



REPORT TO: LICENSING COMMITTEE ON 15 AUGUST 2018

SUBJECT: TAXI AND PRIVATE HIRE COMMUNICATIONS STRATEGY

BY: CORPORATE DIRECTOR (CORPORATE SERVICES)

1. REASON FOR REPORT

- 1.1 To present a draft Taxi and Private Hire Communications Strategy for the Committee's consideration.
- 1.2 This report is submitted to the Committee in terms of Section III H (1) of the Council's Scheme of Administration relating to the exercise of the function of the Council as Licensing Authority for The Moray Council area.

2. RECOMMENDATIONS

2.1 It is recommended that the Committee:-

- (i) **consider and approve, with or without amendment, the draft Communications Strategy attached at APPENDIX 3; and**
- (ii) **instruct the Head of Legal and Democratic Services to undertake consultation on this as set out in section 3.13 of this report and report back to the next Committee meeting.**

3. BACKGROUND

- 3.1 At its meeting on 21 September 2016, the Committee instructed a review of taxi communications and requested a report be submitted to their next meeting (para 8 of the minute refers).
- 3.2 At its meeting on 16 November 2016, the Committee reviewed current communications and instructed consultation with stakeholders, development of a draft Taxi Communications Strategy and a report back to Committee on this. During discussions the Committee also agreed that it might be possible to hold meetings with taxi drivers with a view to encouraging better communications. The feeling of the Committee was that one meeting should be held in Elgin with another being held on a circuit basis. (para 8 of the minute refers)
- 3.3 Throughout 2017 and in to 2018, various meetings and communications with stakeholders took place. Discussions took place with Police Scotland representatives and with officers within other Council departments who have a role in relation to taxi licensing. The general consensus seemed to be that

stakeholder meetings would be a good way to discuss general issues such as changes/developments that are coming up and enforcement, and that a couple of meetings each year would be appropriate. Police Scotland representatives were also keen on attending meetings that are organised with the taxi trade.

- 3.4 A communications survey was issued to all taxi/private hire licence holders. Licence holders were subsequently invited to trade meetings with some Committee members from the Fees Review Working Group to discuss fees and the opportunity was taken to discuss communications. The survey report and a compilation of comments made on communications at meetings are attached as **Appendices 1 and 2**, respectively.
- 3.5 The response rate to the survey was 4.1% or 24 responses. The attendance rate at trade meetings was 6.9% or 38 attendees. The small number of responses/attendees makes it difficult to draw representative conclusions from comments made; however, it is clear that there is no one preferred approach for communication and a variety of methods should be used.
- 3.6 Following the above consultation, work commenced on a draft Communication Strategy, which is attached at **Appendix 3** for the Committee's consideration.
- 3.7 The draft Strategy has been informed by the Committee's previous comments, by consultation comments and the Council's Community Engagement Scheme 2012 -16 and Strategy (CES). Within the CES, it is recognised that engagement can mean different things to different people and it is important to be clear about the level of engagement and the types of engagement that will be undertaken by services. The CES also sets out various principles that are intended to be used as an active tool by officers when planning engagement and as a reference to let the community know what to expect when working with the Council. These include for example, continuous improvement, ensuring actions are relevant to need and have a meaningful and clear purpose, being clear about what can be influenced and what cannot, communications that are accessible to all interested parties, where appropriate consultees are informed of and agree with the communication and feedback methods, and results of engagement are fed back to participants and the wider community. Within the CES, it is also recognised that the Council alone cannot successfully make changes as to how it engages with people and that stakeholders have a part to play to strengthen their involvement in activity.
- 3.8 The draft strategy was also informed by national research commissioned by the Scottish Government in 2012 into Taxi and Private Hire Car Market and Local Licensing Regimes across Scotland that looked at both current practice and context. This research was undertaken by Edinburgh Napier University, whose report was published in April 2013. This research was wider in scope than communications and excerpts relevant to communications are attached as **Appendix 4**.
- 3.9 The Scottish Government Guidance "Taxi and Private Hire Car Licensing Best Practice for Licensing Authorities", Second Edition April 2012 is the latest and current guidance available to licensing authorities. This guidance covers a range of issues but only touches upon communication and engagement to a

limited extent. Relevant excerpts are attached as **Appendix 5**. The Best Practice Guidance suggests that licensing authorities also make use of the information contained within the Scottish Development Department Circular 25/1986 Information for Local Licensing Authorities on the Licensing of Taxi and Private Hire Cars and their Drivers. Excerpts relevant to this issue are also included within **Appendix 5**. These have also been taken into account in drafting the strategy.

- 3.10 The Scottish Regulators' Strategic Code of Practice (Feb. 2015), indicates that regulators should develop effective relationships with those they regulate and have clear two-way communication in place as well as more generally pursue continuous improvement. Regulators are expected to: communicate effectively with those they regulate, to build relationships and mutual understanding; have in place a range of appropriate communication mechanisms; be clear about the purpose of interactions; and allow for and gather regular feedback. This has also been taken into account in drafting the strategy.
- 3.11 Over the years there developed a variety of methods of communication at different times, for different purposes with different stakeholders, all as set out within the report to Committee on 16 November 2016. Working and communication methods have been evolving and the tools available now are very different from the past. There is a greater drive for electronic communications and the ever present need for efficiencies in how services operate. The draft Taxi Communications Strategy will make it clear going forward, when and how The Moray Council licensing team and the Committee will communicate with and carry out engagement with the licensed trade and partners in the regulatory process in relation to taxi and private hire licensing. The aim is to ensure that activity reaches and engages the stakeholders that it needs to, and to strengthen their involvement in activity to help inform practices and service delivery, whilst also balancing activity with the wider work undertaken by the licensing team against the background of reduced resource to make the best use of limited resources.
- 3.12 The draft Strategy was issued to Council Staff stakeholders and Police Scotland as detailed within the consultation section below and comments received incorporated.
- 3.13 Consultation on the draft Strategy is yet to take place with the trade and Moray Community and this is recommended for a 1 month period with feedback received being reported back to the next Committee on 10 October 2018. It is proposed that community and trade consultation on the draft Strategy take place as follows:- by email/letter to Community Councils and Local Area Forums; by contact by the Equalities Officer with Equality groups; by email/letter to the trade with the opportunity being taken by the Licensing Standards Officer to raise this and seek feedback when out and about; postings on the Council's website and social media pages and TellmeScotland portal.

4. SUMMARY OF IMPLICATIONS

(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))

Regulating taxi vehicles and taxi drivers through the licensing system contributes to a safer community by ensuring they provide safe services for the public. Taxis are a valuable part of a growing and diverse economy. They provide employment opportunities and support the tourism and night economies. Taxis also promote health and independence by providing mobility for the whole community and access to resources.

(b) Policy and Legal

As set out within this report.

(c) Financial implications

There may be some costs involved in consulting on the draft Strategy. There may also be costs involved in implementing the Communications Strategy. These are not likely to be great and it is anticipated that they would be able to be met from current budgets.

(d) Risk Implications

Without a clear and consistent approach to communications there is a risk that the Council does not engage appropriately with stakeholders.

(e) Staffing Implications

It will take staff time to consult on the draft strategy and thereafter to communicate and engage with stakeholders on an ongoing basis. It is anticipated that at current resource levels, implementation of the strategy can be met from existing resources. Licensing officers will also liaise with the Council's Corporate Communications section to draw upon available expertise and resources as required.

(f) Property

There are no anticipated property implications arising from this report.

(g) Equalities/Socio Economic Impact

The strategy recognises the need to identify and overcome the barriers to communication and engagement for all stakeholders.

An Equalities Impact Assessment has been started and the further consultation recommended will feed in to that.

(h) Consultations

Consultation on this report, including the draft Strategy has taken place with the following officers: the Equal Opportunities Officer; Carl Bennet, Research and Information Officer; Peter Jones, PPR and Communications Officer; the Community Support Manager; and Tracey Sutherland, Committee Services Officer and comments received have been incorporated.

Consultation on the draft Strategy has taken place with Kenny McGeough, Inspector, Police Scotland; Head of Legal and Democratic Services; the Licensing Standards Officer; Customer Contact Manager; Fleet Service Manager; Manager Development Management; Elaine Penny Engineer Traffic

and Ken Major Senior Engineer Traffic and comments received have been incorporated.

It is proposed that community and trade consultation on the draft Strategy take place as set out within section 3.13 of this report.

7. CONCLUSION

7.1 There is a need to improve communications with all stakeholders and the draft strategy sets out an approach to this going forward.

Author of Report: Margaret Forrest, Legal Services Manager (Litigation & Licensing)

Background Papers:

Council's Community Engagement Scheme 2012 -16
(<http://www.moray.gov.uk/downloads/file85646.pdf>) and Strategy
(<http://www.moray.gov.uk/downloads/file85645.pdf>)

Report by Napier University for Scottish Government in relation to Taxi and Private Hire Car Market and Local Licensing Regimes across Scotland, April 2013:
<http://www.gov.scot/resource/0041/00419531.pdf>

Scottish Government Guidance "Taxi and Private Hire Car Licensing Best Practice for Licensing Authorities", Second Edition April 2012:
<http://www.gov.scot/resource/0039/00391287.pdf>

Scottish Development Department Circular 25/1986 Information for Local Licensing Authorities on the Licensing of Taxi and Private Hire Cars and their Drivers
(<http://www.gov.scot/Publications/2012/04/2261/1>)

Scottish Regulators' Strategic Code of Practice (Feb. 2015)
<https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0ahUKEwiuk6nowZ7bAhUFa1AKHT5UDQIQFgggMAA&url=https%3A%2F%2Fbeta.gov.scot%2Fpublications%2Fscottish-regulators-strategic-code-of-practice%2FScottish%2520regulators'%2520strategic%2520code%2520of%2520practice.pdf&usg=AOvVaw37fzdqo69gsh7Z3DfufD9T>

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