

General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact your Equality, Diversity, and Inclusion (EDI) Business Partner as follows:

- Economy, Environment and Culture (EEC) – [Chris Brown](#),
- Families, Children, and Learning (FCL) – [Jamarl Billy](#),
- Governance, People, and Resources (GPR) – [Eric Page](#).
- Health and Adult Social Care (HASC) – [Zofia Danin](#),
- Housing, Neighbourhoods, and Communities (HNC) – [Jamarl Billy](#)

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to your EDI Business Partner, copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), Equalities inbox, and any other relevant service colleagues to enable EIA communication, tracking and saving.
- When your EIA is reviewed, discussed, and then approved, the EDI Business Partner will assign a reference to it and send the approved EIA form back to you with the EDI Manager or Head of Communities, Equality, and Third Sector (CETS) Service's approval as appropriate.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Public and Trade Wheelchair Accessible Vehicle Survey
Directorate:	City Services
Service:	Safer Communities
Team:	Taxi Licensing

Is this a new or existing activity?	Existing Activity
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	No

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Martin Seymour, Hackney Carriage Officer
Accountable Manager:	Alex Evans, Team Leader Specialist
Additional stakeholders collaborating or contributing to this assessment:	Public and Trade Drivers, Proprietors and Operators, Disability Group Stakeholders

3. About the activity

Briefly describe the purpose of the activity being assessed:

This EIA evaluates a public and trade survey about proposals regarding wheelchair accessible vehicles (WAVs) in Brighton & Hove's taxi fleet. The council aims to improve accessibility for wheelchair users and disabled passengers while balancing the needs of drivers and operators.

The Council undertook a public and trade survey into the use and availability of wheelchair accessible vehicles. The Public Survey was open on the Council's Your Voice website from 15 August 2024 to 13 October 2024 and then extended to 24 November 2024 so that additional stakeholders could respond. The Trade survey was available on the Council's Your Voice website and was available from the 15 August 2024 until 13 October 2024. The trade survey also asked some questions regarding Electric Vehicles.

The results of the survey and subsequent proposals were discussed at a special meeting with the Trade members of The Brighton & Hove Hackney Carriage & Private Hire Consultation Forum on the 26 November 2024. The results of the survey and any changes in Policy changes will go to the Licensing Committee on the 06 February 2025.

The public survey sought views from people who live or work in Brighton & Hove as part of a consultation on accessibility of our taxi and private hire fleet of wheelchair accessible taxis and so that the Council could improve the experience for wheelchair users, disabled passengers and passengers who have difficulties with mobility and to understand the needs of passengers who use wheelchair accessible vehicles.

The survey covered taxis that are accessed via one of the city's taxi ranks, hailed as they drive along or booked in advance through a private hire operator.

The trade survey sought views from drivers, proprietors and operators licensed by the council as part of a consultation on wheelchair accessible taxis and how the council can reduce taxi vehicle emissions.

The council licenses hackney carriage vehicles and private hire vehicles. The principal differences between the two licensing regimes are:

- (i) hackney carriages can ply for hire in the streets and at taxi ranks whilst private hire vehicles can only accept bookings made through a private hire operator
- (ii) powers exist to limit the numbers of hackney carriages in prescribed circumstances but there is no power to limit the number of private hire vehicles

- (iii) the council prescribes fares for hackney carriages but has no power to determine fares for private hire bookings

The Council has adopted several measures to increase the percentage of wheelchair accessible vehicles available. These are: to licence vehicles which are constructed or adapted and configured to carry passengers seated in wheelchairs or; vehicles which are fully electric or; plug-in hybrid (PHEV). Any licensed Hackney Carriage or Private Hire Vehicle which can carry 5 or more passengers must be wheelchair accessible.

A higher fare is also set for vehicles when carrying 5 or more passengers to reflect the higher costs of running these vehicles and to encourage proprietors to change their vehicles to wheelchair accessible. The Council currently increases the number of hackney carriage vehicle licences issued by the council by 5 annually. These plates are issued in accordance with the conditions attached to the Brighton & Hove City Council Hackney Carriage Vehicle Licence Waiting List and vehicles the type and design of the vehicle to be agreed by the Director City Services.

Taxis provide an important means of transport for disabled people, some older people and those with limited mobility and are often the only viable option available. The council's hackney carriage fleet is mixed, consisting of saloon cars and specially constructed or adapted wheelchair accessible vehicles. Locally, representatives of disabled groups have asked for the continued provision of a mixed fleet. This reflects the differing needs and preferences of the travelling public, including those who find it difficult to negotiate entry into wheelchair accessible vehicles and to sit down easily, and those confined to travelling in wheelchairs.

However, the cost of wheelchair accessible vehicles has soared in recent years with many drivers unable to finance and run wheelchair accessible vehicles. Also, proprietors are requesting to change their Compulsory wheelchair accessible vehicles for financial or medical reasons.

What are the desired outcomes of the activity?

Where possible to amend any existing policies to ease burdens on drivers, proprietors and operators without being significantly detrimental to members of the public, especially without discriminating against disabled people and anyone using wheelchair accessible vehicles. Officers have considered a number of proposals to go to licensing Committee although not all as a direct response to the survey.

1. Training – From 1st Jan 25 all drivers to complete Disability Training every three years.

This condition is already in place but has not been fully implemented due to the shortage of training companies able to carry out specific taxi related training. This will help drivers to provide a better and considerate service to disabled passengers not just wheelchair users.

2. Remove the requirement for Operators to have 20% of the fleet WAV when fleet reaches 100 vehicles

Officers are recommending that the requirement for operators to have 20% of their fleet be wheelchair accessible be removed once their fleet reaches 100 vehicles. In practice this requirement has not worked as intended and rather than operators having more vehicles on their circuit, they encourage drivers from other districts where there is not the same condition to work in the City. This is to the detriment of Brighton & Hove licensed drivers who are barred from joining an operator's circuit as they drive saloon cars. Officers are also unable to effectively enforce this condition and rely on operators reporting numbers of vehicles accurately and there is no guarantee that wheelchair vehicles on a circuit would be out working at any one time. Theoretically operators could bypass the restriction by having additional licenses and operate 99 vehicles on each license making the condition unworkable. Since this policy was put in place the way drivers now work has changed particularly since Covid 19. Many drivers now work

for multiple operators at the same time via apps, making it difficult for operators to know how many wheelchair-accessible vehicles are being used at any given moment.

It is believed that this will have a minimal effect for wheelchair users as these vehicles will still be available as drivers will need to continue to receive all work via their chosen operator. It will also mean that operators will be able to have more Brighton & Hove drivers on their circuit without having the restriction of finding more wheelchair accessible vehicles.

3. Allow proprietors with a Compulsory WAV who are unable to drive a WAV due to medical or physical reasons to transfer their compulsory WAV and then be issued a Compulsory Fully Electric/Plug in Hybrid.

Currently where a proprietor is allowed to change their vehicle a wheelchair vehicle is lost to the fleet. By allowing a proprietor to transfer their current wheelchair accessible vehicle to another proprietor and then issue a new plate to a compulsory fully electric/plug in hybrid the number of wheelchair accessible vehicles available remains the same.

4. The current Temporary policy that allows wheelchair accessible vehicles to remain licensed until 14 years to be extended for another 2 years (April 27)

This would have no impact on disabled passengers but would help proprietors financially purchasing replacement vehicles.

5. Allow fully electric vehicles to be licensed up to 15 years old.

This would have no impact on disabled passengers but would help proprietors financially purchasing replacement vehicles.

Which key groups of people do you think are likely to be affected by the activity?

Licensed Drivers, Proprietors, Operators, wheelchair users, disabled people, older people, pregnant people and parents using prams/pushchairs.

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

The public consultation was open to all members of the public on the Council's Your Voice website from the 15 August 2024 to the 13 October 2024 and then extended to the 24 November 2024 so that additional stakeholders could respond. In addition, a wide selection of stakeholders were invited to complete the survey and requesting that their service users/members complete the survey as well. An invite to complete the survey was emailed to a wide group of stake holders including Disability Groups, Older Peoples Groups, Race and Ethnicity Groups, Religious and Belief Groups and LGBTQ groups. There were 67 responses to the Public Survey

Demographic Information from respondents

- **Gender:** 40.3% female, 23.9% male, with a significant portion preferring not to disclose.

- **Age:** Participants ranged across various age groups, with the majority being between 45 to 64 years old.
- **Disability 67.2% Participants stated that their day-to-day activities were limited because of a health condition or disability**
- **Ethnicity:** Predominantly White British, with a small representation from other ethnic groups.

Key Findings from the Public Survey

- **Mobility and Accessibility Needs:**
 - A significant portion of respondents (67.2%) reported that their day-to-day activities are limited due to a health condition or disability.
 - Common aids used include walking sticks, crutches, and wheelchairs.
- **Taxi and Private Hire Usage:**
 - 52.2% of respondents are occasional users of taxis or private hire vehicles.
 - 34.3% are regular users, while 10.4% rarely use these services.
- **Challenges and Barriers:**
 - Many respondents highlighted issues with the availability and suitability of wheelchair-accessible vehicles (WAVs).
 - 53.7% believe there are too few WAVs to meet demand.
- **Driver and Operator Conduct:**
 - Mixed feedback on driver assistance, with some respondents feeling that drivers do not understand their needs.
 - 26.9% felt that taxi drivers do not understand their disability or travel requirements.
- **Recommendations for Improvement:**
 - Increased disability awareness training for drivers and operators.
 - Stronger enforcement against discrimination.
 - A wider variety of WAVs to cater to different needs.

Suggestions for Improvement

These suggestions aim to improve the overall experience for disabled passengers by enhancing driver and operator awareness, increasing vehicle availability, and leveraging technology for better service.

- **Disability Awareness Training:**
 - For Drivers: 21% of respondents suggest that drivers should receive training to better understand and accommodate the needs of disabled passengers.
 - For Operators: 14% recommend similar training for operators to ensure they are also aware of and sensitive to these needs.
- **Enforcement:**
 - License Revocation: 16.6% believe that any driver or operator found to actively discriminate against disabled passengers should have their licenses revoked.
 - More Council Enforcement: 8.7% suggest increased enforcement by the council to ensure compliance with accessibility standards.
- **Variety and Availability of Vehicles:**
 - Wider Variety of WAVs: 14.4% want a broader range of wheelchair accessible vehicles, including those that are not so high off the ground.
 - More WAVs: 13.5% call for an increase in the number of wheelchair accessible vehicles to meet demand.
- **Technology and Communication:**
 - Better Use of Smartphone Apps: 7.4% suggest improving the use of smartphone apps to enhance the booking and communication process for disabled passengers.
- **Other Suggestions:**
 - **None of the Above: 1.7% did not agree with any of the listed suggestions.**
 - **Other: 2.2% provided additional suggestions not covered by the main categories.**

Trade Consultation

The trade consultation was restricted to only licensed drivers, proprietors, and operators. The consultation was available on the Councils Your Voice website and was available from the 15 August 2024 until 13 October 2024. The results of the survey and subsequent proposals were discussed at a special meeting with the Trade members of The Brighton & Hove Hackney Carriage & Private Hire Consultation Forum on the 26 November 2024. There were 49 responses to the Trade Survey

Responses from Participants

This breakdown highlights the key responses and trends from the consultation

License Types Held by Participants

- Hackney Carriage and Private Hire Driver: 48.6% (35 choices)
- Hackney Carriage Vehicle Proprietor: 36.1% (26 choices)
- Private Hire Driver: 6.9% (5 choices)
- Private Hire Operator: 2.8% (2 choices)
- No Answer: 0% (0 choices)
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Opinions on Current Policy for Wheelchair Accessible Vehicles (WAVs)

Mixed Opinions: Some agree with the policy requiring 20% WAVs for operators with at least 100 vehicles, while others believe it is not effective or necessary.

Suggested Changes: Some suggest lowering the percentage to 5%, while one respondent suggests increasing it to 40%.

Concerns: Issues include drivers refusing wheelchair jobs, the policy not applying to companies like Uber, and difficulties in managing the required number of WAVs.

Proportion of WAVs in Fleet

- 10%: 38.8% (19 choices)
- 20%: 24.5% (12 choices)
- 0%: 14.3% (7 choices)
- 30%: 14.3% (7 choices)
- 50%: 6.1% (3 choices)
- 100%: 2% (1 choice)
-

Impact of Current Policy on WAV Availability

- **Sufficient WAVs:** General agreement that there are enough WAVs, but drivers are reluctant to take on wheelchair jobs.
- **Financial Burden:** Higher costs of WAVs compared to standard vehicles are a significant concern.
- **Policy Review:** Suggestions to revise the policy to either not force drivers to have WAVs or provide financial assistance.

Suggestions for Improving WAV Services

- **Penalties for Refusal:** Enforce penalties for operators who refuse wheelchair jobs.
- **Collaboration:** Work together with taxi operators rather than imposing regulations.
- **Monitoring:** Ensure companies meet requirements and provide good service.
- **Financial Incentives:** Offer financial incentives to encourage the use of WAVs.

Standardized Accessibility Requirements

- **Yes:** 61.2% (30 choices)

- **No:** 24.5% (12 choices)

Switching to Electric Vehicles (EVs)

- **Considering EVs:** 28.6% (14 choices)
- **Not Considering EVs:** 46.9% (23 choices)
- **Don't Know:** 24.5% (12 choices)

Factors Preventing EV Purchase

- **Price of Vehicles:** 18.4% (30 choices)
- **Cost of Finance:** 15.3% (25 choices)
- **Lack of Range:** 14.7% (24 choices)
- **Lack of Charging Points:** 11% (18 choices)

Incentives for EV Purchase

- **Discounted EV Charging:** 25.8% (23 choices)
- **Reduced Licence Fee:** 19.1% (17 choices)
- **Discounted Residents Permit:** 12.4% (11 choices)

Year for All Newly Licensed Vehicles to be EV

- **2035:** Some respondents align with the 2035 timeline, while others suggest later dates such as 2040 or 2045.

Dedicated EV Ranks with Charge Points

- **No:** 75.5% (37 choices)
- **Yes:** 18.4% (9 choices)

Equalities Monitoring Questions

- **Gender:** Majority male (61.2%)
- **Age:** Majority in the 45-54 age range (28.6%)
- **Disability:** 53.1% reported no disability
- **Religion:** Majority Christian (26.5%) or no particular religion (14.3%)
- **Sexual Orientation:** Majority heterosexual (51%)

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

We only collect the following Data for Drivers, Proprietors and Operators

(Delete and indicate as applicable from the options Yes, No, Not Applicable)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	NO
Religion, Belief, Spirituality, Faith, or Atheism	NO
Gender Identity and Sex (including non-binary and Intersex people)	Yes, Title only
Gender Reassignment	NO

Sexual Orientation	NO
Marriage and Civil Partnership	NO
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	YES, Right to work checks
Carers	NO
Looked after children, Care Leavers, Care and fostering experienced people	NO
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO
Socio-economic Disadvantage	NO
Homelessness and associated risk and vulnerability	NO
Human Rights	NO
Another relevant group (please specify here and add additional rows as needed)	NO

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

Information is only collected from service users (Drivers, Proprietors and Operators)
We are currently looking into how monitoring can be carried out to corporate requirements and how to store the special category Data collected in accordance with GDPR requirements

Equalities data from service users is not currently collected but the Council is investigating how this can be achieved for service users.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

This will be reviewed one year after implementation and alongside any new additions to the Blue Handbook for Hackney Carriage and Private Hire Drivers, Vehicles, and Operators. A review of the Blue Book is planned for 2025, with Committee approval anticipated in October 2025 for any changes in policy and license conditions. An unmet demand survey is scheduled for 2027, which will assess wheelchair vehicle availability at ranks as well as from operators. In one year, the number of wheelchair-accessible

vehicles will be compared against current license numbers to determine any changes. Additionally, the Public Survey will be repeated in one year's time to evaluate whether the service for disabled individuals has been affected by the proposed changes.

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
 - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal 'staff as residents' consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<p>Positive impacts:</p> <ul style="list-style-type: none"> Maintaining a mixed fleet could help older passengers who struggle with WAV entry <p>Potential negative impacts:</p> <ul style="list-style-type: none"> Older vehicles might be less comfortable/accessible <p>Missing analysis:</p> <ul style="list-style-type: none"> No data on age demographics of current users

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	No
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<p>Potential positive impacts:</p> <ul style="list-style-type: none"> Mandatory disability training will improve service quality for disabled passengers Transfer policy for WAVs maintains current vehicle numbers rather than losing them <p>Potential negative impacts:</p> <ul style="list-style-type: none"> Removing 20% WAV requirement could reduce availability, despite council's assessment <p>Missing analysis:</p> <ul style="list-style-type: none"> No data on current wait times or service availability No assessment of impact on non-wheelchair using disabled passengers No data on current wait times or service availability No assessment of impact on non-wheelchair using disabled passengers

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

We have not explored this as yet or the nature of disabled passenger lived experiences. More work needs to be undertaken to understand this and solutions that will improve the barriers disabled passenger face.

6.3 Ethnicity, ‘Race’, ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	No
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

We do not hold data or understand negative intersecting lived experiences of disabled passengers.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Missing analysis:

- No consideration of language barriers in accessing services
- No assessment of cultural needs or preferences
- No data on driver demographics and potential impacts on drivers

Data is not held but can be reviewed at the next Unmet Demand Survey

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Missing analysis:

- No consideration of safety concerns for disabled women/vulnerable passengers
- No assessment of impact on late-night transport needs
- No data on gender balance of service users

Data is not held but can be reviewed at the next Unmet Demand Survey

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment ?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

We do not hold data or understand negative intersecting lived experiences of disabled passengers.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	No
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Missing analysis:

- No consideration of accessibility needs for pregnant passengers
- No assessment of impact on parents with pushchairs, prams etc.

Babies and Children should not be carried in prams and should be seated with seatbelts or held in arms

Data is not held but can be reviewed at the next Unmet Demand Survey

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

<p>Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)</p>	<p>No</p>
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

We do not hold data or understand negative intersecting lived experiences of disabled passengers.

6.12 [Carers](#):

<p>Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).</p>	<p>NO</p>
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

<p>Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). Also consider our Corporate Parenting Responsibility in connection to your activity.</p>	<p>NO</p>
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.14 Homelessness:

<p>Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)</p>	<p>NO</p>
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.17 Cumulative, multiple [intersectional](#), and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.

- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy and numeracy barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

National comparison carried out in the 2022 Unmet Demand Survey for Hackney Carriages compared Department for Transport (DfT) statistics for 14 other authorities were compared with specific reference to the level of wheelchair accessible vehicle provision. At the end of March 2022, DfT figures show Brighton and Hove had one wheelchair accessible vehicle for every 1,000-resident population. From the list of 14, only three authorities had higher levels of provision – two of which were very large cities (Liverpool at 2.9 and Manchester at 2.0), both of whom have fully wheelchair accessible vehicle hackney carriage fleets. Plymouth had just marginally more (1.1), also until recently having a fully wheelchair accessible vehicle fleet. The average English value was 0.6 vehicles. When considering private hire wheelchair accessible vehicles, the comparison is even more favourable. Brighton and Hove have the highest provision at 0.32 Private Hire Vehicles per thousand resident population: four times the English average and over twice the next highest level of 0.15 in Manchester. When considered as a total licensed vehicle fleet, Brighton and Hove is third in the list of 14 with 1.4 wheelchair accessible vehicle per thousand resident population.

This means the total fleet of Brighton and Hove has unrivalled levels of WAV even with no mandatory policy in place. This is a truly remarkable achievement.

This will be reassessed in the next Unmet Demand Survey in 2027 including survey of relevant stakeholders and any negative impacts assessed.

Key Findings on Disability

These findings highlight the significant challenges faced by disabled passengers in Brighton & Hove and suggest areas for improvement to enhance their travel experience.

Accessibility Needs:

- **Wheelchair Users:** 21.8% require purpose-built wheelchair accessible vehicles (WAVs).
- **Timeliness:** 21.1% need the vehicle to arrive exactly on time.
- **Communication:** 14.1% require a text message upon vehicle arrival.

Challenges Faced:

- **Understanding Disabilities:** 26.9% feel taxi drivers do not understand their disability or travel requirements.
- **Availability of WAVs:** 53.7% believe there are too few WAVs to meet demand.

Service Quality:

- **Average Experience:** 32.8% rate their experience as average.
- **Poor Experience:** 20.9% rate it as poor, and 11.9% as very poor.

Discrimination and Barriers:

- **Refusal of Service:** 16.1% have been refused service because they are in a wheelchair.
- **Extra Charges:** 10.7% were charged extra due to their disability.

Suggestions for Improvement:

- **Disability Awareness Training:** 21% suggest training for drivers.
- **Enforcement:** 16.6% recommend revoking licenses for discrimination.
- **Variety of WAVs:** 14.4% want a wider variety of WAVs.

7. Action planning

Which action plans have the actions identified in the previous section been transferred to?

- For example: FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

We are looking at producing a team/fair and Inclusive Plan action plan action in 2025.

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

1. Investigate the into how Equalities monitoring can be carried out to corporate requirements and how to store the Data collected following GDPR requirement <ul style="list-style-type: none"> ○ Work with the EDI Officer on how to collect and store Data in line with GDPR.
2. Execute planned review of the Blue Handbook or Drivers, Vehicle and Operators during 2025 and gain Committee approval in October 2025. This will include updating advice for Drivers when transporting Disabled Passengers. Require Operators to report how often Wheelchair Vehicles are requested <ul style="list-style-type: none"> ○ An Unmet demand survey is due to take place during 2027 which will include wheelchair vehicle availability in the fleet ○ Consult with disability Groups and Stakeholders on the revised Blue Book before going to Committee ○ Investigate if any missing data can be collected as part of survey
3. Complete an Inclusive Service Plan. <ul style="list-style-type: none"> ○ Inclusive Service Plan (ISP) to be completed by October 2025 in conjunction with Blue Book
4. Check the number of wheelchair accessible vehicles against current numbers in 1 years' time to see if there has been a decline or increase following the policy change and assess impact on disabled passengers and impact of driver training and other actions identified. <ul style="list-style-type: none"> ○ Public survey to be re-run annually to determine any impact – increase representation and participation ensuring equality data is collected and analysed. ○ Review the EIA, identified gaps and impact within 18 months from February 2025.
5. Meet the desired outcomes of this activity that have been identified in this section of the EIA.
6. Further investigate the key findings on disability and the negative experiences of disabled passengers, including the barriers and discrimination faced as part of inclusive service provision. Develop solutions in addition to training solutions to address these. Include review of training and its sufficiency to address issues faced by disabled passengers.
7. Potential future actions to consider and review when this EIA is next reviewed: <ul style="list-style-type: none"> ○ Address the shortage of training companies by exploring partnerships with additional training providers or developing in-house training capabilities to ensure all drivers receive the necessary disability training. ○ Enhance enforcement and compliance measures to ensure that drivers and operators adhere to accessibility standards and do not refuse wheelchair jobs.

- Continue to engage with stakeholders, including disabled passengers and advocacy groups, to gather feedback and make data-driven decisions that improve accessibility and inclusivity in the taxi fleet.

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	X
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	

If your decision is to "Proceed with caution", please provide a reasoning for this:

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

The equality impact assessment (EIA) for the Public and Trade Wheelchair Accessible Vehicle Survey in Brighton & Hove's taxi fleet identifies several gaps. The total fleet of Brighton and Hove has unrivalled levels of WAV even with no mandatory policy in place. Data also points to the negative lived experiences, barriers and discrimination disabled passengers face.

Mitigating actions have been identified in the action plan included in this EIA and more work needs to be done in a future review and through inclusive service delivery changes to be considered.

Some key gaps include a limited representation in the public consultation, with only 67 responses, which may not fully capture the needs of all disabled passengers. The shortage of training companies capable of providing specific taxi-related disability training poses a challenge to the effective implementation of the proposed disability training for drivers. Additionally, the proposal to remove the requirement for operators to have 20% of their fleet as wheelchair accessible vehicles (WAVs) once their fleet reaches 100 vehicles could reduce the availability of WAVs for disabled passengers. The financial burden on drivers due to the increased cost of WAVs is also a significant concern. Furthermore, the current policy requiring 20% WAVs for operators with at least 100 vehicles has not worked as intended, indicating a need for more effective policies³. Lastly, there are mixed opinions on the current policy for WAVs, with concerns about drivers refusing wheelchair jobs and the policy not applying to companies like Uber, highlighting the need for stronger enforcement and compliance measures.

Immediate recommendations that mitigate impacts within the gaps and constraints identified are listed in the [desired outcomes response and About the Activity section](#) of this EIA.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Martin Seymour, Hackney Carriage Officer	24-Jan-25
Accountable Manager:	Alex Evans, Team Leader Specialist	24-Jan-25

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Once the EDI Business Partner has checked the above have been considered for by those submitting the EIA for approval, they will get the EIA signed off and send to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking and saving.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Chris Brown	24-Jan-25
EDI Manager:	Sabah Holmes	24-Jan-25

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment: