

# Crawley Borough Council

## Report to Licensing Committee

10<sup>th</sup> June 2019

### Public Consultation Findings Hackney Carriage and Private Hire Vehicle Livery

Report of the Head of Community Services – HCS/13

---

#### **1. Purpose**

- 1.1 To present to the Licensing Committee the results of a consultation exercise conducted in connection with a request from the trade for a change to the Council's policy to allow the use of temporary (magnetic) livery signs.
- 1.2 The Licensing Committee is asked to consider whether to amend the current vehicle livery conditions that require permanent signage.

#### **2. Recommendations**

- 2.1 The Licensing Committee is asked to:
  - (1) Consider the findings of the independent survey and any other relevant information; and
  - (2) Decide whether to amend the current policy of requiring permanent door signs and vehicle plates on CBC-licensed private hire vehicles and hackney carriages.

#### **3. Reasons for the Recommendations**

- 3.1 The Licensing Committee are the decision making body in regards to the issue of licences pertaining to the trade which includes any changes connected to the requirements to hold a licence.
- 3.2 The fundamental objective of licensing the trade is for the purpose ensuring public safety. This must nevertheless be proportionate and necessary in keeping with the principles of good regulatory practice. The current livery requirements have been in place since September 2002 and whilst the Council has adopted a Policy to ensure a consistent approach to the trade is undertaken, no fundamental changes to the signage requirements have been made since their inception. A review of the current requirements is therefore useful to explore if the present licensing conditions for vehicles concerning permanent door signage are appropriate in light of balancing the needs to deal with potential vehicle crime when weighed against public safety.

#### **4. Background**

- 4.1 The public consultation exercise informing the material for the basis of this report was undertaken independently by a private company. The company were required to

create a set of questions to test if the public would feel safe using vehicles with removable signs. A set of questions was also created for members of the local trade to ask if they had had any problems with their vehicles being damaged and also their view about public safety and removable signs.

- 4.2 In the spring of 2018 the local trade was subjected to a high level of vehicle crime in specific areas of Crawley with in excess of 100 drivers suffering a break in and damage. Private Hire Vehicles were affected the most although several Hackney Carriages were also damaged. Whilst drivers were advised and were cooperative in taking precautions such as not leaving money or valuables in their cabs, break ins nevertheless continued. Due to the scale of the problem the Licensing Team requested a meeting with the local Police to try to assist in solving the problem as the Council is not the lead authority regarding criminal damage.
- 4.3 At the meeting arranged as outlined above it was agreed that the matter of livery requirements particularly the requirements for permanent signage to be used be raised with the Licensing Committee at the next opportunity, to explore possible options to move towards magnetic signs. The Licensing Committee subsequently resolved that the Licensing Team should undertake a consultation process on a possible amendment to the Council's policy. Following this, a public consultation exercise was undertaken on behalf of but totally independently of the Council. This work was undertaken by the Survey Initiative as arranged through the Council's communications team.
- 4.4 The aims of the survey were to uncover the feelings and attitudes of CBC licensed drivers of licensed private hire vehicles and hackney carriages (referred to as Taxi Drivers in this report) and of members of the public regarding security, authenticity, reliability and propensity to use taxis in permanent/removable signage scenarios.
- 4.5 The survey was run from 15 October to 6 December 2018. 355 responses were returned. Taxi Drivers had 25% response rate - 233 out of 937 invited via a paper questionnaire mailed to their home address. 111 responses were received from Members of the public who accessed an online survey via the Council's website or were emailed an invitation to take part. In addition, responses were provided by:
- Connected with Taxis Trade other than a driver (1)
  - Member of a Group Representing Disabled People (3)
  - Visitor (Business) (1)
  - Visitor (Leisure) (2)
  - Not stated (4)
- 4.6 The results of the work undertaken by the Survey Initiative show a divergence between the attitude of the public and the trade in regards to the issue of public safety and the use of temporary stickers with the public having concerns. The results of the survey are attached in full at Appendix A. A representative from the company who undertook the survey has been invited to this meeting to present a summary of their findings and also be on hand to answer any questions that may arise.
- 4.7 It is important to note that some surrounding Local Authorities do not require the use of permanent signage and these vehicles are permitted to legally undertake work in Crawley if properly booked through an operator based outside of the area. Whilst Crawley has had stringent standards concerning both Hackney Carriages and Private Hire Vehicles for a number of years this is not uniform across the country. Historically the fact that London Gatwick Airport is within the Council's area of control has resulted in high degree of attention to this aspect of licensing.

- 4.8 The Council's initial intention was to apply the same licence conditions to all Private Hire Vehicles in the borough. This was nevertheless successfully challenged by the Gatwick Airport Drivers Association via the Magistrates Court in 2002 resulting in vehicles operating from this location being exempt. This situation is considered unsatisfactory and the Licensing Office are working on a plan to revisit the requirements for signage to be required here also.
- 4.9 Sussex Police and West Sussex County Council also responded directly via the Council's Community Safety Manager concerning potential changes to livery requirements. The responses are attached to this report at Appendix B.
- 4.10 Two youths were apprehended in the Summer of 2018 after one of the Council's Community Wardens discovered a moped which was linked to the vehicle crime spree affecting the trade. The number of incidents is believed to have fallen as a result. A request has been made to the Police for current data on this subject but nothing has been received at the time of writing this report. A check on the National Crime map for Broadfield does show a slight increase in vehicle crime in early 2019. It is not possible to filter this data for vehicle type thus it is not possible to see if they are trade-related.

## **5.0 Description of Issue to be resolved**

- 5.1 To consider if the current livery conditions of requiring permanent signage to be affixed to all licenced vehicles is proportionate as regards regulatory controls and the need to ensure public safety.

## **6.0 Information & Analysis Supporting Recommendation**

- 6.1 To analyse the feedback from the independent survey and responses from other agencies in consideration of 5.1 above.
- 6.2 Ward Councillors were not consulted directly as the matter is not ward specific.

## **7.0 Future Developments and Other Implications**

- 7.1 Central Government recently set up a task and finish group (TFG) to look at taxi and private hire vehicle licensing in England. This group made 34 recommendations including '*Government should legislate for national minimum standards for taxi and PHV licensing - for drivers, vehicles and operators. The national minimum standards that relate to the personal safety of passengers must be set at a level to ensure a high minimum safety standard across every authority in England. Government must convene a panel of regulators, passenger safety groups and operator representatives to determine the national minimum safety standards. Licensing authorities should, however, be able to set additional higher standards in safety and all other aspects depending on the requirements of the local areas if they wish to do so.*' It is therefore possible that minimum national standards will soon be in force nationally which may or may not have some impact on current livery requirements also requiring further review.
- 7.2 It is possible that drivers may forget to put their door signs on at the start of their working day which may require additional enforcement by the staff in the Licensing Office. Signs could also be stolen from the vehicle when the vehicle is unattended if not removed on each occasion.
- 7.3 The cost of magnetic signs is likely to be higher than that of the current vinyl stickers resulting in higher costs for licensed drivers.

## **8.0 Background Papers**

[Government Response to Taxis Task and Finish Group](#)

[Draft Statutory Guidance National Minimum Licensing Standards for Taxis](#)

[LGA Councillors Handbook Taxis](#)

[CBC Taxi Licensing Policy](#)

Tony Baldock  
Environmental Health and Licensing Manager  
Tel: 01293 438220  
Email: [tony.baldock@crawlley.gov.uk](mailto:tony.baldock@crawlley.gov.uk)

Report for

Crawley Borough Council  
Taxi Licensing Consultation  
'Have Your Say on Taxi Vehicle Signage'  
Survey 2018  
Summary Report



the survey initiative  
employee research

Abbey Farm, Spinnels Lane, Wix, Manningtree, Essex, CO11 2UJ, United Kingdom

+44 (0) 1255 870735

info@surveyinitiative.co.uk

## Contents

Introduction .....	3
Background .....	3
Approach.....	3
Overall observations .....	3
Genuine licensed taxi/driver .....	3
Insurance and maintenance.....	4
Charged fairly and safety .....	4
Propensity to use taxis.....	5
Vehicles being broken into or damaged .....	5
Alternative solutions.....	6
Conclusions .....	8

## Introduction

This report is designed to provide an executive summary of the results of the Taxi Licensing Consultation undertaken for Crawley Borough Council between the dates of 15 October and 6 December 2018. It looks to identify trends in the data and to provide a summary of the opinions and perceptions of the respondents that took part.

### Background

Crawley's private hires and hackney carriages must have permanent signage displayed on their vehicles, to make it clear that they are licensed and comply with the Council's conditions. However, following recent break-ins of these types of vehicles whilst they are not in use, some drivers are seeking permission to use removable signage so that their identification as licensed vehicles can be removed whilst not in use. This could include detachable signage such as magnetic door stickers.

The consultation sought to uncover the feelings and attitudes of different groups of respondents: the drivers of licensed private hires and hackney carriages (referred to as taxi drivers), and members of the public (referred to as the public) and other stakeholders (Connected with Taxis Trade other than a driver, Member of a Group Representing Disabled People, Visitor (Business), Visitor (Leisure) and the Police). A survey was designed to explore opinions regarding security, authenticity, reliability and propensity to use taxis in permanent/removable signage scenarios.

### Approach

A total of 355 responses to the survey were received from the two respondent groups: 233 were received from the 937 taxi drivers invited to participate via a paper questionnaire mailed to their home address, providing a response rate of 25%. 111 responses were received from the public and 11 from other stakeholders, both groups accessed an online survey via the Council's website or via an email invitation to the online survey.

Essentially, the same set of questions/statements were asked of all participants. These were phrased slightly differently for the respondent groups to make them relevant and easy to understand for the participant. For example, members of the public were asked how much they agreed with the statement *I would be confident that I was entering a genuine, licensed taxi if it was fitted with permanent signage*, whereas for taxi drivers the format was *Members of the public would be confident that they were entering a genuine, licensed taxi if it was fitted with permanent signage*.

A sample of the free text comments has been included within this report to give an indication of the sentiment, opinion and feeling of respondents.

## Overall observations

The results indicate that the opinions of the members of the public were diametrically opposite to those of the taxi drivers for every aspect considered in the consultation. Public respondents feel more confident in all aspects of the consultation if signage is permanent as opposed to being removable. These views and opinions are not generally shared by the taxi driver respondents.

### Genuine licensed taxi/driver

95% of the public respondents said that they would be confident that they *were entering a genuine, licensed taxi if it was fitted with permanent signage* and only 24% said they would feel confident *if it*

was fitted with **removable** signage. In contrast, for taxi drivers the scores were 32% for **permanent** signage and 88% for **removable** signage.

When asked if they would be confident that the driver was licensed, 91% of the public respondents felt they would be if the taxi was fitted with **permanent** signage, whilst 20% felt they would if it was fitted with **removable** signage. Taxi drivers on the other hand returned 32% for **permanent** signage and 87% for **removable** signage.

*“To reduce the possibility of "fake taxis" in Crawley, keep permanent signage on taxis. Removable signage would inevitably lead to theft of the signs and ultimately an increase in unlicensed taxis operating using fake or stolen signage...”*

*“With use of removable signage you could get unlicensed people claiming they are a taxi but forgot to install their signage before starting the day. Older people and ladies could be left unsure.”*

### Insurance and maintenance

The results indicate that the views of the public respondents and taxi driver respondents are also in contrast to each other with regard to confidence that the vehicle is fully insured. 93% of the public respondents would be confident that the vehicle was fully insured if the taxi was fitted with **permanent** signage (29% for taxi drivers) but only 20% if it was fitted with **removable** signage (86% for taxi drivers).

When asked if they would be confident that the vehicle was properly maintained, 88% of the public respondents felt they would be if the taxi was fitted with **permanent** signage (28% for taxi drivers), but only 17% if it was fitted with **removable** signage (86% for taxi drivers).

*“...I have a friend who received life changing injuries back in the 90s when a "taxi" she was in jumped a red light, was hit by car coming other way – and the taxi driver had no insurance. It would be grossly irresponsible for the council not to ensure licence plate are secured to the vehicle so that the public can be confident the right checks have been done.”*

### Charged fairly and safety

The story is the same in response to the statement I would be confident that I was being charged fairly, where the public were 88% positive for **permanent** signage and 23% for **removable** signage, with taxi drivers 30% and 85% respectively.

94% of public respondents would feel safe if the taxi was fitted with **permanent** signage, 19% for **removable** signage. The opposite view was expressed by taxi drivers, 32% and 86% respectively.

*“Anyone can fit removable signage to any car and pretend to be a taxi. This is a backwards step. I would feel less safe and my daughter would be less safe if any car could put removable signs on it”*



### Propensity to use taxis

The difference of opinion between taxi drivers and the public was also present for the survey statement relating to whether *Members of the public would use taxis less often if they were fitted with **removable** signage*. Agreement was 79% amongst the public whereas only 17% of taxi drivers felt this way.

*“I would feel far more confident about permanent signage, whilst removable signage may not entirely stop me using a taxi, it would put a doubt in my mind as to the vehicle complying with necessary regulations.”*

### Vehicles being broken into or damaged

The primary focus of the survey was to understand the opinions of the public respondents and to understand what taxi drivers believe the public’s opinion to be. The results reveal how different the perceptions are when compared to the public’s feedback.

The free text comments, in response to the question *Are there any other comments you would like to make or answers you’ve given which you wish to develop or explain?* indicate that taxi drivers feel that there is an unacceptably high risk that their vehicles, displaying permanent signage, will be broken into or damaged when parked overnight. They feel that removable signage would alleviate this risk, saving them the expense of repairing damaged vehicles.

Of 99 comments made by taxi drivers, 39 were related to the theme *Removable signage would help keep our vehicles safe when not in use and be clear as to when we are / are not available for hire*.

For example:

*“I have had my car broken into on several occasions which I strongly believe is due to the door signage. This comes at a great cost to every driver who has had this happen to them.”*

*“Dear Sir / Madam. I am a private hire Gatwick driver I have been doing this 30 years, because I like what I do. Recently my car is been broken into 4 times during the night time because people see the txi plate e roof sign e automatic ally they think this cab have many left in it if my plate e sign was removable it wouldn't happen so please re design the car plates e sign so they can be removed when we are not working...”*

The free text comments give an indication of the strength of feeling and concerns of the taxi drivers that having permanent signage on their vehicles overnight makes them a target for vandalism and other crimes, specifically break-ins and theft of takings. Taxi drivers see having removable signage as the solution to the problem. They recognise the concerns that removable signage could be stolen with a number of the comments addressing the security of the signage.

*“Drivers will not be able to work without removable signage on their cars, they will have every incentive to keep the signage safe and secure, as they would their home keys, car keys and mobile phones...”*

It is also clear from both the quantitative and qualitative elements of the survey that whilst members of the public have shown empathy and understanding for the plight of taxi drivers, they are very much against removable signage. They express concern that removable signage would be too easy to remove and could be used by rogue drivers, raising issues of safety especially for vulnerable groups.

*“Whilst it is unfortunate that there is an increase of break ins I feel it unacceptable to make it easier for rogue taxi drivers to operate and put the public at risk.”*

*“While appreciating the concerns of taxi-owners about break-ins, I think permanent signage is preferable. Removable signage could all too easily be incorrectly used.”*

*“It is vital that disabled people have confidence that they are secure and safe when travelling by taxi. Having permanent signage is essential for this. Removable signage would allow too many opportunities for fraudulent use...”*

### Alternative solutions

Within the free text comments there were 21 replies relating to the theme *Look for an alternative solution and take a closer look at why there are so many break ins* in the **Comment Report**.

Suggestions were largely around more use of modern IT/smart phones/apps and also embracing the Uber model.

*“If all taxi companies in Crawley allowed us to use a smartphone app to book taxis, then this would remove any concerns about a taxi with removal signage not being vetted, insured etc... as the onus would be on the taxi company to supply qualified drivers / cars. The biggest concern is as you have outlined, security, and getting into a cab that is not legitimate but has removable signs.”*

*“As drivers, we all are in favour of having removable signs including plates and door signs. Nowadays, customers happily sit in Ubers which have no signage at all. Plus all companies operating send details via text to the customer with information about plate number registration number, car colour, license numbers so all these permanent signages are redundant...”*

*“The biggest I go by with taxi is that I get a text message before the taxi arrives telling me the registration of the taxi and the make. Also now you can track your taxi on your smartphone; which most people now own. Also, I look for the taxi driver to identify me by name. Without this I would be reluctant to get into a taxi. I do look for the taxi firm name on the taxi; but to be honest, I had no idea whether it was permanent or not until I done this survey.”*

Other suggestions, which are in a similar vein to giving thought to the Uber model, were around considering what other Councils do regarding the licensing and signage of taxis.

*“As a driver for 17 years I believe permanent signage is NOT needed on license vehicles as other councils dont feel the need to ensure this on their fleets. It wont effect members of the public using taxis with removeable signs as when they see the signs they know the vehicle is for hire. No signs it is not for hire. I am a driver who has had 7 windows smashed BECAUSE I have permanent signage.”*

*“Crawley taxi for no door sticker. It should be like other councils like Reigate and Banstead (Many other council)”*

There were also suggestions regarding the design or re-design of the signage to make it obvious that the vehicle is a genuine taxi when in use, but to be inconspicuous (but not removable) when not.

*“Perhaps a rethink on an optional alternative of the existing design of the signage that allows it to be highly visible when touting for business but almost inconspicuous when it is not may be sufficient for those drives who are concerned.”*

*“Removal signage could be attached inside windows to reduce the risk of it being stolen.”*

Questions were raised as to why cash was left in taxis overnight.

*“I understand that some, if not all, of the taxis broken in to were targeted because they had large amounts of cash in them. As part of your consultation process, I feel you should ask the drivers why they feel the need to leave cash in their vehicles overnight...”*

*“...The responsibility lies with driver to take valuables out when they park up for the night/day...”*

There was a pertinent comment made by a stakeholder (due to the small sample size, to preserve confidentiality we are unable to disclose the writer’s association with the consultation, but this group includes those Connected with Taxis Trade other than a driver, Members of a Group Representing Disabled People, Visitors and the Police).

*“There would be an increased safeguarding risk if taxis had removable signs. Not only around insurance but taxis with signs that are transferrable increases the risk of them being stolen and used by criminals within organised crime gangs around drugs related crime or placing those who are vulnerable at risk of serious sexual offences etc. On a scale of threat harm and risk, using transferrable signs vs permanent signs is much greater risk of harm to vulnerable people or criminal exploitation, as opposed to the harm and risk to individual owners associated with theft. As such this is not something I*

would support. Instead I would encourage owners taking more responsibility around keeping loose change or money in the taxi (especially if visible). It was shown that this reduced the theft during the recent summer months.”

One comment raised the requirement for Crawley Borough Council to be mindful of its legal requirements.

“Section 41 of the Town Police Clauses Act of 1847 states "the number of such licence which shall correspond with the number to be painted or marked on the plates to be fixed on such carriage, together with such other particulars as the commissioners think fit" the definition of the word FIXED is as follows: "fastened securely in position". If the council permit licensed hackney carriages to have non permanently fixed licence plates they are permitting the licensed person to breach the primary legislation. The council would be acting in a ultra vires manner by exceeding their authority by positively breaching the primary legislation and permitting breach of the law. Primary purpose of licensing is public safety and allowing non permanent plates will put the public at risk.”

## Conclusions

The results of the consultation have clearly shown that the views and opinions of taxi drivers and the public contrast with each other. As one taxi driver wrote: *“something must be done to safe guard crawley taxis”*, whilst a member of the public wrote: *“Problem is that whilst reducing one crime, e.g. thefts from taxis with permanent signage, other crimes might increase, e.g. thefts of removable signage, unscrupulous people just fitting bogus signage to their vehicle”*

The results give an indication of the strength of feeling for the taxi drivers in particular. Although the taxi drivers feel that removable signage will resolve the issues that they are facing with regard to damage to and break-in of their vehicles, the results also indicate that removable signage may have an impact on their income as the public report feeling less likely to use a taxi with removable signage.

The opinions of the public respondents show that the solution to the issues faced by the taxi drivers is unlikely to lie in implementing removable signage unless there is further consideration of how to solve the issues relating to the public’s concerns of ensuring that only licensed taxi drivers are operating with the removable signage.

The alternatives suggested within the free text comments offer potential solutions that could be considered in consultation with the taxi drivers.

Prepared by  
Ralph Sutcliffe  
The Survey Initiative

**Crawley Prevention Team****22<sup>nd</sup> January 2019**

Dear Crawley Borough Council Licensing Team

**Recent Consultation on Taxi Vehicle Signage**

Please accept this formal feedback from the local police team on the content and implications of the Taxi Vehicle Signage consultation.

We are committed to catching criminals and making Crawley a safer place to live. The taxi licensing controls and information we receive from the council plays a huge part in enabling us to do that. As such we would have serious concerns if the Licenced Taxi fleet in Crawley was predicated on removable identification. The reasons for this position are detailed below:

We have conducted a number of operations in partnership in 2018 and on every occasion found vehicles that have been reported for breaches of legislation. This is despite the knowledge that the vehicle may be routinely or randomly inspected. The very real risk is that the identification will be used on unofficial vehicles or vehicles in a poor state of repair particularly if the primary car becomes unserviceable.

There is viable intelligence that organised criminals are utilising the Crawley taxi fleet for drugs dealing and our ability to police this is predicated on our right to inspect taxis. This would be hampered by the vehicle signage being removed when drugs or illicit materials or persons were being carried.

We also know that young women on poor incomes disproportionately use taxi's and believe there is a risk of harm for this cohort. Many of our campaigns around personal safety have focussed on ensuring that the taxi is definitely licensed and appropriately identifiable. Removable signage makes fake insignia so much easier for a determined offender to replicate.

In the last 12 months we had 330 direct calls to police about incidents that involved taxis in central Crawley. Calls ranged from Road Traffic Collisions, to assaults on drivers so we consider this sector as a significant demand for policing and as a result needs to be visibly regulated for protection of the public and the drivers.

Finally we suspect that the added risks to individuals highlighted above and frustration of police powers will also be relevant to our Council enforcement partners whom we rely on to conduct regular checks independently of the police.

For any questions or queries you may have, you can also contact the Crawley Prevention Inspector Simon Starns on **087901513543**

Thank you for your help. For more information about the work of Sussex Police and links to the useful advice on crime prevention we currently use, please see our website **[www.sussex.police.uk](http://www.sussex.police.uk)**

Yours sincerely,



**Sussex Police**  
Serving Sussex

[www.sussex.police.uk](http://www.sussex.police.uk)

**Inspector Simon Starns CS610**

Prevention Inspector; Crawley | West Sussex Division | Sussex Police

Crawley Police Station | Northgate Avenue | Crawley | RH10 8BF

Tel No: 101 Sussex / ext 531377

Mobile No: 07901513543

A message from Sussex Police

**APPENDIX B**

Victoria Wise  
Community Services Manager  
Crawley Borough Council  
Town Hall  
The Boulevard  
Crawley  
West Sussex  
RH10 1UZ

25<sup>th</sup> January 2019

**West Sussex Safeguarding Children Board response to Crawley Borough Council's consultation on taxi vehicle signage**

Dear Victoria

The West Sussex Safeguarding Children Board (WSSCB) is responding to Crawley Borough Council's consultation on possible changes to how licensed vehicles (taxis) display their signage. The consultation is in response to local taxi drivers' disquiet about vehicle security.

Safeguarding children across our partnership must be a central consideration to our collective and individual decision making processes. In this instance the WSSCB believe that the proposed changes to improve security of licensed vehicles may raise issues for the protection of vulnerable children and young people.

Examples of how safety could be compromised include scenarios where signage could be lost, stolen, or fraudulently used on other vehicles, either by sharing or copying. This could place vulnerable children and young people at risk of getting into cars with unknown occupants.

This proposed change could also potentially lead to difficulties in tracing vehicles if a crime was committed.

For these reasons the Board would want to be reassured that the implications for safeguarding children and young people have been fully explored in any decision.

Yours Sincerely



Lesley Walker  
Independent Chair, West Sussex Safeguarding Children Board



West Sussex Safeguarding Adults Board  
Post Point 0.4, Centenary House  
Durrington Lane, Worthing  
West Sussex, BN13 2QB

Email:  
SafeguardingAdultsBoard@westsussex.gov.uk

Victoria Wise  
Community Services Manager  
Crawley Borough Council  
Town Hall  
The Boulevard  
Crawley  
West Sussex  
RH10 1UZ

8 February 2019

**West Sussex Safeguarding Adults Board response to Crawley Borough Council's consultation on taxi vehicle signage**

Dear Victoria,

Apologies for the delay in responding.

The SAB would be concerned of the potential increased risk to vulnerable adults with the proposed changes. This is particularly since signage could be lost, stolen, used by others fraudulently and be hard to trace once lost which, would then create difficulties tracing vehicles if harm occurred/a crime was committed.

Crime prevention and education for drivers (including the risk to those who are vulnerable being elevated by the proposed changes) would be a first good step to support drivers.

Public vehicle services are featured and therefore, been evidenced in relation to crime against those adults who are vulnerable. There is, therefore, clear evidence that safety mechanisms to protect those who are vulnerable, including signage use, is considered to the Safeguarding Adults Board, to be very important in preventing/reducing the risk of harm/crime.

The Board would therefore want assurance that the impact for vulnerable adults has been considered with any decision going forward.

Kind regards,

A handwritten signature in black ink, appearing to be 'Annie Callanan', is located below the text 'Kind regards,'.

Annie Callanan  
Independent Chair, Safeguarding Adults Board