



TfL Pedicab regulations detailed licensing requirements consultation - London TravelWatch response

About London TravelWatch

London TravelWatch is the official independent watchdog set up to advocate for people travelling in and around London. Our sister organisation, Transport Focus, covers the rest of Great Britain.

London TravelWatch promotes integrated transport policies and presses for better journeys for everyone, with higher standards of quality, performance and accessibility. We work directly with users, other transport user groups as well as transport operators, providers, regulators and local authorities. In turn, transport operators consult us on proposed changes to services or closures of lines or stations.

Regulation of Pedicabs

London TravelWatch welcomed TfL's initial consultation proposing the introduction of pedicab regulation. We believe that, while pedicabs can provide an additional sustainable type of transport for people in London, regulation is needed to ensure that they operate as a safe and fair service.

In this response we have focused on the needs of passengers, as opposed to some of the more technical aspects as we believe that others are better placed to respond in those areas.

Driver licencing requirements

We believe that it is important that pedicab drivers meet stringent requirements to make sure they have the skills and knowledge needed for the role, so that they can provide their passengers with a safe and positive experience. In our previous submission, we argued that this should include:

- A qualification to show technical competency.
- Topographical knowledge.
- Passing the same UK and overseas criminal checks that taxi and private hire vehicle drivers are subject to.
- An agreed disciplinary procedure for pedicab drivers, as there is for taxi drivers.

As such, we support the proposal that pedicab drivers would need to provide a valid DVSA theory test certificate, if they do not already have a full, current driving licence. However, we reiterate from our previous response that we think this should be extended to include a qualification which covers the skills more specifically needed

to operate a pedicab, such as requiring drivers to have achieved the National Standard for cycle training.

We also support the proposal that all pedicab drivers would need to have an enhanced Disclosure and Barring Service (DBS) and barred list check, and need to register with the DBS Update Service so that TfL would carry out checks every six months.

Alongside these we would still like to see requirements for drivers to have sufficient topographical knowledge and for there to be an agreed disciplinary procedure for pedicab drivers.

We also support TfL's proposal that all pedicab drivers would need to:

- Provide evidence that they have the permission to reside and work in the UK
- Meet DVLA medical standards
- Have passed an English language skills assessment, and a safety, equality and regulatory understanding assessment; and
- Hold a valid public liability insurance policy.

Vehicle requirements

In our previous submission we said that pedicab vehicles should meet standards to make sure they are fit for purpose, properly maintained and insured. Alongside having vehicles requirements in place, compliance and roadworthiness should be regularly checked and monitored by TfL, including random roadside inspections.

And so, we welcome that only manufactured designed and built pedicabs will be licensed, and that pedicabs must be insured to carry passengers. The requirements for pedicabs to pass an inspection before being licensed and then must pass a new licensing inspection each year to remain licensed, and for pedicabs to be inspected/serviced every three months are also welcomed.

We also called for modifications to better meet the needs of Disabled passengers, so we support that TfL will permit the use of internally amplified systems, such as hearing loop systems, which will help to ensure that pedicabs will be more inclusive and accessible for passengers. We also encourage TfL to look at further ways to make vehicles as inclusive and accessible as possible.

Fares and payments

We believe it is important to have transparent and consistent conditions of carriage. As such, we support TfL's approach of making fares simple and easy to understand, and requiring them to be clearly visible so people can make sure drivers are charging them the appropriate amount. As such, TfL's proposed fare structure and the consistent terms of carriage seem sensible.

We also support the proposed payment options to give passengers as much choice as possible about how to pay. We know that many people do not have access to a bank account and so they will benefit from being able to make cash payments, whilst

the requirement to have a TfL approved device for card payments should give reassurance to passenger who wish to make payments that way.

Enforcement

Alongside TfL's regulations, as a way to further provide confidence for passengers, it is crucial that these regulations are supported by enforcement. We note that TfL state that their compliance team would undertake a wide range of compliance activities, including on-street checks of pedicab drivers and vehicles. It is important that such compliance continues on an ongoing basis.

Passenger feedback

We would expect passengers of pedicabs to be able to make enquiries and complaints to TfL, as with other modes (with London TravelWatch similarly the appeals body), so it is positive that the proposals include a requirement for pedicabs to display information on how to contact TfL if a passenger has a complaint (alongside fares information). As the appeals body, we believe London TravelWatch should also be referenced, as on other TfL modes such as buses.

Noise

We support TfL's proposals to prohibit the use of externally amplified audio on pedicabs in order to reduce noise disruption and help create a calmer, more respectful environment for other people in the area. However, it is also positive that internally amplified systems, such as headphones or hearing loop systems, will be permitted, particularly where they help make the service more accessible and inclusive.

Timings

We understand the need to give the pedicab industry time to prepare for the introduction of any new licensing requirements. However, we would ask that within this regulations are introduced in a timely way with minimal delays to make sure passengers are receiving a safe and fair service, while still giving industry appropriate time to prepare.