

Equality Impact Assessment

Introduction

An Equality Impact Assessment (EqIA) is a method for assessing the effects or impacts of a council policy or function on removing barriers to equality.

The Equality Act 2010 includes a public sector equality duty which requires public authorities to try and eliminate discrimination; advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it and promote equality and good relations across a range of protected characteristics.

The protected characteristics are:

Age	Disability	Gender Reassignment
Marriage and civil partnership	Pregnancy and maternity	Race
Religion or belief (including lack of belief)	Sex	Sexual orientation

An EqIA should be completed with the full range of protected characteristics considered during the initial stages of developing new strategies, policies, functions or services, prior to starting a procurement exercise and before decisions are made.

Examples of when an EqIA should be completed are:

- | | |
|--|--|
| <ul style="list-style-type: none">Any proposals to introduce or add to a service | <ul style="list-style-type: none">Any proposals to adopt policy priorities, strategies and plans |
| <ul style="list-style-type: none">Any proposals to remove, reduce or alter a service | <ul style="list-style-type: none">Changes to staffing structure where groups of employees are likely to be negatively affected |
| <ul style="list-style-type: none">Any new policies or changes to policies | <ul style="list-style-type: none">Any proposals in relation to procured or commissioned services |

Stage 1 - Equality Screening

Whenever a policy/service or function is reviewed, changed, developed or removed an initial equality impact assessment stage 1 will need to be undertaken. This is a screening template and will help establish whether a full assessment is needed. This should be done at an early stage of the process so that it is part of policy development.

Stage 2 – Equality Impact Assessment

This is the full EqIA and seeks to identify the equality considerations that have been taken into account including any mitigating actions proposed and ensures decisions are based on evidence. The EqIA will need to be agreed with the appropriate Head of Service or Director and should be included on the decision making report, along with commentary on the assessment in the main body of the report.

STAGE 1 – Equality Screening

1. Identify the policy, project, function or service change

a. Person responsible for this EqIA

Officer responsible: Michelle Bignell

Service Area: Public Protection

Title: Licensing and Public Protection Manager

Date of assessment: July 2025

Signature:

b. Is this a policy, function, strategy, service change or project?

Policy

If other, please specify:

c. Name of the policy, function, strategy, service change or project

Is this new or existing?

Already exists and is being reviewed

Please specify reason for change or development of policy, function, strategy, service change or project

Policy review

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Aims:

Regulation of taxi and private hire licensing in accordance with statutory requirements and government best practice.

Objectives:

Outcomes:

Benefits:

e. What are the expected impacts?

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.

Yes

Do you expect the impacts to be positive or negative?

Both positive and negative

Please provide an explanation for your answer:

It is proposed to amend the current vehicle policy to permit like-for-like replacement vehicles. For example, a saloon can be replaced with a saloon, but a wheelchair accessible vehicle (WAV) must be replaced with a WAV. All new vehicles must be a WAV. Whereas the current policy would result in a fully WAV fleet, this will deliver a mixed fleet which will affect the number of WAV's available.

It is proposed to mandate card payment machines which will impose a cost on the licence holder, however benefit the customer.

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate

Stage Two required

Yes

Owner of Stage Two assessment

Completion date for Stage Two assessment

STAGE 2 – Full Equality Impact Assessment

2. Engagement and consultation

The best approach to find out if a policy etc, is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those equality groups.

a. Research and evidence

List below any data, consultations (previous, relevant, or future planned), or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality.

2022 Survey of disabled people's experiences of using licensed taxis in Cheltenham"

Survey

The survey was undertaken on the authority's 'Citizen Space' portal between 11/07/2022 and 12/08/2022. A 109 survey responses were received. The numbers inside brackets indicate the number of respondents received.

Types of Disabilities

The majority of respondents (72) indicated that they had a physical disability, including congenital conditions, long-term injuries caused by accidents, or progressive neuromuscular diseases.

Use of a Wheelchair

The majority of respondents (69) did not use wheelchairs. Of those who indicated they do, 13 respondents indicated that they use a "custom powered wheelchair" and 12 said they use a "Standard manual (reference) wheelchair". Nine said they use a "Standard powered chair".

Reason(s) for using a Licensed Vehicle

The survey indicated that people with disabilities most often rely on licensed vehicles to drive them to pre-arranged appointments (84), for leisure purposes (76) and shopping (50).

Taxi vs. Private Hire Vehicles

The survey indicated that people with disabilities use licensed private hire vehicles more than licensed taxis.

65 respondents said they exclusively or occasionally use private hire vehicles compared to 40 for the same question but for licensed taxis. Conversely, 69 respondents indicated that they rarely or never use a licensed taxi compared to 44 for the same question but relating to private hire vehicles.

The majority of respondents indicated that they would use licensed taxis and private hire vehicles more if they "were more available or easier to hire". 71 respondents said yes in relation to private hire vehicles and 68 for taxis.

Type of Licensed Vehicle(s)

Whilst the majority of respondents (72) said they preferred a “standard saloon car”, this must be interpreted in context.

69 respondents said that they did not use a wheelchair. It is reasonable therefore to assume that these respondents would not have chosen one of the two “wheelchair accessible vehicle” options. The correlation between the responses relating to the “Types of Disabilities” and the “Type of Licensed Vehicle(s)” further suggests that the assumption can reasonably be assumed as correct.

The split between those preferring a Wheelchair accessible vehicle capable of carrying a standard manual (reference) wheelchair and one capable of carrying a powered wheelchair was minimal, 29 & 27 respectively.

Issues experienced using licensed vehicles in Cheltenham

Respondents reported that the biggest issues they experienced when using licensed vehicles in Cheltenham are Lack of understanding by drivers/operators of my individual needs (48), Lack of availability of suitably accessible vehicles (45), Unreliable service from drivers/operators (40) & Lack of accessible taxis on taxi ranks (40).

The two issues that scored lowest were Types of licensed vehicles are not suitable for my individual needs (22) and Difficulties with drivers/operators taking assistance dogs (10).

The [Department for Transport \(DfT\) best practice guidance](#) (section 8.9) recommends that the local authority understands the demand for mixed fleets as some designs of wheelchair accessible vehicles may not be suitable for some ambulant disabled passengers.

It is recommended that a demand survey is carried out every 5 years. We will commit to working with accessibility groups to deliver this.

In our case, the survey points to a local demand for a mixed fleet.

Also need to reference Equality Act requirements on the authority

Some more stat guidance we can reference:

- Statutory guidance “**Access to taxis and private hire vehicles for disabled users**”

Published 20 June 2022 (<https://www.gov.uk/government/publications/access-to-taxis-and-private-hire-vehicles-for-disabled-users/access-to-taxis-and-private-hire-vehicles-for-disabled-users--2>)

- DfT Best Practice 8.10

- Guidance “**DPTAC position on taxis and PHVs**” Published 8 August 2020 (<https://www.gov.uk/government/publications/dptac-position-on-taxis-and-private-hire-vehicles/dptac-position-on-taxis-and-phvs>)

b. Consultation

Has any consultation be conducted?

Yes

As set out in 6.1 of report.

3. Assessment

a. Assessment of impacts

For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).

Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
AGE	Older people (60+)	Positive	<p>The majority of survey respondents (72) said they preferred a “standard saloon car” which would have captured the view of older people. We know from engagement and complaints that older people can find it more difficult to use WAV vehicles because the step in and out is higher than saloon vehicles.</p> <p>This view is supported by The Disabled Persons Transport Advisory Committee (DPTAC) in its guidance.</p> <p>A mixed fleet will offer older people the choice of which type of licensed vehicle to use.</p>	None identified
	Younger People (16-25)	Neutral	None identified	None identified
	Children (0-16)	Neutral	None identified	None identified
DISABILITY A definition of disability under the Equality Act 2010 is available here . <i>See also carer responsibilities under other considerations.</i>	Physical disability	Positive	<p>A truly accessible fleet is a fleet that licenses both WAVs and saloons.</p> <p>Saloon cars are accessible to the vast majority of the population, including many disabled people. This includes wheelchair users who can transfer into the seat of the vehicle, with the driver folding the wheelchair and placing it in their boot. However, they cannot carry anyone who has to travel seated in their wheelchair who needs a WAV.</p>	To continue to commit to working with disability groups to ensure that we are regularly assessing the demand for WAV's

			WAVs can also be used by non-disabled people and many disabled people.	
	Sensory Impairment (sight, hearing)	Positive and negative	Saloon cars are accessible to the vast majority of the population, including many disabled people including those with sight and/or hearing impairment. There is no known evidence about the specific impact of WAV v saloons on people with sight and/or hearing impairment.	To continue to commit to working with disability groups to ensure that we are regularly assessing the demand for WAV's
	Mental health	Neutral	There is no known evidence about the specific impact of WAV v saloons on people with mental health issues.	None identified
	Learning Disability	Neutral	There is no known evidence about the specific impact of WAV v saloons on people with learning disabilities unless this also affects their mobility.	None identified
GENDER REASSIGNMENT		Neutral	None identified	None identified
MARRIAGE & CIVIL PARTNERSHIP	Women	Neutral	None identified	None identified
	Men	Neutral	None identified	None identified
	Lesbians	Neutral	None identified	None identified
	Gay Men	Neutral	None identified	None identified
PREGNANCY & MATERNITY	Women	Neutral	Pregnancy may restrict or limit movement and mobility.	None identified
			A mixed fleet will offer the choice of which type of licensed vehicle to use.	

RACE* Further information on the breakdown below each of these headings, is available here . For example Asian, includes Chinese, Pakistani and Indian etc	White	Neutral	None identified	None identified
	Mixed or multiple ethnic groups	Neutral	None identified	None identified
	Asian	Neutral	None identified	None identified
	African	Neutral	None identified	None identified
	Caribbean or Black	Neutral	None identified	None identified
		Neutral	None identified	None identified
RELIGION & BELIEF** A list of religions used in the census is available here	See note	Neutral	None identified	None identified
SEX (GENDER)	Men	Neutral	None identified	None identified
	Women	Neutral	None identified	None identified
	Trans Men	Neutral	None identified	None identified
	Trans Women	Neutral	None identified	None identified
SEXUAL ORIENTATION	Heterosexual	Neutral	None identified	None identified
	Lesbian	Neutral	None identified	None identified
	Gay	Neutral	None identified	None identified
	Bisexual/Pansexual	Neutral	None identified	None identified
Other considerations				
Socio-economic factors		Neutral	None identified	None identified

(income, education, employment, community safety & social support)				
Rurality i.e. access to services; transport; education; employment; broadband		Neutral	None identified	None identified
Other (e.g. caring responsibilities)		Neutral	None identified	None identified

* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

** There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions in the census is available [here](#)

4. Outcomes, Action and Public Reporting

a. Please list the actions identified through the evidence and the mitigating action to be taken.

Action	Target completion date	Lead Officer
To liaise with disability awareness groups on how to assess demand for WAV's	December 2025	Michelle Bignell
To assess section 4 of the DfT's guidance and keep under review to ensure that we are delivering an accessible taxi and private hire fleet.	Initial review by December 2025	Michelle Bignell

b. Public reporting

All completed EqlA's are required to be publicly available on the Council's website once they have been signed off. EqlA's are also published with the papers for committee and full council decisions.

Please send completed EqlA's to [email address]

5. Monitoring outcomes, evaluation and review

The Equalities Impact Assessment is not an end in itself but the start of a continuous monitoring and review process. The relevant Service or Lead Officer responsible for the delivery of the policy, function or service change is also responsible for monitoring and reviewing the EqlA and any actions that may be taken to mitigate impacts.

Individual services are responsible for conducting the impact assessment for their area, staff from Corporate Policy and Governance will be available to provide support and guidance, please email xxxx if you have any questions.

6. Change log

Name	Date	Version	Change