

**A Response to the consultation document -**

**Proposals for the Regulation of Taxis  
and Private Hire Vehicles  
Department of the Environment**

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## **Introduction**

The Women's Support Network (WSN), established in 1989, is an umbrella organisation for more than 40 community-based women's centres, women's projects and women's infrastructure groups. The WSN aims to achieve social, political and economic justice through the promotion of the autonomous organisation of women. The Network also aims to strengthen the collective voice for women's groups, to promote and develop networking to enable collective action and to influence policy and decision making processes. The WSN is an important vehicle for taking forward the common agenda of community-based women's organisations, many of which are based in the most disadvantaged areas of the city and which have experienced the worst effects of the political conflict.

## **Context**

The WSN welcomes the proposal to introduce reforms to the regulation of taxis and private hire vehicles. While it has been acknowledged that four per cent of people depend on taxis as their main mode of transport, we would point out that a large percentage of this number will be women, because women have less access to private transport and live longer than men, therefore forming a large proportion of the elderly and those with age-related disabilities. In addition, as mothers, women are often the primary care givers and have the anxiety of worrying about their children socialising late at night. As public transport does not operate late at night and does not possess flexibility of routes, the use of taxis will remain a primary source of transport for many people in the foreseeable future. A safe, cost-effective and readily available mode of transport is therefore essential. We acknowledge the contribution made by taxi drivers throughout the difficult years of the Troubles, and the dangers they have faced, and believe that improved regulation will be beneficial to both drivers and the general public.

The questionnaire accompanying the proposals contain many extremely technical issues, which we believe can best be answered by those within the profession. The WSN therefore proposes to confine its responses to the areas that are of immediate interest to women and their families.

### **The Licensing System**

**P1** We support the Department and its agencies retaining the function of licensing and enforcement of taxi vehicles and drivers.

**P2** While we understand the rationale for the two-tier system, it remains a source of confusion to the general public. This may be slightly alleviated by the change of name from 'private hire taxis' to 'private hire vehicles', if this is widely publicised. The issue of safety on the streets is important, as at night in Belfast city centre there are often no taxis at taxi ranks and little opportunity for hailing one from the street. Mobile phones might have eased the situation, but the availability of public hire taxis would appear to be much less than in other comparable cities.

### **Accessible Vehicles and Services**

**P4** The WSN, mindful of the needs of those with disabilities, welcomes the move to improve taxi accessibility.

**P5** We agree that all new taxis should be accessible, and would urge consideration of moving the time frame forward from the proposed 2008, given that very few taxis are currently fully accessible.

## **Fares and Taximeters**

**P7** We welcome the introduction of taximeters. However we note that taximeters will be fitted in all taxis, but there is no such definite statement in relation to PHVs, where it can be argued there is greater need, both for taxis and for meter-generated receipts. We would ask for clarification of the situation regarding PHVs and assurance that this regulation will also apply to PHVs.

**P9** We agree that taximeters should be engaged for every journey.

**P10** We query why PHV fares will be exempt from regulation.

**P13** We welcome the requirement that Small PSV operators will have to display fares information in a clearly understood format.

## **Operator Licensing**

**P14** We fully support the requirement that Small PSV operators be licensed.

**P15** We support the recommendation that a PSV operator be of 'good repute' but would like further clarification of what is meant by this term. For example, will the operator be screened for possible sexual offences?

**P18** We agree that it must be made an offence for a Small PSV Operator to provide an unlicensed driver or vehicle.

## **Driver Licensing**

**P21** We fully support the re-introduction of a driving test for new applicants and wish to register our surprise that such a test is not currently in existence. We believe that this would do much to curb the excessive speeds of many taxi and PHV drivers and also enable drivers to use more economic routes, as one part of the test should be a thorough familiarisation of routes.

**P22** We would prefer a Small PSV driver to have held a car licence for at least three years in order to have built up essential experience in driving in all conditions.

**P23** We believe that it should be an essential requirement for drivers to undergo disability equity and awareness training and we would recommend that any such training be organised in partnership with Disability Action.

**P24** We support the requirement that new drivers receive compulsory additional training in customer care and legal requirements.

**P25** We believe that all drivers should have to receive some 'refresher' course in customer care, and this should be a compulsory requirement, possibly at 5-year intervals.

**P26** All drivers should have ID on display.

### **Vehicle Licensing**

**P31** Insurance cover should be carried in all taxis/PHVs at all times.

### **Compliance and Enforcement**

**P33** DVTA vehicle examiners should be provided with additional powers to stop vehicles suspected of illegal taxiing.

### **Other Taxi Regulation Issues**

**P37** We welcome provisions to permit sharing of taxis and PHVs and to enable small PSVs to operate bus-type services.

**P39** We agree that operating conditions must apply so that drivers receive more in fares than for an exclusive hire, but that each passenger pays less. This condition might also facilitate those arriving, for example, at a railway station, who are then forced to sit in a taxi while the driver waits for more passengers. Improved regulation should mean that single passengers are accepted by taxis in those circumstances.

**P41** We support the provision that all vehicles providing bus-type schemes be accessible.

**P43** There should be no exemption for taxi drivers in relation to seatbelt wearing. All drivers of all vehicles should be legally required to wear a seatbelt. They have no immunity from death or injury in the case of accidents so this exemption makes no legal or moral sense.

**P49** We fully support the proposal to educate and inform taxi users by making more information available and in a wide range of formats. We would draw attention to the literacy needs of many people to ensure that information reaches all members of our society.

**P50** We note that a separate consultation might be arranged to consider whether stretched limousines should be licensed. This is a serious cause for concern, and we feel that most parents at least, given the popularity of these cars for school functions, are under the assumption that such vehicles are already licensed in some way. We would urge that this issue is given urgent attention.

## Appendix 1

### **WSN Member groups**

Al-Nisa Women's Group  
Ardoyne Women's Group  
Ashton Centre  
ATLAS (Lisburn)  
Ballybeen Women's Centre  
Ballymurphy Women's Centre  
Belfast Travellers Education & Development Group  
Brook (Belfast)  
Citywide Women's Consortium  
Derry Women's Centre  
East Belfast Community Education Centre & Walkway Women's Group  
Falls Women's Centre  
Footprints Women's Centre  
Greenway Women's Centre  
Lenadoon Women's Group  
Lesbian Advocacy Service Initiative  
Northern Ireland Women's European Platform  
Parenting Forum NI  
Shankill Women's Centre  
South Tyrone Empowerment Programme (STEP)  
Strabane & Lifford Women's Group  
Windsor Women's Centre  
Women's Information Group  
Women into Politics  
Women's News  
Women's Resource Development Agency  
Women's Tec