

TRAFFORD COUNCIL

Report to: Council
Date: 24th November 2021
Report for: Decision
Report of: Executive Member for Environmental and Regulatory Services

Report Title

**Greater Manchester Minimum Licensing Standards for Taxi and Private Hire
Stage 2 - Vehicles**

Summary

To set out the proposed Greater Manchester Minimum Licensing Standards (MLS) for Taxi and Private Hire. This report represents Stage Two of the Standards which relate to Vehicles. Stage One relates to Drivers, Operators and Local Authorities and these proposals were reported to Executive in September. This report sets out the responses to the recent public and trade consultation for Stage Two, and outlines the proposed standards, policies and procedures which will be considered by Council on 24th November 2021.

Recommendations

It is recommended that the Council note the recommendations of the Executive on the 22nd November and:

1. Note the feedback from the recent public and trade consultation on the proposed Greater Manchester Minimum Licensing Standards for Taxi and Private Hire.
2. Approve that:
 - wheel chair access for licensed hackney carriage vehicles is applied as per Standard 1 in Table A of this report.
 - age limits for vehicles are applied as per Standard 2 in Table A of this report.

- emission standards for vehicles are applied as per Standard 3 in Table A of this report
- the standards for vehicle colour are applied as per Standard 4 in Table A of this report.
- the standards for vehicle colour are applied as per Standard 4 in Table A of this report
- the standard for livery for vehicles is applied as per Standard 5 in Table A of this report.
- the standards for vehicle testing are applied as per Standard 6 in Table A of this report
- the provision of CCTV in vehicles is applied as per Standard 7 in Table A of this report.
- the standards for Executive hire are applied as per Standard 8 in Table A of this report.
- the standards for Executive hire are applied as per Standard 8 in Table A of this report.
- vehicle design standards are applied as per Standard 9 in Table A of this report.
- vehicle conditions are applied as per Appendix 2 of this report and Standard 10 in Table A of this report.
- the implementation dates for standards and conditions contained within this report within Table A are applied

3. Note the Equalities Impact Assessment, as set out at **Appendix 3**.

Contact person for access to background papers and further information:

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Email: Adrian.fisher@trafford.gov.uk

Background Papers: None

Relationship to Policy Framework/Corporate Priorities	The Greater Manchester Minimum Licensing Standards for Taxi and Private Hire align closely with our priorities on Health & Well-being and Green & Connected Places.
Relationship to GM Policy or Strategy Framework	The Greater Manchester Minimum Licensing Standards for Taxi and Private Hire is a GM wide initiative, led by the Greater Manchester Licensing Managers Network on behalf of the ten districts.
Financial	Revenue and Capital: The Licensing Regime is a self-funded service. Any additional resource implications will be addressed through the annual fee review.
Legal Implications:	The policy changes recommended, if agreed by the Council, will be implemented and form the basis on which decisions are made on applications received by the Council.
Equality/Diversity Implications	Equality Impact Assessment is provided at Appendix 3 .
Sustainability Implications	The MLS supports the GM Clean Air Plan which is consistent with and will support delivery of the Council's Carbon Neutral Action Plan 2020 and the aims and objectives relating to the Council's Climate Emergency declaration.
Carbon Reduction	The MLS supports the GM Clean Air Plan which is a place-based solution to tackle roadside NO ₂ which will have a positive impact on carbon.
Resource Implications e.g., Staffing / ICT / Assets	There are no implications for ICT and Assets as a consequence of this report. The staff time implications have been identified and processes will be amended.
Risk Management Implications	Risk to delivery of the interventions detailed within the new policies and procedures will be monitored and updated as required.
Health & Wellbeing Implications	The basic rationale of the MLS is that it will improve standards of safety for the travelling public and the improvements to the vehicle fleet will support the objectives of the Clean Air Plan in that it will

	improve health and wellbeing across the borough through improving air quality
Health and Safety Implications	As set out above the new standards have public safety as a core objective.

1. Background

- 1.1 There are over 1440 licensed drivers, over 840 private vehicle licenses, 117 hackney carriage licenses and 25 operators in Trafford. An efficient and safe taxi service has a significant contribution to the well-being and economy of Trafford. Minimum Licensing Standards for Greater Manchester raises the profile of the service across the region and aims to encourage the trust and appreciation of GM registered taxis.
- 1.2 This report outlines the final recommendations for the Standards for Vehicles at Stage 2 of the project. These same standards will be considered by all ten of the Greater Manchester Authorities. The standards have been subject to extensive public and trade consultation in 2020.
- 1.3 The recommendations were finalised following GM Licensing Managers considering all the consultation feedback both at a GM and district level and further to additional discussions held during consultation summary briefings presented at district level to Members and trade representatives at the end of June 2021. Additional detailed discussions also took place with Members of District Licensing Committees to help officers finalise a set of recommended Standards at Stage 2.

2 Introduction

- 2.1 Around 2,000 hackney vehicles, approximately 11,500 private hire vehicles and upwards of 18,600 drivers are currently licensed across the ten Greater Manchester Authorities. Whilst there are many similarities in terms of policy standards and licence conditions, there are also significant differences, particularly when it comes to policies relating to the licensing of vehicles, the calculation of licensing fees and the approach to proactive compliance.
- 2.2 In 2018, Greater Manchester's ten local authorities agreed to collectively develop, approve and implement a common set of minimum licensing standards (MLS) for taxi and private hire services.
- 2.3 At that time, the primary driver for this work was to ensure public safety and protection, but vehicle age and emission standards in the context of the Clean Air and the decarbonisation agendas are now also major considerations. In addition, by establishing standards around common vehicle specifications, MLS is an important mechanism that permits the systematic improvements to taxi and private hire service across Greater Manchester and their visibility.

- 2.4 This approach stands to benefit drivers and the trade more widely as public confidence in a well-regulated and locally licensed taxi and private hire sector grows and will contribute directly to better air quality and lower carbon emissions. By establishing and implementing Greater Manchester-wide minimum licensing standards, we can help to ensure that all residents and visitors see these services as safe and reliable, and preferable to those not licensed by Greater Manchester local authorities.
- 2.5 This collaborative approach seeks to establish a basic and common minimum in key areas, whilst allowing Districts to exceed these minimums where they consider this to be appropriate. As licensing is a local authority regulatory function, the Standards have been devised by the GM Licensing Managers Network who work in partnership across Greater Manchester to drive innovation, partnership and change agendas. MLS is also related to other key Greater Manchester priorities, most notably the GM Clean Air Plan and decarbonisation strategies, hence TfGM has been supporting the development of MLS ensuring it complements wider objectives.
- 2.6 Ultimately the collaborative approach that the MLS represents will help achieve the vision of Taxis and Private Hire as a crucial part of the overall transport offer; a strong, professional and healthy taxi sector that can deliver safe and high-quality services to residents and visitors across the whole of Greater Manchester. The proposed MLS, together with funding from the GM Clean Air Plan, will help deliver improved safety, customer focus, higher environmental standards and accessibility.
- 2.7 Local reform through MLS can deliver real improvements across Greater Manchester, but the growth of out-of-area operation undermines local licensing, and gives cause for real concern that vehicles and drivers licensed outside our conurbation (but carrying Greater Manchester residents and visitors) may not be regulated to the high standards we expect. In this regard, it is important to recognise that Government reform of taxi and private hire legislation and regulation remains as critical as ever. Further work to press the case to Ministers for reform is a key part of the overall approach.

3 Minimum Licensing Standards

- 3.1 The GM MLS were ready to be consulted on when the Department for Transport published statutory guidance for taxi and private hire licensing authorities in July 2020. The MLS project has had regard for that guidance, which largely mirrors what is already proposed across GM, and reference is made in the report where appropriate.
- 3.2 It should be noted however that the statutory guidance firmly highlights the past failings of licensing regimes in putting public safety at the forefront of their policies and procedures. The guidance asks authorities to have due regard to reviewing its policies thoroughly and considering good practice in the

implementation of robust standards that address the safeguarding of the public and the potential impact of failings in this area.

3.3 To that end, it is important to recognise that Taxis and Private Hire services are unique in the potential opportunity and risks they present to the travelling public. In no other mode of public transport are passengers as vulnerable or at risk to those who have mal intent; risks that are increased for children and vulnerable adults. The sector itself is also vulnerable to being used for criminal activity such as child sexual exploitation, county lines and other drug dealing/money laundering activity.

3.4 The Casey Report (2015) also made it clear that weak and ineffective arrangements for taxi and private hire licensing had left children and the public at risk:

The safety of the public should be the uppermost concern of any licensing and enforcement regime: when determining policy, setting standards and deciding how they will be enforced. This is nowhere more important than in taxi licensing where sometimes vulnerable people are unaccompanied in a car with a stranger¹

3.5 It is with public safety as our primary duty in mind as Licensing Authorities that the MLS are proposed.

Overall, the GM approach looks to provide:

- the public with safe, visible, accessible and high-quality hackney and private hire services
- the hackney and private hire trades with clarity over what the required standards will be over the long term, and through the GM Clean Air Plan, with unprecedented investment to help renew the fleet
- local authorities with the continued regulatory role in relation to driver, vehicle and operator licensing whilst retaining scope to exceed the MLS as agreed locally by elected members

3.6 The MLS are divided into four distinct sections as follows:

Licensed Drivers; including criminal records checks, medical examinations, local knowledge test, English language requirements, driver training including driving proficiency and common licence conditions.

Licensed vehicles; including vehicle emissions, vehicle ages, common vehicle colour and livery, vehicle testing, CCTV, Executive Hire and vehicle design common licence conditions

¹ Report of Inspection of Rotherham Metropolitan Borough Council, February 2015

Licensed private hire operators; including common licence conditions, DBS checks for operators and staff every year, fit and proper criteria for operator applications and common licence conditions.

Local Authority Standards: including application deadlines and targets, GM Enforcement Policy, Licensing Fee Framework, annual councillor training requirements and Officer delegations.

- 3.7 As Members will know, due to the breadth of proposals to be considered, the final Standards recommendations have been split into two Stages. This Stage 2 report seeks to provide Members with detailed consultation feedback and officer recommendations on the Vehicle Standard proposals.

4 Link to the Clean Air Plan

- 4.1 An important element of the overall approach is to provide clarity and long term certainty for vehicle owners, so that they are able to plan the upgrade of their vehicles in a way that meets and contributes positively to GM's Air Quality, Carbon and other environmental obligations.

- 4.2 This will also help ensure that applicants to the Clean Taxi Fund, secured as part of the GM Clean Air Plan, will have a clear understanding of what locally licensed vehicle requirements will be over the longer term, for example in terms of emissions, age and other criteria, so they can determine the best use of the available funds given their specific circumstances. Note that only those vehicle owners who have licensed their vehicle with one of the GM local licensing authorities prior to 3 December 2020 will be eligible for Clean Taxi Funds to support upgrade.

5 The Consultation

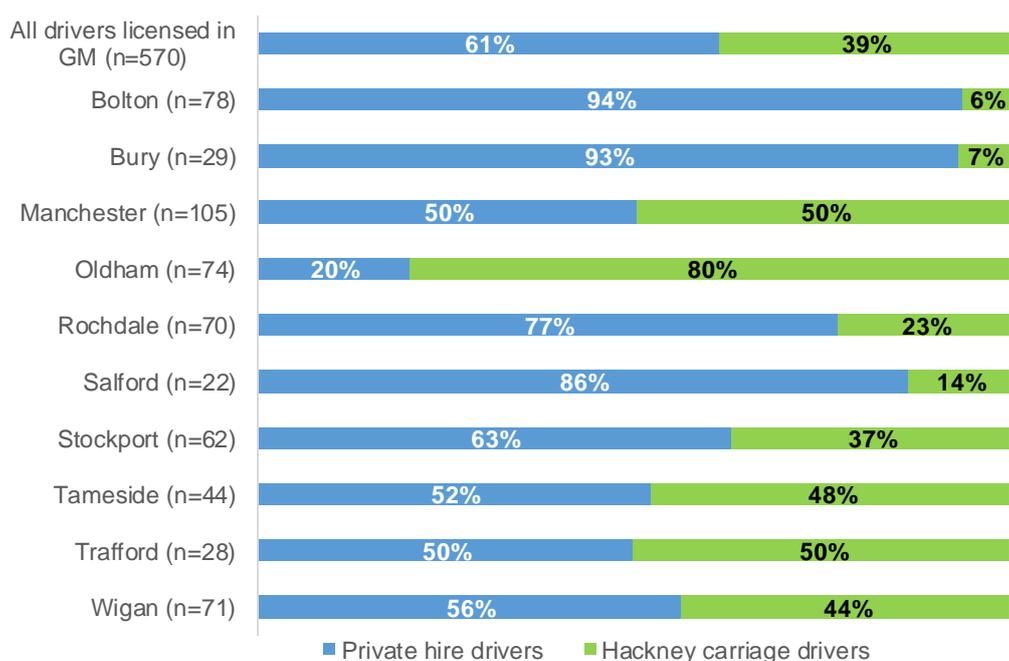
- 5.1 Members have already been provided with a summary of the GM wide public consultation that took place between 8 October and 3 December 2020 in the Stage 1 Report.

- 5.2 For a full breakdown of demographics and to view the complete GM consultation report please visit www.gmtaxistandards.com

- 5.3 The response breakdown for Trafford was as follows:

	Questionnaire*	Letter / email	Total	%
General public	83	0	83	70%
Hackney drivers	14	0	14	12%
Private hire vehicle drivers	14	0	14	12%
Private hire operators	5	0	5	4%
Vehicle leasing companies	1	0	1	1%
Businesses	1	0	1	1%
Representatives	0	0	0	0%
Base	118	0	118	100%

5.4 The following table provides a comparison of driver trade response levels across each of the 10 districts (with numbers on the left column and split shown between Hackney and Private Hire):



5.5 As Members will see, the response rates were generally low across the board, particularly from members of the trade. This isn't uncommon compared to Officers reflections on previous engagement with the trade. At a GM level, there are enough responses to draw conclusions, however, the number of responses in some sub-groups at district level is small and as such, the data should be treated with caution.

5.6 Across GM there were monthly meetings with trade and union representatives to update and reflect on the work being undertaken. Twelve briefings sessions were held for representatives at GM level in MLS and clean air. There were also

twenty five briefing sessions for all trade sectors affected by clean air and at local level a number of local briefings were held and various communication methods used to notify all affected that consultation was underway including emails, newsletters and contact via operator bases.

5.7 It should be noted that the findings of the in-depth interviews and focus groups have been included alongside the findings from the questionnaire, expanding on the findings to provide deeper insight and examples in commentary form. The in-depth interviews enabled those who may be specifically impacted to provide additional detail and specific examples e.g. from a specific business sector.

5.8 The Consultation document provided detail on 10 separate vehicle standard proposals and asked the following questions:

1. To what extent do you agree or disagree with the proposed minimum licensing standards for Vehicles in Greater Manchester?
2. Please use this space to provide any comments relating to the proposals for the minimum licensed standards for Vehicles

For question 1 on each section, response options were:

- strongly agree
- agree
- neither agree or disagree
- disagree
- strongly disagree
- don't know

Respondents were then asked a series of other questions to gain further insight into their views on implementation and impact of the proposals, including free text responses to gain more qualitative feedback.

5.9 Copies of the Consultation Questionnaire and accompanying information booklet are available at www.gmtaxistandards.com

6 SUMMARY FINDINGS

6.1 The following paragraphs provide summaries of the consultation responses at a GM level. District specific comments and feedback on individual standards are included within **Appendix 1** to the report.

6.2 Vehicle Standards

- High level of agreement from members of the public (88%)

- Greater overall level of disagreement from Trade (Hackney 69% and PH 63%)
- Trade mostly commented on age policy proposals; disagreeing
- Concerns raised about the charging infrastructure for electric vehicles
- Public liked the proposal of CCTV but concerns raised by the Trade with regards to cost and data privacy
- High number of comments and disagreement across both public and trade with regards to colour policy proposals

6.3 Drivers from an Asian background were more likely to disagree with the vehicle standards than hackney / PHV drivers from a White British background (70% compared to 58%). Drivers in Bolton (88%), Oldham (91%) and Rochdale (71%) did not agree with the proposals.

6.4 Drivers who rent or lease their vehicle were more likely to agree with the proposed vehicle standards compared to those who own their vehicle (37% and 22% respectively), likely due to the lower likelihood of significant direct financial impact, however in both cases more drivers disagree than agree with the proposed vehicle standards.

6.5 The following table shows the number of total comments made (GM level) for each standard category by respondent type:

Category	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
General Comments	95	11	32	6	3	1	3
Vehicle Emissions	39	20	10	5	1	2	4
Age of Vehicle	82	78	84	8	1	1	10
Vehicle Colour	214	23	95	12	2	1	13
Accessible vehicles	54	38	1	1	1	0	4
Vehicle Livery	62	7	47	6	1	3	11
Vehicle Maintenance and Testing	44	20	31	4	0	0	2
CCTV	83	16	51	6	1	3	8
Executive Hire and specialist vehicles	8	0	5	2	0	0	1
Vehicle Design	9	4	0	0	0	0	1
Vehicle Conditions	24	1	3	2	0	0	0
Base	449	114	187	24	7	6	20
Proportion of respondent type	45%	49%	53%	75%	37%	60%	56%

6.6 Some of the general comments about the vehicle standards as a whole are as follows:

“Really impressed with the standards I hope it is brought in sooner rather than later.” (Public, age 35-44, Trafford)

“All of these are important” (Public, age 55-64, Bury)

“These measures will make all passengers safer.” (Public, age 35-44, Tameside)

“I feel this is a policy that is being rushed through without full thought of the cost and consequences to the self-employed sole trader who has been badly affected by Covid 19.” (Hackney Driver, Tameside)

“Standardising of vehicles leads to a higher demand for a smaller range of vehicles which, in turn, increases initial purchase cost and ongoing maintenance costs (due to high parts demand). The vast majority of private hire drivers are living close to minimum wage and any increasing in their running cost will be pushed directly onto the customers. Resulting in the continuing demise of the industry and customers turning to subsidised transport systems.” (Public, age 25-34, Wigan)

“I believe that wanting completely emission-free taxis by 2028 is a goal that should be circumstantial. Most drivers use these vehicles for their private life too and electric vehicles must have the range and practicality to serve both needs before making it mandatory to have an emission-free vehicle.” (PHV Driver, Stockport)

7 Evaluation of proposals and reasons for recommendations

7.1 The detail of the proposals, current Trafford Standards, consultation feedback on the proposals at both a Greater Manchester and Trafford level and consideration of that feedback are given in **Appendix 1 - Vehicle Standards**. Table A gives a summary of the proposals. Any standard that is contained within the Department for Transport’s Statutory Guidance is highlighted with an asterisk*.

Table A

<p>Standard 1 Accessible Hackney Carriages</p>	<p>To retain the Council’s current standard that all licensed Hackney Vehicles be wheel chair accessible (WAV).</p> <p>To defer the decision on side/rear loading at this time as the consultation response on this specific point was particularly low.</p>
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<p>Standard 2 Vehicle Age</p>	<p>To implement the following as the minimum standard:</p> <ul style="list-style-type: none"> • PHV – under 5 years on to fleet and 10 years off • PHV WAV – under 7 years on to fleet and 15 years off • Purpose built HCV– under 7 on to fleet and 15 years off • Air quality metrics and impacts and testing data to be reviewed over the next 2-3 years by the Licensing Network and risks or proposed amendments brought back to Members as necessary • To remove the exceptional condition (age) test. <p>That the standard be implemented for new to licence vehicles from the 1st January 2022; and that the existing fleet is compliant with the policy standard by 1 April 2024. This will mean that from the 1st April 2023 a vehicle licence will not be renewed if the vehicle does not meet this standard.</p>
<p>Standard 3 Vehicle Emissions</p>	<p>To require licensed vehicles to be compliant with the current Euro emissions standard as follows:</p> <ul style="list-style-type: none"> • For new to licence vehicles from the 1st January 2022; and for the existing fleet vehicles are compliant with the policy standard by 1 April 2024.* This will mean that from the 1st April 2023 a vehicle licence will not be renewed if the vehicle does not meet this standard. • To note the strong ambition to move existing fleets to ZEC as soon as possible <p>*vehicle must also be compliant with the age policy</p>
<p>Standard 4 Vehicle Colour</p>	<p>To retain the Council’s current policy standard that all Hackney Carriage Vehicles should be black in colour with the following exceptions:</p> <ul style="list-style-type: none"> • London Style Taxis may be of the manufacturer’s colour • Advertising is allowed on London Style Taxis <p>Not to recommend a specific colour requirement for Private Hire vehicles at this stage. A piece of research is to be commissioned to further consider the risks/benefits of this policy. However, single colour for private hire vehicles remains an aspiration of the MLS programme.</p>
<p>Standard 5</p>	<p>To require that all vehicles will:</p>

<p>Vehicle Livery</p>	<ul style="list-style-type: none"> • display permanently affixed licence plates on the front and back of the vehicle • display a 'GM approved' sticker on the bonnet <p>To require that all PHVs will:</p> <ul style="list-style-type: none"> • only display stickers provided by the licensing authority (at cost) which will bear the operator name, 'advanced bookings only', 'not insured unless pre-booked' and the licensing authority logo • display those stickers on both rear side doors and the back window • not use any magnetic stickers <p>*Specified design/dimensions and placement on vehicles to be provided</p> <p>That the implementation date for this standard be delegated to the Corporate Director of Place in consultation with the Executive Member for Environment and Regulatory Services with consideration of the need to procure the necessary supplier/materials; to communicate the changes to the trade; and to ensure that processes are in place for a robust implementation of the standard.</p>
<p>Standard 6 Vehicle Testing</p>	<p>To retain Trafford's current standard of requiring vehicles to be tested on first application and every six months thereafter, irrespective of the age of the vehicle. All vehicles to be tested against the DVSA MOT standard plus Trafford's Vehicle Compliance Manual.</p>
<p>Standard 7 CCTV</p>	<p>To approve the drafting of a CCTV policy for further consideration and consultation</p>
<p>Standard 8 Executive Hire</p>	<p>The retain Trafford's current standards including the following conditions:</p> <ul style="list-style-type: none"> • Bookings to be confirmed by written contract • Payments made in advance of the journey or by invoice afterwards • Stipulation on the types of vehicles to be licensed • Dress code • Business plan shared with licensing authority • Vehicles not to be fitted with data heads, radios or meters • Exemptions from plates and door signs only to be given when used exclusively for executive hire

	The standard to apply to new to licence and existing fleet from 1 st January 2022
Standard 9 Vehicle Design	<p>The following standards will apply:</p> <ul style="list-style-type: none"> • all vehicles conform to the M1 standard (any modified vehicle at M2 standard must have an appropriate test to ensure conformity with single vehicle type approval) • No retrofitting of engines into older vehicles will be allowed. LPG conversions will be accepted • Where retrofit emissions technology is installed it shall be approved as part of the Clean Vehicle Retrofit Accreditation Scheme (CVRAS) • Specification for window tints will be: <ul style="list-style-type: none"> ○ Front windscreen – min. 75% light transmission ○ Front side door glass – min. 70% light transmission ○ Remaining glass or rear side windows (exc. Rear window) - allow manufacturer's tint to a minimum 20% light transmission • No vehicle first being licensed will have been written off in any category and will not be renewed (if previously written off) after 1 April 2022. • No roof signs permitted on PHVs • No advertising other than Council approved signage on PHVs • To defer the decision on swivel seats at this time as the consultation response on this specific point was particularly low. <p>The standards to apply to new to licence and existing fleet from 1st January 2022 with the exception of written off vehicles which will apply from 1st April 2022.</p>
Standard 10 Vehicle Conditions	<p>A set of proposed conditions for Hackney Carriage and Private Hire Vehicles are set out at Appendix 2.</p> <p>To implement the standard as proposed with the addition of the DBS requirement for vehicle proprietors who are not licensed drivers.</p> <p>The standard to apply to new to licence vehicles from 1st January 2022; and for existing fleet on renewal of the licence.</p>

8 Equality Impact Assessment

- 8.1 The Equality Impact Assessment (EIA) showed that there were both positive and negative impacts of the proposals. The main positives are that this provides for greater protection for vulnerable people from harm and should also increase the accessibility of the fleet for disabled persons. The contrary issues are that the higher standards may make access to becoming a driver more costly and therefore may reduce the fleet size and therefore mean that there are less taxis available and people may be more tempted to use non licensed vehicles. There are two ways that this impact can be lessened; namely by ensuring that the drivers have adequate time to adjust to the new standards and also that we publicise the benefits of taking a Trafford licensed vehicle.

9 Timescales for Implementation

- 9.1 It is recommended that Council approves the implementation dates detailed in this report.

10 Conclusion

- 10.1 The 'golden thread' of licensing is that of public protection. We have seen from the consultation that the public are overwhelmingly in support of the additional safeguards and protection this project can deliver. As well as the local policy strengthening that minimum licensing standards will bring across Greater Manchester it delivers on the implementation of the statutory standards on safeguarding that the Government have introduced.
- 10.2 The vision of Greater Manchester is to continue to work closely together, influence policy change and support the licensed trade by delivering on its promise to provide financial support to move to greener vehicles. This is the start of a journey to continue to deliver excellence in licensing regulation in Greater Manchester. However, we cannot underestimate the challenges the trade continues to face and our continued support for them, and the public, in delivering safe journeys in safe licensed vehicles, driven by safe licensed drivers is essential. We will continue to work with the hackney and private hire trade to provide that ever important support and guidance whilst ensuring that public protection is at the forefront of our considerations.

11 NEXT STEPS

11.1 That the Council approves the standards as detailed within this report.

12 OPTIONS

12.1 The Council could decide to not implement the MLS. This would mean that the opportunities for a safer taxi service in Trafford, which are outlined in the report, are missed.

13 REASONS FOR RECOMMENDATIONS

13.1 The primary driver for this work was to ensure public safety and protection, and to improve vehicle emission standards in the context of the Clean Air and the decarbonisation agendas. In addition, by establishing standards around common vehicle specifications, MLS is an important mechanism that permits the systematic improvements to taxi and private hire service across Greater Manchester and their visibility.

13.2 The adoption of these policies stands to benefit drivers and the trade more widely as public confidence in a well-regulated and locally licensed taxi and private hire sector grows; they will also contribute directly to better air quality and lower carbon emissions. By establishing and implementing Greater Manchester-wide minimum licensing standards, we can help to ensure that all residents and visitors see these services as safe and reliable, and preferable to those not licensed by Greater Manchester local authorities.

14 APPENDIX 1 – Vehicle Standards

14.1 Attached as a supplementary paper.

15 APPENDIX 2 – Vehicle Conditions

14.1 Attached as a supplementary paper.

15 APPENDIX 3 - Equality Impact Assessment

15.1 Attached as a supplementary paper

Key Decision (as defined in the Constitution): No

If Key Decision, has 28-day notice been given? N/A

Finance Officer Clearance *PC*

Legal Officer Clearance *SL*

CORPORATEDIRECTOR'S SIGNATURE

A handwritten signature in black ink, consisting of a stylized, cursive name followed by a horizontal flourish.

To confirm that the Financial and Legal Implications have been considered and the Executive Member has cleared the report.