

Response to DOE consultation on Taxi Fare and Taximeter Regulations

15 February 2012

Introduction

1. The Equality Commission for Northern Ireland welcomes the opportunity to respond to this consultation on taxi fare and taximeter Regulations by the Department of the Environment ('the Department'). Further details on the scope of the Commission's remit, duties and expertise is contained in Annex 1.
2. The Commission has submitted a limited response to the Department's consultation paper. It has only responded to those questions most relevant to its remit and experience.

Comments

3. In general, we support the Department's proposals to introduce a maximum taxi fare and associated taximeter requirements for taxis in Northern Ireland. We are of the view that the proposed changes will ensure a system with greater transparency and accountability and one which is less likely to be subject to abuse. The changes will, for example, ensure that disabled people using wheelchair accessible taxis cannot be charged more than the maximum tariff.
4. In particular, we support the proposal that all taxis should be fitted with a taximeter. In order to reduce confusion for passengers, we agree that only one taximeter should be fitted in each taxi. This is likely to benefit, in particular, those

passengers with learning disabilities or whose first language is not English.

5. We further agree that a taximeter should be designed to ensure clarity of fare for ease of use by passengers, including on-screen display and verbal clarification from the driver if required. This will also particularly assist passengers whose first language is not English or passengers with learning difficulties.
6. We also support the proposal that all taximeters must be capable of operating a receipt printer which has secure transmission from the taximeter. It is also likely to be of benefit that taximeters store all fare information digitally for a year, and that information can be downloaded either to the receipt printer to produce a hard copy or to a computer for long term storage. We agree that such optional functionalities should be permitted but not compulsory for all taximeters.
7. In addition, we agree that taxis operating within a regulated fare must display a 'fares board' which can be viewed clearly by all seated passengers.

Issues of concern

8. We have, however, a number of concerns in relation to the proposed measures.
9. Firstly, we note that it will be open to taxi drivers and passengers to negotiate a reduced fare below the maximum tariff. Clearly, passengers whose first language is not English or passengers with learning difficulties are placed at a disadvantage in terms of entering into such negotiations. There is also the potential for taxi drivers of wheelchair accessible taxis to refuse to reduce fares for disabled wheelchair users.
10. Secondly, we note that taxi drivers may charge an additional 'soiling' charge up to a maximum of up to £50. We recommend

that the guidance makes it clear that this charge should **not apply** to the removal of dog hair as regards assistance dogs.

11. Finally, it is proposed that the tariff includes a 'waiting time tariff' for when the vehicle is stationary, or moving at very low speeds. We recommend that the Department makes it clear that this waiting time tariff only commences when the **passenger is seated in the taxi**. Clearly, disabled people may require additional time in order to get into the taxi, and should not be penalised as a result of this.

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Annex 1: The Equality Commission for Northern Ireland – Remit

1. The Equality Commission for Northern Ireland (the Commission) is an independent public body established under the Northern Ireland Act 1998. The Commission is responsible for implementing the legislation on fair employment, sex discrimination and equal pay, race relations, sexual orientation, disability and age.
2. The Commission's remit also includes overseeing the statutory duties on public authorities to promote equality of opportunity and good relations under Section 75 of the Northern Ireland Act 1998 (Section 75) and to promote positive attitudes towards disabled people and encourage participation by disabled people in public life under the Disability Discrimination Act 1995.
3. The Commission's general duties include:
 - working towards the elimination of discrimination;
 - promoting equality of opportunity and encouraging good practice;
 - promoting positive / affirmative action
 - promoting good relations between people of different racial groups;
 - overseeing the implementation and effectiveness of the statutory duty on relevant public authorities;
 - keeping the legislation under review;
 - promoting good relations between people of different religious belief and / or political opinion.
4. The Commission, with the Northern Ireland Human Rights Commission, has been designated under the United Nations Convention on the rights of Persons with Disabilities

(UNCRPD) as the independent mechanism tasked with promoting, protecting and monitoring implementation of UNCRPD in Northern Ireland.