

# MAYOR OF LONDON

**Florence Eshalomi AM**

Chair of the London Assembly Transport Committee  
City Hall  
The Queen's Walk  
London SE1 2AA

**Our ref:** MGLA270319-8905

**Date:** 17 JUL 2019

*Dear Florence,*

I am responding to the previous Chair of the Transport Committee's letter of 2 April regarding your Committee's investigation into taxi and private hire services in London. Please accept this as a joint response from myself and Transport for London (TfL).

From examining the report and its detailed recommendations, there is clearly a lot of common ground between myself, TfL and the Transport Committee in our views about where the focus needs to be in order to drive up standards and safety for both passengers and drivers.

Taxi and private hire services are an essential part of London's transport network, providing a wide-ranging service to the business community, members of the public and tourists travelling around the capital. It is a challenging and constantly evolving area at the forefront of transport technology with the introduction of greener vehicles, innovative new services and various new apps. These trends have created challenges for transport authorities around the world, including how to apply existing licensing legislation, managing the impact of more vehicles moving around the city and ensuring a safe and secure service for all. You will no doubt be aware of the many policy and regulatory changes TfL has made in recent years to keep pace with the changing industry.

TfL's primary purpose in respect of taxi and private hire licensing is to ensure public safety by:

- setting appropriate standards for drivers, vehicles and operators within the limits of applicable legislation;
- providing an effective and efficient licensing regime, ensuring driver, vehicle and operator licensees meet TfL's standards; and
- ensuring passenger and driver safety through robust enforcement and compliance activities.

In addition, TfL:

- seeks to improve the passenger experience for these services; and
- reviews and sets taxi fares and tariffs.

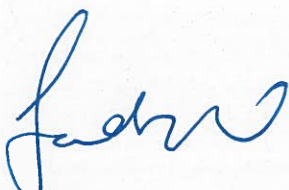
TfL has worked hard to address issues raised in your previous report, "Future Proof", and believes good progress has been made. As you will appreciate, this is an iterative process and TfL will continue to do everything in its power to improve the taxi and private hire services offered to passengers, taking into account the recommendations in your "Raising the Bar" report.

## MAYOR OF LONDON

Together with TfL, I will continue to lobby the Government on a number of important legislative asks, including statutory definitions for "plying for hire" and "pre-booked" as well as the power to impose a cap on licence numbers, where a need is proven through a public interest test.

I hope that you find the responses below helpful and I would like to assure you that your recommendations will be fully considered and taken forward, wherever possible.

Yours sincerely,



**Sadiq Khan**  
Mayor of London

# MAYOR OF LONDON

## RESPONSE TO RECOMMENDATIONS

### **Recommendation 1**

If a decision is taken to remove the congestion charge exemption for private hire, TfL should commit to conducting a full and timely evaluation of the effect of the removal of the congestion charge exemption on levels of congestion within the Charging Zone, the knock-on effects for the areas immediately outside the zone, and the impact on operators, drivers and the wider public transport system.

As the Committee is no doubt aware, the decision to remove the Congestion Charge exemption for private hire vehicles (PHV), other than those which are wheelchair accessible, was made on 17 December 2018 and implemented on 8 April 2019. This means that PHVs which are not wheelchair accessible and do not otherwise qualify for an exemption or discount are subject to the Congestion Charge if they enter the Congestion Charge Zone (CCZ) during charging hours (Monday-Friday, 7am-6pm).

The principal objective of the measure is to reduce traffic and congestion in the CCZ during charging hours without reducing the number of wheelchair-accessible vehicles. It is anticipated that it will generate road user benefits, such as improved (shorter) journey times and a road network that is more resilient to disturbances (improved reliability of journey times). In addition, there will be secondary environmental and health benefits such as improved air quality.

As part of its wider monitoring programme, including the monitoring of the Ultra Low Emission Zone (ULEZ), TfL will be analysing traffic around the boundary of the CCZ as well as congestion within the CCZ, to monitor the effect of the measure. A baseline of the fleet of PHVs prior to the exemption removal is already complete. TfL aims to understand the behavioural response through monitoring vehicles registering for AutoPay, paying by other channels, incurring Penalty Charge Notices and registering for other discounts. They also intend to monitor the number of PHVs detected in the CCZ on average each day, this is usually undertaken quarterly, but the frequency will be increased to understand whether fewer PHVs are entering the zone.

In terms of the boundary effect of removing the exemption, traffic on the Inner Ring Road is being monitored and will be compared to traffic levels prior to the removal of the exemption (and introduction of ULEZ). Particular sections will also be monitored where required.

There a number of different options for monitoring the wider impacts on drivers and customers of the removal of the exemption, which TfL is considering. Wider public transport use is routinely analysed through TfL's Travel in London reports.

TfL will also continue to engage regularly with private hire trade representatives to help it understand the impact of the changes on drivers, vehicle owners and operators.

### **Recommendation 2**

We call on the Mayor and TfL to refresh the taxi action plan and set clear targets; for example, for the wider and accelerated provision of rapid charging infrastructure across London and the establishment of ranks at all Crossrail stations. TfL should also set out to this committee how it will address driver concerns about the lack of options when purchasing new vehicles, and provide an update on its efforts to accredit the Knowledge of London.

# MAYOR OF LONDON

London's taxi regulation framework is world renowned. The Knowledge of London coupled with TfL's requirements for taxis to be accessible and highly manoeuvrable ensures we set a high standard. London's taxis are iconic and remain an integral part of TfL's transport network for Londoners, visitors and businesses. As well as being wheelchair accessible, taxis are available at times and in places where public transport options may not be. TfL is also leading the way with initiatives to clean up London's taxi and private hire fleet and taking the steps necessary to address the air quality issue in our city and safeguard the health of Londoners. You will no doubt have seen the increasing fleet of Zero Emissions Capable (ZEC) taxis, now a common sight across the London landscape, following changes to our regulations.

Since I launched my Taxi and Private Hire Action Plan in September 2016, a host of measures have been delivered, or are planned for delivery, to improve public safety and support London's taxi trade. The majority of the commitments have been met and TfL is working hard to ensure the delivery of the remaining objectives and, where necessary, lobby the Government for the legislative powers needed to do so.

The Taxi and Private Hire Action Plan remains a valid roadmap and TfL continues to work hard to deliver the remaining milestones, alongside the proposals in my Transport Strategy, published in 2018.

## **Taxi ranks**

When fully open, the Elizabeth line will dramatically improve access at key locations along the route. All stations will be step-free from street to platform, with level access from platform to trains at all of the new central London stations as well as at Heathrow and Abbey Wood. However, many passengers, including those with disabilities, need to continue their journeys into areas that are not easily accessed by mainstream public transport and London's taxis provide an accessible, reliable and trusted service to Londoners in such situations. I agree that taxi ranks are a vital part in supporting this service.

As well as being beneficial to the travelling public, ranks also provide other benefits. For example, around 30 per cent of taxi trips start from a rank, so their benefit to taxi drivers is significant. They also benefit the public realm, as an accessible rank in a designated location will allow a taxi to pick up a passenger without affecting traffic flow and provide a means of standing for hire without circulating, meaning that unnecessary congestion and vehicle emissions are reduced.

TfL works closely with the taxi trade to agree suitable locations for taxi ranks. TfL has taxi rank locations at 20 out of 30 Elizabeth Line stations in London. Where TfL has not been able to provide ranks this is principally due to a lack of support from the local boroughs where they are the highway authority for the relevant sections of road.

TfL is determined to provide rank provision at these remaining 10 Elizabeth Line stations in London and will continue to lobby hard to gain support for these ranks. As part of this, TfL is in the process of writing to all of the boroughs to stress the importance of taxis as part of an integrated and accessible transport network. Once again, this is another area where I would be grateful for any assistance members of the Transport Committee could provide in their local constituencies.

## **ZEC taxis**

Air pollution in London is a public health crisis and phasing out diesel taxis to help make London's taxi fleet the greenest in the world is one of the many steps TfL is taking to improve air quality in the capital.

Since 1 January 2018, taxis presented for licensing for the first time have needed to be ZEC.

# MAYOR OF LONDON

Almost 1,700 ZEC taxis have been licensed in London so far and I look forward to this number continuing to rise. To help taxi drivers make the switch to ZEC vehicles and achieve our aim to significantly reduce harmful emissions, TfL and I have provided a £42m taxi delicensing fund, which provides an initial tranche of 1,250 £10,000 payments for taxi owners to delicense their older, dirtier taxis. Tiered payments are available thereafter, and further details can be found here: <https://tfl.gov.uk/info-for/taxis-and-private-hire/taxi-delicensing-scheme>.

These funds are in addition to TfL's continued contribution of £3,500 to the Government-led Plug-in Taxi Grant, which gives taxi licensees up to £7,500 off the price of a new ZEC taxi.

Our world-renowned taxi drivers are leading the way with the uptake of these new ZEC taxis. It is, of course, important for taxi drivers to have a range of ZEC vehicles to choose from, which is why TfL is working with taxi manufacturers to encourage making more ZEC taxis available to purchase. We anticipate that a new, fully electric taxi will be brought to market this year, offering more choice for taxi drivers.

## **Rapid charge points**

TfL continues to build a network of rapid charge points across London to support the growing number of ZEC taxis and the wider take-up of electric vehicles. The total number of charge points across London is now 178, a major step towards my target of 300 rapid charge points by December 2020. The delivery of a pan-London rapid charging infrastructure will require collaboration with both local boroughs and the private sector.

The support of members of the Transport Committee in lobbying those boroughs where take up of rapid charge points (RCP) is low would be appreciated greatly.

At present, there are almost 1,700 ZEC taxis licensed in London. Of the 178 RCPs installed, 72 are dedicated to taxi use. TfL continues to work closely with the taxi trade to identify the most favourable locations based on their suggestions and is therefore focusing on the central CCZ and a three-mile radius from Charing Cross station for taxi-dedicated sites.

TfL is also progressing two RCP hub sites. The first, to be delivered by the City of London in Baynard House car park in late 2019, will be comprised of 10 RCPs. A further hub site in Greenwich is in the design phase and, pending successful planning approval, is expected to be installed in early 2020. This will have up to 8 RCPs.

My Electric Vehicle Infrastructure Taskforce, bringing together representatives from business, energy, infrastructure, government and London boroughs, has been investigating the scale of infrastructure required towards 2025 in London. The taskforce published a delivery plan on 17 June with recommendations and next steps on overcoming the barriers to implementing the necessary infrastructure, so that infrastructure is no longer a barrier to making the switch to electric vehicles. The plan includes a number of initiatives, including:

- Installing the next generation of ultra-rapid charging points at London petrol stations later this year
- Delivering five flagship charging hubs, with the ability for multiple cars to quickly be charged in one place. The first of these hubs will be operational in the heart of the Square Mile by the end of the year

# MAYOR OF LONDON

- A new 'one-stop-shop' for Londoners to request new charging infrastructure from their local authority in areas of high demand led by London Councils, making it easier for drivers to switch to electric vehicles
- Expanding electric car clubs and bringing more vehicles to market, offering greater choice to Londoners and businesses
- New online smart tools to ensure London's energy grid continues to keep pace with demand and to help unlock private sector investment

## **The Knowledge**

As committed to in my Taxi and Private Hire Action Plan, TfL is looking at ways it can raise the profile of The Knowledge and promote the benefits of becoming a London licensed taxi driver.

TfL has attended a number of events, including careers fairs, school career events and careers days for candidates who have left or are in the process of leaving the armed forces. TfL has created a brochure entitled 'How to become a London taxi driver' (<http://content.tfl.gov.uk/knowledge/oflondonprospectus.pdf>) that includes specific case studies of Knowledge students from different backgrounds who have successfully gone through the Knowledge of London process. It also explains the benefits of becoming a London taxi driver and provides information on why our taxi drivers are considered the best in the world.

TfL has received requests for copies from other interested parties, including the London Taxi PR company, and I strongly encourage everyone who has an interest in promoting our taxi trade to share it.

TfL has also co-operated with the Licensed Taxi Drivers Association (LTDA) on the first two episodes of a series of podcasts. These podcasts focus on newly licensed taxi drivers, who share their first-hand experiences and views on working as a London licensed taxi driver alongside TfL Knowledge of London examiners. This has been promoted on the @TfLTPH [Twitter account](#).

### **Recommendation 3**

The Mayor now needs to clarify whether he will continue to press for the powers to cap licence numbers. If he does, TfL will need to demonstrate that they have collected the evidence necessary to conduct a thorough public interest test. The Mayor and TfL should consider 'smart alternatives' to a numerical cap. This should include investigating how current and emerging technologies could be used to identify and mitigate the negative impacts of congestion and pollution at particular times or in particular locations.

TfL and I have, for some time, been calling for legislation allowing us to set a cap on the number of licences we issue, and we agree with the Government that any cap should be subject to a public interest test.

TfL was an active participant in the Government's Task and Finish Group report on taxi and private hire vehicle licensing last year. The group brought together many of the major stakeholders from across the sector, representing different objectives and points of view, and used their insights to produce a number of recommendations for ways that the regulation of taxi and private hire services could be improved, for both the good of the industry and for the passengers that it serves. The independent Chair of the Group, Professor Mohammed Abdul-Haque, published his report on taxi and private hire vehicle licensing in September 2018.

## MAYOR OF LONDON

One recommendation made by the chair was that the Government should promote a Bill to allow local licensing authorities, where a need is proven through a public interest test, to set a cap on the number of taxi and PHVs they license. This was proposed to help authorities solve challenges around congestion, air quality and parking and ensure appropriate provision of taxi and private hire services for passengers, while maintaining drivers' working conditions.

Given our strong support for this recommendation, we were disappointed with the Government's decision not to take it forward, based on concerns over the potential impacts on competition and safety for passengers. TfL and I continue to urge the Government to rethink its position on this. Far from being anti-competitive, this would enhance working conditions for drivers and lead to much better services for passengers.

In order for the implementation of a cap to have the desired effect of tackling congestion, air quality and appropriate parking controls, the issue of 'cross border hiring' must also be addressed. The term 'cross border hiring' is commonly used in the taxi and private hire industries to describe where taxis or private hire vehicles that are licensed by one licensing authority work wholly or predominantly in another licensing authority area. This practice is permitted under current legislation and there are no geographic restrictions providing the private hire operator, driver and vehicle are licensed in the same licensing authority (referred to as the triple licensing requirement) and the booking is also accepted by the operator in that authority.

From TfL's engagement with local licensing authorities, it was clear that, nationally, cross border hiring generates serious public safety issues while undermining local licensing regimes. In agreement with TfL's detailed policy paper on this issue, published in February 2018 and presented to the Working Group, a recommendation was made that the Government should promote a Bill providing that all PHV journeys should start and/or end within the area for which the driver, vehicle and operator are licensed.

TfL and I are clear that any cap on private hire driver numbers must go hand in hand with further measures to address cross border hiring in order to prevent the aims of the cap being undermined.

Aside from concerns over capping driver numbers and taking measures against cross border hiring, TfL has also sought to mitigate the negative impacts of congestion at particular times or in particular locations through the removal of the Congestion Charge exemption for private hire drivers. TfL has also lobbied for statutory definitions for "plying for hire" and "pre-booked" which, along with the ability to cap private hire driver and vehicles numbers and address cross border hiring, will help TfL to maintain a clear two-tier system for taxi and private hire services in London.

### **Recommendation 4**

TfL should work with stakeholders to determine whether there is unmet need for wheelchair accessible vehicles. If this is found, TfL should explore whether requiring larger operators to provide a minimum proportion of accessible vehicles within their fleets would resolve this issue.

All taxis in London's fleet are already wheelchair accessible, but TfL also recognises the need to enhance the provision and improve the availability of wheelchair accessible vehicles (WAVs) in the private hire fleet.

TfL continues to strive to improve accessibility across the capital's transport network and to better understand the needs of all passengers.

# MAYOR OF LONDON

In terms of private hire services specifically, this is complicated by the fact that all private hire operators, vehicles and drivers are licensed separately. Indeed, in many cases, private hire vehicles are owned by drivers or lease companies, rather than operators.

I encourage all private hire operators and drivers to play their part in making London accessible to all.

Some operators are already proactively taking measures to improve accessibility provision for their passengers. The advent of app-based technology in the private hire industry has made it quicker and easier than ever for customers to access private hire services, and private hire operators are using this to make their services more accessible to those with specific travel requirements.

## **Recommendation 5**

TfL should consider how an accreditation scheme can contribute to raising standards and come forward with specific proposals for a Charter Mark scheme. TfL should also review the criteria for 'fit and proper tests' for private hire operators, in line with Government findings.

The types of challenges faced by drivers in the private hire industry have been well documented. TfL agrees that urgent action needs to be taken to improve working conditions, such as driver pay, health, and hours worked. TfL agrees that an accreditation-type scheme could be one solution. It could create more transparency for drivers by providing information on which operator is the best fit for their needs and lifestyle. At the same time, a scheme could incentivise operators to improve conditions for their drivers, in order to remain competitive to the workforce.

Over the past several months, policy teams within the Greater London Authority have convened internal discussions on how to progress a driver-welfare related programme, and TfL will continue to provide feedback and input as this is developed. Further updates on this will be shared in due course.

## **Recommendation 6**

TfL should consider whether elements of the New York model could be applied in London, with a new type of high-volume operator licence based on the number of journeys an operator carries out, rather than simply the size of its fleet. In particular, TfL should consider how to review the current tiered licence fee structure to reflect proportional impact of the operator on enforcement and administration, rather than size of fleet. TfL should also consider whether introducing requirements on high volume operators to submit an analysis of their impact on congestion, and anonymised trip data, should be replicated in London.

TfL regularly speaks to major licensing authorities of a similar size and scope to London to share knowledge and best practice and to see whether there are solutions that can be applied within the confines of our existing licensing and regulatory powers. This is especially true with regard to New York City as it is a similar size with a comparable fleet number to our own. TfL works regularly with the New York City Taxi and Limousine Commission (NYC TLC) sharing ideas and investigating how various aspects of their operating structure could benefit London and vice versa.



## MAYOR OF LONDON

However, it is important to note that, as TfL operates under entirely different legislation to New York City and with very different powers, it is not necessarily possible to simply implement ideas that have worked for one city in the other. For example, unlike TfL, the NYC TLC has access to journey data from all taxis and private hire vehicles which would make a high volume operator licence based on the number of journeys carried out far easier to apply. TfL would welcome additional data, which would enable them to better understand and plan transport in London, understand areas that may need addressing from an air quality or congestion perspective and provide other insights that enable them to keep the network moving safely and in line with my Transport Strategy. However, any obligations placed on operators to provide data would need to be consistent with the public safety objectives of PHV legislation.

TfL will continue to benchmark itself against other similar sized licensing authorities around the world and examine where information and ideas can be shared for mutual benefit.

### **Recommendation 7**

We urge TfL to work with stakeholders to develop proposals for a framework for regulation of on-demand bus services that addresses the convergence of private hire and bus services.

Cities around the world are seeing increasing interest in Demand Responsive Transport (DRT) services and, as you are aware, transport operators are already delivering DRT services in London. TfL believes that trialling services is a controlled way of seeing whether they can complement the core bus network and can deliver the right outcomes for customers, drivers and passengers.

With regard to regulation, legislation only provides for TfL to regulate the routes these services operate on (through the issuing of London Service Permits) rather than the services themselves. That remains the remit of the Traffic Commissioners. TfL consulted last September on updates to the Mayor's guidance document that outline the criteria by which applications are considered, including revisions that would take into account the emergence of DRT services. A decision is expected to be made on the adoption of this guidance over the next few months. In the meantime, TfL will continue to work with any operators who submit applications for local DRT services through the regular LSP process.

### **Recommendation 8**

We urge the Mayor to bring forward a more comprehensive analysis of the potential benefits and risks of ride sharing for drivers and passengers, with a view to developing appropriate regulation, backed by calls for new legislation as necessary.

Ride-sharing is permissible in PHVs under the Transport Act 1985 (TA 85) and is an emerging aspect of the private hire market. Section 11 of the TA 85 provides for the advance booking of PHVs at separate fares provided that all of the passengers have booked in advance and consented to the sharing of the vehicle at separate fares. However, while ride-sharing is lawful, these types of services bring new challenges for the PHV industry and TfL's role in ensuring public safety remains paramount. In its policy statement (<http://content.tfl.gov.uk/private-hire-policy-statement.pdf>), issued in February 2018, TfL identified where action may be necessary, including:

- the prevention and reporting of offences
- appropriate driver training
- raising concerns about fellow passengers

# MAYOR OF LONDON

- allowing passengers to choose who they share with

In terms of regulation, operators are subject to a licence condition to notify TfL in advance of making any material changes to their operating model. Types of change that warrant notification include those that affect an operator's compliance with private hire legislation - including the introduction of ride-sharing. In addition to this, new operators of existing ones that have introduced ride-sharing services have been subject to additional licence conditions, which include training for drivers, insurance and ensuring that appropriate risk assessments have been carried out.

TfL has noted the Department for Transport's recent response to the Task & Finish Group Chair's recommendations on ride sharing and intends to align with government policy on this matter. TfL will look into what potential changes in legislation could further enhance the safety of passengers using ride sharing services in London.

## **Recommendation 9**

We reiterate our calls for TfL to improve its engagement with drivers, operators and passengers for both the taxi and private hire trades, recognising that each group has distinct concerns and needs that must be effectively addressed through regulation.

I recognise the important role associations representing the taxi and private hire trades provide and I place a high value on their input and contribution.

As you are no doubt aware, TfL worked with taxi trade representatives to formulate and agree the terms of a revised taxi engagement policy (<http://content.tfl.gov.uk/taxi-engagement-policy-april-2017.pdf>), updated in April 2017. This revised policy was designed to ensure greater inclusivity and to encourage open and honest dialogue.

Since its inception, TfL has engaged with five of the major taxi trade organisations, the LTDA; London Cab Drivers Club (LCDC); National Union of Rail, Maritime and Transport Workers (RMT); United Cabbies Group (UCG); and Unite the Union. TfL previously engaged with only three (LTDA, LCDC and Unite).

Changes to engagement have meant that meetings are also held on a more frequent basis and include:

- quarterly taxi operational meetings;
- quarterly strategic meetings at a senior level; and
- a meeting three times a year, chaired by either TfL's Commissioner or Managing Director of Surface Transport.

In addition, TfL is invited to trade-led meetings, including a quarterly Heathrow Compliance meeting and bi-monthly Cab Ranks Committee. TfL also meets with trade organisations and individual stakeholders on an ad-hoc basis and at their request to discuss any specific issues that they wish to raise.

This formal engagement is supplemented by day-to-day casework and contact with representatives from across the taxi trade.

# MAYOR OF LONDON

## **Engagement with Private Hire Trade**

TfL's engagement with the private hire trade follows a similar format to that for taxi representatives, including quarterly operational and senior strategic meetings, as well as a meeting three times a year with the Commissioner or Managing Director of Surface Transport.

TfL also frequently meets with other stakeholders and operators on an individual basis to discuss specific issues. Again, this engagement is supplemented by day-to-day contact with trade representatives.

TfL understands the importance of regular engagement with representatives across all parts of the trade as they all have distinct concerns and needs, which is why TfL is reviewing its private hire engagement, taking into account the changes we have seen within the industry in the past few years.

TfL will be writing a new policy to ensure that it engages effectively with stakeholders across all areas of our private hire industry and welcomes any suggestions from the Assembly on how engagement can be improved.

## **Engagement with passengers**

In terms of engagement with customers, TfL provides a dedicated customer complaints service for taxi and private hire services. Customers can contact TfL using a web submission form, by telephone or via the Twitter social media platform. Information on this can be found on the contact page of the TfL website, which also details the complaints procedure – including how any issues that passengers feel have been incorrectly handled can be escalated to the ombudsman for moderation.

TfL is keen to ensure that its engagement with both trades is at an appropriate level and are open to suggestions from the Committee on any improvements that can be made.

## **Other Observations**

I also noted paragraph 1.41 in the Assembly report:

*"As the decision to postpone the introduction of the language test to 2020 has now been taken, we urge the Mayor and TfL to engage again with the private hire trade to address the concerns raised about the potential impacts on drivers."*

It is vital that all taxi and PHV drivers can communicate in English with their passengers. They may need to discuss a fare or route with their passengers or they may need to communicate with passengers on a safety issue like the use of a seat belt or talk with them in an emergency situation.

It is also important that drivers can read and understand information provided by the licensing authority, such as the conditions of licensing, letters about their licence, or notices that TfL issues. Drivers may also need to write to TfL, for example to let them know about changes in their health or to inform them of any criminal convictions.

In 2016, TfL introduced a requirement for every PHV driver to demonstrate that they have adequate English language skills in reading, writing, speaking and listening, as TfL consider all of these skills essential to carrying out their role as a PHV driver in London.

# MAYOR OF LONDON

TfL determined that the appropriate level for PHV drivers to demonstrate was B1 on the Council of Europe's Common European Framework of Reference for Languages (CEFR). At this intermediate level, users should be able to cope linguistically in a range of everyday situations that require a largely predictable use of language. This equates to early secondary school level education. PHV drivers licensed by TfL must demonstrate this level in each of the four skills – reading, writing, speaking and listening.

Setting the standard is consistent with the standard required by other government departments for a variety of purposes, including applying for UK citizenship or to settle in the UK, and working in front line government services. TfL determined that setting the level of English any lower would not be compatible with its goal of driving up standards in the industry.

The Government recently published draft statutory guidance (<https://www.gov.uk/government/consultations/taxi-and-private-hire-vehicle-licensing-protecting-users>) that provides for licensing authorities to consider applicants' oral and written English language skills. Extending the deadline will allow TfL enough time to consider the recommendation and work with Government to ensure consistency in standards, as appropriate. This will also ensure that TfL has engaged with the private hire trade and will continue to do so. After meeting with private hire industry representatives last year, TfL is giving further consideration to reviewing how it tests applicants' English language skills and will continue to engage with the trade as plans develop. This also includes the consideration of any associated costs.