

## Equality Analysis

<b>Directorate:</b> City Environment and Housing  <b>Service Area:</b> Licensing Services	<b>Lead Officer:</b> Greg Bickerdike, Licensing Manager  <b>Date completed:</b> 5 December 2022
<b>Service / Function / Policy / Procedure to be assessed:</b> Driver Safety Enclosures	
<b>Is this:</b> New / Proposed <input checked="" type="checkbox"/> Existing/Review <input type="checkbox"/> Changing <input type="checkbox"/>  (Please tick appropriate box)	<b>Review date:</b>  28 February 2023.

### Part A – Initial Equality Analysis to determine if a full Equality Analysis is required.

**What are the aims and objectives/purpose of this service, function, policy or procedure?**

To reduce violence against hackney carriage and private hire drivers licensed by the Council.

**Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?**

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment	Yes	
Advancing equality of opportunity	No	
Fostering good community relations	No	

**If not relevant to any of the three equality duties and this is agreed by your Head of Service, the Equality Analysis is now complete - please send a copy to the Equality & Diversity Team. If any of the three equality duties are relevant, a Full Equality Analysis will need to be undertaken (PART B below).**

**PART B: Full Equality Analysis.**

**Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)**

<b>What outcomes are sought and for whom?</b>	<b>A reduction in violence against licensed drivers.</b>
<b>Are there any associated policies, functions, services or procedures?</b>	<b>Taxi CCTV Policy</b>
<b>If partners (including external partners) are involved in delivering the service, who are they?</b>	<b>External suppliers will be required to manufacture and install the enclosures.</b>

**Step 2 – What does the information you have collected, or that you have available, tell you?**

**What evidence/data already exists about the service and its users?** (in terms of its impact on the ‘equality strands’, i.e. race, disability, gender, gender re-assignment, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

Nationally, the majority of drivers were male (97%) in 2022. The average age of a driver is 48 years old, with 17% of drivers being aged under 40. The two main ethnic groups of drivers were White and Asian or Asian British in 2022, making up 41% and 42% of drivers respectively. This compares to 63% and 29% respectively in 2010. There was an increase in the proportion of non-UK nationals working as drivers in England, rising from 13% in 2010 to 23% in 2022. Therefore, these groups are more likely to be victims of violent crime from passengers.

**Has there been any consultation with, or input from, customers / service users or other stakeholders?** If so, with whom, how were they consulted and what did they say? If you haven’t consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

Yes, the matter was discussed at the Private Hire Trade Working Group. The enclosures have been proposed by the trade and this policy seeks to mitigate the risks of sub-standard equipment by introducing a list of approved suppliers.

**Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?**

A licensed driver was killed in October 2022 and there is significant anecdotal evidence of assaults on drivers, often involving racial or religious hatred.

**Step 3 – Identifying the negative impact.**

**a. Is there any negative impact on individuals or groups in the community?**

	<p><b>Barriers:</b></p> <p>What are the potential or known barriers/impacts for the different ‘equality strands’ set out below? Consider:</p> <ul style="list-style-type: none"> <li>• <b>Where</b> you provide your service, e.g. the facilities/premises;</li> <li>• <b>Who</b> provides it, e.g. are staff trained and representative of the local population/users?</li> <li>• <b>How</b> it is provided, e.g. do people come to you or do you go to them? Do any rules or requirements prevent certain people accessing the service?</li> <li>• <b>When</b> it is provided, e.g. opening hours?</li> <li>• <b>What</b> is provided, e.g. does the service meet everyone’s needs? How do you know?</li> </ul> <p>* Some barriers are justified, e.g. for health or safety reasons, or might actually be designed to promote equality, e.g. single sex swimming/exercise sessions, or cannot be removed without excessive cost. If you believe any of the barriers identified to be justified then please indicate which they are and why.</p>
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	<p><b>Solutions:</b></p> <p>What can be done to minimise or remove these barriers to make sure everyone has equal access to the service or to reduce adverse impact? Consider:</p> <ul style="list-style-type: none"> <li>• Other arrangements that can be made to ensure people’s diverse needs are met;</li> <li>• How your actions might help to promote good relations between communities;</li> <li>• How you might prevent any unintentional future discrimination.</li> </ul>		
Equality Themes	Positive Impacts	Negative Impacts identified	Solutions (ways in which you could mitigate the negative impact)
<p><b>Age</b> (including children, young people and older people)</p>		<p>Elderly people are more likely to suffer serious injury in an accident from unapproved or ill-fitted enclosures.</p>	<p>The enclosure:</p> <ul style="list-style-type: none"> <li>• Must be professionally installed by a competent person in accordance with the manufacturer’s instructions.</li> <li>• Must be fitted within the vehicle accordance with regulations UN ECE R43.00 and R21.01 and Section 12 of the M1 category DVSA IVA manual.</li> <li>• Must not be modified from the original manufactured design, without the manufacturer’s confirmation that this will not cause any safety issues or non-compliance with the</li> </ul>

			<p>relevant UK and/or EC safety legislation.</p> <ul style="list-style-type: none"> <li>• Must not negatively affect any safety equipment, such as airbags, or escape from the vehicle.</li> </ul>
<b>Disability</b> (including carers)		<p>People with disabilities are more likely to suffer serious injury in an accident from unapproved or ill-fitted enclosures.</p>	<p>As above.</p>
		<p>People who have hearing difficulties may struggle to hear what the driver is saying.</p>	<p>Enclosure must permit clear conversation between the driver and passengers.</p>
		<p>People with sight issues might not be able to see the driver as clearly.</p>	<p>Enclosure must be maintained to a high standard of cleanliness, be 100% transparent and free of marks, graffiti or stickers.</p>
<b>Gender</b> (men and women)	<p>Nationally, the majority of drivers were male (97%) in 2022. As such, additional protection will disproportionately benefit this group.</p> <p>Increased protection from passengers might also encourage greater representation from females as drivers.</p>		
<b>Race</b> (including Gypsies & Travelers and Asylum Seekers)	<p>Asian or Asian British drivers make up 42%, compared to 6.9% of the population. Asian drivers</p>		

	are disproportionately represented in the trade and as such, additional protection will benefit these group, particularly from violence motivated by race.		
<b>Religion or belief</b> (including people of no religion or belief)	Additional protection will benefit these group, particularly from violence motivated by religious hatred.		
<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)			
<b>Pregnancy and Maternity</b>			
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)			
<b>Marriage and Civil Partnership</b>			
<b>Human Rights</b>	This measure supports Article 2 of the Human Rights Act.		

**Step 4 – Changes or mitigating actions proposed or adopted**

**Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure?  
What changes or mitigating actions are proposed?**

Policy has been updated to include the solutions identified.

**Step 5 – Monitoring**


**How are you going to monitor the existing service, function, policy or procedure?**

A six-week consultation on the draft policy is proposed, which will inform the final policy which will be regularly reviewed.

**Part C - Action Plan**

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
Issues not anticipated may result from the policy.	Approval for consultation to be sought from Regulatory Committee.	Greg Bickerdike	By 11 January 2023.

**Equality Analysis approved by:**

Head of Service: 	Date: 06 December 2022
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**Please send an electronic copy of the Equality Analysis to the Equality & Diversity Team:**