

## EQUALITY IMPACT ASSESSMENT

The Equality Act 2010 requires all public bodies, including local authorities, to show “due regard” to the impact their policies and procedures have on people from different groups. This includes gender, race, religion, age, disability, sexual orientation and gender identity. We also have a responsibility to foster good community relations. Although they are not a legal requirement, conducting a basic assessment will allow you to look at the possible implications of a policy or procedure, and take any mitigating action if appropriate.

Remember:

- Equality Impact Assessments (EIAs) should be carried out on **relevant** policies and procedures. Not all policies or procedures will require them. If you are unsure if one is required, please contact the Equality and Diversity Manager on 01753 875069 for advice.
- Assess any potential impacts, positive and negative, in a proportionate way and with relevance
- Make decisions that are justified, evidenced, relevant and identify any mitigating proposals
- Prioritise expenditure in an efficient and fair way
- Have a record showing that the potential impacts have been considered and that decisions are based on evidence

It is important the EIA is carried out at the earliest opportunity to ensure that you have the time to undertake any additional work that will inform your decisions, for example community engagement.

*All relevant committee reports should include an equalities impact assessment. This will ensure that equalities considerations are available for members to consider as part of the formal decision-making process. If your EIA is part of a Cabinet Report, please forward it to Democratic Services, along with your other committee paperwork. It is usual to publish the EIA with the other public papers in advance of a committee meeting. Please also remember to complete the EIA section of the report checklist and the EIA summary section on the report itself.*

**If you have any questions or concerns, please contact the Equality and Diversity Manager on 01753 875069.**

# Equality Impact Assessment

<b>Directorate:</b> Public Health and Public Protection	
<b>Service:</b>	
<b>Name of Officer/s completing assessment:</b> Bethany Ferris	
<b>Date of Assessment:</b> 14.01.2026	
<b>Name of service/function or policy being assessed:</b> Private Hire and Hackney Carriage Vehicle Policy 2023	
1.	<p>What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing?</p> <p><b>Policy Aims</b></p> <p>The aim of this policy is to improve the air quality in Slough. There are areas of Slough where the levels of nitrogen dioxide (NO<sub>2</sub>), a harmful air pollutant, breach national limits and vehicle emissions are the main source of NO<sub>2</sub>. Air quality is important for the health of the population, and especially for children, older adults, and those with existing medical conditions that are more vulnerable to the harmful effects of air pollutants.</p> <p><b>Policy Objectives</b></p> <p>This policy changes the vehicle requirements for private hire and hackney carriage vehicle licensees from 1 November 2023. Please note this policy was reviewed and amended in October 2025 and these changes are reflected below.</p> <p>For licensees with an existing license:</p> <ul style="list-style-type: none"><li>• Petrol, diesel or lid hybrid vehicle licenses will expire when the vehicle reaches 9 years of age (for wheelchair accessible and specialist vehicles this is 17 years of age)</li></ul> <p>For new vehicle licenses:</p> <ul style="list-style-type: none"><li>• All vehicles must be less than 5 years old when first licensed</li><li>• The grant of a new vehicle license to diesel vehicles will cease on 1 January 2026*</li><li>• The grant of a new vehicle license to petrol vehicles will cease on 1 January 2027*</li></ul>

\*wheelchair accessible and specialist vehicles are exempt from this

As a result of this policy, all **new** vehicle licenses (excluding those for wheelchair accessible and specialist vehicles) from 1 January 2027 will only be granted to hybrid and electric vehicles. Hybrid vehicles must have a minimum of 30 miles of zero emission capability. This policy does not go as far as to mandate that vehicles meet ULEV standards (having less than 75 grams of carbon dioxide (CO<sub>2</sub>) per kilometre (g/km) from the tail pipe<sup>1</sup>).

### **Policy Outcomes**

The intended outcome of this policy is that the Slough fleet of private hire and hackney carriage vehicles will produce fewer air pollutants. This will ensure we are in line with the following local strategies:

- Slough Borough Council Air Quality Action Plan (2024-2028)<sup>2</sup>
- Slough Low Emission Strategy (2018-2025)<sup>3</sup>
- Slough Local Transport Plan (2011-2026)<sup>4</sup>
- Slough Health and Wellbeing Strategy (2026-2036)<sup>5</sup>
- Slough Borough Council Climate Change Strategy and Action Plan (2021)<sup>6</sup>

### **Legislation**

This policy is in line with the following legislation:

- Local Government (Miscellaneous Provisions) Act 1976 allows the local authority to set standards for the granting of hackney carriage and private hire vehicle licenses.
- Environment Act 2021 requires the Secretary of State to set a target for fine particulate matter (PM2.5) and a long-term exposure reduction target which local authorities must consider when determining local policies.

<sup>1</sup> [Zero & Ultra Low Emission Vehicles \(ULEV\) | Vehicle Certification Agency](#)

<sup>2</sup> [Air Quality Action Plan 2024 – 2028](#)

<sup>3</sup> [LES Apendix 1.pdf](#)

<sup>4</sup> [Local Transport Plan – Slough Borough Council](#)

<sup>5</sup> [Slough Joint Local Health & Wellbeing Strategy 2026-2036 - Slough Borough Council - Citizen Space](#)

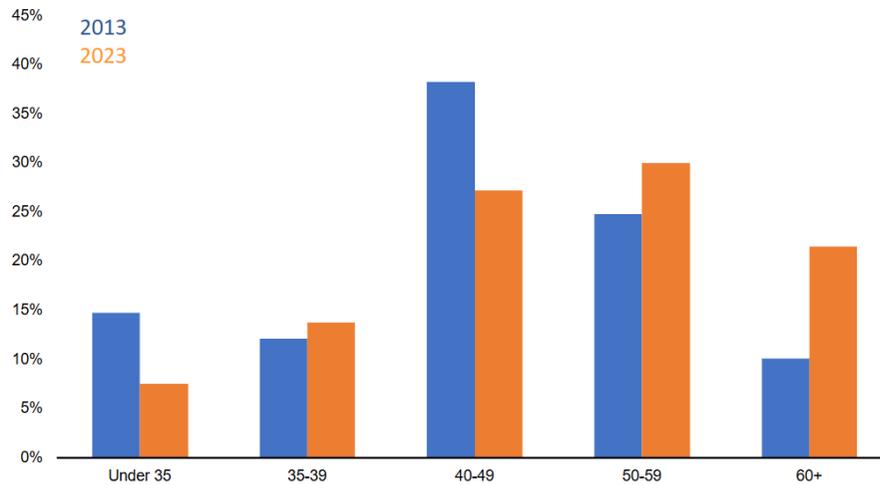
<sup>6</sup> [Climate Change strategy and action plan – Slough Borough Council](#)

2.	<p>Who implements or delivers the policy, service or function? State if this is undertaken by more than one team, service, and department including any external partners.</p> <p>The Licensing Team at Slough Borough Council</p>
3.	<p>Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc. Please consider all of the Protected Characteristics listed (more information is available in the background information). Bear in mind that people affected by the proposals may well have more than one protected characteristic.</p> <p><b>Age:</b>  <b>Disability:</b>  <b>Gender Reassignment:</b>  <b>Marriage and Civil Partnership:</b>  <b>Pregnancy and maternity:</b>  <b>Race:</b>  <b>Religion and Belief:</b>  <b>Sex:</b>  <b>Sexual orientation:</b>  <b>Other:</b></p> <p>This policy will directly affect private hire and hackney carriage vehicle licensees. There will be indirect effects on private hire and hackney carriage vehicle users, residents living in areas with high levels of air pollution and population groups most vulnerable to the health harms associated with air pollutants.</p> <p><b>Directly Affected Groups</b></p> <p><b>Private hire and hackney carriage vehicle workforce</b></p> <ul style="list-style-type: none"> <li>• As of 25 September 2023, there were 449 licensed private hire and hackney carriage vehicles in Slough<sup>7</sup></li> <li>• Of these vehicles, 38% were hybrid or electric and 13% were wheelchair accessible vehicles (exempt from the policy changes)</li> </ul>

<sup>7</sup> [Cabinet Report template 2022.23](#)

- As per the England Labour Force Survey (2023)<sup>8</sup>, the demographic profile of private hire and hackney carriage and cab drivers is as follows:
  - 90% male
  - Average age of 51 years (breakdown of ages given in Figure 1)
  - 50% Asian or Asian British and 35% White
  - 84% are self-employed
  - 16% work part-time

**Figure 1:** Age profile of “Private hire and hackney carriage and cab drivers and chauffeurs”, England 2013 and 2023 (Labour Force Survey)  
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<sup>8</sup> [Private hire and hackney carriage and private hire vehicle statistics, England: 2023 - GOV.UK](https://www.gov.uk/government/statistics/private-hire-and-hackney-carriage-and-private-hire-vehicle-statistics-england-2023)

- Data from the Greater London Authority (2024)<sup>9</sup> about private hire and hackney carriage licensees and private hire vehicles shows similar demographic characteristics (Table 1) such as most drivers being male (98%), between the ages of 41-50 (33%) and 51-60 (27%) and of Asian (37%) or White (20%) ethnicity

**Table 1:** Data from the GLA<sup>9</sup> showing demographic characteristics of private hire and hackney carriage (n=16,947) and private hire vehicle licensees (n=107,412)

	<b>Hackney carriage licensees</b>	<b>Private hire vehicle licensees</b>	<b>Overall</b>
Gender	Female: 2% Male: 98%	Female: 2% Male: 98%	Female: 2% Male: 98%
Age	21-30: 0.5% 31-40: 6.6% 41-50: 19.1% 51-60: 41.1% 61-70: 27.6% 71-80: 4.9% >80: 0.3%	21-30: 6.1% 31-40: 25.8% 41-50: 35.2% 51-60: 24.8% 61-70: 7.7% 71-80: 0.5% >80: 0.0%	21-30: 5.4% 31-40: 23.2% 41-50: 33.0% 51-60: 27.0% 61-70: 10.4% 71-80: 1.1% >80: 0.0%
Ethnicity	Asian: 12% Black: 3% Chinese: 1% Mixed: 2% White: 66% Unknown: 17%	Asian: 41% Black: 15% Chinese: 1% Mixed: 2% White: 13% Unknown: 28%	Asian: 37% Black: 14% Chinese: 1% Mixed: 2% White: 20% Unknown: 26%

### Indirectly Affected Groups

#### Private hire and hackney carriage users

- As per the National Transport Survey (2021)<sup>8</sup>, information related to private hire and hackney carriage users is as follows:
  - 6.5 trips taken on average per person per year

<sup>9</sup> [Private hire and hackney carriage and private hire licensee demographic information - December 2024](#)

- Most trips were taken for the purpose of leisure (40%), shopping (17%), commuting (16%), education (11%) and personal business (10%)
- More trips are taken by those with mobility issues (10 trips per person per year) compared to those without mobility issues (6 trips per person per year)
- More trips taken by males than females of those aged 0-16 years
- More trips taken by females than males of those aged 17-29 and >60 years
- More trips taken by those living in households without access to a car (23 trips per person per year) compared to those with a car (3 trips per person per year)
- No trends in average numbers of trips across income quintile
- No data on ethnicity

**Residents in areas with high traffic-related pollution**

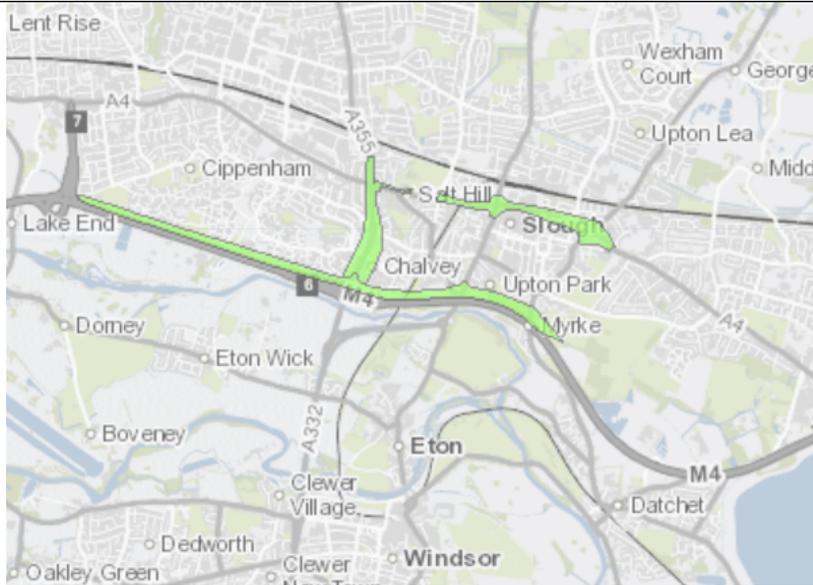
- Slough has five Air Quality Management Areas (AQMA) (see Figure 2) where annual mean concentrations of NO<sub>2</sub> have breached national limits of 40µg/m<sup>3</sup> (based on UK Air Quality Standards Regulations (2020)<sup>10</sup>)<sup>11</sup>
- As of 2022, there were 1961 residential properties located within a AQMA<sup>10</sup>
- On average, 46% of local NO<sub>x</sub> emissions are apportioned to road emissions, and for sites within AQMA there is a higher contribution from road emissions than non-road emissions<sup>10</sup>
- Other air pollutants linked to vehicles include particulate matter – road emissions make up 10.6% of total PM10 emissions and 9.3% of PM2.5 emissions<sup>10</sup>
- The UK Health Security Agency (UKHSA) Committee on the Medical Effects of Air Pollutants (COMEAP) have published multiple reports on the health harms associated with poor air quality<sup>12</sup>

**Figure 2:** AQMA Boundaries based on levels of NO<sub>2</sub> ([AQMA interactive map](#))

<sup>10</sup> [Nitrogen dioxide \(NO2\) - GOV.UK](#)

<sup>11</sup> [2024 Air Quality Annual Status Report \(ASR\)](#)

<sup>12</sup> [COMEAP: reports and statements - GOV.UK](#)



**Children, older people, and those with long-term health conditions**

Children, older adults and those with pre-existing respiratory and cardiovascular conditions are most vulnerable to the health harms associated with poor air quality<sup>13</sup> (see Appendix 1 for further information on health harms of air pollution)

4. What are any likely positive impacts for the group/s identified in (3) above? You may wish to refer to the Equalities Duties detailed in the background information.

**Positive Impacts due to Better Air Quality**

<sup>13</sup> [Using the Daily Air Quality Index \(DAQI\) - GOV.UK](https://www.gov.uk/guidance/using-the-daily-air-quality-index-daqi)

This new policy will have positive impacts on all the groups listed above due to reductions in air pollutants caused by fewer diesel and petrol vehicles being used as private hire and hackney carriage vehicles. The policy will likely have a greater positive impact on those living in AQMAs and for those most vulnerable to the health harms associated with air pollution.

Air pollution causes between 30,000 to 40,000 deaths per year in the UK and is linked to over 700 health conditions affecting every system in the body<sup>14</sup>. It affects the health of pregnant women and unborn babies, children and adults, and those living in areas of deprivation experience the worst outcomes. Both long-term exposure (over years) and short-term exposure (over days) are linked to negative health outcomes for example, hospital admissions due to cardiovascular and respiratory conditions increase when levels of air pollutants rise. Those who are most susceptible to harm from air pollution include children (who experience poor health in childhood e.g., asthma and poor health later in life e.g., lung fibrosis and chronic obstructive pulmonary disease (COPD)), older adults (who experience increased strokes, hospitalisation and cognitive decline<sup>15</sup>) and people living with existing health conditions.

The Association of Directors of Public Health (ADPH) have published a policy position on air quality stating that air quality should be improved by interventions including incentivising the use of low-emission vehicles to avert the 40,000 annual deaths and 20,200 annual hospital admissions due to air pollution in the UK<sup>16</sup>.

In Slough, the fraction of mortality associated with particulate air pollution in 2023 was 5.8%<sup>17</sup>. This figure has been on a downward trend since 2018 but has always remained higher than England. Similarly, the under 75 mortality rate (2022-24) from both respiratory (42.1 per 100,000) and cardiovascular (106.2 per 100,000) disease is higher in Slough than in England<sup>18</sup>.

### **Other Positive Impacts**

For licensees, using an electric vehicle saves on average £700 per year<sup>19</sup>. It takes approximately 5 years to recoup the additional upfront cost of purchasing an electric vehicle by the reduced running costs<sup>19</sup>. After five years, financial gains can be made thus benefitting licensees with more years of driving ahead of them. The costs savings do depend on individual factors such as annual mileage and home

<sup>14</sup> [A breath of fresh air: responding to the health challenges of modern air pollution | RCP](#)

<sup>15</sup> [Air pollution and older people - Reports - Impact on Urban Health](#)

<sup>16</sup> [Formatted-FINAL-Air-quality-Policy-Position-Statement-.pdf](#)

<sup>17</sup> [Public Health Outcomes Framework | Fingertips | Department of Health and Social Care](#)

<sup>18</sup> [Mortality Profile - Data | Fingertips | Department of Health and Social Care](#)

<sup>19</sup> [Electric vehicles: costs, charging and infrastructure - GOV.UK](#)

	<p>electricity rate but drivers can use this calculator (<a href="#">Electric Car Calculator UK 2025/26   EV Running Costs &amp; Savings Calculator</a>) to produce a more accurate calculation based on their own circumstances.</p>
5.	<p>What are the likely negative impacts for the group/s identified in (3) above? If so then are any particular groups affected more than others and why?</p> <p>Whilst this policy applies to all private vehicle and hackney carriage vehicle licensees, there are some groups that may be negatively affected more than others as follows:</p> <ul style="list-style-type: none"> <li>• Age – older licensees may retire from driving before they are able to recoup (from reduced running costs) the additional upfront cost of purchasing an electric vehicle</li> <li>• Disability – licensees who drive an adapted vehicle may face greater costs switching to an electric or hybrid vehicle that requires adaptation</li> <li>• Race – licensees whose first language is not English may not be aware of the policy and face an unexpected cost of needing to switch to a hybrid or electric vehicle</li> <li>• Gender – female licensees may feel less safe when charging a hybrid or electric vehicle at a public charging station</li> <li>• Low-income – those with fewer financial resources may be unable to purchase or have the space for the home infrastructure to charge a hybrid or electric vehicle leading to reliance on and increased unpaid time spent at public charging facilities. This could lead to increased taxi trip costs for taxi users which may mean those on low wages struggle to afford it.</li> <li>• Part-time – those who work part-time (possibly for reasons beyond their control such as caring responsibilities or health conditions) may have to work for longer before recouping the additional upfront costs of purchasing an electric or hybrid vehicle</li> </ul>
6.	<p>Have the impacts identified in (4) and (5) above been assessed using up to date and reliable evidence and data? Please state evidence sources and conclusions drawn (e.g. survey results, customer complaints, monitoring data etc).</p> <p>Please see footnotes.</p> <p><b>Further Sources of Evidence of Health Harms Associated with Air Pollution:</b></p>

	<ul style="list-style-type: none"> <li>• UKHSA Committee on Medical Effects of Air Pollution (COMEAP) provide expert advice to the Department of Health and Social Care<sup>20</sup></li> <li>• Department for Environment, Food and Rural Affairs (DEFRA) monitor and report on air quality across the UK<sup>21</sup></li> <li>• European Environment Agency have published information on human health harms caused by air pollution across Europe<sup>22</sup></li> </ul>
7.	<p>Have you engaged or consulted with any identified groups or individuals if necessary and what were the results, e.g. have the staff forums/unions/ community groups been involved?</p> <p>The Licensing Committee approved a version of this policy in 2018 which meant that most licensed vehicles had to meet ULEV standard by 31 December 2025. At a meeting in October 2023 (following a public consultation) of the Licensing Committee, it was acknowledged that there had been a drop in new private hire vehicle licenses and that the COVID-19 pandemic and cost-of-living crisis had contributed to this. As a result of this meeting, the requirement for licensees to have a vehicle meeting ULEV standards was relaxed, and the vehicle age requirements were amended (a vehicle now has to be less than 5 years of age rather than 3 years of age at first licence).</p>
8.	<p>Have you considered the impact the policy might have on local community relations?</p> <p>A public consultation was held between 16 August and 14 September 2023 for feedback on this policy.</p>
9.	<p>What plans do you have in place, or are developing, that will mitigate any likely identified negative impacts? For example what plans, if any, will be put in place to reduce the impact?</p> <p>There is a government grant of £307,035 received in 2021 to create pilot schemes to assist the licensed trade to try out electric vehicles before they transition. This project roll out has been delayed but there is now a project plan in place to deliver this in 2026/7.</p>

<sup>20</sup> [Committee on the Medical Effects of Air Pollutants - GOV.UK](#)

<sup>21</sup> [About Air Pollution - DEFRA UK Air - GOV.UK](#)

<sup>22</sup> [Harm to human health from air pollution in Europe: burden of disease status, 2024 | Publications | European Environment Agency \(EEA\)](#)

10.	<p>What plans do you have in place to monitor the impact of the proposals once they have been implemented? (The full impact of the decision may only be known after the proposals have been implemented). Please see action plan below.</p> <p>The fleet is analysed through this review to Licensing Committee. New Grant applications in 2025 have been 80% non-diesel vehicles. The Council will report on updates of the Air Quality Action Plan on the progress of all of the air quality improvement measures including the DEFRA grant for vehicle licence transition. The Council is required to report to Defra on the air quality action plan outcomes.</p>

<b>What course of action does this EIA suggest you take? More than one of the following may apply</b>	✓
<b>Outcome 1: No major change required.</b> The EIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken	
<b>Outcome 2: Adjust the policy</b> to remove barriers identified by the EIA or better promote equality. Are you satisfied that the proposed adjustments will remove the barriers identified? (Complete action plan).	
<b>Outcome 3: Continue the policy</b> despite potential for adverse impact or missed opportunities to promote equality identified. You will need to ensure that the EIA clearly sets out the justifications for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact (see questions below). (Complete action plan).	
<b>Outcome 4: Stop and rethink</b> the policy when the EIA shows actual or potential unlawful discrimination. (Complete action plan).	

### Action Plan and Timetable for Implementation

At this stage a timetabled Action Plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function. This plan will need to be integrated into the appropriate Service/Business Plan.

Action	Target Groups	Lead Responsibility	Outcomes/Success Criteria	Monitoring & Evaluation	Target Date	Progress to Date

**Name:** \_\_\_\_\_

<b>Signed:</b> .....(Person completing the EIA)
<b>Name:</b> .....
<b>Signed:</b> .....( Policy Lead if not same as above)
<b>Date:</b>