

**Manchester City Council  
Report for Information**

**Report to:** Licensing and Appeals Committee –16 January 2017

**Subject:** Taxi Compliance Quarterly Report

**Report of:** Head of Planning, Building Control and Licensing.  
Deputy Chief Executive [Neighbourhoods]

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**Purpose of Report**

To inform the Committee of the compliance work undertaken by the Licensing Unit for the following reporting period:

- June – September 2016 (Qtr 2 and 3 2016/17)

**Recommendations**

That members note the report.

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**Wards Affected: All**

<b>Community Strategy Spine</b>	<b>Summary of the contribution to the strategy</b>
Performance of the economy of the region and sub region	Demands and encourages compliance with legal requirements, therefore raises standards and public confidence in licensed vehicles with the potential to increase the public use of these services which benefits the local economy. Supports a safer night time economy in the City for visitors and residents as part of the overall transport offer.
Reaching full potential in education and employment	Not applicable to the content of this report
Individual and collective self esteem – mutual respect	Not applicable to the content of this report

Neighbourhoods of Choice	Organised Multi Agency operations are designed to provide a visible and re assuring presence to the public. It also serves to deter bogus taxi activity. The operations focus on driver eligibility and vehicle standards and seek to identify defective/illegal vehicles and illegal/non conforming drivers. All these factors affect public safety
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**Full details are in the body of the report, along with any implications for:**

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

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**Financial Consequences – Revenue**

Operation Aztec that has been the subject of a previous report to the committee is wholly funded by the Licensing Unit

**Financial Consequences – Capital**

None

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## 1. Introduction

- 1.1 This report provides the committee with information in respect of compliance work undertaken by the Unit during Qtr 2 (July – Sept) 2016/17.
- 1.2 Following the Compliance Update report presented to Committee on 24 October 2016, information from the Licensing and Appeals Sub-Committee and Senior Officer Panel has been included within this report.
- 1.3 Reporting on outcome data from complaints investigations will be incorporated into future reports as this will become available by virtue of the new software (UNiform) system which went live in December 2016. The compliance case management module is currently scheduled for February 2017, and therefore data will begin to be recorded at this time. A full quarter of data will be available Qtr 1 of 2017/18.

## 2. Investigating Complaints Performance

- 2.1 The Compliance Team receives complaints/reports (from members of the public and the trade) against both Hackney Carriage and Private Hire licence holders, which are logged and allocated a unique reference number in chronological order.
- 2.2 All complaints are investigated with licence holders (where permission is required by the complainant, this is sought prior to investigations proceeding), who are given the opportunity to respond to any allegations made against them. All complaints are recorded against licence holder records, noting both the allegation and drivers response, where we are satisfied that drivers have been correctly identified.
- 2.3 Complaints can result in one of the following outcomes:
- No further action (generally due to a lack of evidence or complainant/witness not supporting action)
  - Advice given
  - Formal Warning
  - Referral to Officer Panel or Sub-Committee
  - Prosecution
- 2.4 As explained above in 1.3, the outcome data of these investigations is not yet available. However, Table 1 below details the number received by category and provides quarterly comparisons:

**Table 1 – Complaints received by Qtr and comparisons**

Complaint Category	Qtr 2 (15/16)	Qtr 3 (15/16)	Qtr 4 (15/16)	Qtr 1 (16/17)	Qtr 2 (16/17)	Comparison to last Qtr	Comparison same Qtr last yr
Driver Behaviour or Conduct	64	89	24	12	34	+22	-30

Alleged Overcharge	35	45	24	29	48	+19	+13
Complaint Regarding Driving Manner (Including non passenger)	7	40	23	9	7	-2	0
Refusal of Hire	6	14	5	6	10	+4	+4
Other Traffic Matters (Parking e.t.c)	2	10	11	12	37	+25	+35
Illegal Ply ( Private Hire)	10	5	3	0	6	+6	-4
Long Route	5	5	2	9	9	0	+4
Poor Driver Knowledge	1	4	5	6	1	-5	0
Not Using Meter	1	3	1	2	2	0	+1
Disability Issue	0	0	3	4	2	-2	+2
Other	47	12	25	14	41	+27	-6
<b>Total</b>	<b>178</b>	<b>227</b>	<b>126</b>	<b>103</b>	<b>197</b>	<b>+94</b>	<b>+19</b>

2.5 Table 1 shows a significant increase in complaints received in Qtr 2 16/17 compared to Qtr 1 16/17 but a similar trend compared to the same Qtr last year. Whilst our long term objective is to work with the trade to ensure higher standards of customer service and ultimately reduce the number of complaints from residents and visitors to the City, the Unit Manager expects to see a continual rise in complaints received over the next 12 months and views it as a positive that complaints may increase initially. This is because service improvements are aimed at generally increasing complaint numbers by:

- Ensuring the wider public are more aware of how to report issues and find it more accessible to do so – particularly with regards to disability related issues
- Improvements in response and investigation times and quality should generate more complaints as people see more value in doing so

### 3 Proactive Checks and Operations

3.1 Routine checks are carried out on both day and night shifts at various locations across the City, including railway stations, the airport, hospitals and supermarkets. Every vehicle interaction shown in the tables below also includes a driver check.

**Table 2 – Proactive checks conducted by Qtr**

<b>Vehicle and Driver Type</b>	<b>Qtr 2 (15/16)</b>	<b>Qtr 3 (15/16)</b>	<b>Qtr 4 (15/16)</b>	<b>Qtr 1 (16/17)</b>	<b>Qtr 2 (16/17)</b>	<b>Total</b>	<b>% of total</b>
Manchester Hackney	525	627	665	322	543	<b>2682</b>	<b>33%</b>
Manchester Private Hire	507	621	691	633	744	<b>3196</b>	<b>39%</b>
Other Vehicles (Working) in Manchester	182	196	231	275	304	<b>1188</b>	<b>15%</b>
Other Vehicles (Visiting) Manchester	296	142	193	170	262	<b>1063</b>	<b>13%</b>
<b>Total</b>	<b>1510</b>	<b>1586</b>	<b>1780</b>	<b>1400</b>	<b>1853</b>	<b>8129</b>	

3.2 Proactive checks and investigations can result in one of the following outcomes:

- Advice given
- Formal warning
- Compliance Notice
- Suspension Notice
- FPN
- Referral to Sub-Committee
- Prosecution

3.3 Notices

**Table 3 – Notices issued Qtr 2 2016/17 (July – Sept 2016)**

<b>Defect Type</b>	<b>Compliance Notice</b>		<b>Suspension Notice</b>		<b>Total</b>
	<b>PH</b>	<b>HC</b>	<b>PH</b>	<b>HC</b>	
Tyres	0	0	1	0	<b>1</b>
Bodywork / Interior	5	0	3	1	<b>9</b>
Electrical	0	0	0	0	<b>0</b>
Mechanical	0	0	0	0	<b>0</b>
Cond / Byelaws	13	0	12	0	<b>25</b>
Other	0	0	2	1	<b>3</b>
<b>Total</b>	<b>18</b>	<b>0</b>	<b>18</b>	<b>2</b>	<b>38</b>

3.4 FPNs

FPNs are issued to any drivers smoking in a licensed vehicle, including drivers licensed by other authorities who are visiting or working within the City boundaries (although this information isn't currently recorded separately).

**Table 4 – FPNs issued by Qtr**

FPNs issued	Qtr 2 (15/16)	Qtr 3 (15/16)	Qtr 4 (15/16)	Qtr 1 (16/17)	Qtr 2 (16/17)	Total
<b>Total</b>	<b>7</b>	<b>6</b>	<b>21</b>	<b>17</b>	<b>11</b>	<b>62</b>

### 3.5 Prosecutions

Prosecution cases, on average take anything between 6 to 12 months to be concluded at Court. The most common offence types are:

- Ply for hire (and associated no insurance charge)
- Unlicensed
- Failure to wear ID
- Refusal to hire / carry passengers

The Committee and trade representatives have identified that illegal ply for hire is a priority for the City. The table below is a breakdown of referrals made by the compliance team for prosecution, identifying how many of those cases are for illegally plying for hire.

**Table 5 – Summary of prosecutions by Qtr**

	Cases referred for legal action	Number of which successful (to date)	Number of which for Ply for Hire
Jan – Dec 2015	<b>26</b>	24	18
<b>Total 2015</b>	<b>26</b>	<b>24</b>	<b>18</b>
Qtr 4 15/16 (Jan – Mar 2016)	<b>10</b>	9	7
Qtr 1 16/17 (Apr – June 2016)	<b>13</b>	8	11
Qtr 2 16/17 (July – Sept 2016)	<b>18</b>	3	10
<b>Total (to Sept 2016)</b>	<b>41</b>	20	28

### 3.6 Operations

3.6.1 The Compliance Team participate in a number of joint agency operations targeting both the day and night time Hackney Carriage and Private Hire trades. The Committee will already be aware of Operation Aztec which takes place monthly at night with dedicated GMP Traffic Officers working alongside Compliance Officers. Vehicle Examiners from DVSA [Driver and Vehicle Standards Agency – formerly VOSA] also regularly attend these night time operations, and more recently enforcement officers from other authorities (including Rossendale) have been attending also.

3.6.2 Licensed vehicles are generally stopped at random at a chosen check site location. It is usual to work from different locations throughout the operation and the system is flexible so a check site can be shut down and moved very easily as necessary. Police patrol vehicles, both marked and un-marked are available and assigned to the operation and are used to carry out mobile working, targeting vehicles of interest. In addition to gathering evidence of criminal offences, vehicles and drivers found to have compliance issues are served relevant notices and follow up action is taken to ensure defects are rectified.

3.6.3 Compliance Officers work closely with GMP colleagues and therefore also organise and support GMP on ad hoc operations in key locations across the City, including the airport or in response to emerging issues.

The tables below set out the number of vehicles stopped and checked during the course of each operation.

**Table 6 - Operation Aztec Outputs**

	Date	Vehicle Licence Type				Total	Outputs		
		Manchester HC	Manchester PH	Other working in Manchester	Other visiting Manchester		Compliance Notice	Suspension Notice	Prosecution
<b>Qtr 1</b>	5 <sup>th</sup> Mar 16	39	37	16	6	<b>98</b>	5	3	0
	19 Mar 16	20	27	14	9	<b>70</b>	6	2	0
	28 May 16	10	61	42	16	<b>129</b>	1	6	1
	25 Jun 16	32	35	16	14	<b>97</b>	8	5	1
<b>Qtr 2</b>	23 Jul 16	42	34	8	11	<b>95</b>	8	4	0
	13 Aug 16	27	60	19	13	<b>119</b>	6	2	1
	20 Aug 16	28	12	2	1	<b>43</b>	0	0	2
	24 Sept	42	18	23	19	<b>102</b>	9	2	1
	<b>Total</b>	<b>240</b>	<b>284</b>	<b>140</b>	<b>89</b>	<b>735</b>	<b>43</b>	<b>24</b>	<b>6</b>

**Table 7 - Other Operation Outputs (All daytime weekday operations with GMP)**

	Date	Location	Vehicle Licence Type				Total	Outputs		
			Manchester HC	Manchester PH	Other working in Manchester	Other visiting Manchester		Compliance Notice	Suspension Notice	Prosecution
<b>Qtr 1</b>	2 Mar 16	Oldham Rd	7	24	1	6	<b>38</b>	3	1	0
	8 Mar 16	Airport	3	10	4	15	<b>32</b>	2	0	0
	18 Mar 16	Airport	6	22	6	21	<b>55</b>	5	1	0
	20 May 16	Alan Turing Way	9	37	6	3	<b>55</b>	6	2	0

	15 Jun 16	Hough End	8	36	6	6	<b>56</b>	4	2	0
	16 Jun 16	Airport	9	23	45	68	<b>145</b>	7	3	0
	28 Jun 16	Oldham Rd	5	35	7	5	<b>52</b>	6	2	0
<b>Qtr 2</b>	14 July 16	Airport	7	40	9	58	<b>114</b>	4	2	0
	<b>Total</b>		<b>54</b>	<b>227</b>	<b>84</b>	<b>182</b>	<b>547</b>	<b>37</b>	<b>13</b>	<b>0</b>

#### 4. Senior Officer Panels and Licensing and Appeals Sub-Committees

4.1 Where on a new or renewal application (or during the currency of a licence) an individual has any convictions, cautions or other matters that require further consideration, these are, under the delegated authority of the Council, referred to either The Panel or Sub-Committee.

4.2 The Panel consists of a Senior Officer (normally a Principal Licensing Officer or the Licensing Unit Manager) accompanied by a legal adviser from City Solicitor's office. Applicants are invited to a Panel hearing, where a solicitor, trade union representative or friend, may accompany them or speak on their behalf.

4.3 The Sub-Committee consists of three Councillors selected from the full Licensing and Appeals Committee accompanied by a legal adviser from City Solicitor's office and a Governance Officer. Applicants are invited to a Sub-Committee Hearing, and may be accompanied by a solicitor, trade union representative or friend, to accompany them or speak on their behalf.

4.4 Where applicants are aggrieved by the decision of the Panel, or Sub-Committee to refuse, revoke or suspend a licence they have the right of appeal to the Magistrates' Court.

#### 4.5 Performance

4.5.1 The tables below show the number of cases referred to either Panel or Sub-Committee within Qtr 2 16/17 (July – Sept 2016), broken down by offence category and detailing the outcomes:

**Table 8 – Summary of cases referred to Panel and outcomes Qtr 2 16/17**

<b>Panel</b>											
<b>Offence Category</b>	<b>New Application</b>			<b>Current Licence Holder</b>				<b>Renewal</b>			<b>Total</b>
	Granted	Granted with Warning	Refused to Grant	No Further Action Taken	Warning Given	Revoked	Suspended	Granted	Granted with Refused	Refused	
<b>Dishonesty</b>	0	1	4	0	0	0	0	0	1	1	7
<b>Major Motor Offence</b>	0	0	1	0	3	0	0	0	1	3	8
<b>Intermediate Motor Offence</b>	0	0	1	0	3	0	0	0	5	3	12



<b>Totting Up</b>	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>1</b>	<b>6</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>7</b>	<b>27</b>
<b>Appeal</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Table 9 - Summary of cases referred to Licensing and Appeals Sub-Committee and outcomes Qtr 2 16/17**

Sub Committee	New Application			Current Licence Holder					Renewal			Total
	Granted	Granted with Warning	Refused to Grant	No Further Action Taken	Warning Given	Revoked	Suspended	Granted	Granted with Refused			
Drugs	0	0	0	0	0	0	0	0	0	0	0	0
Sex Offence	0	0	0	0	0	0	0	0	0	0	1	1
Violence	0	0	2	0	1	1	0	0	1	1	6	
DBS Info	0	0	0	0	0	0	0	0	0	0	0	
Dishonesty	0	0	0	0	0	0	0	0	0	0	0	
Totting Up	0	0	0	0	0	0	0	0	0	0	0	
IN10 /Ply for Hire and Complaints	0	1	1	0	0	2	0	0	1	2	7	
Miscellaneous	0	0	2	0	1	2	0	0	0	1	6	
<b>Total</b>	<b>0</b>	<b>1</b>	<b>5</b>	<b>0</b>	<b>2</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>5</b>	<b>20</b>	

#### 4.6 Case Summaries

4.6.1 The following paragraphs provide a brief overview of cases and decisions taken by the Panel or Sub-Committee that were made outside of the Council's Statement of Policy and Guidelines in relation to the relevance of convictions, formal cautions, complaints and/or other matters.

With each case, the Panel or Sub-Committee take into consideration the content of the report, any additional evidence presented at the hearing and statements made by all representatives.

The 'Reason' stated in each case is the presenting issue that prompted the referral to either Panel or Sub-Committee. The explanation provides as much information as possible, without providing specific details.

##### Dishonesty – (1) Senior Officer Licensing Panel

(1) Application for a new hackney carriage driver licence

**Reason:** Theft by employee

**Decision:** Granted with a warning

**Explanation:** The applicant had received a caution in January 2012 whilst working at an airport. The applicant stated they found a mobile phone and placed it in their pocket intending to hand it in, but forgot. The applicant was leaving work and was searched and the phone was found. The applicant declared the caution on their statutory declaration.

Major Motoring Offence (4) – Senior Officer Licensing Panel

- (1) Review of a private hire driver licence

**Reason:** MS90 (failure to give information)

**Decision:** Warning Issued

**Explanation:** This offence occurred when the driver failed to complete a speeding declaration form for an SP30 and return it to the Courts. The Driver claimed they had completed the declaration form and returned it to the courts. The driver declared the conviction immediately to the Licensing Unit.

- (2) Application for the renewal of a hackney carriage driver licence

**Reason:** MS90 (failure to give information)

**Decision:** Renewal granted with a warning

**Explanation:** This offence occurred when the driver failed to respond to a speeding offence (SP30). The driver stated that there had been problems with the post and they had not received the initial fixed penalty notice and were therefore unaware of the speeding offence. The driver declared the conviction on the renewal application.

- (3) Application for the renewal of a private hire driver licence

**Reason:** IN14 (Causing or Permitting an Offence)

**Decision:** Renewal granted with a warning

**Explanation:** The offence was committed when the driver allowed a relative to use his vehicle whilst uninsured. The driver stated they believed their relative was insured and only found out subsequently that they were not. The driver declared the offence immediately.

- (4) Application for a new private hire driver licence

**Reason:** IN10 (using a vehicle uninsured against third party risks)

**Decision:** Granted with a warning

**Explanation:** This offence occurred when the applicant used their partner's vehicle without being insured. The applicant stated they believed they were

insured only to discover after being stopped by the police that the insurance had expired. This offence occurred before the applicant applied for private hire licence and is almost outside the guidelines.

Intermediate Motoring Offence (8) – Senior Officer Licensing Panel

- (1) Review of a private hire driver licence.

**Reason:** CD10 (driving without due care and attention)

**Decision:** Warning Issued

**Explanation:** The driver stated that they were distracted by their daughter's behaviour in the car and drove into the rear of stationary vehicle. The driver declared the incident immediately. This was an isolated motoring offence.

- (2) Review of a hackney carriage driver licence.

**Reason:** SP30 (exceeding the statutory speed limit on a public road)

**Decision:** Warning Issued

**Explanation:** This offence occurred when the driver stated that they were driving in a 40mph zone when they entered a 30mph zone and did not reduce his speed. The driver was caught by roadside camera. The driver declared the offence.

- (3) Review of a hackney carriage and private hire driver licences

**Reason:** SP30 (exceeding the statutory speed limit on a public road)

**Decision:** Warning Issued on both licenses

**Explanation:** The traffic offence was committed when the driver was late to pick up their children from school. The driver expressed deep regret at the incident and this was the driver's only motoring offence.

- (4) Application for the renewal of a private hire driver licence

**Reason:** SP50 (exceeding the speed limit on a motorway)

**Decision:** Renewal granted with a warning

**Explanation:** This offence occurred when the driver was on a domestic journey, on the motorway travelling through roadworks with a mandatory speed limit which the driver stated they did not realise. Offence declared.

- (5) Application for the renewal of a private hire driver licence

**Reason:** CD10 (driving without due care and attention)

**Decision:** Renewal granted with a warning.

**Explanation:** The offence involved in an incident with a cyclist. The driver stated that he 'clipped' the cyclist with his vehicle, that the cyclist was uninjured and after a brief exchange between them, they carried on with their journeys. The driver pled guilty to the offence at Court.

- (6) Review of a private hire driver licence and application to renew a hackney carriage driver licence

**Reason:** CD10 (driving without due care and attention)

**Decision:** Granted with a warning.

**Explanation:** This offence occurred when the driver was travelling down a slip road onto an A road. The slip road was blocked by the police as there had been an accident. The driver decided to do a three point turn and exit the slip road. The driver was stopped by police and charged with the offence. At court the driver pleaded guilty and declared the offence immediately.

- (7) Application to renew a hackney carriage driver licence

**Reason:** Two SP50s (exceeding the speed limit on a motorway)

**Decision:** Renewal granted with a warning

**Explanation:** These motoring offences were committed within a 10 day period. The driver was caught speeding in a mandatory speed limit on a motorway, stating they did not realise it was mandatory, and only knew when the fixed penalty arrived. No other motoring offences on record and previous good history.

- (8) Application to renew a private hire driver licence

**Reason:** Two SP30s (exceeding the statutory speed limit on a public road)

**Decision:** Renewal granted with a warning

**Explanation:** These motoring offences were committed when the driver was not working as a private hire driver. The driver stated they were travelling to and from visiting sick relatives and expressed regret, and up to then had a clean driving licence.

#### Violent Offences – Licensing and Appeals Sub-Committee (2)

- (1) Application to renew a hackney carriage driver licence.

**Reason:** Conviction for criminal damage

**Decision:** Renewal granted with a warning

**Explanation:** This conviction occurred when the driver was involved in an ongoing dispute with a neighbour. GMP confirmed that the driver damaged a gate that had been left lying in a shared driveway and evidence was provided of further mitigating factors.

- (2) Review of a hackney carriage and private hire driver's licenses.

**Reason:** Caution for common assault

**Decision:** Warning Issued

**Explanation:** This offence occurred when the driver was at the airport working under their private hire licence. The driver stated that whilst picking up a booked job, a hackney carriage driver approached their private hire vehicle and started shouting abuse. A physical altercation took place, police officers attended and the driver was issued a caution.

Disclosure and Barring Service (DBS) Enhanced Certificate – Sub-Committee

- (1) Application to renew a hackney carriage driver licence

**Reason:** Contravening Health and Safety Regulations

**Decision:** Renewed with a warning

**Explanation:** This conviction occurred when the driver was charged when he previously worked in the retail business and was selling fireworks that he had not obtained the right licence for. The driver stated that friends who were helping him ordered fireworks which required a different licence. The driver pleaded guilty at court.

Compliance Complaints – Sub Committee (2)

- (1) Review a hackney carriage driver licence

**Reason:** Complaints received from Manchester City Council staff

**Decision:** Renewed with a warning

**Explanation:** The complaints occurred when the driver tried to renew his licence. The driver felt the customer service staff were obstructive in their behaviour and were preventing them from renewing his licence. The driver explained they were also having difficulties in his personal life.

- (2) Application for a new hackney carriage driver licence (previous licence was revoked in 2014)

**Reason:** Historical complaints on record

**Decision:** Granted with a warning

**Explanation:** The complaints had occurred when the applicant was a previous licence holder. The applicant provided evidence they had an attended anger management course and did volunteer work and stated they felt they were a different person and in a better position to handle situations.

**5. Other Service updates**

**5.1 GMP Seconded Officer**

Due to staff changes within GMP the arrangement has been delayed to ensure those moving into new roles have the opportunity to properly immerse themselves in the process.. Officers that had previously expressed an interest in the role have also withdrawn from the process so the role has been re-advertised within GMP Special Operations Division with a closing date of 13<sup>th</sup> January 2017.

5.2 As referred to in 1.3 above, the new UNIFORM system went live within the Licensing Unit on 8<sup>th</sup> December 2016. This has been an intense period in the team with the introduction of the new system and the corresponding changes in processes. Around the same time the Unit implemented the new higher level of identity checks in conformation with the new requirements of the Immigration Act 2016. Whilst a demanding time the team has responded positively to ensure the business continues to process licence applications effectively and in accordance with all regulations. This has though led to a slight delay in implementing the compliance modules within UNIFORM and enabling improved reporting.

**6. Legal implications**

There are no other legal implications to consider.

**7 Contributing to the Community Strategy**

**7.1 (a) Performance of the economy of the region and sub region**

Demands and encourages compliance with legal requirements, therefore raises standards and public confidence in licensed vehicles with the potential to increase the public use of these services which benefits the local economy.

Supports a safer night time economy in the City for visitors and residents as part of the overall transport offer.

**7.2 (b) Reaching full potential in education and employment**

**7.3 (c) Individual and collective self-esteem – mutual respect**

**7.4 (d) Neighbourhoods of Choice**

Organised Multi Agency operations are designed to provide a visible and reassuring presence to the public. It also serves to deter bogus taxi activity. The operations focus on driver eligibility and vehicle standards and seek to identify defective/illegal vehicles and illegal/non conforming drivers. All these factors affect public safety.

## **8 Key Policies and Considerations**

### **(a) Equal Opportunities**

### **(b) Risk Management**

### **(c) Legal Considerations**

## **9 Conclusion**

- 9.1 The report provides the Committee with an update on the Compliance Service activity and performance between 1 July 2016 and 30 September 2016.