



Guide Dogs
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Taxi and private hire vehicle licensing policy: consultation response from Guide Dogs

Introduction

Guide Dogs is the largest sight loss charity in the UK and provides services that support the independence of people with a vision impairment. In the UK, there are 2 million people with sight loss and this number is set to double by 2050¹. It is estimated that there are 9,410 people with sight loss living in Coventry, and for a number of reasons, including an ageing population, this number is predicted to increase to 10,800 by 2032².

Taxis and private hire vehicles (PHVs) and the door-to-door service they provide are essential for disabled people. They are particularly important for the independence of blind and partially sighted people, who are unable to drive, and often face barriers when using public transport. However, accessing taxis and PHVs can be a major challenge for assistance dog owners.

It is a criminal offence to refuse to carry a guide or other assistance dog in a taxi or private hire vehicle, unless the driver has been issued with a valid medical exemption certificate by the licensing authority or DVA. Despite this, our research (2024) found that taxi and private hire vehicles remain one of the most common settings in which guide dog owners experience access refusals. Almost 60 per cent of guide dog owners have been refused access to a taxi or minicab; and 40 per cent

¹ Deloitte, 2017.

² [RNIB Sight Loss Data Tool - statistics on sight loss | RNIB | RNIB](#)



of guide dog owners reported that a taxi or minicab drove away when the driver saw their guide dog.

Access refusals represent a deeply harmful form of discrimination, preventing people with sight loss from getting to work, to medical appointments, or taking part in leisure activities.

Key recommendations:

1. Highlighting the law: taxi and private hire vehicle licensing policy should clearly state that all drivers have a duty to carry, free of charge, any assistance dog. We advise stating within the policy that **this is a legal requirement under the Equality Act 2010 and failure to do so is a criminal offence.**
2. Test for medical exemption certificate: licensing policy should state that a medical exemption certificate is required for drivers who are unable to carry an assistance dog for medical reasons. The policy should specify that medical exemption certificates can only be issued when authorised by a medical practitioner and accompanied by medical evidence, such as a blood test, skin prick test or clinical history. The policy should make it clear that, in the absence of a medical exemption certificate, drivers are required by law to carry an assistance dog and refusal to do so is a criminal offence.
3. Tactile marker for exemption certificates: medical exemption certificates should be accompanied by features distinguishable to vision-impaired passengers, such as an embossed (or raised) 'E'.
4. Zero tolerance: the policy should state that the Council will investigate all reported violations of the Equality Act 2010 in a timely manner, with a view to pursuing a conviction, and that failure to carry an assistance dog will lead to automatic revocation of a taxi or PHV licence.
5. Disability equality training: all drivers should be required to undertake disability equality training when they apply for or renew their taxi or PHV licence.



6. Mystery shopping: the policy should state that the Council will work with assistance dog owners to ensure that taxi and PHV drivers are complying with licensing policy, through various means such as, but not limited to, test purchases.

The impact on guide dog owners

Taxi access refusals and the consequences of delayed travel, combined with the emotional impact of facing discrimination and confrontation when trying to carry out everyday activities, take a significant toll on assistance dog owners. Apart from feelings of anger and embarrassment, refusals can undermine the independence that assistance dogs bring to their owners. 81 per cent of guide dog owners said that access refusals negatively impacted their ability to get out and about independently.

Assistance dog owners also reported that the stress of refusals had a detrimental impact on their mental health and on whether they feel able to leave the house. This also has a negative impact on their ability to access work and other opportunities.

“I was left on my own at the side of the road in the dark. I am deaf and unable to phone for help, and it made me feel very vulnerable. It makes me feel afraid to go out.” - Assistance dog owner.

“I was very upset, it was dark, raining and late at night. I was scared. I avoid evening invites, as I worry about getting home. I lose out on the chance of socialising with friends, which is bad, as I have no family.” - Guide dog owner, Rochester

“I used to have a very tough, two-hour commute to work. The taxi part of the journey was the shortest bit travel-wise, but it always ended up being the bit that held me up the most because I was having to spend time facing drivers who wouldn’t take me with my dog. ... It’s good that my contract was flexi hours otherwise I’m sure I would have been sacked for being late all the time - it happened so often.” - Guide dog owner, Daventry



Highlighting the law in respect of Assistance Dogs

We advise that Coventry City Council's licensing policy explicitly states that all drivers have a legal duty under the Equality Act 2010 to carry, at no extra charge, any assistance dog and failure to do so is a criminal offence.

Guide dog owners also report taxi access refusals which take the form of drivers not stopping the vehicle when they see the assistance dog. **Therefore, we recommend that failure to stop when flagged down by an assistance dog owner is clearly identified as an illegal taxi access refusal within the taxi licensing policy.**

Medical exemption certificates

We believe a taxi and/or private hire vehicle licensing policy should specify that medical exemption certificates must be authorised by a medical practitioner and accompanied by medical evidence, which demonstrates that a driver's medical condition is aggravated by exposure to dogs, such as a blood test, a skin prick test or clinical history.

It is often difficult for vision-impaired passengers to identify the validity of exemption certificates. Currently, it is not permissible for licensing authorities to issue exemption certificates that incorporate tactile features, as this would alter the certificate's prescribed form and render it invalid. We therefore recommend that the Council issues exemption certificates that are accompanied by features distinguishable to vision-impaired passengers, such as an embossed or raised 'E' and a braille marker to accommodate both braille readers and non-braille readers.

Enforcement

Given the significant impact an access refusal can have on assistance dog owners, it is important that all cases are taken seriously and are properly investigated.

It is a criminal offence for any operator or driver to refuse to carry assistance dogs, and the policy should make clear that failure to comply can result in a fine up to £1,000 and revocation of the taxi or PHV licence. **We recommend a zero-tolerance approach to enforcement.**



The licensing policy should clearly state that failure to carry an assistance dog without the required medical exemption certificate will result in immediate suspension or revocation of a driver's licence. It should also state that the Council will investigate all reported violations of the Equality Act 2010 in a timely manner, with a view to prosecution.

We also recommend that the Council works with assistance dog owners to ensure that taxi and PHV drivers are complying with licensing requirements by various means such as, but not limited to, test purchases.

Disability equality training

To help reduce the number of access refusals, it is important that drivers know their legal obligations and how best to assist customers with vision impairments, including those travelling with a guide or other assistance dog.

A Guide Dogs survey found that many taxi drivers are unaware of their legal obligation to carry an assistance dog and of the impact refusals have on assistance dog owners. The best way to address this is by making disability equality training for all taxi and PHV drivers mandatory, when applying for or renewing a licence.

Coventry City Council has a public sector equality duty (PSED) (Equality Act 2010) to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between people who share a 'protected characteristic' (such as a disability) and those who do not.

The [Taxis and Private Hire Vehicles \(Disabled Persons\) Act 2022](#)³ amends the Equality Act 2010 and places duties on taxi and PHV drivers and operators, so that any disabled person has specific rights and protections when using a taxi or PHV, without incurring an additional charge. Under the amendments, taxi and PHV drivers could face fines up to £1,000 if they fail to provide reasonable mobility assistance to disabled passengers taking a pre-booked vehicle.

³ [Taxis and Private Hire Vehicles \(Disabled Persons\) Act 2022 \(legislation.gov.uk\)](#)



As well as highlighting a driver's legal obligations and disabled people's rights, disability equality training should focus on the social model of disability, where people are 'disabled' by barriers and attitudes in society, rather than by their impairment. The training should emphasise the role an organisation and individuals play in the removal of these barriers, while also including awareness elements, such as customer care, etiquette, and appropriate communication.

Many of the positive experiences disabled people report when using taxis and PHVs are a result of drivers attending disability equality training. Councils that have made this training a condition of licensing report very positive results, with fewer refusals and drivers feeling more confident in assisting disabled people. In Northern Ireland, completing disability equality training is a pre-condition when applying for or renewing a taxi/PHV licence and, as a result, access refusals in these settings are extremely rare.

Useful resources

- Equality and Human Rights Commission Guidance for all Businesses: Assistance Dogs
<https://www.equalityhumanrights.com/guidance/assistance-dogs-guide-businesses-and-service-providers>
- Guide Dogs' Guidance for Taxi and Minicab Staff
<https://www.guidedogs.org.uk/about-us/what-we-do/research/policy-and-guidance-for-businesses/guidance-for-taxi-staff/>

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