

Blaenau Gwent County Borough Council - Integrated Impact Assessment

All decisions, policy reviews or policy implementation will now require a completed Integrated Impact Assessment.

- Section 1-Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Section 2-Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Section 3-Corporate Plan
- Section 4-Wellbeing of Future Generations (Wales) Act 2015
- Section 5-Welsh Language (Wales) Measure 2011
- Section 6-Children’s Right “The Right Way”
- Section 7-Community Safety
- Section 8 Armed Forces
- Section 9-Data
- Section 10-Consultations Statutory Consultation Doctrine of Legitimate Expectation and Gunning Principles
- Section 11-Monitoring
- Section 12-Decision of proposal

Lead Officer	Head of Service	Service Area & Department	Date
Steve Osborne	David Thompson	Public Protection, Regeneration and Community Services Dept.	2.3.23

Briefly outline the proposal indicating what change or decision is to be made, also provide any documentation that may be used to support this.
What is the proposal that needs to be assessed?

Review of Policy Relating to Hackney Carriage and Private Hire Vehicle Licences following Welsh Government Guide and Department for Transport Statutory Taxi and Private Hire Vehicle Standards

Section 1 Outline how the proposal will impact on any people or groups of people with protected characteristics, please refer to the Equalities Act 2010 (Wales) for further information Equality Act 2010: guidance - GOV.UK (www.gov.uk) and the EHRC guidance The Essential Guide to the Public Sector Equality Duty: EHRC Briefly outline below if there will be any positive or negative impacts as a result of the proposal being considered.			
Protected characteristics	Will the proposal have any positive impacts on those with a protected characteristics?	Will the proposal have any negative impacts on those with a protected characteristics?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Age (<i>people of all ages</i>)	Yes	No	Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will support principles of fairness and non-discrimination in these licensing processes.
Disability (<i>people with disabilities/ long term conditions</i>)	Yes	No	Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will support principles of fairness and non-discrimination in these licensing processes. Specific change to allow older Wheelchair Access Vehicles is proposed at the request of a member of the taxi trade with a view to improving access to such services.
Gender Reassignment (<i>anybody who's gender identity or</i>	Yes	No	Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and

<i>gender expression is different to the sex they were assigned at birth)</i>			Operators will support principles of fairness and non-discrimination in these licensing processes.
Marriage or Civil Partnership (<i>people who are married or in a civil partnership</i>)	yes	No	Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will support principles of fairness and non-discrimination in these licensing processes.
Pregnancy and Maternity (<i>women who are pregnant and/or on maternity leave</i>)	Yes	No	Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will support principles of fairness and non-discrimination in these licensing processes.
Race (<i>people from black, Asian and minority ethnic communities and different racial backgrounds</i>)	Yes	No	Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will support principles of fairness and non-discrimination in these licensing processes.
Religion or Belief (<i>people with different religions and beliefs including people with no beliefs</i>)	yes	No	Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will support principles of fairness and non-discrimination in these licensing processes.
Sex (<i>women and men, girls and boys and those who self-identify their gender</i>)	Yes	No	Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will support principles of fairness and non-discrimination in these licensing processes.

Sexual Orientation <i>(lesbian, gay, bisexual, heterosexual, other)</i>	yes	No	Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will support principles of fairness and non-discrimination in these licensing processes.
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NOTE: Section 2 only needs to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. See page 6 of the Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance.

Section 2 Socio-economic Duty (Strategic Decisions Only) <i>The Welsh Governments Socio-economic Duty provides a framework in order to ensure tackling inequality is at the forefront of decision making.</i>			
.Please consider the below vulnerable groups and consider how the proposal could affect them: <ul style="list-style-type: none"> ➢ Single parents and vulnerable families ➢ People with low literacy/numeracy ➢ Pensioners ➢ Looked after children ➢ Homeless people ➢ Carers ➢ Armed Forces Community ➢ Students ➢ Single adult households ➢ People misusing substances ➢ People who have experienced the asylum system ➢ People of all ages leaving a care setting ➢ People living in the most deprived areas in Wales (WIMD) ➢ People involved in the criminal justice system 			
Socio Economic disadvantage definitions.	Will the proposal have a positive, negative or neutral impacts on the below?	How could you mitigate the negative impacts outlined?	Please highlight any evidence that has been considered.
Low Income / Income Poverty <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i>	No direct impact expected	No direct impact expected	





<p>Low and/or No Wealth (<i>enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future</i>)</p>	<p>No direct impact expected</p>	<p>No direct impact expected</p>	
<p>Material Deprivation (<i>unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.</i>)</p>	<p>No direct impact expected</p>	<p>No direct impact expected</p>	
<p>Area Deprivation (<i>where you live (rural areas), where you work (accessibility of public transport) Impact on the environment?</i>)</p>	<p>Positive</p>	<p>Access to safe, lawful taxi service provision is supported by the proposal. A change is also proposed to allow more flexibility for older Wheelchair Access Vehicles to be safely licensed.</p>	
<p>Socio-economic Background (<i>social class i.e. parents education, employment and income</i>)</p>	<p>No direct impact expected</p>	<p>No direct impact expected</p>	


<p>Socio-economic Disadvantage <i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)</i></p>	<p>No direct impact expected on cumulative impacts however more flexibility to allow for Wheelchair Access vehicle provision is recommended in the proposal.</p>	<p>A change is proposed to allow more flexibility for older Wheelchair Access Vehicles to be safely licensed.</p>	

<p>Section 3-Corporate Plan <i>Please outline any Corporate Plan linkages of the proposal -BG Corporate Plan 22-27</i></p>	
<p>Priority 1 - Maximise learning and skills for all to create a prosperous, thriving, resilient Blaenau Gwent</p>	
<p>Priority 2 - Respond to the nature and climate crisis and enable connected communities</p>	

Priority 1 - Maximise learning and skills for all to create a prosperous, thriving, resilient Blaenau Gwent	
Priority 3 - An ambitious and innovative council delivering quality services at the right time and in the right place	
Priority 4 - Empowering and supporting communities to be safe, independent and resilient	The Policy proposes appropriate safeguards and standards in relation to Hackney Carriage and Private Hire Vehicles and Drivers.

Section 4-Well-being of Future Generations (Wales) Act 2015 – The Five Ways of Working (ICLIP) <i>Sustainable development principles. The WCFG Act requires the Council to consider how any proposal improves the economic, social, environmental and cultural well-being of Wales using the five ways of working as a baseline)</i>	
Five Ways of Working	How have you used the Sustainable Development Principles in forming the proposal?

<p>Long Tern</p> 	<p>Consider the long-term impact of the proposal on the ability of communities to secure their well-being.</p> <p>The preferred Option will provide the Council with an appropriate Policy for the future.</p>
<p>Prevention</p> 	<p>Consider how the proposal is preventing problems from occurring or getting worse</p> <p>The preferred Option seeks to improve standards and consistency in taxi licensing across Wales and to prevent criminality and inappropriate conduct in the taxi trade.</p>
<p>Integration</p> 	<p>Consider how your proposal will impact on other services provided in our communities (these might be Council services or services delivered by other organisations or groups)</p> <p>Proper licensing of taxi drivers helps ensure that other departments can rely on required standards being met for example in Social Services and Home to School Transport contracts using taxis.</p>
<p>Collaboration</p> 	<p>Consider how you are working with Council services or services delivered by other organisations or groups in our communities.</p> <p>The revised Policy has received input from the Council's Data Protection and Governance Officer and is in line with partners across Wales based upon the Welsh Government and Department for Transport requirements.</p>

<p>Involvement</p> 	<p>Consider how you involve people who have an interest in this proposal and ensure that they represent the diversity of our communities.</p> <p>Consultation on the proposal has been undertaken with the taxi trade, elected members, the Data Protection & Governance Officer, the Council’s Transport team and details were also published on the Council’s website for the wider public. One response has been received to the consultation and a further request to amend the Policy was received from a member of the taxi trade specifically in relation to Wheelchair Access Vehicles, after the Consultation concluded. These responses are shown in Appendix 4 and Appendix 6 respectively and recommendations for amendments to the Policy to reflect these have been incorporated into the proposal.</p>

How does your proposal link to the Welsh Governments Priorities for Wales? Please indicate below.

1. **A PROSPEROUS WALES** ... an innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.

This proposal does not have a direct impact upon these matters however regular testing of taxi vehicles by the Council's Transport team helps to ensure that vehicles are lawful and compliant with required standards. Additionally, the Authority is participating in a Welsh Government pilot scheme to allow use of electric taxis in Blaenau Gwent however this report does not impact upon this scheme.

2. **A RESILIENT WALES** ... a nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change). Think about how your activity will have regard to protecting and enhancing biodiversity.

This proposal does not have a direct impact upon these matters

3. **A HEALTHIER WALES** ... a society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.

This proposal does not have a direct impact upon these matters.

4. **A MORE EQUAL WALES ...** A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).

Amendment to the specifications for Wheelchair Access Vehicles as per the proposal is likely to improve access to this service provision.

5. **A WALES OF COHESIVE COMMUNITIES ...** attractive, viable, safe and well-connected communities.

Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will support principles of fairness and non-discrimination in these licensing processes and help ensure appropriate safeguards and standards are maintained.

6. **A WALES OF VIBRANT CULTURE AND THRIVING ...** a society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.

This proposal does not have a direct impact upon these matters.

7. **A GLOBALLY RESPONSIBLE WALES ...** a nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

This proposal does not have a direct impact upon these matters.



Section 5-Welsh Language (Wales) Measure 2011 and Welsh Language Standards			
<p><i>(The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have 'due regard' for the positive or negative impact that any proposal may have on opportunities to use the Welsh language. Welsh Language Standards)</i></p>			
Requirement	Does the proposal have any positive, negative or neutral impacts in regards to the below?	What can be done to mitigate any negative impacts?	Please demonstrate any evidence used to form this opinion.
<p>Compliance with the Welsh Language Standards. <i>Specifically Standards 88 - 93</i></p>	Neutral		Published documents will be available in Welsh and English.
<p>What opportunities are there to promote the Welsh Language? <i>e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community</i></p>	Neutral		Published documents will be available in Welsh and English.
<p>What opportunities are there for a person or person to use the Welsh Language? <i>e.g. staff, residents and visitors</i></p>	Neutral		Published documents will be available in Welsh and English.
<p>Has the Welsh Language been considered in order to treat the Welsh</p>	Neutral		Published documents will be available in Welsh and English.

language no less favourably than the English language?			
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Section 6 – Children’s Rights Approach - [The Right Way](#)

The Children’s Rights Approach – The Right Way is a framework for working with children, grounded in the UN Convention on the Rights of the Child (UNCRC). It places the UNCRC at the core of planning and service delivery and integrates children’s rights into every aspect of decision-making, policy and practice. The Right Way focuses on three main them Participation, Provision and Protection.

Protected characteristics	Will the proposal have any positive impacts on the Children’s Rights Approach?	Will the proposal have any negative impacts on the Children’s Rights Approach?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Participation (child or young person as someone who actively contributes to society as a citizen)	Positive	None expected	Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will ensure access to taxi services are safe and appropriate.
Provision (the basic rights of children and young people to survive and develop)	Positive	None expected	Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will ensure access to taxi services are safe and appropriate.

Protection (children and young people are protected against exploitation, abuse or discrimination)	Positive	None expected	Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will ensure access to taxi services are safe and appropriate.
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Section 7– Community Safety

Duty to Consider Crime and Disorder Implications

Section 17 of the Crime and Disorder Act 1998 places a duty on the local authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder, anti-social and other behaviour adversely affecting the local environment, the misuse of drugs, alcohol and other substances, re-offending and serious violence.

Impacts	Will the proposal have any positive impacts on crime and disorder?	Will the proposal have any negative impacts on crime and disorder?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Crime (consider impact on each: victims, offenders and neighbourhoods)	The proposal seeks to ensure that Hackney Carriage and Private Hire Drivers, Vehicles and Operators are properly vetted, lawful and safe.	None	Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will ensure access to taxi services are safe and appropriate.

<p>Anti-Social Behaviour and behaviour adversely affecting the local environment (consider impact on each: victims, offenders, neighbourhoods and green spaces)</p>	<p>The proposal does not have a direct impact upon these matters.</p>	<p>None</p>	
<p>Misuse of drugs, alcohol and other substances (Think vulnerable children, adults, families and communities)</p>	<p>No direct impact upon these matters however taxi services must be safe to use for all.</p>	<p>None</p>	<p>Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will help ensure access to taxi services are safe and appropriate for all service users.</p>
<p>Re-offending (Think young people and adults, victims, families, communities)</p>	<p>No direct impact upon these matters</p>	<p>None</p>	
<p>Serious Violence (Think vulnerable young people, vulnerable adults, victims, families, communities)</p>	<p>No direct impact upon these matters</p>	<p>None</p>	
<p>Counter Terrorism (People and places that are vulnerable to terrorism or violent extremism)</p>	<p>Potentially positive impact.</p>	<p>None</p>	<p>Setting out an appropriate and fair policy for licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators will help ensure access to taxi services are safe and appropriate for all service users.</p>

Community Cohesion (Asylum seekers, Migrants, Victims or Hate Crime, Community tensions)	No direct impact upon these matters	None	

Section 8- Armed Forces Covenant Duty [AFC Draft Statutory Guidance - Final.pdf](#)

Impacts	Will the proposal have any positive impacts on the armed forces community?	Will the proposal have any negative impacts on the armed forces community?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Health <ul style="list-style-type: none"> • Provision of services • Planning and funding • Co-operation between bodies and professionals <p>These healthcare functions are within scope of the</p>	No direct impact upon these matters	None	

<p>Duty in the following settings:</p> <ul style="list-style-type: none"> • NHS Primary Care services, including general practice, community pharmacies, NHS dental, NHS optometry services and public health screening services. • NHS Secondary Care services, including urgent and emergency care, hospital and community services, specialist care, mental health services, and additional needs services (as applicable). • Local authority-delivered healthcare services, including sexual health services and drug and alcohol misuse services 			
<p>Education</p> <ul style="list-style-type: none"> • Admissions • Educational attainment and curriculum • Child wellbeing • Transport • Attendance 	<p>No direct impact upon these matters</p>	<p>None</p>	

<ul style="list-style-type: none"> • Additional needs support • Use of Service Pupil Premium funding (England only) <p>These education functions are within scope of the Duty in compulsory education settings, that is, primary, secondary, and, for England only, compulsory further education. The Duty does not cover nursery (early years education), higher education, or other voluntary adult education settings</p>			
<p>Housing</p> <ul style="list-style-type: none"> • Allocations policy for social housing • Tenancy strategies (England only) • Homelessness • Disabled Facilities Grants 	<p>No direct impact upon these matters</p>	<p>None</p>	

Section 9-Data-Please outline any data or evidence that has been used to develop the proposal, this can be previous consultations, local/national data, pilot projects, reports, feedback from clients etc.		
Data/evidence –What data/evidence was used? - provide any links.	What were the key findings?	How has the data/evidence informed this proposal?
<p>The proposal has been formulated based upon two key documents: The Department for Transport (DfT) in the ‘Statutory Taxi and Private Hire Vehicle Standards’ and the Welsh Government’s ‘Guide to Harmonisation of Taxi and Private Hire Vehicle Licensing in Wales’.</p>	<p>Revisions to the Council’s Policy as per the proposal are recommended to ensure consistency with these documents</p>	<p>Both documents have been used to inform and reformat the Draft Policy recommended in Appendix 1 of the Report.</p>
Are there any data or information gaps and if so what are they and how do you intend to address them?		
<p>None known currently however a further White Paper is expected from Welsh Government on Taxi Services and this may require further changes in due course.</p>		

Section 10-Consultation. Please provide details of consultation undertaken to support the proposal. Please consider the Gunning Principles: -

Principle 1: Consultation must take place when the proposals are still at a formative stage. You must not have already made up your mind.

Principle 2: Sufficient reasons must be put forward to allow for intelligent consideration and response. Have people been given the information and opportunity to influence?

Principle 3: Adequate time must be given for consideration and response. Is the consultation long enough bearing in mind the circumstances?

Principle 4: The product of consultation must be conscientiously taken into account when finalising the decision

Briefly describe any planned consultations or consultations that have been carried out to date. Please consider the above principles.

Please consider the following questions; -

1. Who did you consult? Consultation on the proposed changes has been undertaken with the taxi trade, elected members, the Data Protection & Governance Officer, the Council's Transport team and details were published on the Council's website.

2. When did the consultation take place and was adequate time given for a response? The consultation took place throughout October 2022 however one request to make further changes to the Police was received after the conclusion of the Consultation period and this has also been submitted for consideration.

3. Was there enough information provided to response effectively? Full details of the Draft Policy was published along with a table of changes to the existing Policy, to enable consideration.

4. What were the findings? One response was received to the consultation and a further request to make a Policy change was received after the consultation concluded.

5. Have the findings been considered in regards to the decision? Both consultation responses have been reflected in the proposal.

Section 11-Monitoring and Review	
How will the implementation of the proposal be monitored, including the impacts or changes made?	The are no specific monitoring requirements however on-going monitoring of the effectiveness of the Licensing Policies takes place and periodic reviews maintained as necessary.
What monitoring tools will be used?	The are no specific monitoring requirements however on-going monitoring of the effectiveness of the Licensing Policies takes place and periodic reviews maintained as necessary.
How will the results be used for future development?	The are no specific monitoring requirements however on-going monitoring of the effectiveness of the Licensing Policies takes place and periodic reviews maintained as necessary.
How and when will it be reviewed?	The are no specific monitoring requirements however on-going monitoring of the effectiveness of the Licensing Policies takes place and periodic reviews maintained as necessary.
Who is responsible for ensuring this happens?	Responsibility for Policy setting in respect of these matters is with the General Licensing Committee and managed by the Licensing Team within the Council's Public Protection Service.

Section 12 - Decision

Using the information you have gathered from sections 1-9 please state in the table below whether you are able to proceed with the proposal.

Continue with the proposal in its current form	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Continue with proposal but take into account reasonable steps to mitigate any negative impacts of the proposal	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Name of person completing the IIA	
Name:	Steve Osborne
Job Title:	Team Manager- Trading Standards and Licensing
Date:	2.3.23

Head of Service Approval			
Name:	David Thompson		
Job Title:	Service Manager – Public Protection		
Signature:	D Thompson	Date:	3.3.23

Please contact Policy & Partnerships should you require any further advice or guidance on completing your assessment via lissa.friel@blaenau-gwent.gov.uk or emma.scherptong@blaenau-gwent.gov.uk.