



Ms Caroline Pidgeon MBE AM
Chair of Transport Committee
London Assembly
City Hall
The Queen's Walk
London SE1 2AA

Sir Peter Henty CBE
Commissioner of Transport

Transport for London
Windsor House
42-50 Victoria Street
London SW1H 0TL

Phone 0343 222 0000
www.tfl.gov.uk

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Dear 

Future proof report follow up questions

Thank you for your letter of 12 March 2015, following up on our response to the Committee's *Future proof* report.

I have addressed each of your points in turn below.

Strategy

The Taxi and Private Hire Terms of Reference Group has recently been established with representatives from the Licensed Taxi Drivers' Association (LTDA), the London Cab Drivers' Club (LCDC), Unite the Union, the Licensed Private Hire Car Association (LPHCA) and Addison Lee all invited. The meeting is chaired by Isabel Dedring, with attendance from TfL.

The Group's first meeting took place on 5 March and is intended to take place monthly. This group provides an opportunity to discuss regulatory matters and future strategy with the taxi and private hire trades but will not be a decision-making forum.

The Private Hire Regulations Review (PHRR) was published on Friday 26 March 2015 and Appendix 1 contains a copy of the TfL notice announcing this and encouraging responses from the trades and other relevant stakeholders. The consultation will remain open until 19 June 2015 and I would welcome the Committee's views on the issues being consulted upon as well as your support in encouraging other interested parties to respond. The consultation can be found on our website: <https://consultations.tfl.gov.uk/tph/private-hire-regulations-review>.

Enforcement

On the issue of enforcement resources I must reiterate we should not look at the 68 dedicated cab enforcement officers in isolation. It is about making the most effective use of all police and TfL resources to maximise activity and ensuring officers have the right powers and knowledge to deal with issues effectively.

As I have said previously, the 68 dedicated officers work alongside TfL's 41 Taxi and Private Hire compliance officers (with that team being increased by 17 per cent this month, to 48 compliance officers).

The creation of the new MPS Roads and Transport Policing Command (RTPC) brings with it the opportunity to significantly increase the level of cab enforcement activity across London and deal with illegal cab activity more effectively. Cab enforcement is now a shared priority for all officers in the 2,300 strong Command – it is not just limited to the dedicated cab enforcement officers. Over 400 officers at a time can and are being mobilised to focus on priority issues, including touting and cab-related sexual offences. It also provides opportunities to expand on high visibility deterrence activities, improved intelligence gathering and problem-solving in areas that have previously received limited attention.

To tackle the problems of touting, cab related sexual offences and other illegal and non-compliant cab activity, police and TfL officers need to deploy the most effective tactics. Deploying officers from a wider pool who can be used in decoy operations, and are not recognised by persistent touts is often a far more effective way to catch and convict than using recognised officers. It is our view that the flexible use of police resource, combined with TfL's own compliance activity, is essential in dealing with many of the issues raised by the licensed taxi and PHV trades.

Our compliance officers have a vital role in the regulation of the licensed taxi and private hire trades, working to ensure they maintain high standards of safety for the travelling public. Their work involves intelligence led and routine inspections of licensed operators, roadside vehicle and driver inspections; investigating complaints from the trade and members of the public on unlawful activity; test purchase exercises; investigations with the Police into fraud by unlicensed drivers and use of forgeries by licensed yellow badge drivers and undertaking joint operations with the police at major venues such as Heathrow, City Airport and in the West End.

TfL has been ramping up its prosecution of drivers for unlawful plying for hire offences and taking a booking without an operators licence. Since April 2013 we have dealt with 128 cases, and have achieved a 96 per cent conviction rate for the cases we have taken to court to date. These prosecutions are in addition to the offences detected and dealt with by the police.

Over the course of 2014/15, the Cab Enforcement Unit alone made over 570 arrests for touting offences. Ninety-seven per cent of these resulted in a charge (resulting in the driver being prosecuted) or a caution. We consider a caution to be a swift and effective sanction for first time offences where the driver admits guilt. TfL will normally revoke licences from drivers convicted (or cautioned for) touting offences.

It is our view that dealing with illegal cab activity is a shared responsibility between TfL, the RTPC and the wider MPS. As I said at the Committee's meeting in February, I would like to see the local borough police give greater priority to touting and other illegal cab activity in areas where touting has been identified as an issue. I mentioned some examples of areas that have very large and vibrant night time economies and where touts are known to operate. We are working with the MPS on what more can be done in terms of increased activity in priority areas and training and support for officers.

We will continue to keep the number of dedicated resources under review and commit to keeping the dialogue open with the licensed trades on the most effective ways to enforce against touting and other illegal cab activity. We welcome Steve McNamara's comments (made at the Transport Committee on 2 September 2014), that the taxi trade would be prepared to fund increased enforcement activities through a higher license fee, which represented a significant change in position from the trade. Following a recent licensing and compliance meeting with the private hire trade, we are considering what an appropriate level of increased compliance officers would be.

Public awareness and signage

You have again raised the issue about public awareness of what constitutes a licensed taxi or private hire vehicle. Our position on a specific campaign to improve understanding of vehicle identification remains unchanged at the current time but we will look again at this issue following the trial with new private hire vehicle signage in London and responses to the PHRR consultation. I'm pleased to note that the Committee will be writing to the Department for Transport and the DVLA to support our proposal for new vehicle signage.

The PHRR explores additional measures for operators to provide passengers with vehicle and driver photo ID before the commencement of the journey, and I look forward to the Committee's response on this matter.

As we have explained, our current communications campaign focuses on how to book a legal, licensed private hire vehicle (PHV), rather than how to identify a licensed vehicle. The reason for this is to prevent people from approaching a licensed PHV on the street, mistakenly believing it is legal and safe to do so.

The latest survey results commissioned by TfL (Late Night Travel Options, January 2015) show that 36 per cent of people still incorrectly believe that minicabs can take customers who do not have a booking if they are licensed (licence disc in window or driver has a badge). The survey also shows 45 per cent think that by checking the minicab has a licence sticker in the window or the driver has a badge then it is safe to use an un-booked minicab. It is for these reasons we believe the current focus should remain on how to book a licensed minicab, rather than how to identify a licensed vehicle. Our campaign also encourages passengers to check the driver's ID before getting into the vehicle to ensure the driver of the vehicle is a licensed driver and in the case of PHVs, it is the one they have booked.

As I said at the Committee meeting, there is more we can do around education and engagement, building on the success of the Safer Travel at Night campaign. We will work with the tourism industry and the airports to look again at the information given to visitors on how to access licensed, safe taxis and private hire vehicles in London.

I welcome the Committee's support for improving the information available to passengers on how to give feedback and make complaints on taxi and private hire services. Such a move provides the basis of a potential Code of Conduct and Passenger Charter in future. The PHRR asks respondents for suggestions on how the current complaints arrangements can be improved and this has been sent to a number of different passenger groups, as well as stakeholders within the taxi and private hire trades.

Incentives for cashless payment options

We fully agree with the Committee that the widening of payment options for taxis has benefits for both drivers and passengers and we have decided to bring forward the consultation on card acceptance in taxis, which will now be published in May 2015 rather than December 2015 as originally planned. We are also encouraged to hear that the main taxi trade bodies may for the first time be prepared to support the mandating of credit/debit card facilities in cabs, subject to further discussion on details and consultation.

There are already a number of card payment devices approved for use in licensed taxis and a list of these is enclosed in Appendix 2. The devices approved include some with transaction charges of between 2.75-1.5 per cent so drivers can already benefit from lower charges. However, we will continue to work with the card payment industry and taxi trade to explore options for costs being reduced further.

Analysing supply and demand

Given advancements in technology since the last 'Driver Diary' survey we already planned to update the methodology of the planned research this year.

We will be commissioning an independent research company to carry this out on our behalf and intend to identify electronic methods of capturing the data in conjunction with the trades.

As well as the Driver Diary research we'll also be commissioning new separate research to understand the supply and demand for taxi and private hire services across the Capital.

You reference our Cabwise service which provides users with information to enable them to book a minicab or other private hire vehicle. When we engage a company to conduct this research we will discuss the best methods of collecting data from all available sources, including Cabwise.

We do not receive information from taxi and private hire licensees about each individual journey in London. Having anonymised data about taxi and private hire journeys would be extremely useful for transport planning and supporting the taxi and private hire industries; however, any such data collection will need to be discussed with the trades first. In the meantime I would welcome the Committee's thoughts on whether all licensed taxi and private hire vehicles should collect trip data and provide this to TfL.

Ranks Action Plan

As the Committee is aware, we fully recognise extra measures are required to protect existing taxi ranks and accelerate the provision of new ones, particularly in suburban areas, which is why we recently published our Ranks Action Plan, and why we are supporting the plan with a £600,000 budget.

I would like to clarify that the list of taxi rank requests provided by us as part of your initial research holds all the requests received from the trade where TfL has submitted the request to the borough, rather than (as was reported by the Committee) being a list of ranks requested by the boroughs that is waiting for TfL. The vast majority of taxi ranks are on roads where the local borough is the highway authority. TfL is frustrated at the slow progress in some areas and is doing all it can to secure agreement with the boroughs. Many boroughs are citing a lack of resources; we have made it clear funding could be made available to them. For my part, and as I said at Committee, I intend to raise the issue of ranks in my meetings with the CEs of London's borough councils.

There are a number of taxi rank proposals that we are working on with the London Cab Ranks Committee and local taxi drivers. The table in Appendix 3 summarises the current position regarding the high priority requests from the trade.

A dedicated page on taxi ranks is now available on our website at www.tfl.gov.uk/info-for/taxis-and-private-hire/taxi-ranks; we continually review this to ensure the content remains appropriate.

A policy on 'island' taxi ranks is being prepared and I can confirm that this will also cover extension areas.

Our initial review of the Night Tube network, which will be introduced on 12 September this year, shows that of the 144 stations on the Night Tube network, 63 stations (44 per cent) already have a taxi rank in place, although some may require changes to service Night Tube passengers. In total, we have identified 95 stations that may benefit from changes to their rank provision and have shared these findings with the London Cab Ranks Committee to obtain their feedback. Additional resource has been recruited to focus on delivering Night Tube ranks.

At present our ranks team is focussed primarily on liaison with boroughs and other interested parties to deliver the ranks identified in Appendix 3, as well as ranks at Night Tube stations and Crossrail stations.

Entry requirements into the market

I can assure you the Knowledge of London appearance schedule is not unduly delayed by procedural issues and every effort is made to ensure the target days of 56 days (stage 3), 28 days (stage 4) and 21 days (stage 5) remain on schedule. The Knowledge process is not used as a method of controlling numbers and candidates that study the Knowledge with the level of commitment required have been known to pass through the Knowledge in a relatively quick time.

Now the Suburban Review is complete, we will have discussions with the taxi trade to determine a date from which we will proceed with processing applications for the three suburban sectors that were placed on hold for the duration of the review.

Disabled access

The PHRR consultation includes a proposal for additional training, including on the needs of disabled passengers, for private hire drivers. The consultation questions are open and we will examine the responses to determine the support for extending this training to private hire operators.

As covered earlier in my letter, the PHRR also encompasses a review of the complaints process and we look forward to hearing the views from all passenger user groups, including disability organisations, to ensure the complaints process is robust and accessible.

Suburban Action Plan

The Suburban Action Plan includes a commitment to establish a regular forum to discuss suburban taxi driver issues and this will provide an opportunity for suburban drivers to raise specific issues affecting the trade in the outer London boroughs. We have also committed to undertaking a supply and demand survey in autumn this year, the results of which will be carefully considered.

Engagement

We will publish the action trackers from TfL's meetings with trade representatives (from May 2015) on the taxi and private hire pages of the TfL website.

As covered earlier in my letter, the Taxi and Private Hire Terms of Reference Group has recently been established to facilitate a co-operative and inclusive approach and to discuss common areas of interest.

Uber London Ltd

I replied separately to your letter regarding Uber London Ltd on 10 March 2015.

Transport Committee, 25 February

Finally, I would like to confirm I have now had the opportunity to look into the two things I committed to review when I gave evidence to your committee on 25 February.

Firstly, in relation to the recreation of a taxi and private hire director position within Surface Transport, I am satisfied this would not be in the best interests of taxi and private hire customers, in the licensing and regulation of the two trades, or in the creation of a truly integrated transport system in London.

The Surface Transport Service Operations Directorate (under Peter Blake), which was set up in September 2013, is already delivering significant operational synergies, for example developing better working relationships with the trade and better integrating various parts of the business, such as the development of an integrated strategy to make taxi and private hire services a more effective part of social needs transport provision in London. As I outlined earlier, TfL's Enforcement and On-Street Service Directorate (under Steve Burton), also established in September 2013, is already leading to much more effective deployment of TfL's and Metropolitan Police's combined resources to tackle touting. To revert to a situation where all these (and many other) taxi-related issues are managed in isolation to the wider transport needs of London as a whole would, I believe, be a retrograde step.

However, I do accept that while the recent changes in management structure of Surface Transport have brought about many benefits, there are those in the taxi and private hire trades who feel this has been at the expense of them having a single senior level point of contact and 'advocate' for their industry within TfL.


Following discussion with Leon Daniels, he has therefore agreed to create a new taxi and private hire industry relationship manager position at a senior level within Surface Transport.

This person who will be responsible for representing the industry's interests across TfL and provide a single co-ordinating point of contact to ensure its views are heard, and/or responded to consistently across the business. I expect an appointment to be confirmed imminently.

In relation to the Cabbies Cabinet, as I said, this is the Mayor's meeting. The Mayor made his position clear, at Mayor's Question Time, but will raise the publication of the agendas and actions and Assembly participation with the trade reps at the next meeting.

In closing, I agree London's taxi and private hire services are a vital part of the transport network, and I look forward to continuing to work together to ensure these services meet the needs of passengers in the years to come.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Peter Hendy', written in a cursive style.

Sir Peter Hendy CBE

Appendix 1

TPH Notice 01/15

Private Hire Vehicles – have your say

Help us to shape the future of the private hire industry in London by having your say in our comprehensive regulations review of private hire services.

In recent years there have been a number of developments within the private hire industry, including advances in technology and changes to how people engage and share private hire services. We want to ensure the regulations that provide for the licensing of private hire operators, drivers and vehicles keep pace with these changes.

We have today launched a public consultation, seeking your views on the regulations. This consultation covers a range of topics and questions including:

- Should we have an English language requirement for drivers?
- Is it beneficial to introduce new training requirements for applicants?
- Should we review the current arrangements for vehicle insurance?
- Do you have views on what information should be captured by an operator as part of a customer booking record?

The consultation opens today and runs until 19 June 2015.

You can find it on our website:

<https://consultations.tfl.gov.uk/tph/private-hire-regulations-review>, where you will also find details of how to respond.



27 March 2015

For previous Notices visit tfl.gov.uk/tph

**Helen Chapman
General Manager,
London Taxi and Private Hire**

Appendix 2

TfL approved card payment devices for use in taxis

Product names	Type of system	Website address
VeriFone Vx670	Chip & Pin	www.verifone.co.uk
VeriFone Vx510	Chip & Pin & Contactless	
VeriFone Vx810	Chip & Pin & Contactless	
VeriFone Vx820 with Xeta PDA configuration	Chip & Pin & Contactless	
VeriFone Vx680	Chip & Pin	
Radio Taxi Group, VeriFone Configuration	Chip & Pin & Contactless	
Taxipay mobile phone payment service	Mobile Phone	www.adelante.co.uk
Dashtaxi Mobile Phone Payment	Mobile Phone	www.adaptis-solutions.com
CCIPS Terminals and Media TX2 payment system	Chip & Pin	www.cabvision.com
Ingenico Terminal ICT 220 & IPP 350	Chip & Pin with swipe facility	www.ingenico.co.uk
Credit Card Payment Reader/Solution with SM-S220i printer	Bluetooth/WiFi Chip & Pin with printer	www.izettle.com

Appendix 3

Taxi ranks

The table below lists the highest priority taxi rank proposals currently being worked on. The locations are either ones that we currently feel are a high priority or the London Cab Ranks Committee has said are a high priority for them. Please note that this is not an exhaustive list of all taxi rank proposals currently being considered and pursued.

Highway Authority	Location	Current Position
Bexley	The Broadway, Bexley	<p>A positive meeting with the borough was held to discuss this proposal.</p> <p>The discussions are ongoing with latest proposals discussed the end of March 2015.</p>
Brent	<ul style="list-style-type: none"> • Kilburn High Road, Sainsbury's • Kilburn High Road, Wesbury's Pub • Kilburn Lane, Paradise Club • Kilburn Station • Queen's Park, by the station • Station Terrace, Kensal Rise (Chamberlain Road) • Wembley Central Station 	<p>Site visits took place to discuss these proposals.</p> <p>Last year the borough advised us that due to resource issues they would not be able to take these forward immediately but would advise us when there would be sufficient resources to work on this.</p> <p>TfL officers have raised the matter subsequently and the locations will be raised by the Commissioner as part of his next meeting with the borough.</p>
Camden	Tottenham Court Road taxi ranks	<p>As part of the Tottenham Court Road two-way project, the borough are proposing to ban taxi access to sections of Tottenham Court Road which will affect some taxi ranks plus taxi journey times and the ease with which taxi passengers can be picked up and dropped off.</p>

Highway Authority	Location	Current Position
		<p>We asked the borough to investigate mitigation measures and expressed concerns on behalf of taxi passengers looking to alight in the area.</p> <p>However, the borough is intending to proceed with this proposal.</p>
	Camley Street	<p>A site visit was held with the borough last year at which this location was discussed and the borough agreed to review appointing a new taxi rank in Camley Street.</p> <p>The borough has requested a further meeting to discuss taxi issues in the King's Cross/St Pancras area on 3 June.</p> <p>Separately the borough has consulted on proposals which would reduce the size of the taxi ranks at King's Cross and St Pancras stations.</p>
Greenwich	Greenwich Church Street (Greenwich Market)	<p>In March 2015 the borough advised us that as a result of concerns regarding bus movements they would not be taking this forward. We are working on potential mitigation measures to see if it is possible to address these concerns or find a suitable alternative location.</p>
Hammersmith and Fulham	<ul style="list-style-type: none"> • Fulham Broadway • Hammersmith Broadway 	<p>Two separate site visits (July 2014 and January 2015) to discuss these proposals have taken place with the borough.</p> <p>The Commissioner will raise this at his next meeting with the borough.</p>

Highway Authority	Location	Current Position
Hounslow	Chiswick High Road, Jamie Oliver's restaurant	In November 2014 the borough advised us that they did not have the resources to look at this request separately but that it would be considered as part of a new cycle scheme.
Lambeth	Brixton	This has been discussed briefly with the borough and will be formally requested by end of May 2015.
Lewisham	Blackheath Station/Tranquil Vale	<p>This location is on the boundary between the boroughs of Lewisham and Greenwich and there has been a difference of opinion between the boroughs over who is the highway authority for the proposed location.</p> <p>This was raised with the London Borough of Lewisham again last month and we are awaiting a response.</p>
Newham	Stratford Broadway	We continue to investigate this location to ensure the rank does not disproportionately impact on bus passengers. We have requested a site visit with the borough to look at this in detail.

Highway Authority	Location	Current Position
	<ul style="list-style-type: none"> • Upton Park Station • West Ham Station 	<p>The borough advised us last year these proposals would be taken forward although with reduced hours of operation.</p> <p>The hours of operation have been challenged and we continue to press on the matter. The Commissioner will discuss the locations in his next meeting with the borough.</p>
Richmond upon Thames	Twickenham Stadium	<p>A new taxi rank was trialled in last month for England's last Six Nations match.</p> <p>A meeting to review this trial and discuss the next steps has been requested with the borough.</p>
Waltham Forest	Leytonstone Station, Grove Road	<p>A request to reinstate the previous taxi rank with the same number of spaces was submitted to the borough.</p> <p>Following a number of meetings it was agreed a six month trial would proceed with the start date to be finalised by the borough shortly.</p>
Westminster	Bulgari Hotel	<p>A taxi rank outside the hotel was marked out but immediately removed following objections from the residents.</p> <p>The borough has rejected the most recent request for a rank for this hotel.</p>

Highway Authority	Location	Current Position
	Chiltern Firehouse hotel and restaurant	<p>Requests for two taxi ranks – one for the daytime and one for the night – have been submitted to the borough.</p> <p>The borough has rejected the request for a daytime rank citing restrictions in the planning application for this venue.</p> <p>A location for a night time rank has been proposed and this will be discussed with the borough on 11 May 2015</p>
	Waterloo Place, Sofitel Hotel	A taxi rank for this hotel was requested but was rejected by the borough.
TfL*	<ul style="list-style-type: none"> • Clapham South Station • Commercial Street (Smiths of Smithfield) • Finsbury Park Station • Heron Tower • Old Billingsgate Market, Lower Thames Street • The Venue, New Cross • Vauxhall Cross Station 	Assessment of all these are being progressed.
TfL and boroughs	Crossrail Stations	Plans for ranks at Crossrail stations are currently being evaluated.

*TfL is the highway authority where rank requests are on the Red Route

[Ends]