice](#)

[Department
for Transport](#)

Guidance

Taxi and private hire vehicle licensing best practice guidance for licensing authorities in England

Updated 17 November 2023

Contents

1. Introduction
2. The role of taxis and private hire vehicles
3. The role of licensing authorities
4. Accessibility
5. Enforcing the licensing regime
6. Driver licensing
7. Private hire vehicle operator licensing
8. Vehicle licensing
9. Quantity restrictions of taxi licences outside London
10. Taxi fare rates
11. Taxi ranks and roadside infrastructure

12. Taxi zones
13. Flexible transport services
14. Local transport plans and strategy
15. Tax checks in taxi and private hire vehicle licensing

9. Quantity restrictions of taxi licences outside London

9.1 Legal powers

The present legal provision on quantity restrictions for taxis outside London is set out in section 16 of the Transport Act 1985 (<http://www.legislation.gov.uk/ukpga/1985/67/section/1>). This provides that the grant of a taxi licence may be refused for the purpose of limiting the number of licensed taxis if, but only if, the licensing authority is satisfied that there is no significant unmet demand for taxi services in their area.

In the event of a challenge to a decision to refuse a licence, the authority concerned would have to establish that it had, reasonably, been satisfied that there was no significant unmet demand.

9.2 Impacts of quantity restrictions

The Competition and Markets Authority was clear in its 2017 guidance on the Regulation of taxis and private hire vehicles: understanding the impact of competition (<https://www.gov.uk/government/publications/private-hire-and-hackney-carriage-licensing-open-letter-to-local-authorities/regulation-of-taxis-and-private-hire-vehicles-understanding-the-impact-on-competition>) that:

“ Quantity restrictions are not necessary to ensure the safety of passengers, or to ensure that fares are reasonable. However, they can harm passengers by reducing availability, increasing waiting times, and reducing the scope for downward competitive pressure on fares.”

Most licensing authorities do not impose quantity restrictions. The department regards that as best practice. Where restrictions are imposed, the department would urge that the matter should be regularly reviewed. The matter should be approached in terms of the interests of the travelling public:

- What benefits or disadvantages arise for them because of the continuation of controls?
- What benefits or disadvantages would result for the public if the controls were removed?

- Is there evidence that removal of the controls would result in a deterioration in the amount or quality of taxi service provision?
- Are there alternative ways in which the issue could be addressed?

If alternative measures could be used to achieve the same effect, then the department believes these should be used in preference to quantity restrictions.

It has been observed that where quantity restrictions are imposed, vehicle licence plates command a premium, often of tens of thousands of pounds. This indicates that there are people who want to enter the taxi market and provide a service to the public, but who are being prevented from doing so by the quantity restrictions.

9.3 Demand surveys

If a licensing authority does nonetheless take the view that a quantity restriction can be justified in principle, there remains the question of the level at which it should be set, bearing in mind the need to demonstrate that there is no significant unmet demand. This issue is usually addressed by means of a survey. It will be necessary for the licensing authority to carry out a survey sufficiently frequently to be able to respond to any challenge to the satisfaction of a court. To assist in the inclusion of the taxi and private hire vehicle sector in Local Transport Plans these surveys should, where possible, follow the cycle of their production but should be undertaken at least every 5 years.

The following points should be considered when conducting a survey on quantity restrictions:

- waiting time at ranks
- waiting time for street hailing
- waiting time for telephone/online/app engagement
- latent demand (those that would choose to travel by taxi but do not due to excessive waiting times) peak demand (the most popular times for consumers to use taxis should not be discounted as atypical)
- assessments should consider whether the demand for WAVs has been met

The financing of demand surveys should be paid for by the local taxi trade through general revenues from licence fees. Other funding arrangements may call in to question the impartiality and objectivity of the survey process.

9.4 Consultation on quantity restrictions

As well as statistical demand surveys, assessment of quantity restrictions should include consultation with all those concerned, including user groups. User groups that typically use taxis (and/or private hire vehicles) the most include people with mobility difficulties, women, older people and those without access to a car. The views of the retail and hospitality sector (including hoteliers, operators of pubs and clubs and visitor attractions) should also be sought and considered, recognising that most taxi (and private hire vehicle) journeys are for leisure and shopping purposes.

The role taxis can play in dispersing the public that have enjoyed the night-time economy should not be ignored. Alongside pre-booked private hire vehicles, taxis may be the only means by which people can return home. Excessive waits for vehicles may lead to conflict among passengers or the increased use of unlicensed, unvetted and uninsured drivers and vehicles, both of which may then result in increased call upon police resources: they should therefore be consulted on any restrictions.

All local transport plans are expected to promote the use of active or public transport - taxis are frequently used for the 'first and last mile' of longer journeys that could be made using public transport. The views of the providers of other transport modes (such as train operators) should also be sought and considered if a quantity restriction is to be imposed.

All the evidence gathered in a survey should be published, together with an explanation of what conclusions have been drawn from it and why. If quantity restrictions are to be continued, their benefits to consumers and the reason for the level at which the number is set should be set out.

9.5 Reviewing quantity restrictions

The department's view is that licensing authorities that elect to restrict taxi licences should review this decision and, if the policy continues, the quantity at least every 5 years and aligned to the production of local transport plans where possible. The department also expects the justification for any policy of quantity restrictions to be included in the local transport plan process where this is their responsibility. Licensing authorities should consider the following questions when considering quantity controls.

Have you considered the government's view that quantity controls should be removed unless a specific case that such controls benefit the consumer can be

made?

Questions relating to the policy of controlling numbers

- Have you recently reviewed the need for your policy of quantity controls?
- What form did the review of your policy of quantity controls take?
- Who was involved in the review?
- What decision was reached about retaining or removing quantity controls?
- Are you satisfied that your policy justifies restricting entry to the trade?
- Are you satisfied that quantity controls do not:
 - reduce the availability of taxis
 - increase waiting times for consumers
 - reduce choice and safety for consumers
- What special circumstances justify retention of quantity controls?
- How does your policy benefit consumers, particularly in remote rural areas?
- How does your policy benefit the trade?
- If you have an accessibility policy, how does this fit with restricting taxi licences?

Questions relating to setting the number of taxi licences

- When last did you assess unmet demand?
- How is your taxi limit assessed?
- Have you considered latent demand, i.e. potential consumers who would use taxis if more were available, but currently do not?
- Are you satisfied that your limit is set at the correct level?
- How does the need for adequate taxi ranks affect your policy of quantity controls?

Questions relating to consultation and other public transport service provision

When consulting, have you included:

- those working in the market
- consumer and passenger (including disabled) groups
- groups which represent those passengers with special needs, children and other vulnerable groups
- local interest groups, e.g. hospitals or visitor attractions
- the police

- a wide range of transport stakeholders e.g. rail/bus/coach providers and traffic
- managers

Do you receive representations about taxi availability?

What is the level of service currently available to consumers (including other public transport modes)?

10. Taxi fare rates

10.1 Legal powers

Licensing authorities have the power to set maximum taxi fares for journeys within their area, and most do so. There is no power to set fares for private hire vehicles. Unlike most licensing functions, the setting of fares is an executive function, not a council function.

10.2 Setting taxi fare rates

Maximum fare rates should be designed with a view to practicality and reviewed regularly, including any variability of the fare rates dependent on time of day or day of the week. Authorities should consider adopting a simple formula for deciding on fare changes as this will increase understanding and improve the transparency of the process for passengers. The Department recommends that in reviewing fare rates, authorities should pay particular regard to the needs of the travelling public, with reference both to what it is reasonable to expect people to pay but also to the need to give taxi drivers the ability to earn a sufficient income and so incentivise them to provide a service when it is needed. There is likely to be a case for higher fare tariffs at times of higher demand to encourage more drivers to make themselves available or when the journeys are required at anti-social times.

To ensure that taxi tariffs reflect the costs of the trade they should be reviewed following significant changes in licensing fees and other major costs such as fuel. Regular reviews will assist drivers in maintaining their earnings and so continue to attract those seeking to become taxi drivers and provide existing licensees with



Guidance

Regulation of taxis and private hire vehicles: understanding the impact on competition

Published 12 July 2017

Contents

About the Competition and Markets Authority

The purpose of this guidance note

Competition and regulation

Background

CMA view of taxi and private hire trades

Licensing conditions that can have negative impacts on consumers

Examples of conditions that may harm the interests of passengers

What to do if you are considering reviewing your licensing regime



© Crown copyright 2017

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3 or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gov.uk.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at <https://www.gov.uk/government/publications/private-hire-and-hackney-carriage-licensing-open-letter-to-local-authorities/regulation-of-taxis-and-private-hire-vehicles-understanding-the-impact-on-competition>

About the Competition and Markets Authority

On 1 April 2014, the Competition and Markets Authority (CMA) became the UK's lead competition and consumer body. The CMA brought together the competition and consumer protection functions of the Office of Fair Trading and the Competition Commission.

The CMA has a statutory duty to seek to promote competition for the benefit of consumers. The CMA has an advocacy function, which involves giving information or advice to public authorities on the impact on competition of public policy.

As part of this work, HM Treasury has asked the CMA to consider how local authorities can support competition, and to challenge them when they do not.

The purpose of this guidance note

As part of our work on local authorities' impact on competition, the CMA has undertaken a review of taxi and private hire vehicle (PHV) licensing conditions.

The CMA recognises that taxi and PHV licensing conditions play a crucial role in ensuring the safety of passengers. Regulations on vehicle safety and driver suitability are clearly necessary to ensure safety.

This guide is designed to help local authorities understand the impact some licensing conditions can have on consumers and hence help to reach the right balance between ensuring passenger safety and avoiding consumers having to face higher prices or lower service quality.

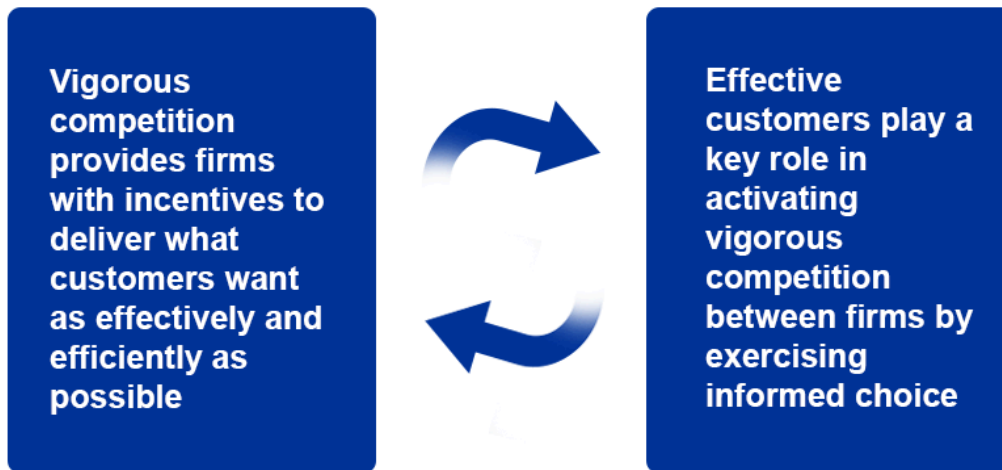
The CMA has found that some licensing conditions are likely to restrict or distort competition in ways that may result in higher prices and/or worse service for consumers.

The CMA recognises that licensing authorities face competing pressures and tough decisions over how to strike the right balance.

The CMA's short report on the impact that licensing conditions can have on consumer welfare is available on request (advocacy@cma.gov.uk).

Competition and regulation

Competition is a process of rivalry between firms that benefits consumers. Competition can exert downward pressure on prices and upward pressure on quality, because greater competition means that firms must fight harder to attract and retain customers.



Effective and fair competition is underpinned by competition and consumer protection laws which govern how businesses can compete.

Government may impose additional regulations in a market where, for example, there are concerns around consumer safety.

The CMA's view is that competition should only be restricted by regulatory rules to the extent that is necessary to protect consumers.

This guide illustrates how some licensing conditions can affect consumers' interests, in order to help ensure conditions are targeted and proportionate.

Background

The CMA's understanding of the hackney carriage and PHV markets is informed by the OFT's 2003 market study and the subsequent impact evaluation in 2007, the examination of a merger between private hire

operators in Sheffield and our recent evidence review and analysis of licensing conditions. We also considered the 2014 Law Commission report on Taxi and Private Hire services.

The OFT's 2003 market study found, among other things, that:

- Passengers are in a relatively weak position to compare offers and negotiate prices in the hail and rank (taxi) trade. There is therefore a need for fare regulation of taxis. This also provides a justification for greater regulation of service standards of taxis compared to PHVs.
- Quantity regulations on taxis are not necessary to ensure either the safety or quality of taxis, or that passengers are charged reasonable fares. However, quantity regulations may damage consumer welfare by reducing the availability and increasing waiting times for taxis.

As part of our review of licensing conditions, the CMA has written to several licensing authorities, including [Transport for London](https://www.gov.uk/government/publications/cmas-response-to-tfls-private-hire-regulations-proposals) (<https://www.gov.uk/government/publications/cmas-response-to-tfls-private-hire-regulations-proposals>) and [Sheffield City Council](https://www.gov.uk/government/publications/taxi-and-private-hire-regulation-cma-letter-to-city-of-sheffield) (<https://www.gov.uk/government/publications/taxi-and-private-hire-regulation-cma-letter-to-city-of-sheffield>), to highlight where conditions may restrict competition and harm consumer welfare.

CMA view of taxi and private hire trades

The 2 tier system

Taxis' right to ply for hire necessitates different regulation for taxis and PHVs. Passengers are in a weak position to judge the quality or to compare prices of taxis; it is therefore necessary to regulate taxi fares (and service standards).

The scope for competition between taxis and PHVs, increasing with the emergence of app-based models, can deliver benefits for passengers. To facilitate this, regulatory distinctions between taxis and PHVs should not go beyond what is required by legislation or necessary to protect passengers.

Private hire

Passengers are in a better position to assess the quality and compare the prices of private hire operators than they are with taxis. Competition can generally work well between private hire operators.

There is a need to ensure passenger safety, but licensing conditions that go beyond this may reduce passenger choice, and increase cost and prices.

Some conditions may also create barriers to entry, reducing the number of operators, and hence reducing competitive pressure on operators to reduce prices or improve service quality.

Hackney carriages

As noted above, there is a need to regulate the prices and service standards of taxis, owing to their unique right to ply for hire. There is also a need, as with the private hire trade, to ensure the safety of passengers.

Quantity restrictions are not necessary to ensure the safety of passengers, or to ensure that fares are reasonable. However, they can harm passengers by reducing availability, increasing waiting times, and reducing the scope for downward competitive pressure on fares.

The CMA takes the view that concerns around congestion, air pollution and enforcement costs can generally be addressed through measures less harmful to passengers' interests than quantity restrictions.

If the removal of quantity restrictions leads to increased waiting times for taxi drivers between journeys, this indicates that price competition which would benefit passengers is not occurring. Licensing authorities should monitor waiting times and consider adjusting the regulated fare cap to address mismatches between supply and demand. Addressing such mismatches is likely to benefit passengers.

Licensing conditions that can have negative impacts on consumers

The CMA's [competition impact assessment guidelines](https://www.gov.uk/government/publications/competition-impact-assessment-guidelines-for-policymakers) (<https://www.gov.uk/government/publications/competition-impact-assessment-guidelines-for-policymakers>) can help those designing policy or regulations to assess their impact on competition and the interests of consumers.

These guidelines contain 4 tests which help policy makers assess whether their proposals will limit competition:

1. Will the measure directly or indirectly limit the number or range of suppliers?
2. Will the measure limit the ability of suppliers to compete?
3. Will the measure limit suppliers' incentives to compete?
4. Will the measure limit the choices and information available to consumers?

Considering these questions will help ensure local authorities are aware of the restrictions they may be introducing on competition and may encourage them to consider alternative courses of action where possible.

Examples of conditions that may harm the interests of passengers

Competition impact assessment test	Examples	Nature of harm
1. Limiting the number or range of suppliers	Quantity restrictions on taxis	Quantity restrictions may cause harm to passengers through reduced availability, increased waiting times, reduced scope for downward competitive pressure on fares and reduced choice. They also may increase the risk to passenger safety if they encourage the use of illegal, unlicensed drivers and vehicles.
1. Limiting the number or range of suppliers	Restricting market development by: - Banning drivers from working for more than one operator - Conditions on vehicle signage that make it difficult for drivers to work for	Such conditions make it difficult for firms to enter the market or expand by recruiting existing drivers on a part time basis. They may also encourage drivers to move to the largest operator. This may reduce the number of firms, thereby reducing competitive pressure to

Competition impact assessment test

Examples

Nature of harm

	more than one operator	reduce prices or improve service quality.
2 & 3. Limiting the ability and incentives of suppliers to compete	<p>Service provision is over regulated beyond passenger needs/wants:</p> <ul style="list-style-type: none"> - Compulsory landline helpline, sometimes having to be based within the authority - Minimum number of days advance booking function - Extensive navigational skills assessments for PHV drivers 	<p>Private hire is a market where passengers are likely to be in a good position to trade off price and quality levels that best suit their needs. If sufficient numbers of passengers desire a high service standard, then it is likely that some operators will offer it.</p> <p>Over-regulation of service standards is likely to mean higher costs and therefore higher fares for passengers, especially those who would most value a low cost service. It may also create barriers to entry, thereby reducing the number of operators, and hence competitive pressure between them.</p>
2 & 3. Limiting the ability and incentives of suppliers to compete	<p>Introducing restrictions on business models or unnecessary distinction between conditions imposed on PHVs and taxis:</p> <ul style="list-style-type: none"> - Prescribing the method in which pre-booked fares should be recorded (eg written records) - Restrictions on advertising products on vehicles - Restrictions on where PHVs can park - Requirement to 	<p>Restrictions on how PHV operators must operate are likely to reduce innovation that could reduce costs or improve the quality of service for passengers.</p> <p>Conditions that apply to PHV operators and not to taxis may increase, relatively, PHV operating costs. Such conditions may therefore make it harder for PHV operators to attract passengers who might otherwise use taxis, potentially resulting in passengers paying higher fares or receiving lower service quality.</p>

Competition impact assessment test	Examples	Nature of harm
	specify exact fare in advance - Approval required for any changes to operating model	
4. Limiting choices and information available to consumers	Banning aspects of service valued by passengers: - Displays of vehicle availability in-app - Compulsory minimum waiting times between booking and journey start	Banning aspects of service that passengers might find valuable is likely to directly harm their welfare.

What to do if you are considering reviewing your licensing regime

Ensure your proposed measures are necessary to achieve your objective(s).

Consider the questions set out in the CMA's [competition impact assessment guidelines](https://www.gov.uk/government/publications/competition-impact-assessment-guidelines-for-policymakers) (<https://www.gov.uk/government/publications/competition-impact-assessment-guidelines-for-policymakers>).

Where measures are likely to restrict competition and harm consumer welfare, consider whether alternative, less-restrictive measures could be employed to achieve your objective(s) and if not, whether the objectives really do necessitate the restriction.

The CMA's short report which contains further detail and information on our view on taxi and PHV licensing conditions is available on request.

If you would like to discuss these issues, including issues not addressed in this review, you can contact advocacy@cma.gov.uk for further advice.

OGI



All content is available under the Open Government Licence v3.0, except where otherwise stated

© Crown copyright

Hackney Carriage Quantity Control Public Consultation Analysis

<https://consultation.oxford.gov.uk/community-services/hackney-carriage-quantity-control>

The activity ran from 04/09/2024 to 27/11/2024

*Total responses to this survey: **343***

*Total responses used for analysis: **223***

Overview	2
Data integrity analysis.....	3
Consultation result analysis	5
Questions used for data analysis and equality impact assessment.....	12
Consultation data full export	15

Overview

Oxford City Council is reviewing its Hackney Carriage Vehicles (Taxis / Black Cabs) quantity control policy. This is a statutory requirement.

There are currently 107 licenses for Hackney Carriage Vehicles (Taxis / Black Cabs) in Oxford.

The Council seeks the views of the public, as to availability of taxis and choice when travelling within the district.

Definitions:

Hackney Carriage Vehicle (HCV): (Taxi/Black Cab) can be flagged in the street or be available for hire on a taxi rank without a booking. These are subject to the policy restricting numbers (107).

Private Hire Vehicle (mini cabs): requires a pre-arranged booking (usually done via phone or app). The number of these is not restricted.

Why your views matter

Your view will assist the Council in answering the following three questions:

1. What benefits or disadvantages arise for the travelling public as a result of the continuation of Hackney Carriage Vehicle quantity controls? and;
2. What benefits or disadvantages would result for the travelling public if the Hackney Carriage Vehicle quantity controls were removed? and;
3. Is there evidence that removal of the Hackney Carriage Vehicle quantity controls would result in a deterioration in the amount or quality of taxi service provision?

Data integrity analysis

A total of 173 responses have been flagged as being submitted from only 31 unique IP addresses.

It is understood that submissions from the same source may be legitimate in households or workplaces where multiple people use the same internet connection and devices. However, instances of multiple submissions from the same source may indicate an attempt to sway the consultation results.

Rather than discounting these responses, they have been further scrutinised for legitimacy as the Council seeks fairness, transparency, and a has a due diligence to ensure the consultation results accurately reflect the community's views.

Scrutiny methodology

Step 1: 173 flagged responses checked.

Identify instances of 2 responses from 1 unique IP address. This is reasonable duplication, even if the content is identical.

Step 1 result: 30 responses from 15 IP addresses. Retain these 30 responses, no further checks applied. Continue checking remaining 143 responses.

Step 2: 143 responses checked.

Identify any of the duplicate sources that have utilised a different browser or device for submission. This is evidence of different users submitting from the same location.

Step 2 result: 12 responses from 3 IP addresses. Retain these 12 responses, no further checks applied. Continue checking remaining 131 responses.

Step 3: 131 responses checked.

Identify if any of the duplicate responses have identical or highly similar responses for questions 5 – 8 (questions that present individual views). This could be evidence of an attempt to sway the consultation results.

Step 3 result: 120 responses from 11 IP address. Retain these 11 varied responses, no further checks applied. Continue checking remaining 120 responses.

Step 4: 120 responses checked.

Identify if any of the responses were submitted with rapid or grouped date and time stamps. This could indicate a single user submitted multiple responses to sway the consultation results.

Step 4 result: All remaining 120 responses from 11 IP addresses have evidence of rapid or grouped submission. These 120 responses were discounted.

Data integrity analysis outcome

223 responses retained for analysis.

120 responses submitted from 11 unique IP addresses removed from analysis as they meet the following criteria:

- Three or more responses from a single IP address.
- Shared the same browser and device.
- Identical or highly similar in response for questions 5 – 8.
- Were submitted with rapid or grouped date and time stamps.

Consultation result analysis

The results have been presented in three ways to assist the General Purposes Licensing Committee.

1. Views of all responders.
2. Views of travelling public.
3. Views of licence holders.

Question 1: In what capacity are you responding?

All

Option	Total	Percent
Hackney Carriage Driver	25	11.21%
Private Hire Driver	9	4.04%
Private Hire Operator	2	0.90%
Hackney or Private Hire Driver licenced by another authority	4	1.79%
Student	10	4.48%
Local Resident	116	52.02%
Oxford Business Owner	20	8.97%
I work in Oxford	22	9.87%
Other Member of the public	14	6.28%
Not Answered	1	0.45%

Note: 40 of the responses were from the current licenced trade (Hackney Carriage Driver, Private Hire Driver, Private Hire Operator and Hackney or Private Hire Driver licenced by another authority), this is 17.94% of all responses.

Question 2: How often do you hire HCVs (Taxi/Black Cabs) or Private Hire Vehicles (mini-cabs) during the day 5am – 5pm?

All

Option	Total	Percent
Daily	56	25.11%
Weekly	61	27.35%
Monthly	28	12.56%
Less than once a month	42	18.83%
Never	33	14.80%
Not Answered	3	1.35%

Question 3: How often do you hire HCVs (Taxi/Black Cabs) or Private Hire Vehicles (mini-cabs) during the evening 5pm – 5am?

All

Option	Total	Percent
Daily	47	21.08%
Weekly	68	30.49%
Monthly	28	12.56%

Less than once a month	50	22.42%
Never	27	12.11%
Not Answered	3	1.35%

Note: The total number of responses meeting the criteria of 'The travelling public' (Daily, Weekly, Monthly and Less than once a month) is 196 which is 87.89% of all responses.

Question 4: How do you normally hire a HCV (Taxi/Black Cabs)?

All

Option	Total	Percent
At a taxi rank	88	39.46%
Hail in the street	56	25.11%
Use an App	39	17.49%
N/A	35	15.70%
Not Answered	5	2.24%

Travelling public

Option	Total	Percent
At a taxi rank	86	43.88%
Hail in the street	54	27.55%
Use an App	38	19.39%
N/A	15	7.65%
Not Answered	3	1.53%

Licensed trade

Option	Total	Percent
At a taxi rank	17	42.50%
Hail in the street	7	17.50%
Use an App	4	10.00%
N/A	12	30.00%
Not Answered	0	0.00%

Question 5: Do you think there are enough HCVs (Taxis/Black Cabs) available to flag down in Oxford during the day 5am – 5pm? *Note that this does not include pre-booked private hire vehicles

All

Option	Total	Percent
Yes	153	68.61%
No	66	29.60%
Not Answered	4	1.79%

Travelling public

Option	Total	Percent
Yes	131	66.84%
No	62	31.63%
Not Answered	3	1.53%

Licenced trade

Option	Total	Percent
Yes	25	62.50%
No	15	37.50%
Not Answered	0	0.00%

Question 6: Do you think there are enough HCVs (Taxis/Black Cabs) available to flag down in Oxford during the evening 5pm – 5am? *Note that this does not include pre-booked private hire vehicles

All

Option	Total	Percent
Yes	145	65.02%
No	72	32.29%
Not Answered	6	2.69%

Travelling public

Option	Total	Percent
Yes	123	62.76%
No	68	34.69%
Not Answered	5	2.55%

Licenced trade

Option	Total	Percent
Yes	24	60.00%
No	15	37.50%
Not Answered	1	2.50%

Question 7: Do you think waiting times to hire or flag down an HCV (Taxi /Black Cab) during the day 5am – 5pm are?

All

Option	Total	Percent
Too long	33	14.80%
Average	57	25.56%
Always available	116	52.02%
Almost never available	13	5.83%

Not Answered	4	1.79%
--------------	---	-------

Travelling public

Option	Total	Percent
Too long	31	15.82%
Average	45	22.96%
Always available	106	54.08%
Almost never available	12	6.12%
Not Answered	2	1.02%

Licenced trade

Option	Total	Percent
Too long	7	17.50%
Average	11	27.50%
Always available	18	45.00%
Almost never available	4	10.00%
Not Answered	0	0.00%

Question 8: Do you think waiting times to hire or flag down an HCV (Taxi /Black Cab) during the evening 5pm – 5am are?

All

Option	Total	Percent
Too long	48	21.52%
Average	54	24.22%
Always available	111	49.78%
Almost never available	7	3.14%
Not Answered	3	1.35%

Travelling public

Option	Total	Percent
Too long	46	23.47%
Average	41	20.92%
Always available	102	52.04%
Almost never available	6	3.06%
Not Answered	1	0.51%

Licenced trade

Option	Total	Percent
Too long	11	27.50%
Average	10	25.00%
Always available	17	42.50%
Almost never available	2	5.00%

Not Answered	0	0.00%
--------------	---	-------

Question 9: Have you ever given up trying to hail down an HCV (Taxi /Black Cab) or stood waiting at a taxi rank in Oxford, and made alternative arrangements for a journey during the day 5am – 5pm?

All

Option	Total	Percent
Yes	59	26.46%
No	154	69.06%
Not Answered	10	4.48%

Travelling public

Option	Total	Percent
Yes	56	28.57%
No	135	68.88%
Not Answered	5	2.55%

Licenced trade

Option	Total	Percent
Yes	13	32.50%
No	24	60.00%
Not Answered	3	7.50%

Question 10: Have you ever given up trying to hail down an HCV (Taxi /Black Cab) or stood waiting at a taxi rank in Oxford, and made alternative arrangements for a journey during the evening 5pm – 5am?

All

Option	Total	Percent
Yes	75	33.63%
No	141	63.23%
Not Answered	7	3.14%

Travelling public

Option	Total	Percent
Yes	71	36.22%
No	123	62.76%
Not Answered	2	1.02%

Licenced trade

Option	Total	Percent
--------	-------	---------

Yes	17	42.50%
No	20	50.00%
Not Answered	3	7.50%

Question 11: Do you think increasing the number of licenced wheelchair accessible vehicles will have a positive impact on the public?

All

Option	Total	Percent
Yes	91	40.81%
No	124	55.61%
Not Answered	8	3.59%

Travelling public

Option	Total	Percent
Yes	80	40.82%
No	110	56.12%
Not Answered	6	3.06%

Licenced trade

Option	Total	Percent
Yes	22	55.00%
No	18	45.00%
Not Answered	0	0.00%

Question 12: Do you think increasing the number of licensed Ultra Low Emission Vehicles will have a positive impact on the environment and the general public?

All

Option	Total	Percent
Yes	93	41.70%
No	122	54.71%
Not Answered	8	3.59%

Travelling public

Option	Total	Percent
Yes	82	41.84%
No	109	55.61%
Not Answered	5	2.55%

Licenced trade

Option	Total	Percent
Yes	22	55.00%

No	17	42.50%
Not Answered	1	2.50%

Question 13: If more HCV (Taxi/Black Cab) licences were made available, would you apply for one?

All

Option	Total	Percent
Yes	41	18.39%
No	174	78.03%
Not Answered	8	3.59%

Travelling public

Option	Total	Percent
Yes	36	18.37%
No	154	78.57%
Not Answered	6	3.06%

Licensed trade

Option	Total	Percent
Yes	21	52.50%
No	19	47.50%
Not Answered	0	0.00%

Questions used for data analysis and equality impact assessment.

Question 14: Please provide your postcode below

There were 192 responses to this part of the consultation.

Question 15: Which age bracket do you fall into?

Option	Total	Percent
Under 16	0	0.00%
16-19	2	0.90%
20-24	13	5.83%
25-34	35	15.70%
35-44	47	21.08%
45-54	46	20.63%
55-59	24	10.76%
60-64	10	4.48%
65-74	12	5.38%
75+	6	2.69%
Prefer not to say	19	8.52%
Not Answered	9	4.04%

Question 16: Which of the following best describes how you think of yourself?

Option	Total	Percent
Male	133	59.64%
Female	54	24.22%
Prefer not to state	23	10.31%
Prefer to self describe - please specify below	0	0.00%
Not Answered	13	5.83%

Question 17: Is the gender you identify with the same as your sex registered at birth?

Option	Total	Percent
Yes	179	80.27%
No	4	1.79%
Prefer not to state	25	11.21%
Not Answered	15	6.73%

Question 18: Which of the following best describes your sexual orientation?

Option	Total	Percent
Straight/Heterosexual	152	68.16%
Gay or Lesbian	5	2.24%
Bisexual	4	1.79%
Prefer not to state	41	18.39%
Other sexual orientation - please specify below	0	0.00%
Not Answered	21	9.42%

Question 19: Which of the following best describes your ethnicity?

Option	Total	Percent
White - English/Welsh/Scottish/Northern Irish/British	82	36.77%
White - Irish	5	2.24%
White - Gypsy or Irish Traveller	0	0.00%
White - Other European	10	4.48%
Any other White background - please specify below	2	0.90%
Black or Black British - African	1	0.45%
Black or Black British - Somali	0	0.00%
Black or Black British - Caribbean	2	0.90%
Any other Black background - please specify below	0	0.00%
Asian or Asian British - Indian	4	1.79%
Asian or Asian British - Pakistani	50	22.42%
Asian or Asian British - Bangladeshi	1	0.45%
Asian or Asian British - Chinese	0	0.00%
Any other Asian background - please specify below	1	0.45%
Mixed/multiple ethnic groups - White and Black Caribbean	2	0.90%
Mixed/multiple ethnic groups - White and Black African	0	0.00%
Mixed/multiple ethnic groups - White and Asian	2	0.90%
Any other mixed background - please specify below	0	0.00%
Other ethnic group - Moroccan Arab	2	0.90%
Other ethnic group - Other Arab	2	0.90%
Other ethnic group - Filipino	0	0.00%
Prefer not to state	33	14.80%
Any other ethnic group - please specify below	1	0.45%
Not Answered	23	10.31%

Question 20: What is your religion or belief?

Option	Total	Percent
Christian	37	16.59%
Muslim	56	25.11%
Jewish	4	1.79%
Buddhist	1	0.45%
Hindu	1	0.45%
Sikh	2	0.90%
No religion or belief	46	20.63%

Prefer not to state	46	20.63%
Other religion - please specify below	5	2.24%
Not Answered	25	11.21%

Question 21: Do you have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more?

Option	Total	Percent
Yes, limited a lot	9	4.04%
Yes, limited a little	16	7.17%
No	141	63.23%
Prefer not to say	36	16.14%
Not Answered	21	9.42%

Question 22: What is your current relationship status?

Option	Total	Percent
Married	113	50.67%
In a civil partnership	4	1.79%
Single	35	15.70%
In a committed relationship (not married or in a civil partnership)	14	6.28%
Divorced	3	1.35%
Widowed	2	0.90%
Prefer not to say	34	15.25%
Not Answered	18	8.07%

Question 23: Which of the following best describes your current situation regarding pregnancy or maternity leave?

Option	Total	Percent
I am currently pregnant	1	0.45%
I am on maternity leave	0	0.00%
I have recently returned from maternity leave	1	0.45%
I plan to become pregnant	2	0.90%
I am not pregnant and do not plan to be	18	8.07%
Not applicable	131	58.74%
Prefer not to say	45	20.18%
Not Answered	25	11.21%

Consultation data full export

This includes responses removed through integrity analysis.

HCV Quantity Control Policy Review

Overview of Taxi Ranks

Oxford City Taxi Ranks			
Location	Available spaces	Time restricted	Year adopted
St Giles	20		1969
Queen Street / Carfax	3	18:30 – 08:00	1984
Gloucester Green	12		1984
The Plain	3	20:00 – 06:00	1984
Barns Road	4		1984
Oakthorp Road	2		1985
Between Towns Road	2		2008
London Road South	1		2010
London Road North	1		2010
Old Greyfriars Street	7		2017
Little Clarendon Street	2	18:30 – 08:00	2019
New Road	2		2019
High Street	2	08:00 – 18:30	2020
Park End Street	3	23:00 – 03:00	2022
JR hospital	2		2024
Cowley Road	2		-
Oxford Train Station	No limit (approximately 16 currently)		unadopted

Hackney Carriages do not solely rely on ranks for picking up passengers, they can also ply for hire within the Oxford City district and operate pre-booked journeys.

11th January 2025

Dear all on the General Purpose Licensing Committee (GPLC),

It was an pleasure to meet some of you at the Lord Mayor's and Councillors Christmas reception where I had a brief opportunity to touch upon some of the issues impacting the Oxford Hackney Carriage trade.

I believe it is vital that I send this representation and highlight some of the issues the taxi trade is experiencing, especially as the GPLC will soon be discussing the Quantity control report.

I will try to keep this brief, however you will appreciate that this information is so vital and everyone needs a clear understanding of our problems.

Introduction

Like many other cities, the Hackney carriage trade of Oxford is regulated. The previous met/unmet demand survey carried out had concluded that there was no unmet demand for Hackney carriages in Oxford and therefore the number of licenses have remained at 107 which has been the case for the past 20 years.

When you look at the the trade as a whole and how overtime certain issues have impacted the trade (which I will explain further), our work has deteriorated significantly and more taxis are now waiting longer on the taxi ranks for longer periods.

The taxi ranks can only accommodate so many taxis before an overspill of the ranks which means that some taxis don't have a place to queue and are forced to drive around the city looking to get hired, which in current circumstances and the availability of apps, is fruitless.

Another important development is the disappearance of the night time economy as we see the nightclubs closing their doors permanently in Oxford. Closures of clubs are happening nationally at an alarming rate of an average of 10 closures a month according to the Night Time Industries Association (NTIA). This is impacting our night drivers who aren't seeing the night revellers travelling into Oxford on Friday or Saturday evenings anymore. Therefore you will see a long queue of drivers parked on Queen street in the evenings, especially on Friday or Saturday nights waiting to be hired. But the waiting time has increased significantly as mentioned.

We continue to battle with traffic in Oxford. The access through the roads with ANPR cameras is welcome but the closure of Botley Road is still causing our drivers significant issues. As a result, the closure is pushing the general traffic onto the Abingdon Road, the north of Oxford and Iffley Road. No update is provided on when the Botley Road will open. We have lost almost all of our passengers going west due to the closure of Botley Road.

A two-tier system of Hackney carriage and Private hire and the Deregulation act

Oxford city has a well established two-tier system of Hackney carriages and Private hire. The Hackney carriages have most probably been around in Oxford for over 100 years whilst the private hires around 40 years. Both have served our city very well providing the public of Oxford and far beyond an efficient service when required. The 2 tier system promotes consumer choice and the range of different services between Private hire and Hackney carriage. This has worked very well as mentioned.

However, since the introduction of the Deregulation act in 2015, the waters are muddied and have created some significant problems for all concerned. Taxis licensed as Hackney carriages in towns outside of Oxford, have taken advantage of the Deregulation act which has created a loophole for drivers licensed elsewhere but come and work the majority of the time in Oxford. We in Oxford refer to them as Out of Town Taxis (OOTTs). There are many issues created because of this 'cross border' work but the 2 main ones are an increase in the number vehicles on our roads in Oxford and the complications created in terms of enforcement for the relevant licensing authorities.

Another important point to note is that those OOTTs that come and work in Oxford make themselves unavailable for hire in their own towns/cities and their local taxi ranks and the general public in those areas are deprived of local taxis. Oxford does not benefit in any way from OOTTs and our licensing department need to take robust action to limit and put a stop the OOTTs from coming and working in Oxford.

Oxford is unable to bear the burden of increased levels of traffic, and OOTTs are fuelling the fire. Especially as explained above, Oxford has plans in place to reduce the traffic, reduce the level of harmful emissions and create a safe environment for all with a Vision Zero strategy.

Emissions standards policy and the transition of diesel taxis to electric.

As you're all aware, the trade is required to transition from the current diesel taxis to electric taxis by 2026. It's very unfortunate that the trade wasn't given an extension to the 2026 deadline (ideally a 1 year extension till 2027) to change to electric taxis as the trade has and continues to face enormous challenges since the onset of Covid.

Our working conditions haven't improved and the trade is still experiencing financial difficulties mainly because the recovery from Covid which has impacted everyone financially. The travelling public coming to Oxford has reduced drastically and the majority of people are working from home.

The owners of the electric taxis continue to face challenges as the servicing regime including the warranty work at the ODS (Marsh Road) is still not adequate. Owners of the electric taxis therefore continue to travel out of Oxford to LEVC dealerships to maintain their taxis. The other issue that I mentioned in our discussion is the problem of 'extended warranty' which owners purchase after the manufacturers 5 year warranty expires on the electric taxi.

The ODS currently is unable to carry out any work on a cab with an extended warranty. This is a massive issue considering that the majority of drivers are unable to afford a brand-new cab (cost is £72,000 cash price or £90,000 if purchased on a loan agreement) and will therefore purchase a used taxi which will generally be a 5 year old one. Or owners may purchase 3-4 year old taxi with a year or 2 remaining before an extended warranty is required. A used taxi may be purchased with an extended warranty but as explained, currently those owners aren't able to have warranty work carried out on their taxi in Oxford.

Working conditions and taxi ranks

Although 24 hour access through the Westgate link route is welcome, the trade continues to struggle with the fact that we don't have a 24 hour taxi rank in the centre of Oxford being Queen Street/Carfax which is a focal point in our city.

With 107 licensed Hackney carriages, to accommodate them all in Oxford is a huge challenge. We only have two main ranks within the city centre during the daytime. One being the Oxford train station which the majority of drivers are forced to currently work from due to other daytime rank unavailability. The other main rank during the day is the Gloucester green taxi rank which can probably accommodate up to about 15 taxis maximum before an overspill onto Gloucester street.

The High Street taxi rank which can accommodate two taxis is in a problematic location as we have seen since its inception. The majority of the time we see delivery vehicles blocking the rank or if there are taxis parked on the rank then a larger vehicle will park in front of the rank obstructing the clear view of the taxis parked there. This therefore blocks passenger view of taxis parked on the rank.

As we have previously mentioned time and time again with the relevant authority/officers, we consider the best location for an additional daytime taxi rank in that vicinity to be on Queen street/Carfax for a maximum of three taxis during the day. This rank functions very well after 6:30 pm. Previously this was supported by our Licensing officers but no progress on the allocation of this rank has been made.

The trade needs to be supported and the members of the GLPC acknowledged this fact in a previous meeting held on 5th February 2024. But to date, no action has been taken to help the trade especially when you look at the fundamental issue which is rank allocation on Queen street/carfax. This is where drivers would benefit and it will be a game changer for the trade.

On a final important point on this, a recent joint strategy by County and City is looking at improving the quality of public spaces within the city centre. I recently had a meeting with Mr. Simon Taylor. It's very early days yet in the strategy but it was an opportunity for me to highlight the importance of having a daytime rank on Queen Street/Carfax. This is something that the GPLC and licensing need to be aware of and support the trade on.

Uber

Most if not all of you by now will be aware that Uber have been granted a license in Oxford. A very worrying development for us as a trade as the introduction of Uber will undoubtedly further impact our trade and serious issues will stem from this development.

We are required to make a back breaking investment and spend thousands of pounds in purchasing the electric taxi, whilst there's a possibility that uber will be allowed to operate unchecked bringing in drivers from other cities who will be driving vehicles costing a fraction of the price compared to what we are asked to fork out.

In other major cities where Uber operates, the local Hackney carriage trade has been impacted severely and drivers have left the trade. We've seen this happen in London and Birmingham to name just a couple. This is well documented.

Serious questions need to be asked here: What is the operational structure of Uber once drivers start to operate with them? Will drivers who operate for them be licensed elsewhere other than Oxford? Will there be a 'ring fence' to prevent the influx of drivers coming from other towns/cities and flooding Oxford?

Oxford is a small city and the introduction of uber will surely have a detrimental effect on the future strategies for Oxford in terms of traffic management/reduction, emissions reduction and vision zero.

Conclusion

For our small city, Oxford has two very professional and functional Taxi and private hire services. The Hackney carriage trade is well established and respected by the travelling public. We provide a professional service in and around the city centre and especially when operating from the taxi ranks. Those people who come off the trains hire us with confidence which includes passengers in wheelchairs, those with luggage or shopping.

We need to be supported and the most important way that this could be achieved is the allocation of a daytime rank on Queen Street/Carfax. In previous years we had a Sunday daytime rank there which functioned very well and drivers were able to make a living throughout the day in a visible location. Since the Sunday rank has been removed, it has taken away a chunk of our livelihood and made things difficult for drivers who are trying to make a living from other taxi ranks, one being in a hidden area on Gloucester Green and the other at the rail station away from the centre of Oxford.

Thank you for taking the time to read this representation.

Yours Sincerely,

Sajad Khan,
Secretary of Colta
(City of Oxford Licensed Taxicab Association, Est. 1952)

Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council’s **Public Sector Equality Duty (PSED) (Equality Act 2010)**.

The General PSED enables Oxford City Council to:

- a. **identify and remove discrimination,**
 - b. **identify ways to advance equality of opportunity,**
 - c. **foster good relations.**
2. **An EqIA must be done before making any decision(s)** that may have an impact on people and/or services that people use and depend on.
 3. An **EqIA form is one of many tools** that can simplify and structure your equalities assessment.
 4. We are passionate about equalities, and we highly recommend that **Corporate Management Team (CMT) reports and all projects must attach an EqIA.**

For questions, queries, and a chat about how to do your EqIA, please email your EDI officers:

1. Sobia Afridi- safриди@oxford.gov.uk

Please do refer to our [SharePoint Page](#) for support such as FAQs and Examples, etc.

A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. Age	6. Race & Ethnicity
2. Disability	7. Religion or Belief
3. Gender Reassignment	8. Sex
4. Marriage & Civil Partnership	9. Sexual Orientation
5. Pregnancy & Maternity	NEW- Socio-economic inequalities (voluntary adoption)

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.
7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	Name of activity being assessed. For example: -New policy, -Review of existing policy, -Changes in service(s), -New project(s), etc.	Review of Hackney Carriage Quantity Control Policy	2.	The implementation date of the activity under consideration:	10 th February 2025
3.	Directorate/Department(s):	General Licensing	4.	Service Area(s):	Community Safety
5.	Who is (are) the assessment lead(s): Please provide: -Name -Email address	Joshua Curnow jcurnow@oxford.gov.uk	6.	Contact details, in case there are queries: Please provide: -Name -Email address	Joshua Curnow jcurnow@oxford.gov.uk
7.	Is this a new or ongoing EqIA?	New <input checked="" type="checkbox"/> Extension to existing EqIA <input type="checkbox"/>	8.	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	
9.	Date this EqIA started:	10 th January 2025			
10.	Will this EqIA be attached to Corporate Management Team (CMT) reports/updates, which will be published online?	This EqIA will be attached to a report for the General Purposes Licensing Committee.	11.	Give a date (tentative or otherwise) when this assessment will be taken to the CMT.	10 th February 2025 (GPL committee)


Section 2: About the activity, change, or policy that is being assessed.

<p>12.</p>	<p>Type of activity being considered:</p> <p>Check the most appropriate.</p>	<input type="checkbox"/> Budget	<input type="checkbox"/> Decommissioning	<input type="checkbox"/> Commissioning	<input checked="" type="checkbox"/> Change to an existing activity.	
		<input type="checkbox"/> New Activity	<input type="checkbox"/> Others. Please specify:			
<p>13.</p>	<p>Which priority area(s) <u>within Oxford City Council's Corporate strategy (2024-2028)</u> does this activity fulfil?</p> <p>Please check as needed.</p>	<input type="checkbox"/> Good, affordable homes	<input checked="" type="checkbox"/> Strong, fair economy	<input checked="" type="checkbox"/> Thriving Communities	<input checked="" type="checkbox"/> Zero Carbon Oxford	<input type="checkbox"/> Well run council
<p>14.</p>	<p>Which priority area(s) within <u>Oxford City Council's Equality, Diversity & Inclusion Strategy (2022)</u> does this activity fulfil?</p> <p>Please check as needed.</p>	<input type="checkbox"/> Responsive services and customer care.	<input type="checkbox"/> Diverse and engaged workforce.	<input type="checkbox"/> Leadership & organisational commitment.	<input checked="" type="checkbox"/> Understanding and working with our communities.	
<p>15.</p>	<p>Outline the aims, objectives, & priorities of the activity being considered.</p>	<p>Review of the Hackney Carriage Quantity Control policy: The aim is for members of the General Purposes Licensing Committee to make an informed decision regarding the retention or removal of the Policy.</p> <p>The two potential outcomes of the policy review are likely to impact different characteristics protected under the equality act.</p>				

16.	<p>Please outline the consequences of not implementing this activity.</p> <p>For example,</p> <ul style="list-style-type: none"> -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, ... to name a few. 	<p>It is a requirement that the policy is reviewed regularly, by not implementing this activity, the council would not be fulfilling its requirements as a licensing authority.</p>

Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	<p>Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?</p> <p>Please provide details—</p> <ul style="list-style-type: none"> -when, -how many, and -the approach taken. 	<p>Public Consultation 4th September 2024 – 27th November 2024</p> <p>The consultation was focused on seeking views from relevant stakeholders such as the traveling public, residents, licensed trade, visitors, business owners and more.</p> <p>The views were sought to assist the General Purposes Licensing Committee in answering three questions:</p> <ol style="list-style-type: none"> 1. What benefits or disadvantages arise for the travelling public as a result of the continuation of Hackney Carriage Vehicle quantity controls? and; 2. What benefits or disadvantages would result for the travelling public if the Hackney Carriage Vehicle quantity controls were removed? and; 3. Is there evidence that removal of the Hackney Carriage Vehicle quantity controls would result in a deterioration in the amount or quality of taxi service provision? <p>The consultation yielded 343 responses (223 retained following data integrity analysis).</p>
-----	---	--

<p>18. List information and data used to understand who your residents or staff are and how they will be impacted.</p> <p>These could be- -third-party research, -census data, -legislation, -articles, -reports, -briefs.</p>	<ul style="list-style-type: none"> • Consultation results • Licensing data • Guidance from the Equality and Human Rights Commission • 2021 ONS Census Data • Equality Act 2010 • ‘Justfair’ Guidance regarding Socio-Economic Duty
<p>19. If you have not done any consultations or collected data & information, are you planning to do so in the future?</p> <p>Please list the details – -when, -with whom, and -how long will you collect the relevant data.</p>	<p>N/A</p> 

Section 4: Impact analysis.

<p>20. Who does the activity impact?</p> <p>Check as needed.</p> <p>The impact may be positive, negative or unknown.</p>	<p>Service Users</p>	<p>Yes <input checked="" type="checkbox"/></p>	<p>No <input type="checkbox"/></p>	<p>Don't Know <input type="checkbox"/></p>
	<p>Members of staff</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input checked="" type="checkbox"/></p>	<p>Don't Know <input type="checkbox"/></p>
	<p>General public</p>	<p>Yes <input checked="" type="checkbox"/></p>	<p>No <input type="checkbox"/></p>	<p>Don't Know <input type="checkbox"/></p>

	Partner / Community Organisation	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
	City Councillors	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't Know <input type="checkbox"/>
	Council suppliers and contractors	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't Know <input type="checkbox"/>

21. Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?

Check as needed and provide evidence-driven conclusions.

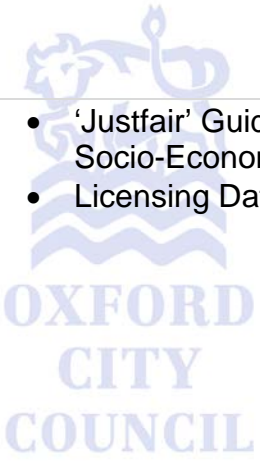
Good Practice is to keep it simple and list your, evidence, insights, and mitigations.

Protected Characteristic	Positive	Negative	Neutral	Don't know	Data/information/evidence supporting your assessment	Analysis & insight Mitigations
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> Recorded age of proprietors. Equality and Human Rights Commission: Age Discrimination Equality and Human Rights Commission: Direct and Indirect Discrimination 	<p>The majority of current Hackney Carriage Vehicle proprietors fall evenly into the three age brackets 40-49, 50-59, and 60-69.</p> <p>By restricting licences, those from other age brackets wanting to enter the trade could be indirectly prohibited in doing so. This particularly effects the younger generation of prospective licence holders who attempt to enter a market that has already reached its limit.</p>

						<p>Vehicle licences can be transferred, those that currently hold licences may sell their vehicles and transfer licences to those that fall in other age groups.</p> <p>Consultation responses:</p> <ul style="list-style-type: none"> • 21% 35-44 • 20% 45-54 • 16% 25-34
<p>Disability (Visible and invisible)</p> <p>71</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>www.oxford.gov.uk</p> <ul style="list-style-type: none"> • Department for Transport: guidance to local authorities and operators on provisions in the equality act in respect of taxis (2010). • Number of wheelchair accessible vehicles (Hackney Carriage & Private Hire combined). • Section 161 Equality Act 2010 • Equality and Human Rights Commission: Direct and Indirect Discrimination 	<p>The current restriction on Hackney Carriage Vehicles, limits the number of wheelchair accessible vehicles available. All Hackney Carriage Vehicles licenced in Oxford City are wheelchair accessible, however, when counting Private Hire Vehicles, the overall number of licenced vehicles that are wheelchair accessible is 14%.</p> <p>The Equality Act 2010 addresses cases where an authority has a low proportion of wheelchair accessible vehicles, stating that quantity control policies should not apply to wheelchair accessible vehicles in these cases.</p> <p>A policy restricting the number of vehicles may directly discriminate against those with disabilities, by reducing availability and/or choice when travelling.</p> <p>Note: When measuring an authority's proportion of wheelchair accessible vehicles, Section 161 of the Equality Act only refers to 'Taxis'. It is accepted that 'Taxis' only refer to Hackney Carriage Vehicles, therefore the proportion of</p>

						<p>Taxis that are wheelchair accessible is 100%. (This does not account for Private Hire Vehicles)</p> <p>Consultation responses:</p> <ul style="list-style-type: none"> 63% No 16% Prefer not to say
Gender re-assignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> Equality and Human Rights Commission: Gender Reassignment discrimination 2021 Gender Identity Census Data Equality and Human Rights Commission: Direct and Indirect Discrimination 	<p>80% of consultation responders answered 'yes', and 1.8% answered 'no' to <i>"Is the gender you identify with the same as your sex registered at birth?"</i>. This is a greater percentage than the national average of 0.5%.</p> <p>The Hackney Carriage Vehicle Quantity Control Policy limits the availability of Hackney Carriage Vehicle licences and may indirectly discriminate against persons with this protected characteristic.</p>
72 Marriage & Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> Equality and Human Rights Commission: Marriage and civil partnership Equality and Human Rights Commission: Direct and Indirect Discrimination 	<p>The retention or removal of this policy has no direct or indirect impact on this protected characteristic.</p> <p>Consultation responses:</p> <ul style="list-style-type: none"> 51% Married 16% Single 16% Prefer not to say
Race, Ethnicity and/or Citizenship	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> Vehicle owner and Driver data. Equality and Human Rights Commission: Direct and Indirect Discrimination Equality and Human Rights Commission: Race Discrimination ONS Census data 2021 	<p>Nearly all the hackney carriage vehicles licensed by Oxford City Council are owned by people of Pakistani heritage. Those from a Pakistani heritage represent 1.5% of the Oxfordshire population.</p> <p>Restricting the number of licences may impact those from certain Race, Ethnicity and/or Citizenship backgrounds who wish to enter the hackney carriage trade.</p>

						<p>Consultation responses:</p> <ul style="list-style-type: none"> • 37% White - English/Welsh/Scottish/Northern Irish/British. • 22% Asian or Asian British – Pakistani. • 15% Prefer not to state. 	
73	Pregnancy & Maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> • Equality and Human Rights Commission: Pregnancy and maternity Discrimination • Equality and Human Rights Commission: Direct and Indirect Discrimination 	<p>The retention or removal of this policy has no direct or indirect impact on this protected characteristic.</p>
	Religion or Belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> • Equality and Human Rights Commission: Religion or belief Discrimination • Equality and Human Rights Commission: Direct and Indirect Discrimination 	<p>The retention or removal of this policy has no direct or indirect impact on this protected characteristic.</p> <p>Consultation responses:</p> <ul style="list-style-type: none"> • 25% Muslim • 17% Christian • 21% No religion or belief • 21% Prefer not to state
	Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> • Vehicle Owner and Driver Data • Equality and Human Rights Commission: Sex Discrimination • Equality and Human Rights Commission: Direct and Indirect Discrimination 	<p>0.4% of Oxford hackney carriage drivers are female, while 35% of private hire drivers are female.</p> <p>This indicates that female drivers who want to enter the licenced trade in Oxford are limited to the private hire sector.</p> <p>The retention of this policy directly impacts persons with this protected characteristic.</p>

						<p>Consultation responses:</p> <ul style="list-style-type: none"> 60% Male 24% Female
<p>Sexual Orientation</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> Equality and Human Rights Commission: Sexual Orientation Discrimination Equality and Human Rights Commission: Direct and Indirect Discrimination 	<p>The retention or removal of this policy has no direct or indirect impact on this protected characteristic.</p> <p>Consultation responses:</p> <ul style="list-style-type: none"> 68% straight/heterosexual 18% prefer not to say
<p>Socio-economic inequalities such as:</p> <p>Income and factors that impact income. -access to jobs</p> <p>This was voluntarily adopted by Oxford City Council on the 13th of March 2024.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>www.oxford.gov.uk</p>  <p>OXFORD CITY COUNCIL</p> <ul style="list-style-type: none"> 'Justfair' Guidance: Socio-Economic Duty Licensing Data 	<p>To drive a Hackney Carriage vehicle currently, a prospective driver must either be a vehicle owner, or approach a vehicle owner to use/rent their vehicle.</p> <p>The removal of the policy could financially benefit some drivers, who rather than relying on and paying the rental fees for the use of someone else's licenced vehicle, could licence their own vehicle.</p> <p>Current number of vehicles: 107 Current number of drivers: 281</p> <p>If existing private hire drivers obtain a licence to drive hackney carriages, and if more hackney carriage vehicles are available for use, they may increase their earnings by lawfully 'plying-for-hire' anywhere in Oxford at any time, rather</p>

						<p>than only complete private hire pre-booked journeys from Operators.</p> <p>Existing hackney carriage vehicle licence holders may be negatively impacted financially, due to removal of the transfer 'value' attributed to the licence, more competition, and reduced income from renting a vehicle to multiple drivers.</p>
<p>Other (voluntary consideration)</p> <p>For example:</p> <p>Migrant, refugee, or asylum seekers.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A
<p>Other</p> <p>For example:</p> <ul style="list-style-type: none"> - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A

Section 5: Conclusion(s) of your Full Impact Assessment

22.	Conclusions. Check as needed.						
	<input type="checkbox"/>	Stop and reconsider the activity.	<input checked="" type="checkbox"/>	Adjust activity before beginning the activity and continue to monitor.	<input type="checkbox"/>	No major change(s) or adjustments and continue with activity but continue to monitor.	<input type="checkbox"/>

23.	Please explain how you have reached your conclusions above.	<p>According to this assessment, the hackney carriage quantity control policy may directly or indirectly negatively impact the following characteristics: Age, Disability, Gender re-assignment, Race, Ethnicity and/or Citizenship, Sex, and Socio-economic inequalities.</p> <p>If the policy is removed, the existing hackney carriage vehicle licence holders (who predominantly come from a Pakistani-heritage community) may be negatively impacted financially, so any mitigations to reduce impact should be considered (subject to statutory requirements).</p> <p>If the policy is retained, detailed reasons and justifications should be published alongside significant measures and mitigations to reduce or remove impact on protected characteristics.</p>

Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA. These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	Who or which team or service area will be responsible for monitoring equalities impact?	General Licensing Team, Community Safety
	For example-	

	<ul style="list-style-type: none"> - team, -directorate, -service area, -Equalities Steering Group,etc. 		
25.	<p>Who (individual, team, or service area) will be responsible for carrying out the EqIA review?</p>	General Licensing Team	
26.	<p>How often will the equality impact be reviewed for this activity? For example- -quarterly, -yearly, etc.</p>	<p>Every three years, aligned with the current Policy. Unless the committee decide to remove the policy entirely, in that case the EqIA will no longer be required.</p>	<p>27. Date when the EqIA will be reviewed again. 2028</p>

77

www.oxford.gov



Section 7: Sign-off

Name: Joshua Curnow

Job Title: Licensing Team Manager

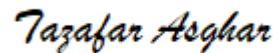
Signature:



Name: Tazafar Asghar

Job Title: Senior Counsel (Litigation & Regulatory

Signature:



Name: Richard Adams

Job Title: Community Safety Service Manager

Signature:



Suggested list of people to include are:

- 1) Project lead/manager.
- 2) Head of service area or team.
- 3) Person who completed the EqIA.
- 4) EDI Lead.
- 5) EDI Specialist.
- 6) For joint projects, please consider the following:
 1. Other project leads
 2. Other service area and/or team lead/managers.

This is not an exhaustive list.

78

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:



You have now reached the end of the assessment.

 Please appended this to any reports and project files for reference.

This page is intentionally left blank