

## Integrated Impact Assessment – Stage 2 Assessment and Action Plan

### Project Details

<b>Name of project or policy:</b>	
Taxi Licensing - Existing policy amendments in line with guidance issued by the Department for Transport	
<b>Directorate:</b>	<b>Senior Officer responsible for policy/service:</b>
Environment and Climate Change	Martin Wood / Russell Williams
<b>Service:</b>	<b>Lead Officer responsible for EIA:</b>
Public Protection	Russell Williams
<b>Specific Service Area/Policy:</b>	<b>Date of EIA (Stage 1):</b>
Licensing	29/11/2021
<b>EIA (Stage 1) reference number:</b>	<b>Date of EIA (Stage 2):</b>
DfT IIA S1	19/05/2022

### Stage 1 Assessment Summary

Theme	Calculated Scores						Stage 2 Assessment Required
	Proposal	Impact	P + I	Mitigation	Evidence	Overall	
<b>Equalities</b>	6	5.3	<b>11.3</b>	5	2	<b>7</b>	Y

Environment		4.6	<b>4.6</b>	5	2	<b>7</b>	N
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## A) Equalities Impact – Evidence from Engagement

CONSULTATION WITH KEY STAKEHOLDERS				COMPLETE THIS DETAIL WHEN YOU HAVE DONE YOUR CONSULTATION	
REF No.	Which key stakeholders have you/are you consulted/ing with?	Why have you/are you consulted/ing them (or not?) and what were you/are you looking to find out?	How did you/are you planning to consult them? Date and method of planned consultation	Actual Date of Consultation	Outcome of consultation What have you learned? Do you have actions to complete that will help mitigate any unnecessary negative impact on groups? [move to section B if you do]
1	Private Hire and Hackney Carriage Trade Representatives	<p>Trade representatives provide a collective voice for licence holders. They speak for and assist licence holders, many of which for whom English is not their first language. They are seen as an important communications channel to both disseminate and collect information from the licensed trade.</p> <p>By consulting with trade representatives, we were/are looking to obtain a collective view from those represented by the trade representatives.</p>	<p>Trade meetings (pre-consultation) – 24/02/2021 16/06/2021</p> <p>Trade meetings (during consultation) 20/10/2021 23/02/2022 11/05/2022</p> <p>Email</p> <p>Drop-in sessions</p>	<p>14/09/2021 to 30/05/2022 (extended on two occasions 06/12/2021 to 31/01/2022 then to 30/05/2022)</p> <p>Dewsbury – 26/10/2021 Huddersfield – 28/10/2021</p>	<p>The Consultation asked 12 questions. These questions related to specific areas of existing policy that did not meet the recommendations being made by the Department for Transport. In total 428 responses were received</p> <p>It has not been possible to identify how many of the 428 responses were completed by trade representatives. It is likely their responses will fall under the banner of licensed driver, licensed operator or vehicle proprietor collectively referred to in this document as ‘the trade’</p>

				<p>Batley – 17/11/2021</p> <p>Virtual Drop In (hackney trade reps) – 18/01/2022</p> <p>Virtual Drop In (private hire Operators) – 18/01/2022</p>	<p>For all but two areas of proposed policy change the trade were in majority agreement with the proposals consulted upon.</p> <p>The two areas where the trade was not in agreement related to decision making and providing a certificate of good character if a person is out of the country for longer than three months.</p>
2	Individual private hire / hackney carriage licence holders ( <i>drivers, vehicle owners and operators</i> )	The changes proposed by the the Department for Transport statutory standards will affect individual licence holders and the companies they work for. It is therefore important to obtain, from individual licence holders, what, if any, impact there will be from the proposed changes.	<p>Email / Letter</p> <p>Online consultation</p> <p>Drop-in sessions (<i>Huddersfield, Batley and Dewsbury</i>)</p>	<p>14/09/2021 to 30/05/2022 (extended on two occasions 06/12/2021 to 31/01/2022 then to 30/05/2022)</p>	<p>The Consultation asked 12 questions. These questions related to specific areas of existing policy that did not meet the recommendations being made by the Department for Transport.</p> <p>Of the 428 responses received 273 (63%) were from the trade.</p> <p>For all but two areas of proposed policy change the trade responses were in majority agreement with the proposals consulted upon.</p> <p>The two areas where the trade were not in agreement related to decision making and providing a certificate of</p>

					good character if a person is out of the country for longer than three months.
3	Ward Councillors	<p>Ward Councillors are in a unique position to inform the consultation on what their constituents feel about the proposed changes.</p> <p>Equally, Ward Councillors are able to listen to licence holders and inform the consultation on behalf of licence holders.</p> <p>Ward Members will also have their own views on the statutory standards, and it is important those views are captured.</p> <p>In consulting with Ward Councillors we were/are seeking the views of constituents, licence holders and Ward Councillors themselves.</p>	<p>Email</p> <p>Online consultation</p>	<p>14/09/2021 to 30/05/2022 (extended on two occasions 06/12/2021 to 31/01/2022 then to 30/05/2022)</p>	<p>The Consultation asked 12 questions. These questions related to specific areas of existing policy that did not meet the recommendations being made by the Department for Transport.</p> <p>Of the 428 responses received 13 (3%) were from Ward Councillors.</p> <p>For all areas of proposed policy change the Councillors that responded were in majority agreement with the proposals consulted upon. However, for the question relating to decision making it was not a clear majority.</p>
4	Members of the Public	<p>The private hire and hackney carriage trade directly serve and interact with the public.</p> <p>The purpose of the statutory standards is to improve safeguarding and public confidence in the private hire and hackney carriage trades.</p>	<p>Social Media</p>	<p>14/09/2021 to 30/05/2022 (extended on two occasions 06/12/2021 to 31/01/2022 then to 30/05/2022)</p>	<p>The Consultation asked 12 questions. These questions related to specific areas of existing policy that did not meet the recommendations being made by the Department for Transport.</p>

		It is therefore important the licensing service seeks the views of the public.			<p>Of the 428 responses received 133 (31%) were from members of the public.</p> <p>For all but one area of proposed policy change members of public who responded were in majority agreement with the proposals consulted upon.</p> <p>The area where the public did not agree related to keeping decision making with the Group Leader of the Licensing.</p>
<b>5</b>	<p>Partnering Agencies</p> <ul style="list-style-type: none"> <li>• West Yorkshire Police</li> <li>• Public Health</li> <li>• Kirklees Safeguarding Children's Board</li> <li>• Kirklees Safeguarding Adults Board</li> <li>• Safer Kirklees</li> <li>• Kirklees CCG</li> </ul>	<p>The private hire and hackney carriage trades interact with a wide spectrum of people, from parent placing children in vehicles in order to go to school to the elderly and vulnerable being transported to hospital appointments.</p> <p>Given the wide spectrum of users, it is important the views of other partnering agencies that also interact with the same wide spectrum of public is taken into account when considering the statutory standards.</p>	<p>Email</p> <p>Online consultation</p>	<p>14/09/2021 to 30/05/2022 (extended on two occasions 06/12/2021 to 31/01/2022 then to 30/05/2022)</p>	<p>The Consultation asked 12 questions. These questions related to specific areas of existing policy that did not meet the recommendations being made by the Department for Transport.</p> <p>From the results of the consultation it has been possible to ascertain three members of West Yorkshire Police responded.</p> <p>Of those responses from West Yorkshire Police they agree with all aspects of the policy changes.</p>

	<ul style="list-style-type: none"> <li>Local Authority Designated Officer</li> </ul>				
6	<p>External Agencies</p> <ul style="list-style-type: none"> <li>Susie Lamplugh Trust</li> <li>National Private Hire and Taxi Association</li> <li>GMB Union</li> <li>Other West Yorkshire Authorities</li> </ul>	<p>The Susie Lamplugh Trust are recognised as a leading charity in the field of personal safety and the service felt it important that an independent body had the opportunity to comment on the proposed changes as a result of the statutory standards.</p> <p>The National Private Hire and Taxi Association represent the interests of the private hire and hackney carriage trades on a national basis and can offer an insight into how the proposed changes may affect the respective trades.</p> <p>The GMB Union represent individual licence holders and therefore can offer an insight in to how the proposed changes may affect the members they represent.</p> <p>Due to cross border hiring issues, other West Yorkshire Authorities could be impacted by any proposed policy changes</p>	<p>Email</p> <p>Online consultation</p>	<p>14/09/2021 to 30/05/2022 (extended on two occasions 06/12/2021 to 31/01/2022 then to 30/05/2022)</p>	<p>The Consultation asked 12 questions. These questions related to specific areas of existing policy that did not meet the recommendations being made by the Department for Transport.</p> <p>From the results of the consultation, it has been possible to ascertain one local authority responded who agreed with all aspects of the policy changes.</p>

**B) Equalities Impact – Action Planning**

Equalities Impact - ACTION PLAN			Complete this section when you have actually carried out some actions		
REF.No	What actions are you going to do as a result of carrying out your consultation?	What do you think these actions will achieve? Will they mitigate any adverse impact on protected groups? Will they foster good relations between people? Will they promote equality of opportunity?	What did you actually do?	When did you do this?	What was the actual outcome? Have you mitigated any negative impact? Have you ensured good relations exist? Have you promoted equality of opportunity?
1 – 6	<p>The following actions are applicable to all responses to the consultation outlined in Section A of this IIA.</p> <p>Other than two areas, the majority of the responses were in favour of the proposals consulted upon.</p> <p>The next steps will be to present a detailed report to Members of the Licensing and Safety Committee who will consider the results of the consultation and take a decision as to whether to adopt the proposed changes.</p> <p>Members of the Committee will also consider whether the proposed changes meet the Council’s Public Sector</p>	<p>The legitimate aim of the Department of Transport Statutory Standards is to protect the public and improve safeguarding.</p> <p>Adoption of policy changes is a matter for the Committee who must, in reaching their decision, consider the Councils duties under the Equalities Act 2010</p> <p>Ensuring the report presented to Members contains information about any equality issues, will enable a more informed decision to be made.</p> <p>Where local needs exist deviation from the standards has been recommended.</p>			



<p>Equality Duty and its duties under the Equalities Act 2010</p> <p>The two areas where it is clear from the consultation, the position is not agreed are–</p> <ul style="list-style-type: none"> <li>a) Requirement to obtain certificate of good conduct if out of the country for 3 or more months</li> <li>b) Decision making</li> </ul> <p>In relation to point a) above, a recommendation will be made to keep the existing policy which states a certificate of good conduct is only required if a person has been out of the country longer than six months. This recommendation takes into account the vast majority of licensed drivers within the district of Kirklees are from a BAME background. Knowledge and Experience shows a large proportion of those licensed drivers travel abroad for extended periods of time to visit family and friends.</p> <p>In relation to point b), officers will be recommending to Members that a more detailed piece of work be carried out in</p>				
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	<p>relation to how individual decisions are made on taxi licensing matters. This will be with a view to a further report being presented to the Licensing and Safety Committee in due course, which will be subject to a separate IIA. This recommendation takes into account the significant shift in Council decision making should the Department of Transport's recommendations in this area be adopted.</p> <p>In addition, it is accepted the majority of drivers licensed by the Council are male and from a BAME background. Therefore, the report to the Committee will make any equality issues clear to enable Members to reach an informed decision, in particular around the two areas identified above.</p>				
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## C) Environmental Impact – Evidence from Engagement

CONSULTATION WITH KEY STAKEHOLDERS				COMPLETE THIS DETAIL WHEN YOU HAVE DONE YOUR CONSULTATION	
REF No.	Which key stakeholders have you/are you consulted/ing with?	Why have you/are you consulted/ing them (or not?) and what were you/are you looking to find out?	How did you/are you planning to consult them? Date and method of planned consultation	Actual Date of Consultation	Outcome of consultation What have you learned? Do you have actions to complete that will help mitigate any unnecessary negative impact on groups? [move to section D if you do]
N/A					

## D) Environmental Impact – Action Planning

Environmental Impact - ACTION PLAN			Complete this section when you have actually carried out some actions		
REF.No [from section C]	What actions are you going to do as a result of carrying out your consultation?	What do you think these actions will achieve? Will they mitigate any adverse impact on protected groups? Will they foster good relations between people? Will they promote equality of opportunity?	What did you actually do?	When did you do this?	What was the actual outcome? Have you mitigated any negative impact? Have you ensured good relations exist? Have you promoted equality of opportunity?
N/A					