

Transport Committee

Oral evidence: [Licensing of taxis and private hire vehicles](#), HC 1224

Wednesday 19 November 2025

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Members present: Ruth Cadbury (Chair); Steff Aquarone; Dr Scott Arthur; Mrs Elsie Blundell; Jacob Collier; Olly Glover; Alex Mayer; Baggy Shanker; Laurence Turner.

Questions 76–137

Witnesses

I: Emma O'Dwyer, Director of Public Policy, Uber; Andrew Wescott, Corporate and Government Affairs Director, Veezu; Kimberly Hurd, Senior General Manager for the UK and Ireland, Bolt; and Mark Robinson, Owner and Director, Vokes Taxis Ltd.

Written evidence from witnesses:

- [Uber](#)
- [Veezu](#)
- [Bolt](#)
- [Vokes Taxis Ltd](#)

Examination of witnesses

Witnesses: Emma O'Dwyer, Andrew Wescott, Kimberly Hurd and Mark Robinson.

Q76 **Chair:** Welcome to this morning's evidence session. This is the second session of our inquiry into the licensing of taxis and private hire vehicles. In the first session we heard from representatives of drivers and licensing authorities.

We will be hosting two panels today. During our first panel, we will be hearing from operators, and during our second panel we will be hearing from a range of witnesses from the voluntary and local government sectors.

Before the witnesses introduce themselves, could I please ask you to be as brief and as concise as you can with your answers as we have quite a lot to get through today? Could I ask the witnesses to introduce themselves?

Kimberly Hurd: Good morning. I am the senior general manager at Bolt for the UK and Ireland. We are live in over 20 cities and 50 councils, and have partnered with over 100,000 drivers across the UK. We have a team of 200 in the UK.

Emma O'Dwyer: Thank you. I lead public policy for Uber here in the UK. Thank you for having us to give evidence.

Mark Robinson: I am a co-owner of Vokes Taxis Ltd. We have 200 vehicles in Medway.

Andrew Wescott: Good morning. I am the corporate and Government affairs director at Veezu. We are a private hire business licensed by over 60 authorities across England and Wales. We partner with over 20,000 drivers nationally.

Q77 **Chair:** Excellent. Welcome. In our first evidence session, witnesses described the current licensing framework as broken. From the operator perspective, how well is it working for you? I will start with Kimberly.

Kimberly Hurd: We believe the fundamentals of the licensing framework are upheld, but there are significant inefficiencies and room for modernisation. Examples of where the national standards are being upheld are on the safety side and on compliance. For instance, 98% of boroughs that we are currently live in have requirements for record keeping, 87% have written complaints procedures, and 82% require processes to suspend drivers.

However, there are areas to essentially modernise. First, those requirements are not fully consistent; there are small inconsistencies across councils. Equally, there is a lack of digitisation and consistency in using digitally available tools, and regional enforcement.



We also, especially as a digital operator, are held under a taxi provision. We are meant to keep physical offices, even though we have digital support 24/7 and the ability for drivers to call or set meetings at any time. There is room for improvement, but the core is being practically upheld.

Chair: Thank you. Emma, do you have anything to add?

Emma O'Dwyer: We would share the same feedback as Kimberly. In general, we think that the sector is well regulated and that licensing authorities uphold high standards, particularly in safety. However, we think there is some room for improvement. As the Committee will be aware, there are quite loose stipulations in terms of requirements in primary legislation, which is underpinned by statutory standards. We think that these could go further and that there should be clearer national mandatory standards that set a clear baseline in licensing. We have set out a few areas where we think that could be helpful.

Mark Robinson: I would answer that by speaking about the area in which we operate. There is good oversight and good licensing control over the vehicles that are licensed in the area, but it does not work when there are vehicles that are licensed elsewhere that are operating. There is zero enforcement. Yes, I think for us it works apart from that.

Andrew Wescott: I think the frameworks are in place for regulating the market, particularly from a safety point of view. It is then about the implementation and where we see variations in conditions and policies across the 263 licensing authorities in England and Wales. So there are things like the amount of time it takes for a driver, a vehicle or an operator to get their licence application through where there are significant variations. The costs of licensing also vary widely, and then there are things like whether vehicles require signage, and whether that is operator delivery or not. Then there are important things like training for drivers, safeguarding and disability awareness. There are significant variations there that mean that there is a real lack of standardisation across the sector.

Q78 **Chair:** Thank you. Kimberly, your evidence was more positive than other witnesses on whether local authorities can regulate the sector effectively. In the statistics that you have just read out, most authorities seem to be complying but there are 10% to 20% of authorities that were not, depending on the different factors. Given that, why do you have a more positive view than other operators?

Kimberly Hurd: That is a good question. There is a difference between advocating for consistent national safety regulation and codes; we believe that passengers across the nation should have the same level of service and safety. Whether or not the core of the framework currently upholds that in a practical way, we believe that needs to be further clarified and made mandatory. We also believe that there is room locally for



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authorities to continue to issue licences and flex non-safety-related restrictions specifically for their local jurisdiction.

Q79 Baggy Shanker: Just concentrating on licensing standards for a moment, there are 263 or 270-odd officers and 230 different sets of licensing conditions across England. This has been described to us as a mess. What impact does that level of variation have on you as operators?

Andrew Wescott: We are licensed by 60 different authorities and there are variations. As an operator, our view is that we look to take the highest standard, wherever it is. I will give you one example where, before they on-board with Veezu, drivers must present certain documentation to show us that they are compliant, whether it is their private hire badge, their DVLA licence, their vehicle insurance or their MOT.

There are variations across licensing authorities. Some require us to see an MOT; some do not. Some require a six-monthly MOT, but with some licensing authorities it is every year. As an operator, so that we are hitting the highest standard and simplifying and standardising it for us as a business, we just hit that higher standard across the business. I guess we try to take the complexity and the variation out of it in the way that we operate.

Mark Robinson: As an operator, we are in one licensed area, so I am very different from the others on the panel here. We have experience of the Medway licensing authority and the licensing, as far as we are concerned, is very good. It is a very high standard. Perhaps we would argue that the standard in some areas is too high, but we are held to a very high standard by the authority, and we work closely with it. From my point of view, that works. It is when you move out of the area. I will come back to the enforcement point, but we are going to discuss that later.

Emma O'Dwyer: We operate in more than 100 different licensing authorities, and we have licences in each of those. There is a significant amount of variation, although I would say variation within a mean.

Compliance is very important to us, so we have a regulatory operations team that execute on all our different obligations across our different licensing authorities, and they do that well. Our view is, yes, there is a bit of complexity for operators, but the main message I want to impart is that there is some opportunity to improve standards from a safety perspective. That is probably the most important thing I would focus on when talking about why we should have clearer standards and licensing mandated.

Kimberly Hurd: I can only echo the points that the other panellists have made. As a team, we actually counted that across the 50 jurisdictions where we are currently live—the councils where we are currently live—we have 3,900 individual requirements. Bolt is live in 50 countries and 600



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cities, and this is the most complex of them all. To effectively meet those requirements, which we do, we have paired across each council with a dedicated contact. We have over 100 people specifically focused on compliance and safety in the UK for that reason. There is room for consistency and, just as the other panellists have said, everybody within a mean is working towards the same objective of safety across the board.

Q80 Baggy Shanker: Briefly then, hearing what you are saying, does where you license and the variation affect your decision making on which area you would go to license your operations?

Kimberly Hurd: Are you asking me? I am not sure I understand the question. We operate nationally so we do not make a choice on which licence or where to be licensed or where to operate based on requirements. We go based on both passenger and driver need. We are currently live across 20 cities for that reason. I personally joined Bolt to expand that further.

Q81 Baggy Shanker: Andrew, you are an operator that operates in different areas.

Andrew Wescott: Yes, we are licensed in every area where we operate, so that is the basic decision, if you like. We hold an operator licence in the areas where we operate.

Q82 Baggy Shanker: You do not avoid any areas or prefer any areas?

Andrew Wescott: No.

Chair: That is interesting.

Q83 Jacob Collier: Is it time for the Government to have one set of national licensing standards that apply everywhere?

Emma O'Dwyer: Yes, we think there should be national minimum standards—both clarity about what the requirements are up front and a set baseline that applies everywhere. In our evidence, we set out a few areas where we think that could be usefully deployed. Background checks were one area we thought could be helpfully clarified, as well as safety reporting, so how we share complaints or the history around trips with our licensing authorities.

We think there is the opportunity to improve safety outcomes by increasing the uptake of CCTV, and clarity in the rules there would be very helpful. We think enforcement against these national minimum standards should apply, and any licensing authority should be able to enforce them with drivers in their area.

The last one, which is important to us, is a licensing database that is accessible for operators. It is critically important to safety that we know if a driver has had their licence revoked or suspended. We want to make sure in a timely fashion that they are not continuing to work in our service. We think a national database that we could consult multiple



times a day—which we have with some licensing authorities—would be good for that. In some areas, how we get that information is still slightly ad hoc, and we think that is a safety risk. Those are the areas we would call out as being important to clarify, yes, with some national minimum standards.

Kimberly Hurd: I need to echo that. We do believe that there is room to have improved and consistent safeguarding and vetting, digital-first compliance, use of the existing NR3S and improving the NR3S database, both in the consistency of usage and adding things like daily flags and checks. Then lastly, we need to make sure that cross-border enforcement or joint enforcement have better powers or are more empowered across the industry.

Mark Robinson: We would agree that national standards make sense to set a baseline with the potential to have local variation that sits on the top and that considers the differences across the regions. Enforcement is the big issue as far as we are concerned. While we support standardisation, we feel that the whole enforcement issue is the big play. It is all very well local authorities having the power to enforce, but in many cases they do not have the resources to be able to enforce. I think that is the big issue that we would see originating with national standards.

Q84 **Jacob Collier:** Do you have any thoughts on what the Government could do around enforcement? Because we have heard from other pieces of evidence that it would be difficult.

Mark Robinson: My approach is probably different from the others on the panel. I believe that local licensing and cross-border hiring is a significant issue. If cross-border hiring was taken out of the equation, you would have local authorities enforcing over vehicles and drivers that are licensed in their authority. That has worked for many years, and it is only the advance of technology and organisations looking to take advantage of the opportunities that are presented by that advance that is causing the system to break down as it is now. Local licensing with local enforcement just makes sense to us.

Andrew Wescott: We are supportive of national standards. They need to bring consistency in some of those areas that I pointed out: the timeframes around licensing, the costs of licensing, and the levels of training that are required. Using the term “minimum” is slightly challenging I think, particularly when we are talking about safety and public perception. I am not suggesting that Emma was implying this by using that term, but there is a slight risk that it gives the perception of a lower base, and it does not necessarily resolve some of the challenges because, if other licences already go above those standards, we will still have the inconsistencies that you could argue exist right now.

Just on the point of enforcement, I think national standards must be coupled with enforcement that crosses borders.



Chair: We will come on to that.

Andrew Wescott: Okay.

Q85 **Chair:** It has been suggested that licensing authorities might choose to exceed national standards. You talk about a minimum base and then some possibly exceeding it. Do you think this would still encourage cross-border hiring? What would a national standard entail to avoid that happening?

Andrew Wescott: With cross-border hiring, it is important to understand why drivers choose to license in other areas. I think one of the reasons they do that—their motivation—is to do with the cost and the timeframes involved in licensing. Just to give you some examples, with Wolverhampton council, which is obviously the oft-quoted one, it costs £138 for a driver's licence for three years. In Portsmouth—not picking on Portsmouth necessarily for any other reason than we are licensed there—it costs £336 for the same timeframe. So you can understand why a driver may choose to go and license there.

Chair: We will come on to that wider issue shortly. We heard similar evidence at our last session. Scott, you want to pick up a particular question.

Q86 **Dr Scott Arthur:** Very quickly, Emma, the point you made about a national driver database was quite interesting. You were saying that a driver in one area in your system could be blocked but then appear elsewhere, and you wanted clarity on that. You must undertake some background checks on your drivers, and you must know the national insurance number. Does that not allow you to just stop them right across your system if you know the national insurance number?

Emma O'Dwyer: Yes. To be clear, what I meant by that was, yes, if we are informed that a driver should no longer be appearing because they have had their licence revoked or suspended, they cannot operate anywhere on Uber. That is absolutely clear. Our point is that at the moment there is some variation in how we receive that information from licensing authorities. Some are great and they have technology-first systems with databases that we can prompt multiple times a day and ensure that we have an up-to-date list. In other places that can be much more ad hoc. It can be email, and there is no timeline or SLA standard by which we would know that information.

We think it would be good to build on what is there already—which is the NR3S system database, which you know licensing authorities share between each other—to allow operators like us to also see that, but for it to be real time and mutually accessible.

Dr Scott Arthur: That is a good point, because there could be quite serious allegations against a driver, and you are saying there could be a delay. It is a good point.



Chair: We are going to come on to NR3S shortly, but we will go back to cross-border hiring.

Q87 **Mrs Elsie Blundell:** I would like to come to each member of the panel on this, but I will go to Emma first as the representative of Uber, if that is okay. In its written evidence, Uber described cross-border hiring as an “essential freedom” that supports connectivity and “benefits drivers, consumers, and local communities and economies”. Others have told us it is a significant problem. Who is correct?

Emma O’Dwyer: We believe that the travelling public would not expect that they would be limited to not travelling across licensing authority boundaries. The reality of having controls like that would mean that lots of trips that happen today that people do just would not take place. Quite regularly, locations of important civic importance to people, be it the shopping centre, the university or the hospital, are outside of their licensing boundaries, and indeed people do not generally know where they are. We think that the concern to be addressed about variation in standards is to ensure that there are national minimum standards, and that would give passengers the confidence that a driver’s licence in Luton is as safe as a driver’s licence anywhere else. That is the right public policy solution to that concern.

Kimberly Hurd: Cross-border is essentially the way people live and work. Let’s take London as an example as we are here today. I crossed several boroughs to get here this morning. There are 32 boroughs in London and there is one consistent standard and one licence across it. Equally, if we think about other large areas, and especially outside of London, the density of councils and boroughs is quite high, meaning people are crossing them all the time.

If I could use one specific example—because I hear Wolverhampton and, for instance, Manchester mentioned—in our records, 47% of our drivers based in Manchester also have Wolverhampton licences. As Veezu has said, I believe that the reason drivers often end up selecting an out-of-council licence is speed, because they want to work faster, and cost.

Outside of that, the differences between Manchester and Wolverhampton and how they issue licences for drivers are minimal, especially on the safety side. The only difference is a local knowledge test. I would argue—especially for myself, as I use sat-nav every day—that local knowledge might not be essential. It is also an additional cost. For those reasons, drivers tend to live and work in one area rather than commuting in and going back home. They live and work in one area. They happen to be licensed somewhere else.

It is the same with passengers. Passengers expect—especially as Emma just highlighted—if they are going to a place of interest or if they are going to work, often especially in metro areas, they do not live and work in the same city area. It is just a natural way of life and work, to be honest.



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Q88 Mrs Elsie Blundell: The constituency that I represent is Heywood and Middleton North, which is in the Rochdale borough in Greater Manchester. There 40% of PHVs and taxis are licensed out of area.

I was speaking to the head of public protection at Rochdale borough council, and he says that he is concerned about the number of taxis and PHVs that are licensed out of area and part of that is around data sharing. Are you satisfied that you are meeting the standards of local authorities like mine when it comes to passenger safety?

Kimberly Hurd: On that point—and this is for anybody who works across every council—Bolt works directly with every council to meet the local requirements, and we often exceed them. As a digital platform, what we can do is make sure from driver on-boarding, through driver vetting and ways that we are checking through selfie verification, and from a passenger safety perspective that we go above industry standards. We also resolve 75% of inbound issues and complaints within six to eight hours. We go above and beyond essentially what we are supposed to be doing or what the minimum thresholds are.

The additional point is that we also build in safety features. Something that is very important to us and, we believe, the industry is making sure that both passengers and drivers feel safe. For that reason, we have live journey tracking. We have an emergency SOS button. We have additional privacy details and codes to make sure that both passengers and drivers feel safe and comfortable.

Q89 Mrs Elsie Blundell: Mark and Andrew, do you have any comments on the issue of cross-border operating?

Mark Robinson: I disagree with a lot of what has been said. Again, I am talking from the area in which we operate, which is the Medway towns. Some 95% or more of our journeys—probably 97% or 98% of our journeys—originate within the Medway towns or they end in the Medway towns. We all know the ABBA rule on that.

We see a situation where we are not just talking about cross-border hiring; we see many vehicles that are not licensed in Medway come in and operate in Medway. They operate without any oversight whatsoever. From a safety concern, whether it is to do with the quality of the vehicles, the condition of the vehicles or the driver, there is zero oversight because the local authority does not have any ability or authority to even inspect those vehicles, the majority of which are licensed by TfL. I see this slightly differently in that we are not just talking about journeys that cross borders, we are talking about drivers who deliberately work in a different area from which they were licensed and can do so without any oversight.

Andrew Wescott: I think the availability and supply of private hire services are synonymous with safety, and there are areas where we operate where private hire is the only 24/7 safe, reliable mode of



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transport. There is simply little or no public transport available. If someone needs to take a late-night journey, they are relying on private hire.

In many areas, there are not enough licensed drivers to satisfy all those bookings, or they might not be around at those times. Having the ability to have a flexible operation where drivers who perhaps are not licensed in that area can operate is essential, and it has that link to safety.

Thinking about our hometown in Cardiff, lots of events go on there. During very busy periods, drivers will come in from Newport, Bridgend and the surrounding areas to help with the demand at that point. Otherwise, passengers would either be left waiting for a long time or they would not have a service at all.

Chair: Scott, did you want to pick up something from the Edinburgh perspective?

Dr Scott Arthur: I find this interesting because in Edinburgh we do not have cross-border hiring and everybody seems quite happy, to be honest. We have drivers who often live quite far outside Edinburgh, but they are licensed to operate in Edinburgh. I think drivers from outside Edinburgh can bring rides in, but we do not have people licensed in surrounding local authorities coming into the city to operate day in, day out, in a way that would not be great for the city, because enforcement is so much harder. So why is it working in Edinburgh, yet it seems impossible in England?

Q90 **Chair:** Yes, I see what you are trying to get at. The ABBA principle used to be the way of operating, I think, up until the regulatory changes in 2015. Would the world fall apart if we went back to that principle?

Emma O'Dwyer: The world certainly would not fall apart, but I think what we would see and what we do see in the average day of a driver is that they cross multiple boundaries, and multiple boundaries can be within quite a small geographical area.

In general, if you are restricting the reliability of demand for drivers around the edge of their operating area—so yes, they might be able to get a trip there but if they go over there, will they be able to get a trip back?—means that what they tend to do is gravitate more to the centre of the licensing area within which they are licensed. We do see that in Scotland.

That has an impact on people who live further out from the immediate centre of a city. Fewer drivers will go there because they will have less reliable demand and therefore less work, so people who want to get trips from there have fewer opportunities to do so. It also has the effect of pulling services into the centre of town, which might cause congestion or other secondary issues. We do see that causes us some challenges in Scotland.



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Dr Scott Arthur: I do not hear friends and colleagues telling me they find it difficult to get taxis anywhere.

Chair: I think Emma specifically mentioned suburban and out-of-Edinburgh towns.

Dr Scott Arthur: I live in suburbia; I am proud to do so.

Chair: In the city of Edinburgh?

Dr Scott Arthur: Yes.

Chair: I think the point that Emma and Andrew were making was about local authorities further away from the city, but it is an important point. Laurence, did you want to come in at this point?

Laurence Turner: Elsie, did you want to come in first?

Mrs Elsie Blundell: I have one more.

Chair: Sorry, Elsie.

Q91 **Mrs Elsie Blundell:** Thank you very much. This one is just for Kimberly, if that is okay, as the representative of Bolt. As Bolt states in its written evidence—and you have just repeated now—if cross-border hiring does not lead to worse safety outcomes, why do you think we have heard so much about its effect on passenger safety?

Kimberly Hurd: I think the challenge is probably consistency. From our perspective, what we want to do is give the data and the support to local councils to be able to enforce locally.

Mrs Elsie Blundell: You are committed to sharing that data.

Kimberly Hurd: We do actively. Not only do we meet the minimum thresholds and standards within each of the councils, we also have a law enforcement portal. Any council at any given time can request information from us. I think I mentioned before that each council has a dedicated representative on our team. We have a team of 100 people who are responding quickly to any inbound inquiries.

There is also, I think, a lack of joint enforcement. We have asked the councils that we work with how many have done joint enforcement efforts, and there are only three of the 50 that we currently work with. I think there is a lot more to be done around joint enforcement and again, as we are now reviewing some of the regulations around safety, that is something that can be improved.

Q92 **Laurence Turner:** Following up on Elsie's point about safety, this question is not so much about your individual actions as operators as it is about the suitability of the current system. The 2018 task and finish group did recommend that the 2015 cross-border hiring changes be reversed on the basis partly of public safety. TfL at the time quoted



Rotherham's licensing manager as saying there were numerous examples in Rotherham of drivers being refused a licence or having their licence revoked, only to then make use of that 2015 subcontracting provision. He said the sole aim of these drivers is to "circumvent" the high standards that have been introduced in Rotherham and felt that this would put the public at significant risk of harm. Do you recognise that description?

Emma O'Dwyer: No. The Deregulation Act 2015 was never relied on and we do not subcontract. Everywhere we license we maintain the triple lock, so that is not how we see what is going on. This is why we think it is important that information is shared with councils around revocations and refusals. The NR3S—which I think has come about since that review—is an important tool that should be built on now to make that more accessible.

Q93 **Laurence Turner:** Do you observe that behaviour from other players in the industry?

Emma O'Dwyer: As in, do they maintain the same standards as us?

Laurence Turner: No, I am talking about poor practice.

Emma O'Dwyer: I will not comment on other players. I think in general private hire is a very safe service, and high standards are maintained both by operators and licensing authorities.

Andrew Wescott: If the NR3S system is used properly, a driver who is refused, revoked or suspended anywhere should not be able to achieve a licence anywhere else. That system needs to be looked at properly. I share the view that there is an inconsistency in the information that is shared with operators directly from licensing authorities as to whether a driver has been revoked, refused or suspended. Not all of them suspend; there is an inconsistency there. Some provide us with a daily list of drivers that we can then act on, but there are some where even when we have reported an incident to them, we never find out the outcome of that. That is a significant issue that needs to be addressed through national standards.

Mark Robinson: Following on from the 2015 changes, that reinforces our belief that local authorities should have enforcement over drivers who are licensed in those authorities. That system worked; it worked for many years. I do not want to say it has been deliberately broken, but the changes in 2015 have contributed to a reduction in safety because of the lack of local enforcement.

Kimberly Hurd: We have a slightly different view from that. First, to give colour to how digital operators or PHVs operate currently, in London a driver is automatically checked about 5,100 times a year and we have manual checks included in our process as well. That is because we are integrated with TfL so we are able to do consistent checks all throughout the year.



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As much as we agree, and I think the Chairman's point is that we believe that local licensing should stay locally, we also believe it is not about cross-border. As an example I will quote a stat. Only 3% of safety complaints in London came from out-of-borough drivers, and cross-border has a significantly lower complaint rate per 10,000 rides—it is about 83 times lower, so 0.128 versus 4.894 to be specific. Safety is not an issue of cross-border; it is around the consistency and the digital tools that are in place for local authorities to be able to stay on top of these changes.

Chair: We touched on NR3S so I will go to Steff now.

Q94 **Steff Aquarone:** Should operators have access to NR3S? What would the downsides be? Thinking about the driver's rights in particular, we do not want to get into a situation like the construction industry blacklisting of the last decade.

Andrew Wescott: Having access to NR3S is one thing; making sure it is being used effectively by all licensing authorities is the first point I would make. I am slightly repeating my previous answer but it is about making sure that licensing authorities are sharing the results or, if they have had a complaint directly to them about a driver, making sure that we are aware of that. If they have chosen to suspend or revoke a driver, it is about making sure that we are made aware of that as well. That is the key thing. Whether NR3S is the system to use for that or not, ultimately it is about making sure that communication is effective and timely.

Mark Robinson: We do not have any issue with this whole subject. We work very closely with the local licensing authority. It is a daily dialogue, so when any issue comes up—whether it is purely a complaint or whether there is a driver in the area who should not be because they have been barred elsewhere—it is a daily dialogue. That adds an extra layer of safety.

Q95 **Steff Aquarone:** Is that because you and the local authority have closer access to the communities you are serving and you have relationships with people that mean that you know when something looks or sounds iffy? Or is it a function of that relationship and data-sharing provisions that you have in place?

Mark Robinson: Yes, I think it is the former. We are not in a small area. Medway towns has close on 300,000 people so it is a fairly large licensing area. There is a very good relationship with the local licensing authority so it is very easy to pick up the phone if something is going wrong, and to deal with it there and then. That happens all the time.

Emma O'Dwyer: We agree. To Andrew's point, whether it is the NR3S or another version of that with a database that we can access, the key point—that Andrew also made—is that it should be updated in a timely fashion and we have some security around that.



Kimberly Hurd: I can speak only for Bolt. We only on-board drivers who have received their licence locally so the focus of this should be around how to improve both access and consistency to NR3S for councils, and how to improve some of the features available, including things like daily flags. We need more confidence that that is being upheld to a standard and is either mandatory or very clear and consistent across councils.

Q96 **Steff Aquarone:** Is it a danger that the statistics you quoted earlier might not be fully representative of the reality if data is not flowing between the operators and the licensing authorities in the same way that you have described it flowing in London?

Kimberly Hurd: Yes, but it is almost a secondary priority that operators have access. The first issue is that it is consistently used and the data is correct, and that local authorities are currently using it.

Q97 **Steff Aquarone:** Do you think it is used consistently at the moment?

Emma O'Dwyer: I do not think we would have visibility.

Kimberly Hurd: I do not have evidence.

Q98 **Steff Aquarone:** So you can see the whole country but you cannot see whether you feel as though on balance the system is being consistently used by different licensing authorities?

Kimberly Hurd: I can say anecdotally it is not, but I do not have the evidence or the data to be able to support that.

Emma O'Dwyer: What I specifically mean is we would not have visibility into who is using the NR3S because that is only accessible to local authorities.

Steff Aquarone: You cannot see it—right, understood. Thank you.

Andrew Wescott: With the NR3S, I agree, we do not have access, but what I can say—and Mark made the point—is that we have very good relationships with all our licensing authorities. It is about the rules that they have in place around data sharing. Like I said, there are licensing authorities that will share a daily list, and some when we ask about the information they will say, “We cannot share that with you based on GDPR.” That is legal advice they are being given. That is outside of how effective the relationship is; that is a decision they have made as a licensing authority.

Mark Robinson: Is there not a bigger point to this? Because there are many out-of-town licensed drivers, the local licensing authority has no idea of the drivers who are regularly working supposedly in its territory but over which it has no oversight whatsoever.

Q99 **Steff Aquarone:** They would not be checking because someone drove across the county border?



Mark Robinson: Exactly that. Part of the big problem here is drivers who are licensed—whether it is in Wolverhampton or elsewhere—consistently working in Manchester or Medway or wherever else. They go shopping for their licence in the easiest place to get it and then who knows where they are working outside of the operator, which in many cases is a national operator.

Q100 **Steff Aquarone:** If there were to be greater access to NR3S—the big list of banned and suspended licences—for operators, what would the downside potentially be?

Kimberly Hurd: It is not that there is a downside. I cannot speak for the panel, but the fact that we were silent there I think means that we are all very much in favour of finding the right ways to make sure that there is consistent data sharing across councils and operators. Again, I do think, though, the challenge is about ensuring that consistency of access and usage at a local level. The point on cross-border hiring and enforcement is about making sure that there is clear empowerment and rules on how that is done. The fact that three out of the 50 councils that we currently work in have done that means that there is not enough attention or focus on being able to do that effectively.

Q101 **Steff Aquarone:** You do not fear a construction industry blacklist type situation where drivers find themselves unable to work anywhere suddenly because of a complaint that they have had very limited right to respond to, for instance?

Mark Robinson: We have not had experience of that.

Chair: We might come on to that issue from a driver's perspective.

Q102 **Alex Mayer:** I was wondering about the complaints that come in. Presumably, some complaints come in via the app because a passenger thinks that is the easiest and simplest way for them, and some complaints you will be told about from licensing authorities. Are they very different, the complaints you are getting from those two angles, or are they broadly similar?

Emma O'Dwyer: We get many more through the app. As you know if you are an Uber user, we prompt people to give feedback and that reveals to us a lot of information that may be safety relevant. We look at all kinds of things that could have any safety concern attached to them. The greater number will come through that fashion. Fewer people will get in touch with their licensing authorities to make a complaint and pass that on, and they will tend to be in more serious but rarer instances.

Andrew Wescott: We have app feedback but we also take a significant number of bookings over the phone as well, so we have that as another route to take complaints. In terms of the licensing authorities, it is often the more serious cases where the passenger may go there directly, but if they do come to us first we will take that to the licensing authority as well, which is a requirement as part of the conditions.



Mark Robinson: In Medway towns if someone gets into one of our vehicles they may make a complaint to us or, if they think it is serious enough, they may make a complaint to the local licensing authority. One of the problems that people will experience is if they get in a car that is not locally licensed, they haven't got a clue who to make that complaint to. If it is an Uber vehicle, they will naturally make the complaint to Uber and Uber will deal with it in the way that it deals with it. I know from experience—and I probably should not say this—when we get a complaint directly, it is dealt with, but alarm bells start ringing if we get contacted by the local licensing authority to say there is a complaint against us. You naturally take it much more seriously; it is better publicised. So I do not think asking the operators to manage their complaints system is as strong as having a dedicated licensing authority that the complaint is made directly to.

Q103 **Mrs Elsie Blundell:** If, as some of you suggest, abolishing cross-border hiring is neither practical nor desirable, what realistic steps do you think could be taken to help both licensing authorities and operators ensure that local standards are enforceable? Andrew, I will go to you with that one.

Andrew Wescott: National standards definitely would help that, and that is across the board, whether it is on training or making sure there is standardisation around licensing timeframes and costs. I think the enforcement point is important here. There have to be enforcement panels across jurisdictions as well. Kimberly has touched on it, but there are examples of joint enforcement already in place, so there is a precedent for that, but it should be explored more. If it is already happening, why is it not happening more frequently?

Mrs Elsie Blundell: Would the other members of the panel agree with that? Kimberly, you have touched on it, so I will go to Emma.

Emma O'Dwyer: Yes, we strongly agree with that. There should be national minimum standards and everybody should be able to enforce those national minimum standards in their area.

Mark Robinson: I believe that cross-border hiring should be outside of the legal framework.

Q104 **Mrs Elsie Blundell:** Kimberly, you suggested there should be a better use of joint enforcement, and Andrew suggested the same powers could resolve concerns about cross-border hiring. When licensing authorities operate under different standards and have very different levels of income and capacity, how do you think joint enforcement could work in practice?

Kimberly Hurd: It is a very fair point. Wolverhampton as an example has 100 people dedicated to the specific function of licensing, where many have one or a fractional person who is dedicated, so there is an issue of resourcing from a local perspective. There is also the issue of



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training and the associated costs as well. As we are reviewing these standards, there is a question about how we can help local authorities to be better able to access the powers that they already have, and to become aware of the powers that they already have so that the standards can be more jointly enforced.

Q105 **Chair:** If we have more or less consistent standards, authorities might still differ in price, so there would still be a risk that people—drivers—would shop around. Wolverhampton reckons its sheer volume gives it an economy of scale and thus the price benefit. Is there still a risk that we would still have cross-border licensing?

Andrew Wescott: I would argue that if we are having national standards, they need to cover everything—that would include the cost and the timeframes involved in granting licences.

Q106 **Baggy Shanker:** When they talk about joint enforcement, some authorities insist there have to be two people there, one from the licensing authority and one from where they are operating. However, if the standards were the same, would it not be better if any person could do the enforcement because they would be enforcing to the right standard?

Andrew Wescott: We would support that. Any officer in any licensing authority could effectively enforce the standard, yes—absolutely.

Q107 **Laurence Turner:** One of the issues we are particularly interested in for this inquiry is disability access. We have heard evidence from Transport for All that disabled passengers often face discrimination and refusals or cancellations of bookings. Similarly, Guide Dogs report that 63% of guide handlers were refused service in the past year, and Leonard Cheshire has told us that local authorities often fail to respond to complaints about disability discrimination. Is there a systemic issue here? Is there something in the way the licensing works that is failing disabled passengers?

Andrew Wescott: The first point to make is that if we are made aware of that happening to a disabled passenger—and when I say “disabled”, the majority of disabilities are not visible so that is an important point to make—a wheelchair-accessible user or a blind passenger with an assistance dog, we immediately report it to the licensing authority. We would deactivate that driver so they would not be able to take any further bookings until a full investigation had taken place.

The issue here is a significant challenge across the entire sector; I do not think it is for one stakeholder in the sector to solve. Transport for All’s evidence and the LGA’s evidence set out that only two thirds of licensing authorities provide any disability awareness training, and then there are significant inconsistencies within that training. That has to be addressed. In our view that training should be mandatory.



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The other point is about the incentive for driver partners to purchase wheelchair-accessible vehicles. Those vehicles are significantly more expensive, there are fewer models and makes of those vehicles, and we are already seeing that the VAT exemption on those vehicles will be removed, which I think will further exacerbate this problem. There is a challenge for us all to take responsibility for this, and we would work with licensing authorities and national Government to resolve it.

Mark Robinson: This may be something to do with the fact that our local companies are not purely digital. I do not know what the situation is with all my colleagues on the panel, but where we have somebody with a specific requirement, generally we have a conversation with them—we take phone calls, and most of our bookings are made via phone calls—so we can understand the requirements and then deal with them properly.

I echo what Andrew has said: the cost of vehicles is prohibitive. Trying to enforce the idea that all vehicles should be wheelchair accessible or anything else—which is one of the ways that the local authority is trying to deal with it—is very difficult because there is no funding available or return available for the expense that the drivers would have to go to.

Emma O'Dwyer: I share the views of the other panel members. There are quite a few different issues going on there. We think better training would be helpful; incentives around vehicles are also extremely helpful. We take all such complaints on service denial extremely seriously and we make sure that we act on those, but we think better training would be helpful. We also have special products that are designed specifically to help disabled people access our services. We have an assist service with drivers specially trained to help people who might need extra help getting in or out of a vehicle, and indeed with wheelchair-accessible vehicles as well.

Kimberly Hurd: I am very similar. On the systemic point, the lack of training and funding support, and the lack of available models—especially from an EV perspective—that are wheelchair accessible means that less than 2% of PHV vehicles in the UK are currently accessible. We have launched Bolt Assist, and we have a WAV category as well, but even though we literally take no money and we offer incentives it is very difficult to on-board and find additional drivers to fulfil the demand that we have on the platform for that reason. It is not a licensing issue; it is actually a systemic industry issue about the lack of incentives and training for drivers essentially to upgrade their vehicles or to get another vehicle that would meet those requirements.

To your point on guide dogs or other support, from our perspective we have had 34 reports of a driver refusing a guide dog in the last 12 months. We take those very seriously. I think of it like Emma from Uber said: we investigate all complaints about passenger refusals and in those instances we also report those to the councils. After two complaints from



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a passenger and speaking with the driver we review termination on our platform, so we take that very seriously as well.

- Q108 **Dr Scott Arthur:** Kimberly, I am picking on you but I think others have made the same point. You talked about the lack of incentives and training for drivers of accessible vehicles, but you could provide those incentives and training if you wanted to—as a company.

Kimberly Hurd: We provide the incentives we can. We take no money from Bolt Assist. We essentially connect the drivers and the passengers directly. We have also offered incentives for on-boarding and signing up. Again, the costs are quite prohibitive and even the designs and the types of vehicles that are available are prohibitive.

- Q109 **Dr Scott Arthur:** Black cab companies are able to operate at a profit in the most part, as I understand, with accessible vehicles, but for some reason you are saying that your business model is not compatible with that. Is it not that you are hammering down prices and disabled people are paying the price for that? I am looking at you but I think it applies to other operators here. This is about keeping prices low, and disabled people are paying the price.

Kimberly Hurd: Again, in this instance we are literally not taking any money from connecting a disabled passenger—or, to be fair, Bolt Assist is also available for older people who need more assistance. We are not driving down the prices. What we are trying to do is provide a service.

Dr Scott Arthur: You could choose to have more accessible vehicles in your fleet and that would come at a cost to all riders. That is just the way it would work. I am picking on you, which is unfair—

Kimberly Hurd: No, it is okay.

- Q110 **Dr Scott Arthur:** Emma, if I was to call an Uber, how likely is it to be a wheelchair-accessible vehicle?

Emma O'Dwyer: I am actually not sure of the precise numbers. I could take that away and look at it.

- Q111 **Dr Scott Arthur:** Is it more than 5% likely, more than 50% likely, more than 1% likely?

Emma O'Dwyer: What is important for Uber—

Dr Scott Arthur: Is it not shameful you do not know?

Emma O'Dwyer: I will have to take that away and look to get that number to you but—

Dr Scott Arthur: Is that not incredible that you do not know? Is that not quite important? What does it say about your values as a company that you do not know how much of your fleet is accessible to wheelchair users?



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Emma O'Dwyer: Well, the reality is that it will vary quite a lot across the country, and the reason for that is—as other panel members have touched on—that the vehicle requirements locally will be quite significantly different. In some parts of the country, such as Brighton, there is—

Q112 **Dr Scott Arthur:** So this is about you meeting minimum requirements rather than showing leadership and having more accessible vehicles in your fleet?

Emma O'Dwyer: It is about the availability in terms of driver supply and vehicle supply locally and how many vehicles have been licensed—and that is why we touched on incentives to ensure there are more of those. You mentioned black cabs. The number of black cabs is in decline and one of the reasons for that is the vehicles are extremely expensive.

Dr Scott Arthur: Yes, because you are undercutting them with a cheaper fleet. That is what is happening.

Chair: Black cabs in London are also required to be fully wheelchair accessible.

Dr Scott Arthur: Exactly.

Q113 **Chair:** We know the numbers are declining, and you are saying that is because of the cost of the vehicles, and because their fares are much higher.

Emma O'Dwyer: That is one of the contributing factors, yes.

Q114 **Alex Mayer:** We have heard from some local taxi firms that feel they face unfair competition from the larger app-based private hire platforms. To start with, who do you feel that you are competing with? Are you competing with each other? Are you competing with ABC taxis from somewhere or other, or are you competing with the taxis on the taxi rank outside the stations?

Kimberly Hurd: I guess I will go first, so—

Alex Mayer: The answer cannot be “all of them”. If you think it is all of them, try to rank it a bit.

Kimberly Hurd: Unfortunately, it is all. We support both passenger and driver choice and what we hear from drivers in particular is they often work across multiple platforms—to your point, the app-based ones—as well as companies. At any given time a driver could be working quite literally for two companies, have two apps open, or also be looking for street work as well. Ultimately, what we are looking for is to have the right value proposition for drivers to want to work with Bolt. We end up competing quite literally with everyone. We are a challenger. We are actually quite a small player in comparison, so as much as we are competing—and I look down the panel; we are all competing with each



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other—I actually think it ultimately brings a better level of service and choice, both for passengers and drivers, because of that.

Emma O'Dwyer: Yes, I echo what Kimberly said. Competition is important for passengers. There are thousands of operators across the UK, which is a good thing. We are competing against lots of other forms of transport but we are also competing against the private car and encouraging people to leave their car at home.

Mark Robinson: I take a completely different view, as you might expect. I will give a prime example of Tunbridge Wells in Kent where Uber has been granted a licence recently. There is a partnership between adjacent boroughs; it is adjacent to us but it is not affecting us directly. What we are seeing is that Uber vehicles are taking fares that are heavily subsidised by Uber, so a £7.50 fare is being paid as £7.50 to the driver, but the general public is being charged £2.50 for that in a deliberate strategy of making life very difficult for the taxi companies to compete.

When it comes to competition, I think there is very much a battle between local taxi companies and incoming national or global players that are looking at achieving domination—before that whole reversal of pricing comes into play when the significant losses that they have accumulated over the last 10 years come into play.

Andrew Wescott: We are a national operator but we are not app-only. We take about 30% of our bookings over the phone still, so we sit in the traditional and the app space, if you like. Our model is that we acquire local operators but we keep the local teams in place and we very much offer that local service. There is a lot of competition in the market but markets are very different throughout the UK. If we think of London, there are lots of different modes of transport and passengers have lots of options. In some areas where we operate, over 50% of journeys that we fulfil are for essential bookings, so people trying to get to the hospital or picking up their shopping; they are regular bookings. I think it is challenging to look at the entire UK or England and Wales, however you want to look at it, and say there is a one-size-fits-all approach. There are different journey profiles and different needs depending on the locality.

Q115 **Chair:** Could I ask particularly Kimberly and Emma about an issue that has been raised with me by somebody who was in an Uber ride? The model is such that if the driver needs to get another fare, fares are coming up on their app on their screen all the time while they are driving, so the driver has to keep swiping to decide whether to take that next ride or not. Drivers are being distracted from driving. Has that issue been raised with you? It certainly concerns me that drivers are being distracted in order to make sure they keep the fares. They do not earn a lot; they need every fare they can get.

Emma O'Dwyer: It is important that people are not distracted while they are driving. There is no requirement for drivers to interact with their phone and they do not—as the example suggests—have to accept or



reject any trip. The offers will come through and they can ignore them; as you rightly described, there are new ones coming through all the time. It is important to us that the design of our app—we are thinking about it all the time—is not causing any issues of distraction.

Q116 Chair: But new rides are not coming through all the time, or not nearby, so they cannot afford much down time. The reality is that as they are coming to the end of one ride they do not want to miss an opportunity for the next nearby ride.

Emma O'Dwyer: The app is designed so you can see it very clearly over here and it is a single tap and should not be significantly distracting. We have experts that look at this in great detail and who are very focused on making sure that it is not distracting.

Kimberly Hurd: I cannot speak for Uber but it is important for us to make sure that drivers are not distracted. We want to give more controls to them, so we have actually allowed our drivers to create their own minimum standards for an auto accept—for instance, how much they want to earn per mile and the zones they want to operate in—so they are not being distracted. Towards the end of the trip they are automatically matched.

Chair: That may raise some further questions in future but many thanks for that. We will now go to Scott on employment rights.

Q117 Dr Scott Arthur: I think I can predict the answer to my first question. There is evidence that app-based companies are focusing too much on their business model and not enough on compliance. Is there any truth in the suggestion that your business model comes before compliance with your local licensing arrangements?

Kimberly Hurd: I can go first. I have a 200-person team that focuses only on the UK; 100 people are dedicated to compliance, safety and upholding our licences. So I would actually argue the opposite. We started talking about national standardisation because we have 3,900 individual requirements. We cannot not uphold those. We actually are exceeding the standards on them all and it requires a significant amount of effort to do that.

Q118 Dr Scott Arthur: You will say the same, I assume, Emma?

Emma O'Dwyer: Absolutely. Compliance is super important to us and there are no trade-offs being made there.

Q119 Dr Scott Arthur: Perhaps a more legitimate concern is that in many jurisdictions you operate, I understand you do not have a physical presence in terms of a contact point. You may have a phone number or an email address but you do not have a physical person. What does that mean for interactions with you? If your customer—or one of your drivers, or somebody from the local authority, or perhaps even your local trade union representation—wants to speak to someone face to face, is that a



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barrier?

Kimberly Hurd: First, we have local offices. We have offices in Nottingham—

Q120 **Dr Scott Arthur:** Are they staffed?

Kimberly Hurd: Yes, in Nottingham, Manchester, Birmingham and, of course, London—

Q121 **Dr Scott Arthur:** Do you have an office in every jurisdiction?

Kimberly Hurd: Where licences require it, we have an office but they do not all have manned office requirements. From a licence and a local authority perspective, I think I mentioned before that on a literal one-to-one basis we have contacts with every licensing authority. We have a law enforcement portal so anybody can ask for information at any time. We have a dedicated email and phone number if there are any questions from a council perspective. From a passenger and driver perspective, we offer in-app, on-phone, 24/7 support, especially in cases of emergency. For any complaints or incidents, 75% are resolved within eight hours. We have a dedicated team ensuring that across all jurisdictions we are serving passengers, drivers and local authorities.

Q122 **Dr Scott Arthur:** Emma, do you think you would benefit from having a physical presence in each licensing authority?

Emma O'Dwyer: We do not think there should be a physical presence in every single licensing authority. We, like Kimberly, have what we call greenlight hubs that are local to almost every area. We use those to support our relationships with licensing authorities and compliance, but they are also open to drivers at any time of day to come in and resolve issues. We have a specialist cities team that owns the relationships with all their licensing authorities. They know all their key and relevant officers. They are often a WhatsApp message away. They go to all their trade meetings.

Mark Robinson: I can only talk about my experience, and my experience in Medway is that there are now less than 400 locally licensed drivers. One of the reasons for that is there are several hundred Uber drivers who are operating locally. There is no local licence; Uber is not locally licensed at all. These are drivers who are driving 30 miles outside of London where they were licensed, so I take exception to the fact that not only is there not an Uber presence but they are not even licensed, which presents significant problems, as far as I am concerned, for the enforcement of safety.

Q123 **Dr Scott Arthur:** So what would one of your customers do, Emma, if they wanted to speak to an Uber member of staff face to face?

Emma O'Dwyer: You can call us. We have all the same—

Dr Scott Arthur: So no face-to-face opportunity?



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Emma O'Dwyer: No, not generally, but I think even local operators are covering very large areas. As Mark referred to, there are 300,000 people living in the Medway area and most of the time what people want is ease of access. They want to be able to get us either via our in-app support functions or on the phone. We have specialist safety agents who are trained to help people, particularly when challenging situations or safety events occur; they are particularly trained bespoke to help people who have been victims or what have you. We think what is important is the quality of the interaction and the ease of access, and the fact that they can get us any time of day.

Q124 **Mrs Elsie Blundell:** Greater Manchester has a population of 3 million people. Do you know how many offices Uber has in Greater Manchester?

Emma O'Dwyer: I am not sure but we have one very large greenlight hub.

Q125 **Mrs Elsie Blundell:** You have one office. Do you think that is sufficient?

Emma O'Dwyer: Yes. It is staffed all day; it is open all week. There are around-the-clock services there. It is very large and it is very readily accessible. We have drivers come in and work with us all the time. None the less, as I say, our cities team that owns all the relationships with its licensing authorities goes out and meets the licensing authorities. We have people based in Manchester whose job it is to own those relationships, and they do know the people well.

Q126 **Dr Scott Arthur:** Emma, it feels like in some parts of the UK there is a real saturation of Uber drivers and there are more and more getting registered all the time. I guess that is good for consumers because it means when they want an Uber there is a 99% chance it will come quite quickly. It is good for you as a company because it means that every opportunity for you to earn money is met, and I accept that it is a legitimate aim for a company to make money. However, are the drivers not paying the price for this? They are competing harder and harder to get rides and it means they are earning less and less money per hour. Are the drivers paying the price for this business model?

Emma O'Dwyer: That is not a characterisation that we would reflect. What we see and what we continue to see in the UK is that demand for our services continues to grow and grow and grow. We need more drivers, not fewer, and we see that is likely to be the continued pattern.

Q127 **Dr Scott Arthur:** If you include waiting time, are drivers' earnings rising or coming down in relation to inflation?

Emma O'Dwyer: We pay drivers for their time on trip and that will be because—

Dr Scott Arthur: But waiting time is important, is it not?

Emma O'Dwyer: Waiting time is important but I think the thing that the Committee should understand is quite often drivers are working for lots



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of operators. They could be working with all four parties, and they would likely be online on all those apps at the same time. That is good for drivers because they have competition in terms of the offers that are made to them, and we compete for their time as much as anything else. We think that gives the best outcome for them and the best flexibility of earnings, and we think they earn well.

Q128 Dr Scott Arthur: It crossed my mind earlier when Kimberly was speaking, but if a driver is struggling to earn money on your service, do you have limitations on how long they could work on a shift? Is that a limitation you place on your app?

Emma O'Dwyer: Yes, we have a 10-hour limitation.

Q129 Dr Scott Arthur: That driver could run 10 hours with your app and then switch over to Kimberly's app.

Emma O'Dwyer: They could do so. We would strongly encourage them not to do that. It is important, and they will be—

Dr Scott Arthur: But there is nothing to stop them from doing that?

Emma O'Dwyer: No, there is nothing to stop them from doing that, other than the fact that I guess it is a licensed profession and they have a responsibility to uphold safe standards, be a safe driver, and ensure that they are well rested.

Q130 Dr Scott Arthur: If your business model is making it harder and harder for them to earn a living, those temptations will always be there, will they not?

Emma O'Dwyer: We would not accept that it is making it harder and harder for them to earn a living. We think that this style of work—

Q131 Dr Scott Arthur: You do not know if earnings are going up or down in relation to inflation, including waiting time.

Emma O'Dwyer: Earnings are broadly £30 an hour on the Uber app when you are logged in. It is very difficult because—

Dr Scott Arthur: That includes vehicle maintenance and it does not include waiting times so that is slightly misleading.

Emma O'Dwyer: The thing to understand is that earnings vary. They are different according to the trip, where you are going, area of the country, time of year. It is quite seasonal, so it is difficult to describe precisely what is going on. Last year we commissioned Frontier Economics to look into this for us. They determined that the average driver who is working full time or in the region of 30 hours a week is making about £43,000 pre-cost, and post-cost about £36,000 as a median. That is broadly in line with the UK average earnings. We think we offer a good opportunity to drivers. That is why Uber continues to be very popular and more drivers join the app every day.



Q132 **Dr Scott Arthur:** Independent analysis suggests that drivers are earning much less than that, but I guess we can disagree about that.

Can we move on to deactivation? Kimberly, you raised a good example of when you would deactivate a driver who is accused of not respecting the rights of a disabled person. You said you would deactivate and then you would investigate. Two questions come with that, and it applies to the other operators as well. What is the threshold for deactivating? I guess you do not deactivate a driver because they are talking too much to the passenger. There must be some threshold. Secondly, if that accusation is found to be false, that driver has lost earnings. Do you compensate them for that?

Kimberly Hurd: First, you are right, we would not deactivate a driver for talking too much, nor would we deactivate a passenger for talking too much, and these are thresholds that one would not define. What we take seriously are things like fraud and safety incidents. Again, we have a team that investigates each incident. With any question of whether a driver should be deactivated, they are first encouraged to give evidence or to have a conversation. It is reviewed by a human; this is not an automated thing. We take it very seriously because it is a driver's livelihood. In fraud cases they have 30 days to appeal the decision. We put all the controls in place to make sure that we are making a thorough investigation of any of these incidents, and in particular if it is something related to safety and fraud.

Q133 **Dr Scott Arthur:** Let us pretend the complaint is malicious. You have deactivated the driver. Do they get compensation for that?

Kimberly Hurd: Sorry, when you say "malicious" you mean it is incorrect?

Dr Scott Arthur: Yes, so it is a spurious—

Chair: If after the investigation it is found to have been malicious.

Dr Scott Arthur: Because there is loss of earnings there, and that is fundamentally unfair on the driver.

Kimberly Hurd: I am not aware of cases where that has been the case, but I am happy to—

Dr Scott Arthur: If the money is restored, that is great.

Kimberly Hurd: Again, this is something that we take very seriously so we do a thorough review. It is manually reviewed. We have conversations directly with the driver, we ask for evidence, and we thoroughly review it. I can review that and come back to you if you would like a written response on that.

Q134 **Dr Scott Arthur:** That would be interesting. Emma, what is the threshold in terms of a complaint from a customer for deactivating a driver? It is obviously a big step, is it not?



Emma O'Dwyer: It is important and we take it extremely seriously because it has an impact on drivers, as it does on passengers, if we are not maintaining a safe service. We have lots of similar processes as Kimberly described to investigate the complaint very thoroughly. It is difficult to say what the precise threshold is because it varies quite a lot, depending on the issue we are talking about. It is extremely rare that we are deactivating for a one-time complaint; usually, it is about patterns that we are looking out for that can indicate risk in the future.

That said, we take those decisions seriously. We ask for the testimony from everybody involved in a complaint. We look at the data that is available to us. We can see a lot from the GPS and things that go on around a trip. CCTV is increasingly becoming a very important part of that. Finally, any decision that we make is appealable. With the GMB—which is our union partner—we have introduced a review process where people can either appeal and be represented by their union or through the app and the review centre.

Q135 **Chair:** Do your processes tick the boxes in terms of natural justice? Is it a completely transparent process that sets out who will investigate, what, at what level, by what time period, what the appeal process is and what the time period is? Can drivers clearly see that? I have a lot of constituents who lose their income overnight and tell me that they struggle to know what the process is to get their activation back, and sometimes their licence.

Andrew Wescott: Yes, but I think it is important to factor in the licensing authority because ultimately they license the driver partners. The relationship then between the operators and the licensing authority is important in terms of the information sharing and making sure that they are aware of any historical issues. You are right that taking the decision to deactivate or fully remove a driver from the system is a tough decision to make, but ultimately as an operator we are licensed for public safety, to be fit and proper in that sense. We always have to work—

Chair: Yes, I am asking about your justice processes.

Andrew Wescott: We have local driver teams that will always get the driver's side of any issue, but ultimately if there is a public or passenger safety issue we have to take that seriously, and we have to go to the licensing authority to get it to look at it.

Q136 **Chair:** Fraud has been mentioned as well. Do you set out timescales and processes? Are they clear and do you operate within them—yes or no?

Mark Robinson: Yes, as far as we are concerned. It helps that we know all our drivers personally and there is that relationship, so it is a bit different.

Emma O'Dwyer: Yes, we communicate with drivers as soon as we have a complaint that might lead to a suspension where we need to investigate. They will be spoken to and they will have clarity over that



process. We have found that in the last four years when we have had our relationship with GMB that has been a hugely helpful support for drivers who are going through that process, and they can have peer drivers help them with that.

Kimberly Hurd: Yes, I would echo everything the panel has already said. In addition, we also operate things called drivers' hubs where drivers can either schedule or drop in at any time to ask questions. We also do Bolt on the Move events where we gather feedback if anything is unclear, and we have a team that is dedicated to making sure from a communications standpoint we are continually improving our comms.

Q137 **Chair:** I have one other question particularly for Mark, and possibly to Andrew. Do you find that the terms and conditions for your drivers are being driven down by the increased use of Bolt and Uber? Or is that not a factor?

Mark Robinson: In the area where we work the tariffs are set by the local authority, which I think is a key issue. The earnings of drivers have reduced over the last four or five years because of increased competition and, as I mentioned earlier, the different pricing strategies of incoming and unlicensed vehicles operating in the area.

Andrew Wescott: Did you say terms and conditions?

Chair: Terms and conditions, and by that I include income and working hours.

Andrew Wescott: I would not say that they have significantly. There is more competition in areas where we operate and it is a challenging situation. Obviously, there is different pricing going on—there is dynamic pricing, subsidised pricing or fixed pricing—and we have a taxi sector in there with fixed tariffs. It is an issue that perhaps could be looked at but I do not think it is a significant challenge.

Chair: That is fantastic. Thank you so much for your time and your evidence today. That brings our first panel to an end. As we say to all our witnesses, if there is anything else you want to pick up on in more detail feel free to do so in writing.