

# Private Hire Vehicle Operators Guidance on the Voice Contact Requirement

## Introduction

Private hire operators play a fundamental role in the delivery of private hire journeys in London and this includes helping to ensure the safety of private hire services and high levels of customer care. Operators are required to make a person available for passengers to speak to at all times during operating hours and when a journey is being undertaken in the event that a passenger wants to make a complaint to the operator or discuss any other matter about the carrying out of a booking. We call this the Voice Contact Requirement ('the Requirement').

The Requirement secures a number of benefits:

- It is in the interests of public safety for passengers to be able to speak to the operator, in order to make a complaint or discuss any other aspect of their booking;
- This benefit is particularly significant for disabled and vulnerable passengers;
- It is also in the interests of customer protection more generally.

The Requirement means that a passenger will be able to contact and speak to a real person in real time in order to make a complaint or when concerned about any aspect of the booking. It could also assist in resolving disputes and recovering lost property. This ensures that operators can be made aware of relevant concerns quickly. They will be able to respond to the matter as swiftly as possible, rather than through often less reactive electronic communication such as email. The ability to speak to a real person also provides comfort to the individual who has a complaint or concern.

Some operators are already contactable by telephone, in the manner described above. However, other operators are not contactable in this way. As well as making this service available to passengers, in the interests of public safety, TfL encourages operators to also make the service available to other persons such as drivers and parents or carers so that they can also speak to the operator where they need to.

This guidance is intended to assist licensees in complying with the Requirement, to ensure consistency in service provision and achieve the highest levels of customer care.

## Licence condition

Regulation 9(11) of the Private Hire Vehicles (London) (Operators' Licences) Regulations 2000 provides that:

*"At all times during the operator's hours of business and at all times during a journey, the operator shall ensure that the passenger for whom the booking was made is able to speak to a person at the operating centre or other premises with a fixed address in London or elsewhere (whether inside or*

*outside the United Kingdom) which has been notified to the licensing authority in writing if the passenger wants to make a complaint or discuss any other matter about the carrying out of the booking with the operator.”*

## **Guidance**

In this guidance we refer to operators taking ‘calls’ from passengers on the ‘phone’. However, operators are not restricted to telephones as a medium of communication, and other methods of voice contact may be used (e.g. voice communications made over the internet). Compliance with the Requirement does not preclude operators from offering additional means of contact such as text message and/or other written channels.

Operators can choose to take calls at their operating centre or other premises with a fixed address. If not an operating centre, the premises should be appropriate for the purpose of answering and responding to passengers’ calls. We recommend, for example, that a call centre or dedicated office would be suitable for this purpose. Public spaces, some shops or premises licensed for gambling or the sale of alcohol, such as bookmakers and public houses, fast food outlets, and temporary or mobile premises are not appropriate. They do not offer a professional environment in which passengers’ concerns and complaints can be dealt with properly and in a suitably confidential manner.

Operators may have more than one premises where they take calls. The location of any such premises (including an operating centre) must be notified to TfL in advance of it being used to take calls. Premises can be located in London, or elsewhere, whether inside or outside the United Kingdom.

TfL will contact the operator if we believe that it is not complying with the Requirement and we will take appropriate licensing action in the event of any breach.

Operators may wish to consider pooling resources to offer joint call handling facilities or using third-party service providers. To take calls other than at the operating centre or notified premises would be a breach of the Requirement.

The number (or other means) by which passengers can call the operator should be easy to find and publicised clearly by operators. It should be displayed at a booking office that might be attended by passengers, on websites and within smartphone apps. We consider it best practice for operators to provide the contact number when sending passengers the booking confirmation.

While calls may initially be handled by automated messages and systems (e.g. interactive voice response or initially selecting different options), passengers must always have a clear, initial option to speak to a person.

All personnel handling calls are expected to be at least 18 years of age and have a level of English that allows them to communicate adequately with passengers, particularly in cases of emergency or other situations requiring an immediate or urgent response.

TfL considers that genuine emergency situations include when a crime is in progress or has just occurred; there is danger to life; violence is used or threatened; or someone is seriously ill or injured and their life is at risk. In all such cases callers should be advised to dial 999. The operator should also take appropriate action in emergency situations (for example, providing any assistance it can and initiating any investigation that may be required) including notifying the police and TfL where appropriate.

Where a passenger is calling to report a crime that is not in progress or has not just happened, or that a road traffic collision has occurred, the caller should be encouraged to report the matter to the police either online or by calling 101. The operator should take any appropriate action upon being informed of this, including reporting the matter to the police itself.

More detailed guidance on reporting allegations of crime is available on our web page for [Existing private hire operators](#).

In providing contact centre facilities, operators are encouraged to follow contact centre industry benchmarks. For example, this includes setting service level standards and publishing performance for the percentage of calls answered within a certain time frame, call abandonment rates, call durations, first call resolution, rejection rates, etc.

Existing regulations require operators to maintain records of complaints about bookings they have accepted. These records must be kept at the operating centre where the booking was accepted. Where complaints are received by the operator elsewhere, for example at a remote call centre, particulars of those complaints must still be kept at the operating centre.

Operators may want to consider making recordings of calls, which are stored at the operating centre and made available to TfL upon request to support complaint investigations. Where calls are recorded, callers should be advised of this.

Operators must comply with any applicable information and data security controls in their compliance with the Requirement, whether information or data is held at the operating centre or elsewhere (or in multiple locations). TfL's guidance for operators on privacy and data protection can be found [here](#).

Operators must comply with any applicable health and safety requirements, whether calls are taken at the operating centre or elsewhere.

## **Next steps**

The Requirement requires operators to notify TfL of premises with a fixed address other than an operating centre that will be used for taking calls.

Currently licensed operators must ensure that TfL receives notification of an address of premises which they will use to comply with the Requirement (including an operating centre if it is used for that purpose) in writing, either by email to:

[tph.operators@tfl.gov.uk](mailto:tph.operators@tfl.gov.uk)

or by post to:

Transport for London  
London Taxi & Private Hire  
PO Box 177  
Sheffield S98 1JY

Operators should quote their operator licence number in all correspondence.

Operators must also inform TfL of any changes to information they have provided or any new address used to comply with the Requirement.

Operators must inform TfL of any address of premises which they will use to comply with the Requirement **before** they begin to use those premises for that purpose. Failure to do so will be a breach of the licence condition imposed by the Requirement.

TfL will monitor compliance with the Requirement, by (amongst other things) sampling passenger complaints and undertaking mystery shopping exercises.

TfL will also keep the Requirement itself under review in the light of compliance monitoring and other feedback (from PHV operators, passengers and other persons).

This guidance will be kept under review and may be updated from time to time, in accordance with the needs of passengers and operators and other relevant matters.

**Transport for London**  
**4 September 2018**