

## COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

Title of EIA		Statement of Taxi Licensing Policy 2026-2031
EIA Author	Name	Mick Coggins
	Position	Senior Licensing & Enforcement Officer - Taxi Licensing
	Date of completion	
Head of Service	Name	Debbie Cahalin-Heath
	Position	Strategic Manager - Regulation & Communities
Cabinet Member	Name	Councillor Patricia Hetherton
	Portfolio	City Services

PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

### SECTION 1 – Context & Background

#### 1.1 Please tick one of the following options:

This EIA is being carried out on:

- ☐ New policy / strategy
- ☐ New service
- ☒ Review of policy / strategy
- ☐ Review of service
- ☐ Commissioning
- ☐ Other project (*please give details*)

#### 1.2 In summary, what is the background to this EIA?

Amendments to the Taxi Licensing Policy

The changes to the emissions policy are necessary as should we continue with the existing policy arrangements, and not extend the emissions policy to January 2030. This will allow further time for over 400 of our current vehicles which are required to be replaced by the taxi licensed trade.

If the amendment is not agreed a reduction in the overall operational fleet would have several significant impacts. Firstly, there would be a reduction in the number of wheelchair accessible vehicles, currently only Coventry licensed Hackney Carriage vehicles are wheelchair accessible (no Coventry licensed private hire vehicles are wheelchair accessible).

Secondly, much of the Coventry licensed Hackney Carriage vehicle undertake school contracts in Coventry and Warwickshire, and a reduction in the number of available vehicles may have had an adverse effect in this service.

As many of the licensed trade have been adversely impacted by the pandemic and the cost of living crisis, and the availability of vehicles licensed outside of the Coventry Boundary, the extension to the emissions policy will provide sufficient time for the trade to prepare for the trade to prepare for complying with the proposed emissions standards and obtaining suitable compliant vehicles.

Removing the London Conditions of Fitness, which restricts the type of vehicle that can be licensed as a Hackney Carriage, in conjunction with the revision of emissions standards in the Policy will provide a greater flexibility for drivers when selecting vehicles to license and will further enable a more accessible fleet in terms of wheelchair accessibility. Such vehicle will be required to be either as manufactured Wheelchair Accessible Vehicles (WAVs) or modified (with the approval of the Driver Vehicle Standards Agency (DVSA)) as WAVs. Removing the London Conditions of fitness will also even the playing field as all neighbouring authorities do not adopt such conditions to their Hackney Carriage fleet.

The current London Conditions of Fitness ([taxi-conditions-of-fitness-update-2019.pdf](#)) require amongst other matters for their hackney carriages to be able to turn within a 25 foot turning circle.

By widening the type of vehicle, it will provide greater choice to the licensed trade, which may give flexibility in the affordability of vehicles and this in turn may attract a new generation of drivers entering the trade. This also may enable more licensed drivers to work in the Night Time Economy, where the safety of particularly women and girls and vulnerability is of paramount importance.

### 1.3 List organisations and people who are involved in this area of work

Licensed Private Hire Operators, Private Hire Drivers, Private Hire Vehicle Proprietors, Hackney Carriage Drivers and Hackney Carriage Vehicle Proprietors. Public who travel by Private Hire Vehicles or Hackney Carriage Vehicles. Coventry City Council and Warwickshire County Council School Contracts.

### 1.4 Who will be responsible for implementing the findings of this EIA?

Debbie Cahalin-Heath

## SECTION 2 – Consideration of Impact

*Refer to guidance note for more detailed advice on completing this section.*

## COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

Data Sources to consider are :

- Previous research - consultation or EIAs carried out
- Customer feedback - including complaints, comments, surveys
- Employee feedback - including surveys, workforce monitoring, trade unions
- Specialist feedback - including focus groups, technical experts, subject specialists
- Feedback from organisations - such as those representing target groups
- National and local statistics –
  - National guidance or legislative requirements
  - Census data
  - Audit information
  - JSNA
  - Public health profiles
  - LG inform
  - Census
  - Office for National Statistics
  - Facts about Coventry
  - Breakdown of Coventry by Protected Characteristic
  - Armed Forces Veteran Data

Where possible, when you are analysing the data please try and break the data down by protected characteristic and additional groups.

### 2.1 Baseline data and information to include data

Please include a summary of data analysis below, using both your own service level management information. Where possible, compare your data to local data using: Facts about Coventry; Census 2021; JSNA etc

Taxi Licensing currently licenses 597 Hackney Carriage Drivers, 464 Private Hire Drivers, 430 Hackney Carriage Vehicles, 356 Private Hire Vehicles, 52 Private Hire Operators. Most of these licensee holders live within the Coventry City boundary or within a few miles outside the border.

Drivers have to have a Group 2 Medical from any Medical Practitioner.

The Taxi Licensing Office does not collate protected information about the licensee holders apart from their name, address, date of birth, contact details, national insurance number, driving license number and passport number - in line with the National Anti-Fraud Network (NAFN) requirement & Department for Environment, Food and Rural Affairs (DEFRA).



## 2.2 Please highlight which Marmot Principles this EIA supports

1. Give every child the best start in life
2. Enable all children, young people and adults to maximise their capabilities and have control over their lives
3. Ensure a healthy standard of living for all
4. **Create fair employment and good work for all**
5. **Create and develop healthy and sustainable places and communities**
6. Strengthen the role and impact of ill health prevention
7. **Tackle racism, discrimination and their outcomes**
8. Pursue environmental sustainability and health equity

## SECTION 3 – Protected Groups and Additional Groups

### 3.1 Based on section 2, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)

Please include considerations of health and digital inequality as part of your analysis below.

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	P	<p>.Gradual emission reductions will lead to improved air quality, offering significant health benefits—particularly for individuals with respiratory conditions who are more vulnerable to pollution</p> <p>If the proposed amendment is not approved, school transport contracts supported by this service will be adversely affected. A substantial reduction in available vehicles would compromise service delivery, potentially disrupting children's access to education.</p>



Age 19-64	P	<p>By removing the London conditions of fitness drivers could choose from more affordable or varied models. Due to lower costs it Could attract new drivers to the trade.</p> <p>Reducing emission reductions will lead to improved air quality, offering significant health benefits—particularly for individuals with respiratory conditions who are more vulnerable to pollution</p> <p>Many taxi drivers in Coventry fall within this age group and are more likely to be in lower-income brackets, making the upfront cost of transitioning to electric vehicles a considerable challenge.</p> <p>Extending the implementation period would give these drivers more time to manage the financial transition and explore available government grants and other forms of financial support.</p> <p>This extension would also help ensure that residents of Coventry continue to have access to reliable taxi services, which are essential for enabling social interaction and participation in work. Without this amendment, a significant reduction in available vehicles could occur, potentially disrupting these vital connections and negatively impacting community wellbeing</p>
Age 65+		<p>Gradual emission reductions will lead to improved air quality, offering significant health benefits—particularly for individuals with respiratory conditions who are more vulnerable to pollution</p> <p>Extending the implementation period would give these drivers more time to manage the financial transition and explore available government grants and other forms of financial support.</p> <p>This extension would also help ensure that residents of Coventry continue to have access to reliable taxi services, which are essential for enabling social interaction. Without this amendment, a significant reduction in available vehicles could occur, potentially disrupting these vital connections and negatively impacting community wellbeing.</p> <p>A considerable number of the drivers are over the age of 65 and the extension would help drivers to make informative decisions about whether to finance a replacement vehicle or possibly look to retirement.</p>

## COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

Disability	<b>P</b>	<p>If the amendment is not agreed a reduction in the overall operational fleet would have several significant impacts.</p> <p>There would be a reduction in the number of wheelchair accessible vehicles, currently only Coventry licensed Hackney Carriage vehicles are wheelchair accessible (no Coventry licensed private hire vehicles are wheelchair accessible).</p> <p>This extension would also help ensure that residents of Coventry continue to have access to reliable taxi services, which are essential for enabling social interaction. Without this amendment, a significant reduction in available vehicles could occur, potentially disrupting these vital connections and negatively impacting community wellbeing</p>
Gender reassignment	<b>NI</b>	
Marriage and Civil Partnership	<b>NI</b>	
Pregnancy and maternity	<b>NI</b>	
Race (Including: colour, nationality, citizenship ethnic or national origins)	<b>P</b>	<p>Many taxi drivers in Coventry fall within this group and are more likely to be in lower-income brackets, making the upfront cost of transitioning to electric vehicles a considerable challenge.</p> <p>Taxi drivers may also face language barriers, limited access to information, the extended time will allow targeted intervention to take place with group</p> <p>Without targeted outreach and support, these groups may be excluded from transition benefits or face penalties and possible lead to loss of livelihoods</p>
Religion and belief	<b>NI</b>	
Sex	<b>P</b>	<p>If this amendment is not agreed there will be a disproportionate negative impact on males and they make up most of Coventry taxi work force</p> <p>This could lead to loss of livelihood if their vehicles are non-compliant with emission standards</p> <p>Expanding the range of permitted vehicles will offer greater choice to the licensed taxi trade, potentially making vehicle ownership more affordable. This increased flexibility may encourage a new generation of drivers to enter the profession.</p>



## COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

		Additionally, it could enable more licensed drivers to operate during Night Time Economy hours, where ensuring the safety of women, girls, and vulnerable individuals is especially critical.
Sexual orientation	NI	

**3.2** Based on section 2, complete the table below to show what the potential impact is for each of the additional groups.

Group	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Care Experienced	NI	
Armed Forces	NI	
Social Economic Groups	P	<p>If the amendment is not agreed: Drivers from low-income backgrounds may not afford the upfront cost of EVs, even with grants. This can lead to loss of livelihood if their vehicles are non-compliant with emission standards</p> <p>Over time, EVs can be cheaper to run due to lower fuel and maintenance costs, which may benefit drivers from lower socio-economic backgrounds and ethnic minority groups, who are overrepresented in the taxi trade</p>

### SECTION 4 –Next steps

Planned Action	Owner	Timescale
Collating ethnicity data for taxi drivers	Debbie	

**4.2** How will you monitor and evaluate the effect of this work?

Monitor the number and type of complaints from passengers. Taxi Licensing receives about 5% of its complaints from passengers who have disability issues. All the hackney carriage vehicles licensed by Taxi Licensing are Wheelchair Accessible Vehicles (WAVs). Liaison with Disability Groups.

### SECTION 5 – Impact on Council Staff

**5.1** Will this area of work potentially have an impact on Council staff? Yes/No  
If yes

## COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

### Nature of impact and any mitigation required

n/a

#### 5.2 Please provide headcounts for the below.

If you think by completing this section's headcounts, employees will become identifiable please email [equality@coventry.gov.uk](mailto:equality@coventry.gov.uk) for advice on data protection implications

#### Impact on Council staff - Sex

Female

Male

#### Impact on Council staff - Disability

Disabled

Not disabled

Prefer not to state

Unknown

#### Impact on Council staff - Ethnicity

White

Black, Asian, Minority ethnic

Prefer not to state

Unknown

#### Impact on Council staff – Sexual orientation

Heterosexual





COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

LQBT+

Prefer not to state

Unknown

Impact on Council staff – Age

16-24

25-34

35-44

45-54

55-64

65+

Impact on Council staff – Religion

Any other

Buddhist

Christian

Hindu

Jewish

Muslim

No religion

Sikh

Prefer not to state



Unknown

## SECTION 6 – Completion Statement

**As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:**

- No impact has been identified for one or more protected groups ☐
- Positive impact has been identified for one or more protected groups** ☒
- Negative impact has been identified for one or more protected groups ☐
- Both positive and negative impact has been identified for one or more protected groups ☐

Before you submit this form - please save your progress and forward the email you receive with any questions to [equality@coventry.gov.uk](mailto:equality@coventry.gov.uk). The team will review your Equality Impact Assessment and provide you with feedback.

## SECTION 7 - Approval

<b>Name of Head of Service:</b>	<b>Date approved by Head of Service:</b>
<b>Name of Director:</b>	<b>Date sent to Director:</b>
<b>Name of Lead Elected Member:</b>	<b>Date sent to Councillor:</b>

