

# Public Document Pack



**TRAFFORD  
COUNCIL**

## **AGENDA PAPERS FOR EXECUTIVE MEETING**

**Date: Monday, 22 November 2021**

**Time: 6.30 p.m.**

**Place: Council Chamber, Trafford Town Hall, Talbot Road, Stretford M32 0TH**

**PLEASE NOTE: Owing to COVID-19 precautions, attendance for those who are not Elected Members is by prior registration only. A link to the meeting broadcast can be found at:**

<https://www.youtube.com/user/traffordcouncil/videos>

<b>A G E N D A</b>	<b>PART I</b>	<b>Pages</b>
<b>1. ATTENDANCES</b>		
To note attendances, including officers, and any apologies for absence.		
<b>2. QUESTIONS FROM MEMBERS OF THE PUBLIC</b>		
A maximum of 15 minutes will be allocated to public questions submitted in writing to Democratic Services ( <a href="mailto:democratic.services@trafford.gov.uk">democratic.services@trafford.gov.uk</a> ) by 4 p.m. on the working day prior to the meeting. Questions must be relevant to items appearing on the agenda and will be submitted in the order in which they were received.		
<b>3. DECLARATIONS OF INTEREST</b>		
Members to give notice of any interest and the nature of that interest relating to any item on the agenda in accordance with the adopted Code of Conduct.		
<b>4. MINUTES</b>		<b>1 - 22</b>
To receive and, if so determined, to approve as a correct record the Minutes of the Meetings held on:  27 <sup>th</sup> September 2021 11 <sup>th</sup> October 2021 (Budget Proposals) 25 <sup>th</sup> October 2021.		

5. **MATTERS FROM COUNCIL OR OVERVIEW AND SCRUTINY COMMITTEES (IF ANY)**
- To consider any matters referred by the Council or by the Overview and Scrutiny Committees.
6. **CORPORATE PLAN REFRESH 2021/24** 23 - 64
- To consider a report of the Executive Member for COVID-19 Recovery and Reform.  
[PLEASE NOTE: The Corporate Plan Refresh brochure will be circulated under separate cover.]
7. **ELECTRIC VEHICLE (EV) CHARGING POINTS IN TRAFFORD - UPDATE REPORT** 65 - 80
- To consider a report of the Executive Member for Environmental and Regulatory Services.
8. **GAMBLING ACT 2005 - STATEMENT OF GAMBLING PRINCIPLES 2022-2025** 81 - 164
- To consider a report of the Executive Member for Environmental and Regulatory Services, for information and recommendation to Council.
9. **GREATER MANCHESTER MINIMUM LICENSING STANDARDS FOR TAXI AND PRIVATE HIRE STAGE 2 - VEHICLES** 165 - 258
- To consider a report of the Executive Member for Environmental and Regulatory Services, for information and recommendation to Council.
10. **GM VCSE ACCORD** 259 - 284
- To consider a report of the Executive Member for Communities and Partnerships.
11. **THE CARER CONFIDENT QUALITY STANDARD** 285 - 292
- To consider a report of the Executive Member for Health, Wellbeing and Equalities.
12. **BUDGET MONITORING 2021/22 - PERIOD 6 (APRIL TO SEPTEMBER 2021)** 293 - 322
- To consider a report of the Executive Member for Finance and Governance and the Director of Finance and Systems.

**13. URGENT BUSINESS (IF ANY)**

Any other item or items which by reason of:-

- (a) Regulation 11 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, the Chairman of the meeting, with the agreement of the relevant Overview and Scrutiny Committee Chairman, is of the opinion should be considered at this meeting as a matter of urgency as it relates to a key decision; or
- (b) special circumstances (to be specified) the Chairman of the meeting is of the opinion should be considered at this meeting as a matter of urgency.

**14. EXCLUSION RESOLUTION (IF REQUIRED)**

Motion (Which may be amended as Members think fit):

That the public be excluded from this meeting during consideration of the remaining items on the agenda, because of the likelihood of disclosure of "exempt information" which falls within one or more descriptive category or categories of the Local Government Act 1972, Schedule 12A, as amended by The Local Government (Access to Information) (Variation) Order 2006, and specified on the agenda item or report relating to each such item respectively.

**SARA SALEH**  
Deputy Chief Executive

**COUNCILLOR ANDREW WESTERN**  
Leader of the Council

Membership of the Committee

Councillors A. Western (Chair), C. Hynes (Deputy Leader), S. Adshead, M. Freeman, J. Harding, E. Patel, T. Ross, J. Slater, G. Whitham and J.A. Wright

Further Information

For help, advice and information about this meeting please contact:

Jo Maloney, Governance Officer  
Email: [joseph.maloney@trafford.gov.uk](mailto:joseph.maloney@trafford.gov.uk)

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## **EXECUTIVE**

**27 SEPTEMBER 2021**

## **PRESENT**

Executive Member for Children's Services (Councillor C. Hynes) (in the Chair),  
Executive Member for Communities and Partnerships (Councillor G. Whitham),  
Executive Member for Covid-19 Recovery and Reform (Councillor M. Freeman),  
Executive Member for Culture and Leisure (Councillor E. Patel),  
Executive Member for Environmental and Regulatory Services (Councillor S. Adshead),  
Executive Member for Finance and Governance (Councillor T. Ross),  
Executive Member for Health, Wellbeing and Equalities (Councillor J. Slater)  
Executive Member for Housing and Regeneration (Councillor J. Wright).

Also present: Councillors Acton, Akinola (part only), Blackburn, Boyes, Butt, K. Carter, Chalkin, Coggins (part only), Evans, Jerrome, Myers, New and Newgrosh.

### Officers in attendance:

Deputy Chief Executive and Corporate Director, Strategy and Resources (Ms. S. Saleh),  
Corporate Director, Place (Mr. R. Roe),  
Corporate Director, Governance and Community Strategy (Ms. J. Le Fevre),  
Corporate Director, Adult Services (Ms. D. Eaton),  
Corporate Director, Children's Services (Ms. J. McGregor),  
Director of Finance (Mr. G. Bentley),  
Director, Education Standards, Quality and Performance (Ms. K. Samples),  
Governance Officer (Mr. J.M.J. Maloney).

## **APOLOGIES**

Apologies for absence were received from Councillors A. Western and J. Harding; and from the Chief Executive.

## **22. QUESTIONS FROM MEMBERS OF THE PUBLIC**

It was noted that no questions had been received in time for consideration at this meeting. The Deputy Leader reported that a question had been submitted in relation to item 27; but that, as this had been considerably after the final deadline, it was not possible to respond at this meeting. It was reported that a response would, however, be made, outside the meeting.

## **23. DECLARATIONS OF INTEREST**

No declarations were made by Executive Members.

**24. MINUTES**

RESOLVED – That the Minutes of the Meetings held on 21<sup>st</sup> June and 26<sup>th</sup> July 2021 be approved as correct records.

**25. MATTERS FROM COUNCIL OR OVERVIEW AND SCRUTINY COMMITTEES (IF ANY)**

Councillor Acton, as Chair of the Scrutiny Committee, advised Members that a Panel overseeing a review of the Council's Scrutiny function had met and agreed terms of reference. A survey had been issued to Members and to senior officers, seeking to identify where arrangements currently worked well and where there might be room for improvement; and both Councillor Acton and the Deputy Leader encouraged the completion of this survey.

**26. RE-DEVELOPMENT OF FORMER SALE MAGISTRATES COURT SITE, SALE - PART I**

[Note: A related report was considered in Part II of the agenda.]

The Executive Member for Housing and Regeneration submitted a report which sought approval to implement the recent planning permission and commit the necessary resources to enable the Council to undertake a direct development of the former site of Sale Magistrates Court, Sale. A related report, setting out financial details relating to the proposal, was considered in Part II of the agenda. In response to queries raised by Members, it was noted that the Council did have aspirations to promote the development of zero-carbon homes in future; and that it was intended that the "Pocket Park" would be retained if the current proposal proceeded.

RESOLVED -

- (1) That the due diligence currently undertaken, as set out in the report, be noted.
- (2.) That the re-development of the former Sale Magistrates Court be authorised pursuant to planning permission : 102822/FUL/20 and in accordance with planning policy, to include all non-material amendments and variations that may be required as a consequence of the development.
- (3) That authority be delegated to the Corporate Director of Place in consultation with the Corporate Director of Governance and Community Strategy to negotiate agree and authorise the entering into of all contracts, professional appointments, or any other similar matter required or beneficial to the delivery of the development.

*Executive (27.9.21)*

- (4) That authority be delegated to the Corporate Director of Place in consultation with the Corporate Director of Governance and Community Strategy to negotiate, agree and authorise the entering into of easements, wayleaves, substation leases or any other similar matter required or beneficial to the delivery of the development whether or not it secures the best consideration that can be obtained.
- (5) That the disposal of the completed units be authorised in principle, and that authority be delegated to the Corporate Director of Place to negotiate agree and authorise the entering into of all contracts and deeds for the disposal of the completed units.
- (6) That the Corporate Director of Governance and Community Strategy be authorised to finalise and enter into all legal agreements required to implement the above recommendations.
- (7) That approval be given to an increased level of sustainability at a cost of £350k and inclusion of a contribution of £260k to Trafford Housing Trust towards Social Rent.

**27. CARRINGTON & PARTINGTON TRANSPORT INFRASTRUCTURE - CARRINGTON RELIEF ROAD UPDATE**

The Executive Member for Housing and Regeneration submitted a report which referred to the proposals in the 2012 Trafford Core Strategy for a number of transport improvements around Carrington, including the provision of a new link road to provide better capacity, alleviate congestion and improve public transport and cycling. The report noted that the Council had undertaken further appraisal of route options for the proposed new link road and had identified the offline route (Option F) as the preferred option to be taken forward to submission of a planning application. The report set out the rationale for selection and the strategy for progressing the scheme.

Members held a wide-ranging discussion which sought to draw attention both to the need to cater for the range of infrastructure and transportation needs of current and future communities and businesses in Partington and Carrington, and to the potential ecological and environmental impacts of the proposed road's construction and route. Questions were also raised in relation to financial aspects of the proposals, and the extent to which other adjacent areas of land might potentially become vulnerable to additional future development. The Executive Member drew attention to a public statement which had been prepared, responding to a range of representations which had been made as part of the consultation process. It was noted that further consultation was planned; and that detailed assessments of environmental and transportation aspects of the proposals, and the potential need for additional protection for adjacent areas, would be considered as part of the planning process for any eventual development.

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RESOLVED -

- (1) That the outcome of the public engagement process be noted.
- (2) That Option F be approved as the route for the new Carrington Relief Road and that the Corporate Director of Place be authorised to:
  - a. engage external resources where this will assist in implementing the relief road, including a professional team where reasonably required.
  - b. Commission, submit and/or authorise as appropriate:
    - i) an application for planning permission to deliver the relief road; and
    - ii) any surveys/investigations where such surveys will reduce risks and/or assist with the preparation, submission and resolution of any planning permission application, or any other usual pre-construction survey or investigation.
  - c. authorise community engagement and consultations where the Corporate Director deems it necessary or advantageous
- (3) That the funding position for the next development phase be noted.
- (4) That the current funding gap and strategy for securing further funds be noted.

### **28. PROPOSED LEASE OF THE FORMER PARTINGTON YOUTH CENTRE, MOSS LANE, PARTINGTON TO THE BOYS AND GIRLS CLUBS OF GREATER MANCHESTER**

The Executive Member for Housing and Regeneration submitted a report which sought approval for the Council to proceed with granting a 99 year lease to the Boys and Girls Clubs of Greater Manchester (at an undervalue) to enable them to invest in the building and reinstate the asset as a Youth Facility to benefit the children in the Locality of Partington. In discussion a broad welcome was expressed for the proposals, which would involve partners with a creditable track record in promoting participation in constructive activities and physical exercise in an area where need existed, and whose population included the highest proportion of young people in the borough.

RESOLVED -

- (1) That approval in principle be given to the grant of a 99 year lease of the former Partington Youth Centre on similar terms to the draft heads of terms included in the report.
- (2) That authority be delegated to the Corporate Director for Place to finalise and agree the heads of terms in order to facilitate the grant of a lease.



*Executive (27.9.21)*

- (3) That the Corporate Director of Governance and Community Strategy be authorised to enter into any legal documents required to finalise the transaction.

**29. TRAFFORD TOGETHER LOCALITY PLAN 2019 - 2024 REFRESH**

The Leader of the Council and Joint Chair of Trafford One System Board, Executive Member for Adult Social Care and Executive Member for Health, Wellbeing and Equalities submitted a report which presented for endorsement the refresh of the Trafford Together Locality Plan 2019-24. This had been developed in conjunction with the Council's health and social care system partners and was strategically owned by the Trafford One System Board. It was noted that both the Trafford One System Board and the Trafford Local Care Alliance (and in its future state as the Trafford Together Health and Care Alliance) were fully committed to establishing the key steps outlined in this plan to define the future of Trafford's health and social care system and see it thrive in the new Greater Manchester Integrated Care System (GM ICS) arrangements. In discussion the Executive Member emphasised that the Plan was a dynamic document, with further updates to be reported in future as appropriate. She commended the effective partnership work which had already been undertaken under the Plan's auspices, and which had proved vital in assisting the response, across the borough, to the COVID-19 pandemic.

## RESOLVED -

- (1) That the content and approach laid out in the Trafford Together Locality Plan 2019-24 Refresh be agreed.
- (2) That it be noted that this is an evolving document which will be strategically owned by the Trafford One System Board and Trafford Together Health and Care Alliance (Trafford Local Care Alliance currently).

**30. EDUCATION AND EARLY YEARS BASIC NEED CAPITAL REPORT**

The Executive Member for Children's Services submitted a report which referred to the Council's a statutory duty to provide sufficient places in schools and early years settings. It noted that to support the achievement of this duty, and to meet any risks in relation to school conditions and access, the Council had received Basic Need capital funding (for expansion of pupil places) of £7.842m for 2021/22 and a nil allocation for 2022/23. The report provided further details and an update on the progress that had been made on existing projects to meet demand for places as projected in January 2021. It set out the Council's proposals to address the shortfall of places, it being noted that all proposals were at the budget estimate stage and would be met from within the grant allocation available. In particular it provided an update on the current position in relation to Stamford Park Schools. In discussion, Members noted the unprecedented recent demand which had been placed on school admissions. A significant factor in this was the Hong Kong visa

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scheme; whilst this covered a five year period, evidence suggested that demand was now stabilising. Members were reminded of the limited control the LEA possessed over schools' admission arrangements, and the impact of applications from outside the borough. Extensive monitoring and planning was in place to assist the Council in managing envisaged needs, and the Council was continuing to liaise with the DfE and Regional Schools Commissioner to assist with identified pressures. The Executive's thanks were accorded to all who were involved in this significant work.

RESOLVED - That the Executive agrees the proposals contained within the report be agreed as the detailed capital programme for 2021/22, specifically:

1. Note the demand for primary and secondary school places in Section 2 and 4 of the report.
2. Note the feasibility study and options appraisal in Section 3 of the report for refurbishment and expansion of the now amalgamated Stamford Park Primary School and approve the proposal not proceed with the expansion of Stamford Park Primary School and to reallocate the £8m budget and instead proceed with the expansion of The Willows Primary School.
3. Approve the expansion proposals detailed in Section 6 of the report:  
Willows Primary School (PAN 45 to 60)  
Templemoor Infant School (PAN 60 to 90)  
Moorlands Junior School (PAN 60 to 90)  
Davyhulme Primary School (PAN 70 to 90)
4. Note and agree the completion of previous schemes and the demand for early years places in Section 5 of the report.

### **31. BUDGET MONITORING 2021/22 - PERIOD 4 (APRIL TO JULY 2021)**

The Executive Member for Finance and Governance and the Director of Finance and Systems submitted a report which informed Members of the current 2021/22 forecast outturn figures relating to both Revenue and Capital budgets. It also summarised the latest forecast position for Council Tax and Business Rates within the Collection Fund. In discussion a question was asked, and an update provided, on the latest position on the Trafford Waters project. In relation to re-phasing of the capital programme, Members were advised that no Government grant funding was at risk in consequence. Within Leisure, re-phased monies related primarily to planned repairs; these would need to be scheduled in the light of the wider investment programme which was to be brought forward in the autumn.

RESOLVED – That the updated positions on the revenue budget, collection fund and capital programme be noted.

*Executive (27.9.21)***32. GREATER MANCHESTER MINIMUM LICENSING STANDARDS FOR TAXI AND PRIVATE HIRE STAGE 1**

The Executive Member for Environmental and Regulatory Services submitted a report which set out the proposed Greater Manchester Minimum Licensing Standards for Taxi and Private Hire. It represented Stage One of the Standards which relate to Drivers, Operators and Local Authorities. Stage Two related to Vehicles and these proposals would be reported to the Executive in October. The current report set out the responses to the recent public and trade consultation for Stage One, and outlined the proposed standards, policies and procedures which would be considered by Council on 13<sup>th</sup> October 2021. In discussion there was a very broad welcome for the proposals and the contribution they would make to personal safety in what was an integral part of the region's transport system. Whilst some disappointment was expressed that it was not possible under existing legislation to restrict the operation of drivers who had been licensed under less stringent regimes, it was noted that the Council would continue to lobby Government on the issue; and also that publicity and awareness of the Greater Manchester scheme would allow customers to make informed choices regarding the operator they selected.

**RESOLVED -**

- (1) That the feedback be noted from the recent public and trade consultation on the proposed Greater Manchester Minimum Licensing Standards for Taxi and Private Hire.
- (2) That it be recommended to Council that Enhanced Criminal Record checks are undertaken as per Driver Standard 1 in table A of the report.
- (3) That it be recommended to Council that Medical Checks are undertaken as per Driver Standard 2 in table A of the report.
- (4) That it be recommended to Council that assessments of English proficiency are undertaken as per Driver Standard 4 in table A of the report.
- (5) That it be recommended to Council that driver proficiency tests are implemented as per Driver Standard 5 in table A of the report.
- (6) That it be recommended to Council that driver training is undertaken as per Driver Standard 6 in table A of the report.
- (7) That it be recommended to Council that it approves the Licensed Drivers Dress Code, at Appendix 1 to the report.

## Executive

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- (8) That it be recommended to Council that it approves the Private Hire Driver Conditions Policy at Appendix 2 to the report.
- (9) That it be noted that a further report on alcohol and drug testing for taxi drivers will be forthcoming in 2022.
- (10) That it be recommended to Council that it approves the Private Hire Operator Conditions Policy at Appendix 3 to the report and notes the Appendix 4 proposed amendments to Operator Conditions.
- (11) That it be recommended to Council that Enhanced Criminal Record checks for Operators and their staff be undertaken as per Operator Standard 2 in table B of the report.
- (12) That it be recommended to Council to adopt the timescales for applications as per Local Authority Standard 1 in Table C of the report.
- (13) That it be recommended to Council to approve the development of a common enforcement approach as per Local Authority Standard 2 in Table C of the report.
- (14) That it be recommended to Council to agree to adopt a common methodology for setting the costs and calculating the taxi and private hire fees as per Local Authority Standard 3 in Table C of the report.
- (15) That it be recommended to Council to delegate decision making powers as per Local Authority Standard 5 in Table C of the report.
- (16) That it be recommended to Council that the implementation dates, for standards, policies and procedures contained within this report, 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 communicate changes to the trade and ensure that processes are in place to ensure the robust implementation of the standards.
- (17) That the Equalities Impact Assessment, as set out at Appendix 8 to the report, be noted.

*Executive (27.9.21)*

### **33. COUNCIL'S DIGITAL STRATEGY UPDATE**

The Executive Member for Covid-19 Recovery and Reform submitted a report which summarised progress on the Council's Digital Strategy. It noted that Digital was now recognised as a key enabler of the locality priorities and a contributor to the financial challenges faced by the Council; and that the Council's Digital Strategy 2020-23 provided the focus for its digital ambitions over the coming years. The report provided further detail of the Strategy's key themes, the progress achieved during 2020 and the first half of 2021, and the remaining work needed in digitally modernising the Council and its operations. The Executive Member noted the impact on progress of the COVID-19 pandemic, but drew attention to the key areas of focus for the forthcoming year. In response to a question regarding progress in relation to the Greater Manchester Full Fibre network programme, it was agreed that a response would be provided outside the meeting.

RESOLVED – That the progress made on implementing the digital strategy, as detailed within the report, be noted.

### **34. EXCLUSION RESOLUTION**

RESOLVED - That the public be excluded from this meeting during consideration of the remaining items on the agenda, because of the likelihood of disclosure of "exempt information" which falls within one or more descriptive category or categories of the Local Government Act 1972, Schedule 12A, as amended by The Local Government (Access to Information) (Variation) Order 2006, and specified on the agenda item or report relating to each such item respectively.

### **35. RE-DEVELOPMENT OF FORMER SALE MAGISTRATES COURT SITE, SALE - PART II**

[Note: A related report was considered in Part I of the agenda.]

The Executive Member for Housing and Regeneration submitted a report setting out financial details in relation to the seeking of approval to implement the recent planning permission and commit the necessary resources to enable the Council to undertake a direct development of the former site of Sale Magistrates Court, Sale. A related report setting out other details relating to the proposal had been considered in Part I of the agenda; and details of issues discussed and all formal resolutions relating to this issue are set out earlier in these Minutes. In discussion, a question was raised regarding the expected financial returns to the Council, with the Executive Member responding that the Executive was comfortable with the envisaged position.

The meeting commenced at 6.30 p.m. and finished at 8.05 p.m.

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## **EXECUTIVE – BUDGET PROPOSALS MEETING**

**11 OCTOBER 2021**

### **PRESENT**

Leader of the Council (Councillor A. Western) (in the Chair),  
Executive Member for Adult Social Care (Councillor J. Harding),  
Executive Member for Communities and Partnerships (Councillor G. Whitham),  
Executive Member for Covid-19 Recovery and Reform (Councillor M. Freeman),  
Executive Member for Culture and Leisure (Councillor E. Patel),  
Executive Member for Environmental and Regulatory Services (Councillor S. Adshead),  
Executive Member for Finance and Governance (Councillor T. Ross),  
Executive Member for Health, Wellbeing and Equalities (Councillor J. Slater)  
Executive Member for Housing and Regeneration (Councillor J. Wright).

Also present: Councillors Acton, Blackburn, Boyes, Butt, K. Carter, Evans, Holden, Jerrome, Lloyd, Mirza, Morgan, Myers and Newgrosh.

### Officers in attendance:

Deputy Chief Executive and Corporate Director, Strategy and Resources (Ms. S. Saleh),  
Corporate Director, Place (Mr. R. Roe),  
Corporate Director, Governance and Community Strategy (Ms. J. Le Fevre),  
Corporate Director, Adult Services (Ms. D. Eaton),  
Corporate Director, Children's Services (Ms. J. McGregor),  
Director of Finance (Mr. G. Bentley),  
Interim Director of Strategy and Policy (Ms. D. Geary),  
Governance Officer (Mr. J.M.J. Maloney).

### **APOLOGIES**

Apologies for absence were received from Councillors C. Hynes; and from the Chief Executive.

### **36. DECLARATIONS OF INTEREST**

No declarations were made by Executive Members.

### **37. EXECUTIVE'S DRAFT REVENUE BUDGET PROPOSALS 2022/23 & MTFS 2023/27**

The Executive Member for Finance and Governance and the Director of Finance and Systems submitted a report which set out the Executive's updated 5 year budget strategy proposals including the draft revenue budget proposals for 2022/23 and the Medium Term Financial Strategy (MTFS) for the period 2023/27. In introducing the report the Executive Member drew attention to key features of the current draft budget and assumptions made in preparing it; noting that the October Spending Review and Local Government finance settlement towards the end of the year were expected to inform the development of the current proposals.

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In discussion, queries were raised regarding a range of issues, including: the potential impact of the shortfall of income from the Investment Strategy, and measures to mitigate it; capacity issues in relation to the delivery of the Capital Programme; the potential impact of price increases on the Council's finances; plans for the efficient and effective use of the Council's built estate; the nature of comparator Local Authorities used in the report; demographic assumptions used, with particular reference to the demand on school places; and the potential financial impact of measures to redesign services.

It was noted that final decisions would be taken by the Executive after taking into consideration further proposals to address the gap, all relevant matters and feedback, at which time a proposed budget would be put to Council for approval in February 2022.

RESOLVED -

- (1) That the 2022/27 proposed budget strategy, including the 2022/23 draft revenue budget and the 2023/27 MTFS, be approved. The income and savings proposals are included for the purposes of consultation only (where necessary) and these proposals will also be referred to the Scrutiny Committee for their consideration.
- (2) That the proposal be noted to increase Council Tax by 3.99% in 2022/23 (comprising 2.0% adult social care precept and 1.99% general increase) and by similar levels for the remaining years of the MTFS 2023/27.
- (3) That the remaining budget gap for the years 2022/23 to 2026/27 be noted.
- (4) That it be noted that the draft proposals are subject to various consultation exercises, further analysis of reserves, savings and income including impact assessments, potential future movements in core funding and specific grants, revised costings and robustness assessments.

The meeting commenced at 6.43 p.m. and finished at 7.03 p.m.



## **EXECUTIVE**

**25 OCTOBER 2021**

## **PRESENT**

Leader of the Council (Councillor A. Western) (in the Chair),  
Executive Member for Adult Social Care (Councillor J. Harding),  
Executive Member for Children's Services (Councillor C. Hynes),  
Executive Member for Communities and Partnerships (Councillor G. Whitham),  
Executive Member for Covid-19 Recovery and Reform (Councillor M. Freeman),  
Executive Member for Environmental and Regulatory Services (Councillor S. Adshead),  
Executive Member for Finance and Governance (Councillor T. Ross),  
Executive Member for Health, Wellbeing and Equalities (Councillor J. Slater),  
Executive Member for Housing and Regeneration (Councillor J. Wright).

Also present: Councillors Acton, Blackburn, Boyes, Butt, K. Carter, Chalkin, Evans, Holden, Jerrome, Myers, Newgrosh and Young.

### Officers in attendance:

Deputy Chief Executive and Corporate Director, Strategy and Resources (Ms. S. Saleh),  
Corporate Director, Governance and Community Strategy (Ms. J. Le Fevre),  
Interim Director of Strategy and Policy (Ms. D. Geary),  
Governance Officer (Mr. J.M.J. Maloney).

## **APOLOGIES**

Apologies for absence were received from Councillors E. Patel; and from the Chief Executive.

## **38. QUESTIONS FROM MEMBERS OF THE PUBLIC**

It was noted that two questions had been received for consideration at this meeting. One related closely to the diversion of the CAT 5 bus service, on which a petition was also due to be considered at this meeting. (The following Minute refers.) The question would thus be addressed in the context of the consideration of the petition.

The second related to the integration of health and care, and the evolution of a One System Board, due to be considered later on the agenda. The questioner was present, to put the following questions:

- What are the benefits for the people of Trafford from the adoption of the One System Board in Trafford?
- Why support a One System Board for Trafford that has no power to make policy decisions for the Trafford residents you represent (or, indeed, those people from Trafford who need IVF services)?
- Why should Trafford representative support this new scheme?

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- Shouldn't Trafford Council Executive also oppose the One System Board in the interests of Trafford residents?

The Executive Member for Health, Wellbeing and Equalities noted the similarity of the question to one which had also been raised at a meeting of the Health and Wellbeing Board, in the presence of senior representatives of the CCG; and that a detailed response, incorporating input from the CCG, would be made to the questioner outside the meeting. For the time being, the Executive Member noted that changes were necessary, on a national basis, in response to a Government initiative; and that it was unlikely to have been the Council's choice to bring forward change on such a scale during the COVID-19 pandemic. Once further guidance had been received from Government, formal consultation would be undertaken. As set out in more detail in the report considered later on the agenda, shadow arrangements would be put in place until the formal ending of the CCG structure in March 2021. The Executive Member noted that to some extent she shared the questioner's concerns, and would be happy to discuss them in greater detail outside the meeting. In any event, she reiterated that a further written response would be supplied to the questioner in due course.

### **39. CONSIDERATION OF PETITION: DIVERSION OF THE CAT5 BUS SERVICE**

The Executive gave formal consideration to the following petition.

"Six months ago the CAT5 between Warburton and Altrincham was put on a diversionary route due to a new advisory height sign erected by Trafford MBC following guidance issued by the Department of Transport. A similar issue on Barsbank Lane, Statham with a similar low underbridge was resolved this year, as the bridge was re-signed by Warrington Borough Council. We the undersigned insist that this situation is resolved without further delay by Trafford MBC. Also, until that time, TfGM arrange for a diversion that best serves the travelling public instead of just the operator by travelling down a route that is already well served."

A representative of the petitioners had submitted the following further material clarifying the concerns which had prompted the petition, and the Executive Member had taken this into consideration in responding on behalf of the Executive.

"It is my belief petitions with over 500 signatories will be considered at a full council meeting.

I therefore present the results of a current petition to date for consideration at said meeting.

The petition has the backing and support of Warburton Parish council, Lymm Parish Council, public house's and other business's and has been signed by people who live and or work in the catchment area and their social, business and family life has been affected by the ridiculous situation of the withdrawal of a service which historically extends over 60 years due to what we believe is the mis-signing of the height limit of the under-bridge in Dunham Massey.

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The under-bridge itself was rebuilt (I believe) some 39 years ago and was specifically redesigned to accommodate single deck buses.

Despite the fact that it is 11' 9" in height from the road surface to the lower deck it is signed at 9' I am lead to believe that this complies with new government guidelines. Guidelines are there to guide and are not law. Can we please see some common sense applied, as this diversion is causing a lot of disruption to peoples lives.

The new CAT5 buses at a height of 9' 6" have been transiting safely since their introduction in spring of 2018.

Increasing the height by 6" to allow the buses to continue would surely not encourage a deluge of high heavy vehicles to use this route!

Please find attached the signatories who have signed to enforce the statement:

**We the undersigned insist that this situation is resolved without further delay by Trafford MBC. Also, until that time, TfGM arrange for a diversion that best serves the travelling public instead of just the operator by travelling down a route that is already well served.**

Thanks and Regards"

It was noted that a related question had also been received from the petitioners' representative, as follows:

"In all correspondence with the various authorities and various Paris Councils. The word new laws is used in defence of the bridge signage:

I can find no such 'new law'. But have discovered the following guidance:-

### **Prevention of Strike on Bridge over Highways**

#### **A Protocol for Highway Managers & Bridge owners ISSUE 2**

Which in Section 2.29 states:-

#### **Measurement of headroom**

**2.29** All bridges with headroom of less than 16'6" (5.03m) at any point over a carriageway should be signed in accordance with the guidance given in the tsM43 section 7. this will, in all situations, allow a minimum safety margin for vehicle (suspension) bounce etc. of 3" or 0.1m (these are not equivalent values but each is applied in accordance with the measurement guidelines).

"I personally, have measured the distance from the tarmac road deck to the bottom of the 'collision protection beams' and it is 11' 9" at it's lowest, the signage is 9', the CAT5 vehicles height is 9' 6". This leaves 2' 3" clearance". 2' in excess or the guidelines.

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I therefore request that the council reassess the situation and install more accurate signage to enable the CAT5 buses to transit this underbridge as they have been doing for a period of 2.5 years prior to the diversion”

As indicated above, the content of this question had been taken into account by the Executive Member; and it was noted that a detailed written response would also be provided to the questioner following the meeting.

The Executive Member responded as follows.

“As some Members may be aware the decision to re-route the Cat 5 service away from the Dunham Underbridge was made by Warrington’s Own Buses based on their own Legal Department’s advice and despite many months of discussions between Council officers, WOB and Transport for Greater Manchester (TfGM).

Their decision followed an increase in bridge strikes around the country, that resulted in the Traffic Commissioner issuing national guidance to bus operators to take additional steps to remove the potential for any bridge strikes. Traffic Commissioners are responsible for the licensing and regulation of bus, coach and goods vehicle operators, and registration of local bus services.

The bridge itself is owned by the Bridgewater Canal Company Limited (BCCL), a subsidiary of Peel Holdings, and is signed at 9’0”, which is itself an increase on the signed height on the previous structure that was replaced here over 40 years ago. WOB approached the Council and TfGM to ask whether the signage could be amended to 9’6”, which is the current height of their low roof service buses. They advised that Warrington Council had made a change to the signs on one of the canal bridges in their area around Barsbank Lane.

The previous approach taken by WOB on this route for many decades, was that their single deck buses could pass through the bridge safely. In addition, WOB actually purchased several low height (9’6”) high buses because standard single decker buses were considered too high and the lower unit gave an increased clearance.

Since WOB’s request to change the sign the bridge clearance was re-measured, and the sign height calculation checked to ensure this remains applicable which it does. Importantly the owner of the bridge have stated that they do not want the height on the signs increased at Dunham due the risk to their asset. We are aware that a number of issues have occurred in Warrington on Barsbank Lane with over height vehicles being stuck since the signage was amended.

Trafford Council and Transport for Great Manchester (TfGM) initially offered an option of a way forward to ask the Traffic Commissioner whether a formalised “Memorandum of Understanding” between all parties was appropriate to ensure the service could still be in use. Unfortunately the Traffic Commissioner did not consider that this was an issue for them to get involved with.

Officers have met many times with TfGM and WOB this year to try and resolve this issue and I can advise that this matter has progressed recently, and that TfGM

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have confirmed the restoration of public transport links to the western side of Bowdon, Dunham Massey and Dunham Woodhouses. This has been as follows:

From Sunday 29 August, the Little Gem service 287 was revised in Bowdon; this service now runs from Altrincham Interchange via Ashley Road, Langham Road, Park Road, Dunham Road, Bow Green Road and return via Bowdon Vale and Upper Bowdon to Altrincham Interchange. This revised service now calls at bus stops on Park Road which are close to the A56, a 25-minute walk through Dunham Massey grounds to the entrance of Dunham Massey.

Also with effect from earlier September, the Partington Local Link provision has also been extended to provide a service to the rural part of this area; this pre-booked service can be used for journeys to and from Dunham Massey, Dunham Woodhouses and Dunham Town. In addition, services CAT5 and CAT5A will continue to operate as they have and provide a link between Altrincham, Warburton, Lymm and Warrington. Information about this service is on TfGM's website.

Trafford Council and all parties remain committed to trying to find a solution to resolve this issue and to enable a service to return to the original route.

I hope this clarifies the current position for Members.”

#### **40. DECLARATIONS OF INTEREST**

The Leader of the Council declared a Personal Interest in the Stretford Future High Streets Fund Project item by virtue of his position as Chair of the Management Board of the Trafford Bruntwood LLP.

#### **41. MATTERS FROM COUNCIL OR OVERVIEW AND SCRUTINY COMMITTEES (IF ANY)**

As Chair of the Scrutiny Committee, Councillor Acton provided an update on the ongoing review of the Scrutiny function, expressing his thanks to all who had responded to the associated survey. The Executive would be advised of the outcome in due course. The Leader added his thanks, acknowledging the significance of the review for an important aspect of the Council's work.

#### **42. STRETFORD FUTURE HIGH STREETS FUND PROJECT**

The Executive Member for Housing and Regeneration submitted a report which advised that a bid to the government's Future High Streets Fund had been successful in securing over £17m for a range of schemes to regenerate and transform Stretford Town centre for the benefit of local residents, businesses and visitors. The report identified those schemes and provided an update on progress. In discussion the Executive noted a number of comments including in relation to the current guard rails along Edge Lane, the potential for a taxi rank on Kingsway, and proposals for, and communication of, measures to reduce the carbon impact in the locality. These issues would be addressed as the project progressed; and it was noted that dialogue with stakeholders would continue.

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RESOLVED -

- (1) That the undertaking of the schemes identified in Section 2.0 of the report be approved and authorised in principle.
- (2) That authority be delegated to the Corporate Director of Place to make minor amendments to the schemes as necessary in consultation with the Executive Member for Regeneration and Housing.
- (3) That authority be delegated to the Corporate Director of Place to deliver the schemes, including engaging external resources, commissioning surveys, investigations and any other works required to deliver highways and public realm improvements; and applying for planning permission if required.
- (4) That the Corporate Director of Governance and Community Strategy be authorised to finalise and enter into all legal agreements required to implement the above decisions.
- (5) That an update be provided to the Executive following the public consultation identified in Section 5.1 of the report and every six months thereafter.

**43. INTEGRATING HEALTH AND CARE: EVOLUTION OF ONE SYSTEM BOARD TO PROVIDE FIT AND PURPOSEFUL OVERSIGHT OF TRAFFORD LOCALITY LEADERSHIP FROM APRIL 2022**

The Leader of the Council and Joint Chair of Trafford One System Board, Executive Member for Adult Social Care and Executive Member for Health, Wellbeing and Equalities submitted a report which gave details of the proposed governance arrangements for the Trafford One System Board for both shadow arrangements and beyond March 2022, in relation to the formal introduction (pending legislation) of Integrated Care Systems. The report outlined the various governance options for the One System Board for shadow operation from October 2021 and formal implementation in April 2022, and articulated the option as agreed in principle by the One System Board. It was noted that the situation was developing rapidly, and that there was therefore a commitment to bringing regular updates to the Executive on related system governance issues and plans, as legislation materialised and enhanced clarity on the GM ICS operating model and therefore locality operating model.

In discussion the current lack of definitive clarity was noted, and the importance of effective scrutiny of developing proposals at Greater Manchester level. It was acknowledged that further information was awaited from Government. The Executive Member for Health, Wellbeing and Equalities advised that she was happy to discuss Members' concerns further; and the Leader emphasised and

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agreed the priority of effective local oversight and scrutiny, to ensure that the system developed in the interests of Trafford residents.

**RESOLVED -**

- (1) That the setting up of a joint committee (formally from April 2022 and in Shadow form from October 2021) be agreed in principle.
- (2) That the proposed arrangements operate in shadow form from October 2021 with accountability and decision making remaining with individual statutory organisations.
- (3) That the suggested locality board functions be agreed, noting that clarity on the finer detail is still to be fully determined.
- (4) That the proposed revised membership from October 2021 be agreed.
- (5) That the arrangements for the appointment of a chair to the proposed shadow joint committee, as set out in the report, be noted.
- (6) That it be noted that the details relating to the terms of reference, delegations, voting and quoracy of the joint committee will be brought back to the Executive for further consideration at a later date.

**44. FAIR PRICE FOR CARE**

The Executive Member for Adult Social Care submitted a report which provided the Executive with an update on recent and planned activity relating to the setting of a "Fair Price for Care", in the context of the Ethical Care Charter. The revised timescale facilitated a consultation exercise, the results of which would be reported to the Executive later in the year.

**RESOLVED –**

- (1) That the content of the report be noted.
- (2) That the lengthened time frame for the analysis of day care costs be noted.

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#### **45. DOMESTIC ABUSE JOINT STRATEGIC NEEDS ASSESSMENT AND DOMESTIC ABUSE STRATEGY 22/23**

The Executive Member for Communities and Partnerships submitted a report which advised that the Council had commissioned an external consultant to complete a Domestic Abuse Joint Strategic Needs Assessment (“JSNA”) and to co-develop a Domestic Abuse Strategy. It provided information on the scope and outcome of the JSNA and planned activities which would enable the Council to respond to identified priority areas.

In considering the report, Members discussed the significance of awareness of domestic abuse, because of its impact on children, in schools; and it was agreed that consideration would be given to appropriate training and awareness-raising. The Executive would be kept informed of progress on the JSNA, with its final authorisation expected early in the coming year.

RESOLVED – That the content of the report and planned actions detailed within it be noted.

#### **46. CORPORATE PLAN 2021/22 QUARTER 1 REPORT**

The Executive Member for COVID-19 Recovery and Reform submitted a report which provided a summary of performance against the Council’s Corporate Plan, 2021/22, with the Q1 report covering the period 1<sup>st</sup> April to 30<sup>th</sup> June 2021. In discussion, comments were raised by Members regarding the limited nature of detailed metrics, in relation to carbon reduction targets, and more generally. It was noted that in many cases the impact of the COVID-19 pandemic had rendered the collation of such metrics impracticable; but that it was planned that this issue would be addressed as part of the refresh of the Corporate Plan (as set out in the next Minute). For the time being, due consideration would be given to any suggestion made by Members regarding the inclusion of additional items as part of the refresh exercise.

RESOLVED – That the content of the Corporate Plan Quarter 1 Report be noted.

#### **47. CORPORATE PLAN REFRESH 2021/24**

The Executive Member for COVID-19 Recovery and Reform submitted a report which provided a summary of the Council’s Corporate Plan refresh. The Executive was advised of the level of response received to date from the public engagement exercise; and that the intention was to seek approval for the refreshed Plan from the Executive and Council in November. In response to the issues raised under the previous item, Members were advised that the draft Plan was a working document, and that its current Appendix provided a sample of potential measures, not a definitive or exhaustive list. The invitation was reiterated to Members to raise suggestions, for consideration, of additional issues which might be included. It was noted that further research would also be undertaken into the timeliness of data sets used for evaluation and comparative purposes.



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## RESOLVED –

- (1) That the content of the report be noted; and that it be noted that a further report will be presented to the Executive in November 2021.
- (2) That the intention be noted to seek a recommendation to adopt the refreshed Corporate Plan to Council from the Executive in November 2021.
- (3) That the detail in relation to the citizen space survey be noted.
- (4) That the reporting schedule for corporate plan updates be noted.

The meeting commenced at 6.30 p.m. and finished at 7.37 p.m.

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## TRAFFORD COUNCIL

**Report to:** Executive  
**Date:** 22 November 2021  
**Report for:** Decision  
**Report of:** Executive Member for COVID-19 Recovery and Reform

### Report Title

Corporate Plan Refresh 2021/24

### Summary

This report provides a summary of the Council's refreshed Corporate Plan.

### Recommendation(s)

It is recommended that the Executive:

1. Approves the refreshed Corporate Plan and recommends its adoption to Council; and
2. notes the reporting schedule for Corporate Plan updates.

Contact person for access to background papers and further information:

Name: Dianne Geary  
Extension: 1821

Background Papers: None

### *Implications:*

Relationship to Policy Framework/Corporate Priorities	<i>The Corporate Plan 2021/22 report summarises the Council's performance in relation to the Council's Corporate Priorities</i>
Relationship to GM Policy or Strategy Framework	<i>The Corporate Plan is aligned to the GM policy and strategy where required.</i>
Financial	<i>None</i>
Legal Implications:	<i>The Corporate Plan forms part of the Council's overarching Policy Framework. Subject to the urgency procedure contained in the Access to Information Procedure Rules in Part 4 of the Constitution, decisions about any matter in the discharge of an executive function which is covered by the policy framework or the budget where the decision maker is minded to make it in a manner which would be contrary to the policy framework must be referred to the full Council for decision.</i>
Equality/Diversity Implications	<i>The Corporate Plan enables the Council to fully observe &amp; promote equality of outcomes for service users and their families</i>
Sustainability Implications	<i>The Corporate Plan is a key driver for the long term sustainability of the council and the borough</i>
Carbon Reduction	<i>The Corporate Plan is a key driver to supporting carbon reduction, delivering the Council's Carbon Neutral Action Plan and supporting the growth of the green economy.</i>
Resource Implications e.g. Staffing / ICT / Assets	<i>No direct impact</i>
Risk Management Implications	<i>A risk management log has been developed as part of the overall governance for the Corporate Plan and this will be reviewed and updated on a regular basis</i>
Health & Wellbeing Implications	<i>No direct impact</i>
Health and Safety Implications	<i>No direct impact</i>

## **1.0 BACKGROUND**

- 1.1 The Corporate Plan describes Trafford Council's strategic vision, outcomes and priorities for the borough, with the priorities being key to its delivery. It includes an overview of what the council will do and how we will work with our residents, communities, businesses and other partners to deliver change to Trafford in line with these commitments.
- 1.2 The 2018/9 Corporate Plan has been refreshed to set out the most critical things that we need to do over the coming years to recover from COVID-19, deliver public services and collaborate with communities, businesses and other partners. This plan reflects the ambition of Trafford's leadership and the values and aims of the Council to provide a blueprint for improving the borough. It will shape the activity within the council, help prioritise resources and monitor progress made, as well as aligning with strategic financial planning.
- 1.3 The delivery of the plan will focus on a blend of service performance and qualitative case studies to inspire and demonstrate the Council's achievements on these outcomes and priorities between now and 2024.

- 1.4 It is also intended as a guide for our partner organisations to help identify shared objectives so we can work together more effectively to achieve far more for Trafford than we ever could working alone.

## 2.0 THE REFRESHED PLAN

- 2.1 The vision, outcomes and priorities set out below have been refreshed with input from members, staff and residents and were shared at the October meeting of the Executive.
- 2.2 Following Executive feedback, reinforced by the online survey and staff engagement with more than 400 contributions, it was acknowledged that two of the priorities which had initially been proposed described our approach to delivering the vision and outcomes; our “way of working”, and that our key priorities should instead focus on what we will deliver. As such it is proposed that we focus on three key priorities to ensure that our strategies and resources are directed where they are most needed and where they will deliver the best outcomes for the Borough. This will ensure that that we are continuing to build on our amazing communities, as demonstrated during the pandemic, supporting those most in need, addressing poverty and improving healthy life expectancy. At the same time, we will ensure our town centres and high streets continue to go from strength to strength and we continue to make best use of our fantastic parks and green spaces. This means that the priorities will concentrate on the three key areas described below.
- 2.3 The new vision for Trafford is:

***Trafford - where all our residents, communities & businesses prosper***

- 2.4 The key outcomes are:

- All our residents will have access to quality learning, training and jobs
- All our communities will be happy, healthy and safe
- All our businesses and town centres will be supported to recover and flourish for the benefit of everyone

- 2.5 The refreshed priorities are:

### **1. Reducing health inequalities**

*Working with people, communities and partners, particularly in deprived areas, to improve the physical and mental health of all our residents*

Rationale: The diversity of our population is one of our greatest strengths and we want all our neighbourhoods to have thriving and healthy communities. However, some groups are currently disadvantaged – not just in life expectancy but in areas such as housing and poverty that can contribute to poorer health.

Throughout the pandemic, we’ve made rapid changes to the ways we support residents in their community, their own home, in acute care and across our health and social care services. We will create the conditions for our communities to thrive by increasing access to jobs, investing in local infrastructure and transport and improving the local high street.

In Trafford we have a 16-year difference in healthy life expectancy between our most affluent and most deprived areas, and the pandemic has laid bare these inequalities. Nationally, new inequalities have emerged and existing inequalities have intensified. We must do more to address these inequalities so all our residents can live long and healthy lives.

## **2. Supporting people out of poverty**

*Tackling the root causes to prevent people from falling into poverty, and raising people out of it*

Rationale: We know that more people will be experiencing poverty as we emerge from the pandemic. For some, this will be temporary as the economy recovers and job opportunities are created. For others, the poverty and inequalities they were already experiencing will have deepened due to the challenges of the pandemic.

This priority will mean that we will focus on both tackling the root causes of poverty in our communities and on helping to raise people out of poverty.

By providing the necessary skills, opportunities, information and advice we will work with partners to give people the choices and power to make best use of their income and prevent and reduce poverty.

By recognising the importance of access to good quality affordable and sustainable housing we will prioritise increasing affordable and social housing. We will work with partners to encourage the building of adjustable, sustainable low-energy housing which in turn will help to reduce fuel poverty.

We want our borough to be a place where no-one is marginalised or discriminated against and especially not due to their financial or material circumstances.

## **3. Addressing our climate crisis**

*Reducing our carbon footprint and tackling the impact of climate change*

Rationale: We can only address our climate crisis and the impact of climate change by working together and having clear plans to prevent future challenges. This priority focuses on both reducing our carbon footprint and adapting to the challenges posed by climate change.

Being in lockdown showed just how important our local environment, green spaces and parks are for our physical health, our mental health and wellbeing. We want to enable more residents to be environmentally responsible in their daily lives, with improved access to local transport and more active travel including cycling and walking.

We will help clean up the air we breathe by supporting the delivery of the Greater Manchester Clean Air Plan and work with partners to improve the energy efficiency of our homes and encourage the building of new housing developments which are adjustable, sustainable and have low-energy use.

By increasing the amount we reuse, repurpose and recycle and through educating everyone, it will help to reduce our carbon footprint and minimise the amount we waste.

We will be looking at the Council's own carbon footprint: looking at the sustainability of our own buildings and ways of working and supporting and encouraging our workforce and partners to adopt more measures which will reduce our impact on the environment and help towards our carbon reduction targets.

### **3.0 OUR APPROACH**

3.1 The key to the successful delivery of the vision, outcomes and priorities in the corporate plan is the approach adopted. This is defined as:

- Delivering the right, quality services at the right time for residents, communities, businesses and partners using our skilled and diverse workforce;
- Being responsive, accessible and fair to all and placing this at the heart of everything that we do. This means becoming a digital council, improving connectivity and helping more residents to get online and access new technology. At the same time, we will ensure that residents are not left behind in our increasingly digital society;
- Providing value for money, targeting investment and better partnership working; ensuring our services are built around the needs of people who live, work and visit the borough;
- Working with residents, communities and business to provide properly maintained, clean, attractive and safe green spaces for everyone to enjoy;
- Continuing to maintain tight control on our finances through the medium term financial plan (MTFP) to deliver a balanced budget;
- Working more closely with residents and using data effectively, to influence and inform our local decision making and continuing to engage both directly and through social media, websites and online platforms; and
- Working together to help develop a strong, dynamic and diverse voluntary sector as a key partner in the borough and actively encourage volunteering.

### **4.0 ENGAGEMENT ACTIVITY**

- 4.1 To raise awareness and wider understanding of our refreshed Corporate Plan it is important that residents, businesses, communities and partners are aware of the changes to the Corporate Plan, understand the reasons for the changes and understand how the changes can benefit them.
- 4.2 An online survey on the Corporate Plan vision and priorities opened on 16 October and closed on 7 November. The purpose of the survey was to seek feedback on which of the priorities matter and to test the definitions and understanding of each priority. Feedback was sought on the 'we will' statements which state the intent and what the Council will do to reach its outcomes and vision and deliver on the priorities. There was also the opportunity to share other ideas/suggestions for inclusion in the final version of the plan.
- 4.3 Two 'Drop-In' engagement sessions were held internally for staff in the Council to introduce and outline the refreshed priorities, capture views on which of the 'we will' statements were most important from their perspective and to provide feedback on additional points and how the new priorities could be delivered.
- 4.4 Other engagement included sharing information at the senior leaders and colleagues 'Let's Talk' events held in October and November as well as obtaining input from the Strategic Delivery Group.

## **5.0 SURVEY AND ENGAGEMENT FEEDBACK**

- 5.1 There were 389 responses to the survey on the refresh of the Corporate Plan held between 16 October and 7 November 2021.
- 5.2 The respondents were evenly split across all age groups, with the main survey respondents being white British or white other between the ages of 45 to 54. 11% of respondents were aged 18 to 34 which was encouraging. 65% was equally split between North and Central Trafford respondents, with the remaining 30% being equally split between West and South Trafford. 5% of the respondents were from outside of the borough of Trafford
- 5.3 Generally respondents felt that the right priorities were being focused on. The 'we will' statements were accepted although the order of the ranking slightly changed for priority one and two. This will be reflected in the corporate plan document. There were no amendments to the order of the 'we will' statements for priority three.
- 5.4 By reflecting on the key points from the responses there are a range of topics that residents have highlighted as being important either personally or to the wider community. Specific mention was made of making full and active use of the fantastic pool of talent in Trafford's communities, through listening to the public and their views as well as taking into consideration the needs of different races and of marginalised communities experiencing inequalities.
- 5.5 Respondents provided additional feedback on both the priorities and on a range of topics. A summary is outlined below with detailed analysis contained in Appendix 1.

### **Reducing Health Inequalities**

- There was a focus on care for children and mental health services and support for SEND.
- There was a focus on looking after older people to tackle loneliness and isolation, preventing suicide and supporting care homes, improving wellbeing and support for disabled people and thorough at-home care.
- Feedback was given on improving leisure facilities and accessibility, with more physical activities and sports sessions being available in the community.
- The importance of supporting active travel, environmentally friendly transport, cycling and buses were seen as key, while reducing noise pollution at night.
- Feedback was shared on the importance of cooking healthy school meals and making these available for people on low incomes.

### **Supporting People out of Poverty**

- There was recognition of the need to support people to get into work.
- Reference was given to the real living wage and preventing reliance on benefits and the need for better job security.
- There was an acknowledgement that alleviating poverty for the most vulnerable, such as through second-hand furniture initiatives, second hand uniform shops and vouchers for food and bills, would assist.
- The importance of educating people on how to manage money, training and development for the unemployed was fed back.
- The cost of transport was identified as a barrier with respondents requesting free travel for young people to go to work or school, free bus travel for disabled people and young people, and support for the BEE network.
- Another key theme mentioned for this priority was the importance of housing, specifically affordable housing, minimum standards in private rented accommodation, insulated housing, lower cost of rent, social mix in new developments, hostels for homeless people, and more council housing.



## **Addressing our Climate Crisis**

- A range of methods were suggested to tackle climate change, such as rethinking town centres, low traffic neighbourhoods, more community power generation projects, renewable energy/ alternative sources, advice for residents, giving spare land to community groups, group cookouts with food, developing community groups, increasing education on waste, educating young people, and promoting low carbon diets.
- Feedback relating to not building on greenbelt or not cutting down trees was received
- Housing was also a common theme in this priority, specifically home insulation, retrofit over new build, use of derelict buildings, not building in overpopulated areas, adapting older houses and sustainable property development.
- Better waste management and helping increase recycling everywhere was another theme.
- Importance of cheaper, improved and more accessible public transport as an enable to encourage walking to reduce traffic.
- A small number of respondents disagreed with the priority and wanted there to be no Clean Air Plan.

5.6 The information received against each of the priorities broadly aligns with the refreshed corporate plan and the measures.

5.7 From the feedback and suggestions received to date, it would appear that it is not always clear which services the Council delivers and which are led and managed by partner organisations. This will be taken into account when considering how to improve awareness and communicating Council services.

5.8 During October and November, drop-in sessions and Let's Talk sessions were held with staff in the Council which included

- Presenting the refreshed vision, outcomes and priorities
- Capturing feedback on the importance of the priorities and at the drop-in session which of the 'we will' statements was most important

Although these sessions were with a smaller cohort of people than those who completed the resident survey, the feedback supported the three refreshed priorities.

## **6.0 COMMUNICATION**

6.1 The Corporate Plan will be relaunched using a variety of channels – media press release, website, internal presentations and externally with partners, videos for each priority - all supported by social media to demonstrate how we are working together for the good of the borough.

6.2 The communication and engagement will continue on an ongoing basis for the duration of the plan.

## **7.0 PERFORMANCE**

7.1 The strategic measures will provide clarity about where we are going as a Council. They will demonstrate to our residents, businesses, communities, partners and other stakeholders that our Council is overcoming the challenges of Covid-19, seizing new opportunities and on our way to becoming stronger than ever.

- 7.2 The table in Appendix 2 outlines the suggested list of indicators, annual data for the past three years where available and a description of the measure. For ease of navigation, indicators are aligned to relevant shared priorities. Some of the indicators are subject to wider factors, and the levers of change sit outside of Trafford Council's control, so targets will not be set but they are important to track progress against our longer-term ambitions. It should be noted that some of the indicators also have a long lag between data capture and publication, particularly in the health inequality section.
- 7.3 The measures were chosen to align with Trafford and GM strategies where possible – for example health inequality measures are aligned to the [Independent Inequalities Commission](#) and the Marmot City -Region [Build Back Fairer](#) reports and the addressing our climate crisis measures are aligned with Trafford's Climate Action Plan and the overarching GM Strategy.
- 7.4 A dashboard will be developed to complement the quarterly reporting and will include corporate priority measure data and wider Council services performance data. All measures will show a direction of travel based on latest available data compared to previous outturn. The quarterly reports will also showcase a case study or feature piece highlighting each priority. Charticles will be used with a short narrative alongside charts or maps to demonstrate the level of performance.
- 7.5 Work and wider discussions are continuing to finalise the indicators suggested in the table and are therefore subject to change or refinement.

## 8.0 RECOMMENDATIONS

It is recommended that the Executive:

- 8.1 Approves the refreshed Corporate Plan and recommends its adoption to Council; and
- 8.2 notes the reporting schedule for Corporate Plan updates.

**Finance Officer Clearance: GB**

**Legal Officer Clearance: JL**



**DEPUTY CHIEF EXECUTIVE & CORPORATE DIRECTOR'S SIGNATURE: Sara Saleh**

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

## Appendix 1: Survey and Staff Drop In Session – Feedback

### Background

This Appendix summarises feedback from engagement on the refreshed Corporate Plan and priorities through:

1. A Resident Survey on Citizen Space
2. Staff Drop-In sessions for the Council

### 1. Residents Survey on Citizen Space

A Residents Survey was published on Citizen Space which asked for:

- Feedback on whether residents agreed these were the right priorities overall
- Feedback on whether residents agreed these priorities would meet future challenges
- Ranking the priorities in order of importance
- Ranking the 'we will' statements under each priority in order of importance
- Providing additional feedback and suggestions on areas to consider including

There were **389** responses in total to the resident survey.

### Survey Respondents Profile

- Majority of respondents aged 45-54, then 35-44, then 55-64
- 11% of respondents were aged 18-34
- Majority of respondents 94% were White British or White Other (Trafford Profile – 14% at 2011 Census from BAME group)
- Respondents located in: North Trafford (33%), Central Trafford (32%), West Trafford (15%), South Trafford (15%), Outside of Trafford (5%)

### Feedback on overall corporate priorities

On being the right priorities for the council to focus on

- **7 in 10** (73%) either strongly **agree** or **agree** these are the right priorities
- **1 in 10** (12%) either strongly **disagree** or **disagree** these are the right priorities

On the priorities meeting future challenges

- **6 in 10** (62%) either strongly **agree** or **agree** these meet future challenges
- **1 in 10** (14%) either strongly **disagree** or **disagree** these meet future challenges

### Order of most important Corporate Priority to you

1. Reducing health inequalities

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2. Supporting people out of poverty

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3. Making best use of our resources to deliver quality services

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4. Addressing our climate crisis

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5. Being a more open and accessible Council

## Ranking 'We Will' Statements (1 = Top Ranking)

### 1) Reducing Health Inequalities

1. Prevent poor health in children and promote good mental and physical health.
2. Ensure Trafford's mental health services are resilient, accessible and fit for purpose.
3. Ensure more people are in good health for longer.
4. Focus on areas of deprivation and with the highest rates of illness, and reduce the impact of deprivation.
5. Work with partners to improve how services are delivered, and to help reduce health inequalities.
6. Provide effective and sustainable physical activity and sport opportunities for our communities.

### 2) Supporting people out of poverty

1. Support children out of poverty and to have the best start in life.
2. Give people skills and opportunities to enable them to get out of poverty.
3. Prioritise support for people to avert poverty, and improve the situation for people experiencing poverty.
4. Ensure agencies work well together to minimise the risk of individuals becoming homeless and to support those who are experiencing homelessness.
5. Give people the power to maximise their household income.

### 3) Addressing our climate crisis

1. Reduce our carbon footprint and increase the amount we re-use, repurpose and recycle.
2. Ensure that new housing developments are adaptable, sustainable and low-energy use, while working with partners to increase the energy efficiency in our homes.
3. Reduce the amount of food waste in our borough and encourage surplus food to be donated to foodbanks.
4. Promote and increase environmentally friendly travel, such as walking and cycling.
5. Put in place the measures in the GM Clean Air Plan.
6. Promote sustainable, healthy and lower-carbon diets, such as locally grown and seasonal food.

### 4) Being more open and accessible

1. Ensure the way we serve our borough is built around the needs of residents, businesses and communities.
2. Ensure our communications are open and accessible to all.
3. Put respect at the heart of how we work with colleagues, residents, business, partners and voluntary groups.
4. Make better use of technology to improve the way we deliver services.
5. Help people that are less digitally able to get online.

### 5) Making best use of our resources

1. Ensure our highways, roads and pavements are safe, well maintained and well lit.

2. Drive the borough's economic recovery from Covid-19 by supporting businesses, increasing investment and improving our economic resilience to ensure Trafford remains a great place to live.

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3. Develop our leisure areas and use our parks and green spaces to benefit residents.

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4. Make smart decisions about what we buy and how we get the most out of our purchases.

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5. Deliver more joined-up services.

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6. Give staff the right skills to deliver and commission good quality services.

## Additional feedback and suggestions from free text question

### Reducing Health Inequalities

- Active travel, environmentally friendly transport, cycling and buses promoted.
- Address waiting times (for GPs), access to health services, aftercare, parental care, dental care.
- Improve leisure facilities, open up membership, increase exercise, more physical activities and tackle noise pollution at night.
- Focus on green spaces, parks and accessibility, disabled parking.
- Care for Children, including children mental health services, sport classes, community sports, support for SEND.
- Support for disabled people and at home care.
- Older people, including fitness classes, elderly care, tackling loneliness and isolation, prevent suicide, care home funding.
- Education on cooking healthy meals, in schools, for people on low incomes.
- Consider needs of different races and of marginalised communities experiencing inequalities.

### Supporting People out of Poverty

- Childcare funding so parents can work, unpaid carers, free travel for young people to go to work or school, free school dinners for all children, fresh fruit for all children, cooking skills for low income families, English language lessons.
- Fairness and support for pensioners, free bus travel for disabled people and young people, support the BEE network.
- Match people with vacancies, apprenticeships, tackle skillset shortage.
- Education on how to manage money, starting in schools, free development courses, training for unemployed, employers provide time off for people with young children.
- Affordable housing, minimum standards in private rented accommodation, insulated housing, lower cost of rent, social mix in new developments, hostels for homeless people, more council housing.
- Pay people a real living wage to avoid relying on benefits and better job security.
- Second-hand furniture initiative, second hand uniform shop, vouchers for food and bills.

### Addressing our climate crisis

- Cheaper, improved and more accessible public transport, electric vehicles, reduce cars near schools, rethink town centres, low traffic neighbourhoods.
- Community power generation projects, don't build on greenbelt or cut down trees, more renewable energy/alternative sources and advice for residents.
- Home insulation, retrofit over new build, use derelict building, don't build in overpopulated areas, adapt older houses, sustainable property development.

- Improve choice of recycling, make all plastic recyclable, better waste management provider, timely collections, obligate businesses to recycle, upgrade recycling centres.
- Support businesses who allow remote working to avoid travel, move pension fund away from fossil fuels.
- Improve air quality, encourage walking and cycling, and promote green jobs.
- Teach cycling in schools, safe cycle lanes, help people on low incomes.
- Remove coned cycle lane, gully emptying, reduce HGV traffic, council owned electric vehicles and more charging points, more visible recycling in council buildings, no clean air plan.
- Free car park for tram users, give spare land to community groups, group cookouts with food, develop more community groups, increase education on waste, educate young people, promote low carbon diets.

### **Being more open and accessible**

- Consult residents before acting and listen to consultations, ensure a voice, webcast committees such as planning, change times for planning consultations so workers can access, active engagement, more transparent, encourage involvement, Q&A session for residents.
- Find ways to bring people back together to tackle isolation, open discussion events, residents first, meaningful consultation, more visibility in community, support people in libraries to access the online services.
- In person accessibility, contact face to face, connections and communications, answer people in person or over the phone.
- Upgrade website to make it user friendly, clear route for accessing services, contact emails, keep human element, reply on social media, better communication from staff, website for suggestions and feedback.
- You are great! It is the system and resources that need an improvement.

### **Making best use of our resources**

- Make full and active use of the fantastic pool of talent in Trafford's communities and voluntary sector, listen to the public and their views, encourage businesses to hire local people.
- Economic recovery needs to include and encompass climate change and health inequalities.
- Well-lit and safe cycle paths, prioritised pedestrians and cyclists, parking for disabled people, paths cleared for disabled people.
- Pop ups in empty business spaces, invest in local businesses, lower rent for independents, support businesses impacted by covid.
- Improve roads pavements and paths and repair potholes, manage roadworks so not all at once, unblock drains, tackle flytipping, collect litter, take ownership of road signs, no parking charges in small villages.
- Revamped and new leisure facilities and centres, consider density of housing proposals.



## 2). Supporting people out of poverty (Ranked)

Rank	We Will Statement
=1	Give people skills and opportunities to enable them to get out of poverty.
=1	Prioritise support for people to avert poverty, and improve the situation for people experiencing poverty.
=3	Ensure agencies work well together to minimise the risk of individuals becoming homeless, and support those who are experiencing homelessness.
=3	Support children out of poverty and to have the best start in life.
=5	Give people the power to maximise their household income.

## 3). Addressing our Climate Crisis (Ranked)

Rank	We Will Statement
=1	Promote and increase environmentally friendly travel, such as walking and cycling.
=1	Reduce our carbon footprint and increase the amount we re-use, repurpose and recycle.
3	Ensure that new housing developments are adaptable, sustainable and low-energy use, while working with partners to increase the energy efficiency in our homes.
4	Put in place the measures in the Greater Manchester Clean Air Plan.
5	Promote sustainable, healthy and lower-carbon diets, such as locally grown and seasonal food.

## 4). Being a more open and accessible Council

Rank	We Will Statement
1	Ensure the way we serve our borough is built around the needs of residents, businesses and communities.
2	Put respect at the heart of how we work with colleagues, residents, business, partners and voluntary groups.
=3	Ensure our communications are open and accessible to all.
=3	Help people that are less digitally able to get online.
=3	Make better use of technology to improve the way we deliver services.

## 5). Making best use of our resources to deliver quality services

Rank	We Will Statement
=1	Drive the borough's economic recovery from Covid-19 by supporting businesses, increasing investment and improving our economic resilience to ensure Trafford remains a great place to live.
=1	Give staff the right skills to deliver and commission good quality services.
=3	Deliver more joined-up services.
=3	Make smart decisions about what we buy and how we get the most out of our purchases.



## Appendix 2: Corporate Plan Refresh Proposed Performance Indicators

Priority	Indicators	Frequency of publication	Current performance			Details regarding the Indicator
			2018/19	2019/20	2020/21	
Page 37  <b>Reducing Health Inequalities</b>	Improve % of 'social value' spending (as % of total tendering/contracting)	Quarterly	2018/19	2019/20	2020/21	Social Value Target Against Contract Value (%) Social Value plays an important part of procurement of services. Social value is the wider benefit gained by a local community from the delivery of public contracts or services. Examples of social value may be the skills gained by young apprentices from an area or the wellbeing gained by communities from having access to greener spaces or organically sourced produce. These things hold great importance but aren't always as easy to quantify in the same way as financial value.
			NA	30%	31%	
	Improve number of housing completions	Quarterly	2018/19	2019/20	2020/21	The building of quality, affordable and social housing is a key priority for the Council. New homes are required to meet identified local need across the borough to ensure that Trafford has the homes which residents need, can afford and that the borough continues to be an attractive place to live.  The delivery of new homes provides the Council with income from additional Council Tax revenue and New Homes Bonus which is paid directly by the government. This income plays an important part in the Council's future funding strategy and can be used to support the delivery of Council services to benefit the residents and businesses
953			788	1301		

						<p>in the borough.</p> <p>The number of housing completions is determined via undertaking quarterly site visits on those residential sites with full planning permission.</p>
	Reduce the % of children who are classified as obese	Annual (Children 2019/20)	<p><b>2013/14 - 2017/18</b></p> <p><b>Reception</b></p> <p>Most deprived quintile 12.16</p> <p>Second most deprived quintile 9.3</p> <p>Average deprived quintile 8.5</p> <p>Second least deprived quintile 6.7</p>	<p><b>2014/15 - 2018/19</b></p> <p><b>Reception</b></p> <p>Most deprived quintile 12.0</p> <p>Second most deprived quintile 9.6</p> <p>Average deprived quintile 8.5</p> <p>Second least deprived quintile 6.9</p>	<p><b>2015/16 - 2019/20</b></p> <p><b>Reception</b></p> <p>Most deprived quintile 11.6</p> <p>Second most deprived quintile 8.8</p> <p>Average deprived quintile 8.8</p> <p>Second least deprived quintile 6.9</p>	<p>Indicator Names: Reception: Prevalence of obesity (including severe obesity), 5-years data combined or Year 6: Prevalence of obesity (including severe obesity), 5-years data combined</p> <p>Number of children in Reception Year (aged 4-5 years) or Year 6 (aged 10-11 years) classified as obese (including severely obese) in the National Child Measurement Programme (NCMP) attending participating state maintained schools in England as a proportion of all children measured for five years' worth of data.</p> <p>Child obesity prevalence shows a close association with socioeconomic deprivation. Obesity prevalence in children living in the 10% most deprived areas of the country is more than double that of children living in the least deprived 10% of areas</p> <p>Deprivation data are provided by deprivation quintiles (groups of five equal-sized bands), based on the Index of Multiple Deprivation (IMD) decile (ten equal-sized bands) (2019 IMD for 2015/16-2019/20 data and 2015 IMD for all</p>

			Least deprived quintile 5.6	Least deprived quintile 4.8	Least deprived quintile 5.3	previous years).
			<b>Year 6</b>	<b>Year 6</b>	<b>Year 6</b>	Prevalence of obesity (including severe obesity), 3-years data combined is available at ward level.
			Most deprived quintile 24.2	Most deprived quintile 23.8	Most deprived quintile 24.6	Source: <a href="https://digital.nhs.uk/services/national-child-measurement-programme/">https://digital.nhs.uk/services/national-child-measurement-programme/</a> <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a>
			Second most deprived quintile 21.4	Second most deprived quintile 21.5	Second most deprived quintile 21.9	
			Average deprived quintile 19.0	Average deprived quintile 19.7	Average deprived quintile 19.5	
			Second least deprived quintile 15.8	Second least deprived quintile 15.7	Second least deprived quintile 15.2	
			Least deprived quintile 11.5	Least deprived quintile	Least deprived quintile	

				11.7	12.7	
Reduce the % of adults who are classified as overweight or obese	Annual	<b>2017/18</b> 57.3 Better than England	<b>2018/19</b> 64.0 Similar to England	<b>2019/20</b> 59.3 Better than England	Indicator Name: Percentage of adults (aged 18+) classified as overweight or obese  Obesity is recognised as a major determinant of premature mortality and avoidable ill health.  Questions on self-reported height and weight are included in Active Lives to provide data for monitoring excess weight in adults at local authority level for the Public Health Outcomes Framework (PHOF).  Source: <a href="https://www.sportengland.org/research/active-lives-survey/">https://www.sportengland.org/research/active-lives-survey/</a> <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a>	
Percentage of adults who are active (increase)/fairly active/inactive (decrease)	Annual (May 2019/20 latest published)	<b>2017/18</b> Active adults 64.2 Similar to England  Inactive adults 20.8 Similar to England	<b>2018/19</b> Active adults 69 Similar to England  Inactive adults 19.9 Similar to	<b>2019/20</b> Active adults 68.1 Similar to England  Inactive adults 20.6 Similar to	Indicator names: Percentage of physically active adults Percentage of physically inactive adults  Physically active is measured as doing at least 150 moderate intensity equivalent (MIE) minutes physical activity per week in bouts of 10 minutes or more in the previous 28 days  Physical inactivity is defined as engaging in less than 30 minutes of physical activity per week.	

				England	England	<p>Physical inactivity is the 4th leading risk factor for global mortality accounting for 6% of deaths globally. People who have a physically active lifestyle have a 20-35% lower risk of cardiovascular disease, coronary heart disease and stroke compared to those who have a sedentary lifestyle. Regular physical activity is also associated with a reduced risk of diabetes, obesity, osteoporosis and colon/breast cancer and with improved mental health. In older adults physical activity is associated with increased functional capacities. The estimated direct cost of physical inactivity to the NHS across the UK is over £0.9 billion per year.</p> <p>Source: Active Lives Adult Survey, Sport England  <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a></p>
			<b>2018</b> Fairly active adults 13.1	<b>2019</b> Fairly active adults 10.9	<b>2020</b> Fairly active adults 12.3	<p>Indicator Name:          Percentage of adults aged 16+ who are fairly active (30-149 minutes a week)</p> <p>Source: Active Lives Adult Survey, Sport England  <a href="https://lginform.local.gov.uk/">https://lginform.local.gov.uk/</a></p>
	Improve the % of children who are active	Annual (May 2019/20 latest published)	<b>2017/18</b> Active children and young people 41.4 Similar to	<b>2018/19</b> Active children and young people 47.5	<b>2019/20</b> Active children and young people Not	<p>Indicator names:          Percentage of physically active children and young people</p> <p>The percentage of children (5-15) undertaking an average of at least 60 minutes of physical activity</p>

		England	Similar to England	Available	<p>per day across the week.</p> <p>Regular moderate-to-vigorous physical activity (MVPA) improves health and fitness, strengthens muscles and bones, develops co-ordination, maintains healthy weight, improves sleep, makes you feel good, builds confidence and social skills and improves concentration and learning.</p> <p>Source: Public Health England (based on Active Lives Children and Young People Survey, Sport England)  <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a></p>
Reduce the under 75 mortality rate from causes considered preventable (per 100,000 population)	Annual (2017-19 latest published by PHE)	<b>2015 – 17</b> 143.2 Similar to England	<b>2016 – 18</b> 141.2 Similar to England	<b>2017 – 19</b> 139.4 Similar to England	<p>Indicator Name: Under 75 mortality rate from causes considered preventable (2019 definition)</p> <p>Age-standardised mortality rate from causes considered preventable in persons aged less than 75 years per 100,000 population.</p> <p>The basic concept of preventable mortality is that deaths are considered preventable if, in the light of the understanding of the determinants of health at the time of death, all or most deaths from the underlying cause (subject to age limits if appropriate) could mainly be avoided through effective public health and primary prevention interventions.</p> <p>The data are insufficiently robust to provide local authority and unitary authority estimates for</p>

					<p>single years and must be aggregated over three years; this means the timeliness of non-overlapping time periods to make judgements on health improvement is limited.</p> <p>Deaths from causes considered preventable, under 75 years, standardised mortality ratio for period 2015 - 2019 is available at Ward level.</p> <p>Source: Public Health England (based on ONS source data)  <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a></p>
Improve the healthy life expectancy (by deprivation and gender)	Annual (2019 latest published by PHE)	<b>2015 – 17</b> Female 65.3  Male 64	<b>2016 – 18</b> Female 66.0  Male 66.0	<b>2017 – 19</b> Female 65  Male 65.6	<p>Indicator Name: Healthy life expectancy at birth</p> <p>A measure of the average number of years a person would expect to live in good health based on contemporary mortality rates and prevalence of self-reported good health.</p> <p>Life expectancy at birth, (upper age band 90+) for the period 2015 – 2019 is available at Ward level.</p> <p>Source: Office for National Statistics (ONS) death extracts, Mid-year population estimates, Annual Population Survey (APS).  <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a></p>
		<b>2015 – 17</b> Female 8	<b>2016 – 18</b> Female 7.4	<b>2017 – 19</b> Female 7.9	<p>Indicator Name: Inequality in life expectancy at birth</p> <p>The slope index of inequality (SII) is a measure</p>

		Male 9.5	Male 9.3	Male 8.8	<p>of the social gradient in life expectancy, i.e. how much life expectancy varies with deprivation. It takes account of health inequalities across the whole range of deprivation within each area and summarises this in a single number. This represents the range in years of life expectancy across the social gradient from most to least deprived, based on a statistical analysis of the relationship between life expectancy and deprivation across all deprivation deciles.</p> <p>Source: Figures calculated by Public Health England using mortality data and mid-year population estimates from the ONS and Index of Multiple Deprivation 2015 and 2019 (IMD 2015 / IMD 2019) scores from the Ministry of Housing, Communities and Local Government. <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a></p>
Reduce the proportion of five year old children with experience of visually obvious dental decay	Bi-Annual (2018/19 latest published by PHE)	<b>2014/15</b> 26.4 Similar to England	<b>2016/17</b> 19.0 Similar to England	<b>2018/19</b> 26.0 Similar to England	<p>Indicator Name: Percentage of 5 year olds with experience of visually obvious dental decay</p> <p>Source: Dental Public Health Epidemiology Programme for England: oral health survey of five-year-old children <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a></p>
Reduce the depression (recorded prevalence age 18+)	Annual (2019/20 latest published by PHE)	<b>2017/18</b> 12.6	<b>2018/19</b> 13.9	<b>2019/20</b> 14.8	<p>Indicator Name Depression: Recorded prevalence (aged 18+)</p> <p>The recorded depression prevalence is the estimated number of people with depression recorded on their practice register as a</p>



						<p>proportion of the practice list size, aged 18 years or over, allocated to a local authority boundary using the postcode of the practice.</p> <p>Source: Quality and Outcomes Framework (QOF), NHS Digital  <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a></p>
Reduce smoking in routine/manual workers vs general population (inequality in smoking rates)	Annual (2019 latest published By PHE)	<p><b>2017</b> 26.8 Similar to England</p>	<p><b>2018</b> 26.4 Similar to England</p>	<p><b>2019</b> 17.4 Similar to England</p>	<p>Indicator Name: Smoking Prevalence in adults in routine and manual occupations (18-64) - current smokers (APS)</p> <p>The prevalence is calculated by dividing the weighted number of self-reported smokers aged 18-64 years by total number of respondents (with a valid smoking status) aged 18-64 years in a subset of the routine and manual group, expressed as a percentage.</p> <p>Smoking is the most important cause of preventable ill health and premature mortality in the UK. Smoking is a major risk factor for many diseases, such as lung cancer, chronic obstructive pulmonary disease (COPD) and heart disease. It is also associated with cancers in other organs, including lip, mouth, throat, bladder, kidney, stomach, liver and cervix.</p> <p>Source: Annual Population Survey (APS)  <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a></p>	

<b>Supporting people out of poverty</b>	Reduction in those receiving Universal Credit and the Claimant Count	Monthly	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	<p>The figures are for March in the given fiscal year.</p> <p>The Claimant Count (CC) constitutes those claiming unemployment related benefits. It includes all Universal Credit (UC) claimants who are required to seek work and be available for work, as well as all JSA claimants.</p> <p>UC includes benefit claimants who are not in employment and those eligible who are in employment (it can be claimed by people in or out of work).</p> <p>The CC stat is for % of pop aged 16+ whilst UC is for % aged 16-65. UC data comes from the DWP's <a href="#">Stat-Xplore</a> service and CC data can be accessed via <a href="#">Nomis</a>. Both can be found via <a href="#">LG Inform</a>.</p> <p>Note: The CC does not attempt to measure unemployment. However, it can provide a useful indication of how unemployment is likely to vary (both geographically and over time).</p>
			2.3% (CC) 5.1% (UC)	2.5% (CC) 6.4% (UC)	5.3% (CC) 11.8% (UC)	
	Number of people prevented from becoming homeless	Quarterly	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	<p>Homeless prevention is vital. The Council and partners must ensure they intervene earlier to help prevent families and individuals becoming homeless in the first place. Preventing homelessness also reduces the costs associated with securing temporary or emergency accommodation.</p> <p>Homeless Prevention refers to where an applicant has been prevented from becoming</p>
			416	444	303	

						homeless by securing their current accommodation or securing new and suitable accommodation before a crisis situation occurs. Homelessness can be prevented through various methods. Mediation and conciliation with family or friends is the main preventative method used to enable applicants to remain in their existing home. In addition resolving rent or service charge arrears in the social and private sector has enabled applicants to remain within their existing home, thus preventing homelessness.
Improve the number of affordable housing completions	Quarterly	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	79	Ensuring that there is a supply of permanent affordable in Trafford is vital in tackling poverty. People living in poor quality unaffordable accommodation can end up in a situation whereby mortgage or rent arrears occur which can lead to them being in poverty and in some cases homeless.  Trafford has an affordability ratio of 8.35 (average income to property price) which presents difficulties in terms of local residents getting on the property ladder and also the recruitment and retention for both businesses and public services because lower paid staff cannot afford to live in the borough. This may be having an adverse effect on the local economy and, anecdotally, is causing recruitment and retention problems in some parts of the public sector in areas such as social care. The provision of new affordable homes is therefore critical.
		82	69			

						<p>The Council and partners need to increase the supply of affordable housing of the right size and type to meet this shortfall as well as provide for future needs.</p> <p>Affordable housing completions are determined through undertaking quarterly site visits and liaising with the Registered Providers/Housing Associations.</p>
Reduction in % of children in poverty	Annual	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<p>The actual measure in question is <i>% of children in relative low income families</i>. Relative low income is defined as a family in low income before housing costs in the given year. More detail on what actually constitutes low income can be seen in the downloadable files.</p> <p>The stats in brackets are those children in <i>absolute</i> low income families. This is the same as the relative low income approach, except it looks at things in comparison with incomes from 2010/11.</p> <p>For reference, the UK's 2019/20 stats are 19% and 16% (the latter being the absolute low income one).</p> <p>Children included are those aged 15 and under. Figures for all children (i.e. including 16 to 19 years old) are available on Stat-Xplore and can be broken down by age (years and bands).</p>	
		13% (11%)	13% (11%)	12% (10%)		

						Source is the <a href="#">DWP</a> .
Maintain the low level of 16-17 year olds who are not in education training or employment (NEET)	Quarterly	<b>2018</b>	<b>2019</b>	<b>2020</b>	The figures presented are the annual (calendar year) ones.	
		2.3% (5.3%)	1.8% (5%)	2.3% (4.8%)	This is the number of 16 and 17-year olds who are NEET, expressed as a proportion of that cohort known to the local authority (i.e. those who were educated in government-funded schools). Refugees, asylum seekers and young adult offenders are excluded. Ages are taken at the beginning of the academic year (31 August).  The second statistic (underneath in brackets) is NEET plus young people whose status is not known.  The data is produced by the <a href="#">DfE</a> but can be found easily on LG Inform.	
Improve the number of people being re-housed (from Trafford's housing waiting list)	Quarterly	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	Trafford Council is not a stock holding authority and relies on Registered Providers/Housing Associations to provide a percentage of their available lets in order to re-house residents who are on the Council's Housing Register. The	
		229	301	119		

						Registered Providers/Housing Associations operating in Trafford have signed a Nomination Agreement which ensures that 50% of available lets (75% from Trafford Housing Trust) are provided to the Council. The number of properties offered for nomination depends on the number of properties that are available. The Council continues to encourage Registered Providers/Housing Associations to increase the provision of affordable/social housing in Trafford to increase the number of properties available.
Reduce % of households fuel poverty levels	Annual	<b>2017</b>	<b>2018</b>	<b>2019</b>	This shows fuel poor households as a % of all households in the area. A household is said to be fuel poor if it needs to spend more than 10% of its income on fuel to maintain an adequate standard of warmth (usually defined as 21 degrees for the main living room and 18 degrees for other occupied rooms). The definition also includes spending on heating water, lights and appliance usage and cooking costs.  Produced by <a href="#">BEIS</a> . On LG Inform. Seems to be a on a calendar year basis.	
		11.4%	10.4%	12.8%		
Improve overall employment rate (aged 16-64) (%)	Quarterly	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	This is the proportion of the working age population who are in employment according to the ILO definition.  Data is derived from the <a href="#">Annual Population Survey</a> (a rolling annual survey updated quarterly). In our case the data is taken from the surveys ending in March of the given fiscal year (e.g. the most recent one being April 2020-March 2021). Relevant survey data is accessible via	
		77%	79.6%	76.5%		

						Nomis or LG Inform.
Improve school readiness (free school meal status)	Annual	<b>2016/17</b>	<b>2017/18</b>	<b>2018/19</b>	<p>School readiness: percentage of children achieving a good level of development at the end of Reception</p> <p>School Readiness: percentage of children with free school meal status achieving a good level of development at the end of Reception</p> <p>This is a key measure of early years development across a wide range of developmental areas. Children from poorer backgrounds are more at risk of poorer development and the evidence shows that differences by social background emerge early in life.</p> <p>Source: PHE England's <a href="#">Fingertips</a> site.</p>	
		Reception 73%	Reception 75.3%	Reception 74.7%		
		Reception with free school meal 48.1%	Reception with free school meal 50.3%	Reception with free school meal 56%		
Improve employees paid at/above real living wage	Annual	<b>2019</b>	<b>2020</b>	<b>2021</b>	<p>The <a href="#">Living Wage Foundation</a> sets real living wage (RLW) rates. They are calculated annually to "meet the real cost of living".</p> <p>The ONS publication producing this analysis can be seen <a href="#">here</a> (2021 version). It considers those paid <i>under</i> the RLW. They use <a href="#">Annual Survey of Hours and Earnings</a> (ASHE) data for their estimates.</p> <p>Trafford is the <i>workplace</i> area in this context (i.e. we're not looking at Trafford residents).</p>	
		77.4%	76.7%	80.7%		
		FT/PT male: 82%/18%	78%/22%	79%/21%		
		FT/PT female: 61%/39%	58%/42%	60%/40%		

Addressing our climate crisis	Reduce borough wide CO <sub>2</sub> emissions (kilotonnes)	Bi-Annually (last published 2019)	2018/19 1,507.0 (2018)	2019/20 1,467.6 (2019)	2020/21 Not yet published	<p>These statistics provide the most reliable and consistent breakdown of CO<sub>2</sub> emissions across the country, using nationally available data sets going back to 2005.</p> <p>The main data sources are the UK National Atmospheric Emissions Inventory and the BEIS National Statistics of energy consumption for local authority areas. All emissions included in the national inventory are covered, except aviation, shipping and military transport, for which there is no obvious basis for allocation to local areas.</p> <p>Trafford's Climate Action Plan aims <b>for carbon neutrality by 2038</b>, aligned with the GM 5 Year Environment Plan and overseen by a cross-sectoral Trafford Climate Emergency and Air Quality Commission.</p> <p><a href="https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2019">https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2019</a></p>
	Reduce corporate CO <sub>2</sub> emissions (kilotonnes)	Annual data (Financial Year)	Data not available			Data for this is not yet available but it is expected Jan 2022
	Increase number of electric charging points per 100,000 population (Absolute)	Annual (April)	2018/19 No data available	2019/20 21.6 (51)	2020/21 19 (45)	<p>Department for Transport data for electric vehicle charging statistics on the number of publicly available electric vehicle charging devices in the UK.</p> <p><a href="https://www.gov.uk/government/statistics/electric-">https://www.gov.uk/government/statistics/electric-</a></p>



						<a href="#">vehicle-charging-device-statistics-july-2021</a>
Improve percentage of household waste which is collected for recycling	Quarterly	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	Household waste sent for recycling/composting/reuse (annual) is taken from the LA Collected and Household Waste Statistics. Data is based on figures entered by local authorities onto WasteDataFlow for each quarterly return for the financial year.	
		57.3%	56.9%	54.1%		
Improve number of staff trained in carbon literacy	Annual	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>	The Public Health Team and HR provide Carbon Literacy training for staff. 39 staff were trained and 35 certified as Carbon Literate. Certified means that people have committed to specific actions to reduce their carbon footprint.	
		NA	39			
Reduce vehicle miles travelled on roads in Trafford (millions)	Annual	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	‘Whilst historically significant, the long term trends can be misleading in most cases due to the extraordinary circumstances observed as a result of the coronavirus pandemic. Vehicle miles travelled in Great Britain have had year-on-year growth in each year between 2010 and 2019. However, the sharp decrease in 2020 has resulted in traffic estimates that are lower than the 2010 levels. Therefore, to say traffic has fallen over the last decade would misconstrue, as the overall decrease is entirely due to the decline in traffic levels observed in the 2020 estimates.’	
		1034.3	1084.7	886.6		
Reduce number of	Annual	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	The first time in 5 years that the number of	

	licenced vehicles with Trafford addresses		130,076	131,133	129,116	license vehicles in Trafford has experienced a year-on-year reduction. The highest proportional reduction compared to previous years was HGVs and Buses and coaches.  <a href="https://www.gov.uk/government/statistical-data-sets/all-vehicles-veh01">https://www.gov.uk/government/statistical-data-sets/all-vehicles-veh01</a> (VEH0105)
	Increase number of licenced Ultra Low Emission Vehicles with Trafford addresses (Number registered at year end)	Annual	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	Ultra Low Emission Vehicles (ULEVs) are those which emit less than 75g CO <sub>2</sub> for every km travelled. This is 60% average CO <sub>2</sub> emissions for cars registered for the first time in 2021 Q1 ( <a href="#">Vehicle Licensing Statistics</a> ).  <a href="https://www.gov.uk/government/statistical-data-sets/all-vehicles-veh01">https://www.gov.uk/government/statistical-data-sets/all-vehicles-veh01</a> (VEH0132)
			510	754	1,169	
	Improve proportion of Energy Performance Certificates (EPC) registered to Trafford addresses that are A,B or C	Annual	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	Almost 40% of the UK's energy consumption and carbon emissions come from the way our buildings are heated and used. Even comparatively small changes in energy performance and the way a building is used will have a significant effect in reducing energy consumption. An EPC is required when a building is constructed, sold or let, and is valid for 10 years. Domestic EPCs are banded from "A" to "G", where "A" is the most energy efficient in terms of likely fuel costs and CO <sub>2</sub> emissions. The ambition is to <a href="#">have as many homes as possible in EPC band C by 2035.</a>  <a href="https://epc.opendatacommunities.org">https://epc.opendatacommunities.org</a>
31.2%			31.4%	32.5%		
Reduction in annual mean concentration of	Annual	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	The burning of fossil fuels for transportation and industry is a major contributor to air pollution	

	nitrogen dioxide (NO <sub>2</sub> ) µg/m <sup>3</sup>		29	30	21	emissions such as Nitrogen Dioxide (NO <sub>2</sub> ). In Trafford, after the start of the Covid-19 pandemic and during the associated lockdowns and restrictions the NO <sub>2</sub> levels measured at the roadside site on the A56 have been lower compared to periods with no restrictions. Reduction in NO <sub>2</sub> is part of the Greater Manchester Clean Air Plan (GMCAP)
	Reduce household waste not sent for recycling (Tonnes)	Annual	<b>2018/19</b> 32,420	<b>2019/20</b> 33,815	<b>2020/21</b>	Household waste not sent for recycling (annual) is taken from the LA Collected and Household Waste Statistics. Data is based on figures entered by local authorities onto WasteDataFlow for each quarterly return for the financial year. WasteDataFlow is a web-based system for quarterly reporting on Local Authority collected waste data by local authorities to central government. <a href="#">Household waste not sent for recycling (annual) in Trafford   LG Inform (local.gov.uk)</a>
<b>Council Services</b>	Improve libraries loans (digital and physical)	Quarterly	2018/19	2019/20	2020/21	Throughout 2020/21 Trafford saw a shift to more e-library loans through the pandemic with the libraries closed for periods of time. Tracking number of physical loans and e-library loans is one of the ways to highlight the use of libraries which provide a community resource and create opportunities for learning and a shared social space. Libraries have a role in supporting digital literacy and social prescribing. This is an internal data source so no comparator information is available.
			80,219 (digital)	160,718 (digital)	311,710 (digital)	
	Improve shifting enquiries to online	Quarterly	2018/19	2019/20	2020/21	Self-service request come through via the Internet pages through Contact 360 the

	self-service(reduce call volume)		22,686	36,406	45,922	Customer Relationship Management (CRM) platform. Contact categories include: Blue Badges, complaints and compliments, information requests, parks and open spaces, pest control, recycling and rubbish, road and highways, and street care and cleaning. Contacts are captured if they are self-service or mediated (phoning up, emailing, face to face etc). Self-service requests offer an accessible route for making contact as residents can do it quicker and at all hours of the day and at weekends and receive direct feedback about the progress of the service request.  Polarity: High is good
	Improve timeliness of FOI requests	Quarterly	2018/19	2019/20	2020/21	FOIs can enhance the transparency of policy making, administrative decision making and government service delivery. Under the Freedom of Information Act 2000 the normal timescales for completion of an FOI request is 20 working days. This measure looks at how many FOI requests were met within the 20 working days timescale. Polarity: High is good
			NA	83.4%	67.1%	
	Improve residents' digital access via device lending scheme	Quarterly	2019/20	2020/21	2021/22	The device lending scheme aim is to improve digital literacy by giving people the skills and confidence to use digital technologies to help them in their everyday life. The co-ordinated project is being delivered through the Trafford Library service. The laptop lending was initially launched 11th March 2021 so no historical information is available.
NA			NA	110		
Improve % of Council's controllable	Annual	2018/19 49%	2020/21 39%	2020/21	Spending more in Trafford is about creating a	

	spend in Trafford					<p>resilient and inclusive economy for the benefit of the local area. Procurement is the term used for how organisations and businesses acquire goods and services. When procuring goods and services it is also important to look at more than just the financial cost. We should also look at what additional value, or benefit, we can get from what we are buying. Procuring locally supports local services and communities and cuts down on our carbon footprint.</p> <p>This then creates a ripple effect with local workers having better financial stability and available income to enjoy businesses in their area such as shops and restaurants ensuring the proceeds of business supports communities.</p>
	Maintain percentage of council tax collected	Quarterly	<b>2018/19</b> 98.1%	<b>2019/20</b> 97.8%	<b>2020/21</b> 97.2%	Council tax is a tax on domestic properties. It is collected by local councils, and it helps to pay for services which councils provide, such as education, refuse collection and streetlighting. Council Tax is charged on all domestic properties, whether they are rented or owned, and whether they are lived in or not. High collection rates help support service delivery.
	Maintain percentage of major planning applications processed within timescales	Quarterly	<b>2018/19</b> 100%	<b>2019/20</b> 100%	<b>2020/21</b> 100%	<p>Percentage of planning applications processed within 13 weeks or agreed time for major developments.</p> <p><b>Source name:</b> Ministry of Housing, Communities &amp; Local Government</p>
	Maintain percentage of highway safety inspections carried	Quarterly	<b>2018/19</b> 97.0%	<b>2019/20</b> 98.7%	<b>2020/21</b> 100%	The One Trafford Partnership has an agreed programme of safety inspections of all roads in the Borough, either monthly, quarterly or

	out in full compliance with agreed programme					annually, based on the national classification of roads. Highways inspectors carry out approximately 700 inspections per month in accordance with this programme.
	Improve adopted streets and paths scored at grade B or higher (road tidiness)	Quarterly	<b>2018/19</b>	<b>2019/20</b> 88.0%	<b>2020/21</b> 93.8%	Street cleanliness is monitored against guidelines set out by Keep Britain Tidy, for litter and detritus (dust, mud, soil, grit, gravel, stones, rotted leaf and vegetable residues, and fragments of twigs, glass, plastic, etc.). Inspectors carry out 75 randomly selected surveys per month, and grade streets between A (clean) and D (heavy deposits). Grade B is an acceptable level of cleanliness at which all streets should be maintained.
	Improve the number of apprenticeships in the Council	Quarterly		April 2017- March 2021 274	2020/21 71	The Apprenticeship Levy came into force on 6 April 2017 and was introduced by the Government in order to address the shortage of skilled workers in the UK, by increasing the number of apprenticeship opportunities offered by employers.  The Target requires public sector employers to employ an average of 2.3% of their organisation's headcount as new apprentice starts each year between 1 April 2017 and 31 March 2021.
	Reduce sickness absence from previous year	Quarterly		Q4 2019/20 3.85%	Q4 2020/21 3.56%	This metric is the percentage of time lost to sickness absence over the 12 month period. It is based on taking the total hours of recorded sickness absence and dividing this into the total available or working hours and multiplying by 100. *We previously used the old Local Authority

						BVPI12 indicator of average full time equivalent days lost to sickness and so this is detailed for 2018/19. However we moved to percentage of time lost in 2019/20 as this is more widely used. It is also easier to calculate based on different working patterns.
	Reduce the % of turnover in the 12 months period		2018/19 12.49%	2019/20 10.21%	2020/21 10.50%	This metric is the percentage of turnover over the 12 month period. It is based on taking the total number of leavers and dividing this into the average total number of post holders and multiplying by 100. The average total number of post holders is calculated by taking the number of post holders at both the beginning and end of the period, adding them together and dividing by 2. This includes leavers for all reasons.
	Maintain rate of admissions to permanent residential nursing in over 65+	Quarterly	2018/19 539.5	2019/20 684.8 (962 in ASCOF)	2020/21 543	<p>Older people whose long-term support needs are best met by admission to residential and nursing care homes relative to the population size.</p> <p>Avoiding permanent placements in residential and nursing care homes is a good measure of delaying dependency, and the inclusion of this measure in the framework supports local health and social care services to work together to reduce avoidable admissions. Research suggests that, where possible, people prefer to stay in their own home rather than move into residential care. However, it is acknowledged that for some client groups that admission to residential or nursing care homes can represent an improvement in their situation.</p>

						Source: Measures from the Adult Social Care Outcomes Framework, England. <a href="https://digital.nhs.uk/">https://digital.nhs.uk/</a>
	Maintain older people still at home 91 days after discharge from hospital into reablement services	Quarterly	2018/19 93%	2019/20 91.6%	2020/21 88.9%	<p>The proportion of older people aged 65 and over discharged from hospital to their own home or to a residential or nursing care home or extra care housing for rehabilitation, with a clear intention that they will move on/back to their own home (including a place in extra care housing or an adult placement scheme setting), who are at home or in extra care housing or an adult placement scheme setting 91 days after the date of their discharge from hospital.</p> <p>There is strong evidence that reablement services lead to improved outcomes and value for money across the health and social care sectors. Reablement seeks to support people and maximise their level of independence, in order to minimise their need for ongoing support and dependence on public services. This measures the benefit to individuals from reablement, intermediate care and rehabilitation following a hospital episode, by determining whether an individual remains living at home 91 days following discharge – the key outcome for many people using reablement services. It captures the joint work of social services, health staff and services commissioned by joint teams, as well as adult social care reablement.</p> <p>Source: Measures from the Adult Social Care Outcomes Framework, England.</p>



						<a href="https://digital.nhs.uk/">https://digital.nhs.uk/</a>
	Improve the proportion of clients receiving community based services with direct payments	Quarterly	2018/19 26.8%	2019/20 28%	2020/21 24.9%	<p>The number of adults, older people and carers receiving Direct Payments as at 31st March as a percentage of all clients receiving community based services.</p> <p>Research has indicated that personal budgets impact positively on wellbeing, increasing choice and control, reducing cost implications and improving outcomes. Studies have shown that direct payments increase satisfaction with services and are the purest form of personalisation. The Care Act places personal budgets on a statutory footing as part of the care and support plan.</p> <p>Source: Measures from the Adult Social Care Outcomes Framework, England. <a href="https://digital.nhs.uk/">https://digital.nhs.uk/</a></p>
	Maintain Children in Need rate	Quarterly	2018/19 291	2019/20 251	2020/21 258	The rate of Children in Need as at the 31 <sup>st</sup> March reflects the number of open episodes of need across Children's' Social Care, from Referrals through to Aftercare. Trafford's child in need rate is already low in comparison to other authorities and comparator groups.
	Maintain Children In Care rate	Quarterly	2018/19 74	2019/20 67	2020/21 69	Children looked after rate, per 10,000 children aged under 18 - This is the number of children looked after as at 31st March, expressed as a rate per 10,000 children aged 0-18. The term 'looked after' includes all children being looked after by a local authority; those subject to a care order under section 31 of the Children Act 1989;

						<p>and those looked after on a voluntary basis through an agreement with their parents under section 20 of that Act. Data is collected through the SSDA903 return.</p> <p>The rate of Looked After Children in Trafford is relatively high compared to most of the Authorities in the Statistical Neighbour group and when viewed against many other indicators. The average rate for the group was 56.8, so Trafford has amongst the higher rates seen in the Statistical Neighbour group. In National terms, the rate was 67: the same as Trafford. In regional terms, Trafford has a low rate of Looked After Children, the average for the region being almost 100.</p>
	Improve Education Health Care (EHC) timeliness	Quarterly	2018/19 60.4%	2019/20 81.2%	2020/21 78.3%	<p>The Education Health and Care (EHC) planning and assessment process should take no more than 20 weeks from the date of the request until the plan is issued, unless certain conditions occur. An education, health and care (EHC) plan is for children and young people aged up to 25 who need more support than is available through special educational needs support.</p> <p>EHC plans identify educational, health and social needs and set out the additional support to meet those needs.</p> <p>This measure considers all new EHC plans, including 'exceptions'. Trafford has made significant improvement since 2017/18 (14%). National is 49%, Statistical Neighbours, 55%.</p>

	Maintain Trafford's Educational Attainment Performance		2018/19 KS4, A8: 56.1  KS4, P8:  KS5: 3+ A grades: 22.5%  Average Point Score per entry: 39.6  KS2, % pupils achieving expected standards in Reading, Writing and Maths (RWM): 77%	2019/20 KS4, A8: 59.2  KS5: 3+ A grades: 34.2%  Average Point Score per entry: 44	2020/21 KS4, A8:  KS5: 3+ A grades:  Average Point Score per entry	<p>Whilst there is data for Assessment 8 (A8) for the last two years (2021 yet to be published) it is not comparable with what came before due to being centre / teacher assessed outcomes. Neither will they be comparable to what follows. Next year will be see a half-way house in terms of outcomes, before assessment methods and thresholds return to 'normal' in 2023. Progress 8 (P8) data has not been calculated for 2020 nor 2021. Similarly, KS5 data is not comparable for previous or future. Outturns for 3+Agrades is essentially doubled across the country in 2020: 22.5% in England. Trafford ranked 3<sup>rd</sup>. APS also saw significant increase from previous outturns similar to that seen in Trafford: England, 34 to 39.5. Trafford ranked 2<sup>nd</sup> in country.</p> <p>No KS2 data for 2020 or 2021</p>
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## TRAFFORD COUNCIL

**Report to:** Executive  
**Date:** 22 November 2021  
**Report for:** Decision  
**Report of:** Executive Member for Environment and Regulatory Services

### Report Title

Electric Vehicle (EV) Charging Points in Trafford – Update Report

### Summary

This report provides updated information to Members relating to the rollout and options associated with the introduction of EV charge points across Trafford.

### Recommendation

The Executive is recommended to:

- a) Note the outcome of the GMCA Contract with Be.EV (Iduna) relating to EV charge points in Trafford.
- b) Approve the approach for the rollout of EV charge points in Trafford as outlined in the report.
- c) Approve in principle the entering into of leases with Be.EV for rollout of EV charge points across Trafford and delegate authority to the Corporate Director of Place to finalise the terms of the leases.
- d) Delegate authority to the Corporate Director of Place, in consultation with the Corporate Director for Governance and Community Strategy and the Director of Finance and Systems and relevant Executive Members to enter into negotiations and agree future investment opportunities for rollout of EV charging points and hubs through JV or other partnership vehicle.
- e) Delegate authority to the Corporate Director of Governance and Community Strategy to complete any documents required to give effect to the proposals contained in this report.

Contact person for access to background papers and further information:

Sharon Walls  
[Sharon.walls@trafford.gov.uk](mailto:Sharon.walls@trafford.gov.uk)

Background Papers: None

Implications:

Relationship to Policy Framework/Corporate Priorities	Improving Public Health Improving Air Quality Improving Road Safety Green and Connected
Relationship to GM Policy or Strategy Framework	Air Quality Management Clean Air Plan Environment Plan
Financial	The report sets out the proposed options for the provision of EV charge points across Trafford. The accelerated rollout will be financed under lease arrangement with Be.EV (Iduna) under the existing procurement undertaken by TfGM. This covers both the capital investment and ongoing running costs and provides a 10% to 20% profit share depending on site. The profit share may need to be used to offset any loss of car parking income at certain sites, and charging options are being considered to mitigate any effects here in order to maximise the net income benefit to the Council and generate savings. Going forward options are being evaluated to identify the best risk/reward model for the Council for further roll out of EV, this includes the potential to develop a JV Partnership and/or direct investment in EV charge points – these carry additional cost risk but with potentially higher returns. There is £500k included in the capital programme approved by Council in February 2020, plus any external funding sources which may be available.
Legal Implications:	No legal implications from this report. Legal will need to be involved with sign off of the lease with Be.EV (Iduna).
Equality/Diversity Implications	Not Applicable
Sustainability Implications	Improving availability and access to EV charge points will lead to a more sustainable mode of transport and environment
Carbon Reduction	The introduction of EV Charge points contributes to the Clean Air Plan approved at Council in July 2021. Transition to electric vehicles will contribute to a positive net reduction of carbon within Trafford
Resource Implications e.g. Staffing / ICT / Assets	Not Applicable
Risk Management Implications	Not Applicable
Health & Wellbeing Implications	There are wide ranging health through less use of conventional vehicles and therefore air quality will improve.
Health and Safety Implications	The air quality will become cleaner through the implementation of the measures described in this report therefore improving health and safety.

## **1.0 Background**

- 1.1 In March 2020 the Executive was updated on Trafford's suggested approach to EV charging and agreed to exploring the market further through a soft market testing exercise.
- 1.2 An update report was brought to the Executive in December 2020 seeking approval to soft market test and look at procurement options for rolling out EV charge points across Trafford.
- 1.3 The electric car market has continued to grow during the last 12 months and road transport is still a major contributor to the UK's greenhouse gas emissions. Reducing emissions from road transport remains a significant challenge and has now been stretched for the UK to reach net zero emissions targets by 2050 to 2035.
- 1.4 Greater Manchester and Trafford Council have since approved the Clean Air Plan and Zone (CAZ) at Council in July 2021. The Clean Air Plan includes proposals for a GM-wide Clean Air Zone, which is anticipated to launch on 30 May 2022, alongside more than £120m government funding to support local businesses upgrade to cleaner, compliant vehicles so they can travel in the Zone without incurring a daily charge.
- 1.5 The transition and demand to use and charge EV vehicles therefore is likely to increase significantly in the short to medium term.

## **2.0 Electric Vehicle Charging Soft Market Test and GMCA EV Strategy**

- 2.1 During early 2021 Trafford Council with the assistance from STAR procurement reviewed the procurement options following the soft market testing of Expressions of Interest from known EV infrastructure providers. Providers were asked to outline their potential models for expanding the EV charging infrastructure for public use.
- 2.2 Also in 2021 GMCA launched the GM EVCI Strategy which is a sub-strategy of the GM Transport Strategy 2040 (GMTS 2040). It sets out objectives for EVCI which follow from the GMTS 2040 and should be considered alongside and read in conjunction with GMTS 2040 and the "Right Mix" vision for at least 50% of all trips to be made by active travel and public transport by 2040.  
[Electric Vehicle Charging Infrastructure Strategy \(ctfassets.net\)](https://www.ctfassets.net/...)
- 2.3 Whilst there was appetite for the EV market, developing a procurement strategy that would be future proofed and aligned with the GMCA strategy procurement model would have potentially become complex. The ambition is to improve the EV charging experience by having a fully interoperable public charging network across Greater Manchester that has a leading and recognisable brand that exists across GM.
- 2.4 The initial focus for investment by GM for the next 3 years will be to provide a blend of EV Charging Infrastructure (EVCI) that prioritises meeting the demand likely to be generated by the most polluting vehicles transitioning to EVs as part of the Clean Air Plan Objectives. The three areas of focus is the taxi trade, EV Car Clubs and trials of small number of EV community based charging hubs.

- 2.5 Delivery of Trafford's EV infrastructure is currently being managed by TfGM on behalf of all the Greater Manchester Local Authorities. GM has appointed an EV Charging Infrastructure Service Provider (EVCISP) to deliver a range of EVCI solutions through a 7-year EVCI contract to expand, upgrade, re-brand and maintain the existing publicly owned EVCI.
- 2.6 The EVCI contract managed by TfGM involves two phases; the first phase involves the transition and rebranding from GMEV to Be.EV including the upgrade of 118 old GMEV fast chargers to new fast charge points (which is now complete) and the delivery of the Early Measures project delivering 24 new rapid charging points across 22 sites (including 1 site which is a dedicated taxi charge point)
- 2.7 As a result of the fast developing market and through the transition from GMEV to Be.EV by GMCA, Trafford now has the opportunity to utilise the appointed EVCISP to accelerate the introduction of EV charge points that aligns with the GM strategy within Trafford without the need to procure in isolation.

### **3.0 Acceleration of the EV Charge Point Infrastructure through Be.EV**

- 3.1 Be.EV (Iduna) was appointed by Transport for Greater Manchester (TfGM) to roll out EV charging infrastructure across the region. Be.EV works closely with TfGM, the 10 Greater Manchester Local Authorities and other national bodies.
- 3.2 Trafford has been in dialogue with Be.EV in order to explore delivery options that will accelerate the rollout of EV across Trafford and to explore income and investment opportunities. The following are options that are being explored
  - (i) **Supplier Owned Infrastructure:** the supplier (Be.EV) will be responsible for meeting the purchase/installation costs as well as the ongoing operation and maintenance costs and the supplier will own the EV Chargers i.e. no financial outlay for the third party (Trafford) granting the lease. The third party will be responsible for granting the lease / providing the land for Be.EV to install, maintain and use the EV Chargers.
  - (ii) **Publicly Owned Infrastructure** the local authority would pay for the capital costs and an ongoing maintenance fee in respect of the EV Chargers and would own the EV Chargers. Be.EV would supply, install and maintain the EV Chargers.
  - (iii) **Joint Venture:** the local authority and Be.EV both invest direct equity in a special purpose vehicle. The local authority would invest on similar terms to Be.EV (Iduna) and any other private sector investor, mitigating subsidy control/state aid issues by ensuring that they are investing as a market economic operator.
- 3.3 Under these models, all EV Chargers will use the Be.EV brand and customers will have the same unified brand experience.
- 3.4 To accelerate the rollout it is recommended to enter into a lease arrangement initially with a view to exploring the Publicly Owned Infrastructure and JV model to enable Trafford to receive a return on any potential investment. This option requires no capital investment from Trafford.



3.5 Trafford has £500k in the existing approved capital programme to invest and support the rollout of EV charging infrastructure.

#### 4.0 Placement of the Be.EV Charging Infrastructure

4.1 Be.EV have conducted a desktop exercise, using their site location tool, and visited a number of the sites to ensure Trafford has a widespread and fair rollout of EV chargers across the Borough.

4.2 In partnership with Trafford Council, Be.EV have identified a number of sites that would be suitable for the development of EV charging infrastructure. The deployment of this infrastructure is a key part of your Clean Air Strategy and 2040 transport vision, and will incentivise residents to drive a positive change to the environment

4.3 Across Trafford it is proposed to deploy a mix of Fast, Rapid and Ultra-rapid chargers:

	<b>kW</b>	<b>Time to charge (80%)</b>	<b>Typical location</b>
<b>Fast</b>	7kW – 22kW	1 – 6 hours	Day long/overnight charging
<b>Rapid</b>	43kW+	20 – 60 min	Short stay locations
<b>Ultra-rapid</b>	100kW – 350kW	5 – 10 min	EV charging hubs

**Table 1**

4.4 Parking arrangements are a critical constraint that may require innovative placement of apparatus, especially if locations are selected where there is currently no off-street parking and pavement parking is prevalent.

4.5 Be.EV have utilised a mapping tool that identifies where residential frontages to park a car off road are limited and hence may require a hub to be located within close proximity to their premises. This then allows properties without driveways to have ready access to locally placed EV charge points within a 10 minute walk. This is required to ensure that there is a balanced amount of affordable and accessible infrastructure available for all those who may require it.

4.6 The mapping and site location tools available will allow Trafford and Be.EV to identify potential sites for local charge points where there is demand from a household without a driveway.



Map 1 - Ashton upon Mersey area



Map 2 – Ayres Road Area, Old Trafford

- 4.7 Map 1 illustrates a car park and streets in the Ashton upon Mersey area – that are within 10minute walking distance to potential EV charge points / mini hub
- 4.8 Map 2 illustrates properties in and around Ayres Road, Old Trafford with low probability of a driveway hence will need a local hub to charge their electric vehicle much like having access to a local petrol station.
- 4.9 Map 3 and Table 2 illustrates the proposed rollout for Phase 1 in Trafford: **Appendix A** details the locations and reason for choice.



**Map 3 – proposed Phase 1 rollout**

Ward	Rapids	Fasts	Total
Altrincham	3	3	6
Ashton on Mersey	0	3	3
Bucklow St Martins	2	2	4
Flixton	2	2	4
Hale	0	3	3
Longford	2	2	4
Sale	3	3	6
Stretford	2	2	4
Timperley	2	2	4
Urmston	8 ultra-rapids	0	8
<b>TOTAL</b>	<b>24</b>	<b>22</b>	<b>46</b>

**Table 2 – Proposed Chargers in Wards**

### User experience & membership

- 4.10 The chargers will be branded Be.EV, as part of the unified network in the North, and have access to 8000+ members who will benefit from a reduced tariff and incentivised membership packages.
- 4.11 Be.EV recently conducted a Be.EV membership survey in June 2021, which returned over 1,370 responses (a 27% response rate). This survey gave insight in to charging habits, membership demographics, charging experience and recommendations going forward.

4.12 Highlights of the survey results regardless of whether a driver has access to home or workplace charging (66% of members surveyed have this access), they found that 96% of the members surveyed use the Be.EV network at least once a month. The behaviour pattern observed is that nearly everybody is using the public network for top-up charging and based on the convenience of use.

## **5.0 Funding / Financial Considerations**

5.1 Grant funding is readily available and support for any funding application will be incorporated in the development of options as outlined in 3.2. Funding for example is available from OZEV and Innovate UK and other suitable government grants are likely to become available as a result of recent announcements. These grants however, require elements of match funding and the £500k already identified in the capital programme will be able to support this requirement should it be needed.

5.2 The Be.EV proposal for phase 1 as contained in this report will be funded by Be.EV including equipment, civils, power upgrades and ongoing operations. An estimate of the cash equivalent cost of this investment by Be.EV is of the order of £3.6million.

5.3 If the supplier owned infrastructure is accepted as the route to rollout Phase 1 then Be.EV have offered Trafford BC a range of net profit share which will range from 10-20% depending on the utilisation of a charger on a site. For example a hub, a busy location such as Regent Road would attract 20% profit share per unit whereas quieter locations would attract 10%. This is without any capital investment from Trafford

5.4 If Trafford were to invest in the infrastructure via options identified in 3.2(ii) and 3.2(iii) this net profit share would increase. These investment options require further development once future sites have been identified and future rollout options are agreed.

5.4 As above there is a potential opportunity to realise increased revenue with capital investment from Trafford. Future opportunities and financial considerations will be developed for future phases to be rolled out which will utilise our capital allocation of £500k.

## **6.0 TfGM Considerations**

6.1 There is currently still only a small network of Greater Manchester Electric Vehicle (GMEV) charge units introduced by Transport for Greater Manchester (TfGM) across Greater Manchester (GM). The EV charging infrastructure is spread throughout the Greater Manchester districts with the next phases looking at taxi rank facilities. TfGM EV taxi rank proposals are located at Ashfield Rd Sale, The Quadrant Urmston & Trafford Wharf Rd.

6.2 Transport for Greater Manchester will continue to install, operate, maintain and collect any subsequent revenue from the new EV charging posts that they install.

6.3 Following the engagement of Be.EV by GMCA / TfGM in 2021 the 10 Districts including Trafford can now use the TfGM EV contract to install a seamless infrastructure model and Trafford have been in dialogue with TfGM to ensure a joined up approach to the rollout of EV infrastructure across Trafford.

6.4 Trafford will therefore continue to work with TfGM to support the GM work alongside this proposal.

## **7.0 Rolling out EV Charging across Trafford - Timescales**

7.1 Typically from site agreement it takes three months to install an operating network. If power upgrades are necessary, which will be the case on some of the Trafford sites, Be.EV will continue to install chargers taking up current power capacity and alongside that will develop additional capacity at the substations to deliver the scale of infrastructure.

7.2 Subject to approval of this report and approach to delivery, Phase 1 of this proposal would be undertaken in Jan-March 2022.

7.3 The Office for Zero Emission Vehicles (OZEV) provides grant funding to install such infrastructure. Trafford will look to apply for funding to help with the costs of procurement and installation of on-street charging points for residential use were we are able to.

7.4 It is anticipated that there will be future funding opportunities that will support the rollout of EV charge point infrastructure that we can utilise and apply for.

## **8.0 Procurement**

8.1 As contained in the report it is proposed to utilise the existing contract that GMCA / TfGM have commissioned with Be.EV to rollout additional apparatus in Trafford as the contract has been awarded to allow Districts to enter into their own lease arrangements.

8.2 STAR procurement are currently reviewing the contract and the lease option to allow the accelerated rollout to progress

8.3 Future options to enter into a JV or public owned model will be explored to ensure Trafford can maximise its income opportunities from this project.

## **9.0 Conclusions**

9.1 The accelerated rollout of EV infrastructure to support increased demand as the transition from using fuel to electric vehicles is ever more important following approval of the Clean Air Plan in 2021.

9.2 Due to the engagement of Be.EV by GMCA / TfGM and the procurement options now available via this route Trafford has an opportunity to develop delivery options and rollout a wider network of EV charge points with a potential income stream.

9.3 The phasing of the rollout will see a marked increase in charge points in 2021/22 with a potential for further rollouts on a larger scale thereafter

9.4 There is the potential to scale up the income potential by investing more capital and rolling out a wider EV network of charge points especially if a joint procurement exercise is able to be developed.

## **10.0 Other Options**

10.1 A range of initiatives and options are suggested to be explored further as included within this report and in the report of December 2020.

10.2 The other alternative is that we decide not fit EV Charging units within Trafford and rely on TfGM and / or private initiatives to do it. However, this would not support the Council's clean air initiatives or ambition to accelerate EV rollout in Trafford.

## **11.0 Consultation**

11.1 Consultation with stakeholders, partners and members will be ongoing as part of the development and delivery of the project.

## **REASONS FOR RECOMMENDATION**

To inform and seek approval from members to utilise the Be.EV contract awarded by GMCA/TfGM to rollout additional EV infrastructure in Trafford and allow the Corporate Director of Place to develop a model for a joint funded or public owned infrastructure relating to EV that has the potential to raise revenue.

**Key Decision** Yes

**If Key Decision, has 28-day notice been given?** Yes

**Finance Officer Clearance**      **PC**  
**Legal Officer Clearance**      **TR**

**CORPORATE DIRECTOR'S SIGNATURE**



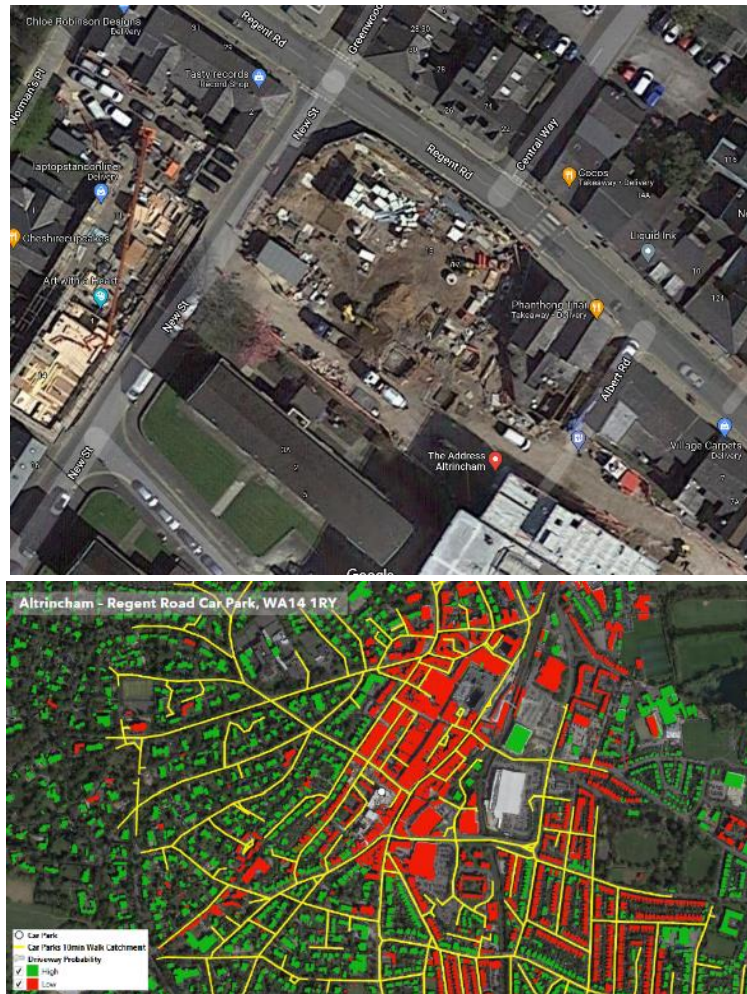
To confirm that the Financial and Legal Implications have been considered and the Executive Member has cleared the report.

# APPENDIX A – EV SITE PROPOSALS - PHASE 1

**Proposal 1** *includes mapping (removed from other proposals due to size)*

## Altrincham – Regent Road Car Park, WA14 1RY

Regent Road Car Park is being redeveloped and will re-open in spring 2022 with 50% more public parking spaces. The development, known as Chapel Square, will include 70 apartments and a 223 space public car park.



### Solution for Phase 1

Install x3 Rapid Chargers & x3 Fast Chargers (12 bays), with infrastructure for additional units in Phase 2, following usage increase demonstrated from our demand modelling tool.

### Solution for Phase 2

Install x3 Rapid Chargers & x3 Fast Chargers (12 bays)

**Total 24 bays**

## Proposal 2

### Ashton on Mersey - Greenbank Road Car Park, M33 5PH

Small car park near residential and retail locations.

#### Solution for Phase 1

Install x3 Fast Chargers, with potential to develop into a mini hub in the future as demand increases.

**Total 6 bays**

## Proposal 3

### Bucklow St Martins – Partington Central Road Car Park, M31 4EL

Council owned car park in central Partington, beside Partington Shopping Centre.

#### Solution for Phase 1

Install x2 Rapid Chargers & x2 Fast Chargers (8 bays), with infrastructure for additional units in Phase 2, following usage increase demonstrated from our demand modelling tool.

#### Solution for Phase 2

Install x2 Rapid Chargers & x2 Fast Chargers (8 bays)

**Total 16 bays**

## Proposal 4

### Flixton - Flixton Road Car Park, M41 6JF

Well located car park next to Flixton train station, local retail units and Flixton Park.

The site has an existing Be.EV Fast charger, and a soft dig area for additional units to serve the communities EV charging requirements.

#### Solution for Phase 1

Install x2 Rapid Chargers & x2 Fast Chargers (8 bays), with infrastructure for additional units in Phase 2, following usage increase demonstrated from our demand modelling tool.

#### Solution for Phase 2

Install x2 Rapid Chargers & x2 Fast Chargers (8 bays)

**Total 16 bays**



## Proposal 5

### Hale – Victoria Road Car Park, WA14 9AF

Busy car park in the centre of Hale, beside Hail train station.

#### **Solution for Phase 1**

Install x3 Fast Chargers & with infrastructure for additional units in Phase 2 if demand is high.

**Total 6 bays**

## Proposal 6

### Longford - Longford Park Car Park, M21 9LF

Car park beside Longford Park, Longford Health & Fitness club and Longford Athletic club.

#### **Solution for Phase 1**

Install x2 Rapid Chargers & x2 Fast Chargers (8 bays), with infrastructure for additional units in Phase 2, following usage increase demonstrated from our demand modelling tool.

#### **Solution for Phase 2**

Install x2 Rapid Chargers & x2 Fast Chargers (8 bays)

**Total 16 bays**

## Proposal 7

### Sale - Oaklands Drive Car Park, M33 7NS

Large open car park which has the potential to be transformed in to a charging hub for the local community. We appreciate the number of nearby homes without off-street parking that would benefit from local charging infrastructure.

#### **Solution for Phase 1**

Install x3 Rapid Chargers & x3 Fast Chargers (12 bays), with infrastructure for additional units in Phase 2, following usage increase demonstrated from our demand modelling tool.

#### **Solution for Phase 2**

Install x3 Rapid Chargers & x3 Fast Chargers (12 bays)

**Total 24 bays**

## Proposal 8

### Stretford - Lacy Street Car Park, M32 8LS

Well utilised car park in across from Stretford Mall, with existing Be.EV infrastructure.

#### Solution for Phase 1

Install x2 Rapid Chargers & x2 Fast Chargers (8 bays), with infrastructure for additional units in Phase 2, following usage increase demonstrated from our demand modelling tool.

#### Solution for Phase 2

Install x4 Rapid Chargers (8 bays)

#### Total 16 bays

**\*Note: this will need to be developed in line with Stretford Masterplan proposals**

## Proposal 9

### Timperley - Thorley Lane Car Park, WA15 7BJ

Well located car park in Timperley, near busy row of shops and substation on site.

#### Solution for Phase 1

Install x2 Rapid Chargers & x2 Fast Chargers (8 bays), with infrastructure for additional units in Phase 2, following usage increase demonstrated from our demand modelling tool.

#### Solution for Phase 2

Install x2 Rapid Chargers & x2 Fast Chargers (8 bays)

#### Total 16 bays

## Proposal 10

### Urmston - Atkinson Road Car Park, M41 9QN

Small, well located car park near the centre of Urmston, with potential to be developed into a mini charging hub.

#### Solution

Develop an 8 bay EV charging hub with a dynamic load balancing system, which will effectively give 8 satellite charging points a charging experience of 75kW up to 300kW each. The chargers are single bay units powered by three power banks, which could be supported by an onsite battery storage option.

# Future HUB proposals

The image below shows a simple design of what this site and others could look like in the near future. We believe this is the future of ultra-rapid charging, where customers have an enjoyable and sustainable charging experience.



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## TRAFFORD COUNCIL

**Report to:** Executive  
**Date:** 22<sup>nd</sup> November 2021  
**Report for:** Decision  
**Report of:** Executive Member for Environmental and Regulatory Services

### Report Title

**Gambling Act 2005 – Statement of Gambling Principles 2022-2025**

### Summary

The Council is required to prepare, consult on and publish a Statement of Gambling Principles in accordance with the Gambling Act 2005.

The Executive is invited to consider the summary of responses received following the statutory consultation.

### Recommendation(s)

It is recommended that the Executive:

1. Note the feedback from the recent public and trade consultation on the proposed Statement of Gambling Principles;
2. Recommend to Full Council to adopt the Statement of Gambling Principles 2022-2025 as attached at Appendix 3.

Contact person for access to background papers and further information:

Name: Joanne Boyle – Licensing Team Leader  
joanne.boyle@trafford.gov.uk

Background Papers: None

## 1.0 Background

Relationship to Policy Framework/Corporate Priorities	<i>Having a Policy on how the Council will administer its functions under the Gambling Act 2005 makes the processing of applications more efficient by giving residents, applicants and decision makers clear guidance on what factors will be taken into consideration when making decisions.</i>
Relationship to GM Policy or Strategy Framework	<i>The Policy reflects the common approach to be taken across all 10 Greater Manchester Authorities.</i>
Financial	<i>There will be no net additional cost to the Council</i>
Legal Implications:	<i>Section 349 of the Gambling Act requires the Council to publish a Statement of Gambling Policy every three years.</i>
Equality/Diversity Implications	<i>An EIA is attached to the report at <b>Appendix 4</b></i>
Sustainability Implications	<i>None</i>
Carbon Reduction	<i>None</i>
Staffing/E-Government/Asset Management Implications	<i>None</i>
Risk Management Implications	<i>None</i>
Health and Safety Implications	<i>None</i>
Health and Well-being Implications	<i>One of the aims of the policy is to prevent and reduce the negative impacts of gambling on individuals, families and communities. We are working with partners across Greater Manchester to ensure that gambling is a safe and enjoyable activity for all who choose to take part.</i>

- 1.1 Under the terms of the Gambling Act 2005 the Council is required to prepare, consult on and publish a statement of principles that it proposes to apply in exercising its functions under the Act, applicable to a three year period. The Council published its last Statement of Gambling Principles on the 31<sup>st</sup> January 2019 and must now review and publish any revisions to its Principles by 31<sup>st</sup> January 2022.
- 1.2 The Council's Statement of Principles was reviewed to ascertain if it was necessary to update the policy to incorporate either any new guidance from the Gambling Commission; or any significant changes in the local area.
- 1.3 This year the 10 Greater Manchester Licensing Authorities have agreed to take a common approach to refreshing their gambling policies, so this policy reflects the principles adopted across the region.

## 2.0 Revisions (Highlighted yellow in Policy Document)

## 3.0 Other Options

- 3.1 The only alternative option is for the Council not to approve and publish a Statement of Gambling Principles. The consequences of this course of action would be that the Council would not be complying with the requirement of the

Paragraph	Revision	Reason
2.2- 2.5	Addition	To define and differentiate clearly the definitions of 'Gaming', 'Betting' and Lottery
2.6	Addition	It changes the responsibility of the regulation of Gambling to being Shared between the Gambling Commission (GC) and Local Authorities (LA). GC take lead to ensure Gambling is conducted in a fair and open manner through administration and enforcement. GC are responsible for remote gambling activities via the internet, television or radio
3.11-3.17	Addition	It includes the Councils commitment to reference and consult Public Health regarding their involvement/insight of research, raising awareness and treatment programmes relating to Gambling disorder within GM.  It directs the Director of Public Health to the Gambling Commissions toolkit.
3.23-3.28	Addition	Clarifies the LA view on sharing information in the course of processing applications, abiding by the Freedom of Information Act and the General Data Protection Regulation (GDPR).  Identifies what circumstances that information will be kept in the context of the Gambling Act.  Places a Statutory duty on LA to notify various parties regarding applications using statutory forms.  Inserts a commitment by LA in several circumstances to notify the GC of information received i.e. concern regarding serious disorder, the suitability of operators; and if an alcohol licenced premise/club/institute are holding bingo in the week with stakes and prizes exceeding £2000

Gambling Act 2005, and the Council would not be able to effectively carry out any function in respect of applications made under the Act.

		Emphasises that LA will act in accordance with legislation and guidance from the commission and adopt better regulation
3.36-3.39	Addition	This section details factors which will <u>not</u> be relevant in respect of a licence application if 'Interested parties' or 'responsible authorities' wish to comment.
3.45- 3.47	Addition	Inserts additional requirements of premises that can be used for gambling and will be granted a licence. It notes that a licence will not prejudice or prevent action under appropriate planning or building law.
3.48-3.51	Addition	Inserts applicant requirements set out under The Gambling Act (s51) to submit plans of premises to the LA to assess whether they are fit and proper for gambling, and is appropriate in conjunction with the risk assessment.
3.52	Addition	Inserts additional considerations for applicants in their plans of track events
4.6-4.7	Addition	Adds additional considerations for the LA to consider in determining whether to grant or refuse an application.
4.8- 4.10	Addition	Sets out how the licensing committee decides what conditions are applied to premises licence and specifies the different organisations who can specify conditions.
4.15	Addition	Additional bullet point for the LA to consider when determining whether to go ahead and review a licence.
5.1- 5.18	Addition	To include additional relevant factors when determining an application and review.
5.25- 5.27	Addition	Additions and inclusions to prevent gambling from being a source of disorder and associated with crime or disorder; additional needs to consult and develop relationships with the police; additional measures to be considered and included.



5.28	Addition	Includes the general objective of ensuring that gambling is conducted in a fair and open way
5.30-5.36	Addition	<p>Inserts how licensees and applicants will be expected to demonstrate they have carefully considered vulnerable persons and the protection of children from harm. It includes having arrangements in place for preventing underage gambling,</p> <p>It includes the onus to consult a Mental Health Advisor and formulate a policy to protect persons of mental impairment or mental health difficulties from being harmed, or exploited.</p> <p>Arrangements in place for multi-occupancy premises, having arrangements in place for controlling access to children and the capability of different uses.</p> <p>Children not being permitted to premises where there are, or being able to, use Category C machines or above</p>
5.37-5.39	Addition	Inclusion of expectations of operators when it comes to their staffing provision.
5.40-5.43	Addition	Inclusion of expectation on operators to data share. Expectation to keep track of problem gambling in Trafford and share that information with the Licensing Section when requested. A template has been included of information to be provided.
5.44-5.55	Addition	Expectation of all customer facing staff and management staff to have knowledge and training to tackle risks and promote responsible gambling. It inserts a list of expectations of knowledge. There is also an expectation with managers to support standards with regard to protecting children from harm and vulnerable persons.
5.46-5.51	Addition	Sets out the expectation on how operators should monitor gaming and layout.

**4.0 Consultation**

6.12	Addition	Expectation on operators to provide a breakdown of the number of electronic bingo machine terminals that they provide at their premises.
6.13- 6.22	Addition	Inserts requirements and restrictions for gaming machines at bingo premises, including limiting the number and times that the bingo machines are not provided. It allows for the licensing authority to limit the number.
6.23- 6.25	Addition	It acknowledges the phenomenon of Bongo Bingo in reliance of an alcohol licence. It encourages venues to send out responsible gambling messages.
6.26-6.29	Addition	Insertion to betting premises to encourage participation in the Safe Bet Alliance and demonstrate and incorporate safety measures. It stipulates times for betting premises, and that licensing authorities can only vary the hours if they have robust measures in place. It allows LA the power to restrict the number of betting machines
7.6-7.9	Addition	Inserts further measures for Unlicensed Family Entertainment centres, requiring the need for a permit if the premises does not hold a premises licence.

- 4.1 The Act requires the Council to consult on its Policy with the police; those who represent the interests of gambling businesses in their area; and those which represent interested persons likely to be affected. The Policy was consulted on between the 9<sup>th</sup> July 2021 and the 3<sup>rd</sup> September 2021.
- 4.2 The Council received one direct response to its consultation which is detailed at **Appendix 1 – Summary of Responses**.
- 4.3 Oldham and Manchester Councils received a response from the Betting and Gaming Council as part of their consultation which has been accepted as a response to all 10 authorities and is detailed at **Appendix 2- Summary of Response - Betting and Gaming Council**.
- 4.4 A copy of the Council's proposed Statement of Gambling Principles for 2022 – 2025 is attached to this report at **Appendix 3**.
- 4.5 The Principles, if approved, will come into force on **31<sup>st</sup> January 2022**, and will remain in force for a period not exceeding three years, and will be subject to review and further consultation before **31<sup>st</sup> January 2025**. The Council will

keep the policy under review, making any amendments as it considers appropriate.

## **5.0 Reasons for Recommendation**

5.1 The Council is legally required to prepare, consult on and publish a statement of principles that it proposes to apply in exercising its functions under the Gambling Act, applicable to a three year period. The Statement of Principles proposed reflects the common approach to be taken across all 10 Greater Manchester Authorities to the processing of applications, giving clear guidance on what factors will be taken into consideration when making decisions. One of the aims of the policy is to prevent and reduce the negative impacts of gambling on individuals, families and communities.

## **6.0 Recommendation.**

6.1 It is recommended that the Executive:

6.1.1 Note the feedback from the recent public and trade consultation on the proposed Statement of Gambling Principles;

6.1.2 Recommend to Full Council to adopt the Statement of Gambling Principles 2022-2025 as attached at Appendix 3.

**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**



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

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## SUMMARY OF RESPONSES TO CONSULTATION

POLICY	RESPONSES	COUNCIL RESPONSE
	<p>1 respondent</p> <p>Responded 'Yes' to having read the policy.</p> <p>Responded 'Yes' that they thought the policy was strong enough to prevent gambling shops being used as a source of crime.</p> <p>Responded 'Yes' that they thought the Gambling Policy will be effective in encouraging fairness and openness in gambling premises.</p> <p>Responded 'Yes' that they feel the draft policy does enough to help protect children and vulnerable people from harm.</p> <p>Responded 'Agree' that gambling premises should operate in shopping and business areas only, and should not be located near schools or in residential neighbourhoods.</p> <p>When asked for anything else they felt should be included in the Gambling Policy- no response was received.</p>	<p>The Council notes the response made.</p>

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## SUMMARY OF RESPONSE - Betting and Gaming Council (BGC)

### Introduction

Oldham and Manchester Councils received a consultation response from the Betting and Gaming Council (BGC) to the proposed gambling licensing statement of principles. This Appendix addresses the comments made by the BGC and provides suggested amendments to the draft statement of principles which are highlighted in green.

Existing text	BGC response	Amendments	Notes
<p>“In Greater Manchester we are thinking differently about gambling with a shared aim to prevent and reduce the negative impacts of gambling on individuals, families and communities. As part of our innovative public service reform and population health agenda we are working with partners across Greater Manchester to ensure that gambling is a safe and enjoyable activity for all who choose to take part.” (Forward)</p>	<p>Overall, the draft statement of principles appears to adopt an anti-gambling stance and ignores the fundamental “aim to permit” principle contained within s153.</p>	<p>None.</p>	<p>We clearly state throughout the document that licensing decisions will be made in accordance with the Gambling Act “aim to permit” and that our objective is for “gambling to be a safe and enjoyable activity for all who choose to take part”.</p>
<p>The Council has a responsibility under the Gambling Act 2005 to decide whether to grant or reject applications and in the case of premises licensing applications to decide any conditions to apply where the decision is taken to grant. (Para 2.7 in “Introduction” section)</p>	<p>This omits a fundamental requirement of the Gambling Act to “aim to permit”</p>	<p>None.</p>	<p>The aim to permit is clearly included in the document at later stage and is referenced as “all decisions are based on the Act”.</p>

<p>“While for some gambling is an enjoyable activity, it is a source of harm for many” (Para 3.11 under “Public Health”)</p>	<p>This is, at best, misleading.</p>	<p>Suggest an amendment to:</p> <p><i>“While gambling can be an enjoyable activity, it is a source of harm for many”</i></p> <p>With the addition of the following references:</p> <p>Citizens Advice (2018) <i>Out of Luck - An exploration of the causes and impacts of problem gambling</i>. Available at: <a href="http://www.citizensadvice.org.uk/about-us/policy/policy-research-topics/consumer-policy-research/consumer-policy-research/out-of-luck-an-exploration-of-the-causes-and-impacts-of-problem-gambling/">http://www.citizensadvice.org.uk/about-us/policy/policy-research-topics/consumer-policy-research/consumer-policy-research/out-of-luck-an-exploration-of-the-causes-and-impacts-of-problem-gambling/</a></p> <p>IPPR (2016) <i>Cards on the table: The cost to government associated with people who are problem gamblers in Britain</i>, IPPR. Available at: <a href="https://www.ippr.org/research/publications/cards-on-the-table">https://www.ippr.org/research/publications/cards-on-the-table</a></p>	<p>We consider the original statement to be accurate as every person who directly experiences harm as a result of gambling, between 6-10 others are affected, suggesting that the impact of harm is widely felt beyond just those who participate in gambling, with resulting costs for wider society.</p>
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<p>“Research suggests that in a city-region like Greater Manchester there are approximately 39,000 people living with a gambling disorder, with a further 118,000 at risk.” (Para 3.12 under “Public Health”)</p>	<p>This refers to “research”, but it is not clear what this research is, when this research was conducted or where</p>	<p>Retain this data but include the following reference:  <i>Kenyon (2017) Problem Gambling in Leeds: Report to Leeds City Council. Leeds Beckett. Available at: <a href="http://eprints.leedsbeckett.ac.uk/id/eprint/3945/1/Problem%20Gambling%20Report.pdf">http://eprints.leedsbeckett.ac.uk/id/eprint/3945/1/Problem%20Gambling%20Report.pdf</a>.</i></p>	<p>This is the most up to date data we have available and incorporated an estimate based on GM population demographics using analysis conducted by Leeds Beckett University specifically looking at urban areas. The national data for gambling harm quoted by the BGC includes areas that bear no similarity to GM (for example, rural areas in Devon), therefore we have used more specific data to inform our estimates so they are relevant to our local population.</p>
<p>“Men, younger adults (aged 18-34) and adults from a lower socio-economic or black and minority ethnic background are more likely to be classified as gamblers experiencing some level of harm.” (Para 3.13 under “Public Health”)</p>	<p>This may be correct where those groups do engage in gambling but context is all important. Otherwise, a misleading impression is given.  The letter goes on to quote an exploratory piece of research from 2015 looking at vulnerability to gambling harm.</p>	<p>Retain this text but include the following reference:  <i>Dinos, S. et al. (2020) ‘Treatment Needs and Gap Analysis in Great Britain’, GambleAware p. 45. Available at: <a href="https://www.begambleaware.org/sites/default/files/2020-12/treatment-needs-and-gap-analysis-in-great-britain-a-synthesis-of-findings-1.pdf">https://www.begambleaware.org/sites/default/files/2020-12/treatment-needs-and-gap-analysis-in-great-britain-a-synthesis-of-findings-1.pdf</a></i></p>	<p>Anyone who gambles is vulnerable to harm, however this data is taken from the most recent surveys conducted by Gamble Aware – more research has been done in this space following the quoted 2015 report. We know that gambling prevalence is lower among people from black and ethnic minority backgrounds so the overall numbers are lower, but of those who do participate more report experiencing harm as a result, therefore this statement is an accurate reflection of the data.</p>

<p>“The licensing authority will not take into account representations that are</p> <ul style="list-style-type: none"> <li>• Repetitive, vexatious or frivolous</li> <li>• From a rival gambling business where the basis of the representation is unwanted competition</li> <li>• Moral objectives to gambling</li> <li>• Concerned with expected demand for gambling</li> <li>• Anonymous”</li> </ul> <p>(Para 3.38 – “Factors that will not be relevant”)</p>	<p>This contains a list of bullet points detailing representations that would not be considered. This list should be expanded to include issues of nuisance and whether the proposals have or are likely to be granted building regulation approval or planning permission.</p>	<p>None</p>	<p>Current text sufficiently describes factors which will not be taken into account.</p> <p>There is no legal basis for planning permission to be incorporated into a licensing decision as these are determined on different grounds and therefore is irrelevant.</p>
<p>How the licensing committee decides what conditions to apply to premises licenses (Para 4.8-4.12 “How the licensing committee decides what conditions to apply to premises”)</p>	<p>This section would be assisted by a clear explanation that all Gambling Act 2005 premises licences are subject to mandatory and default conditions which are intended to be sufficient to ensure operation that is consistent with the licensing objectives, and it is unlikely that additional conditions will need to be imposed.</p>	<p>None.</p>	<p>The first bullet point of para 4.8 refers to “conditions specified in the Gambling Act 2005”.</p> <p>Individual licensing authorities can determine what conditions apply in accordance with the Statement of Principles and the Gambling Act. While some conditions are mandatory these do not describe the minimum conditions that can be imposed on licenses. We consider the current operation of the Gambling Act to provide insufficient protection to gamblers from harm which is why we have developed risk-based conditions which may apply.</p>

<p>Gambling related harm (Para 5.5-5.7 in the “Relevant factors when considering applications and reviews” section)</p>	<p>These are headed “Gambling related harm”. It is not clear what the purpose of these paragraphs are, and they should be removed.</p>	<p>None.  For clarity we have referred to “Public Health (3.7-3.11)” in the paragraph title.</p>	<p>This section provides context to inform the risk assessment and the Statement of Principles.  In accordance with the objectives of the GM gambling harm reduction programme these are key factors to consider.</p>
<p>Local risk assessments (Para 5.8-5.17 in the “Relevant factors when considering applications and reviews” section)</p>	<p>These paragraphs explain the requirement for an operator to assess the local risk to the licensing objectives posed by the provision of gambling facilities at its premises and have policies procedures and control measures to mitigate those risks. These paragraphs are overly prescriptive and unnecessary.</p>	<p>None.</p>	<p>This section is included specifically to provide clear guidance on what is expected from operators in accordance with our shared aim of preventing and reducing gambling harm.</p>
<p>“The Authority will expect the local risk assessment to consider the urban setting:</p> <ul style="list-style-type: none"> <li>• Proximity of the premises to schools</li> <li>• The commercial environment</li> <li>• Factors affecting footfall</li> <li>• Etc. etc.”</li> </ul> <p>(Para 5.12 under “local risk assessments”)</p>	<p>The policy should be clear that the mere presence of any of the issues outlined in the bullet points should not affect the grant of an application as long as an operator has assessed those risks and has control measures and strike control measures, policies and procedures in place to address and mitigate them.</p>	<p>None.</p>	<p>Para 5.8-5.10 clearly describes what is expected of the risk assessment and does not suggest that a licence will not be granted if these conditions are present.</p>

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# TRAFFORD COUNCIL

## **Draft Statement of Principles under the Gambling Act 2005**

2022 - 2025

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## Foreword from Elected Member

In Greater Manchester we are thinking differently about gambling with a shared aim to prevent and reduce the negative impacts of gambling on individuals, families and communities. As part of our innovative public service reform and population health agenda we are working with partners across Greater Manchester / Trafford to ensure that gambling is a safe and enjoyable activity for all who choose to take part. Our priorities are

- Developing our understanding of gambling related harms
- Improving access to high quality treatment and support
- Supporting interventions to prevent gambling from becoming a harmful activity
- Engaging with people and communities to co-design our work



Councillor Stephen Adshead

Executive Member for Environmental and Regulatory Services



## 1. Introduction

- 1.1 As the licensing authority, we are required to perform the following functions under the Gambling Act:
- 1) Be responsible for licensing premises where gambling activities are to take place by issuing premises licences
  - 2) Issue provisional statements where it is proposed that gambling activities will take place but a premises is not yet ready for use
  - 3) Regulate members' clubs and miners' welfare institutes who wish to undertake certain gaming activities by issuing club gaming permits and/or club machine permits
  - 4) Issue club machine permits to commercial clubs
  - 5) Issue permits for unlicensed Family Entertainment Centres where Category D machines may be used
  - 6) Receive notifications from premises licensed for on-sales of alcohol for use of two or fewer Category C or D gaming machines
  - 7) Issue licensed premises gaming machine permits for premises licensed for on-sales of alcohol for use of two or more Category C or D machines
  - 8) Register small society lotteries
  - 9) Issue prize gaming permits
  - 10) Receive and endorse Temporary Use Notices for temporary use of premises for gambling
  - 11) Receive Occasional Use Notices for betting at tracks

2.1. Gambling is defined in the Act as either gaming, betting or taking part in a lottery

2.2. Gaming' means playing a game for the chance to win a prize.

2.3. 'Betting' means making or accepting a bet on:

- the outcome of a race, competition or other event
- the likelihood of anything occurring or not occurring
- whether anything is true or not.

2.4. A 'Lottery' is where participants are involved in an arrangement where prizes are allocated wholly by a process of chance.

2.5. The responsibility for regulating gambling is shared between the Gambling Commission and local authorities. The Gambling Commission is responsible for issuing operating licences to organisations and individuals who provide facilities for gambling and personal licences to persons working in the gambling industry. The Commission takes the lead role on ensuring that gambling is conducted in a fair and open way through the administration and enforcement of operating and personal licence requirements. The Commission is also responsible for remote gambling activities such as facilities provided via the internet, television or radio.

2.6. We are also required to:

- Provide information to the Gambling Commission regarding details of licences issued
- Maintain a register of the permits and licences that are issued under the functions above.

2.7. The council has a responsibility under the Gambling Act 2005 to decide whether to grant or reject applications and in the case of premises licence applications to decide any conditions to apply where the decision is taken to grant. All decisions made by the licensing authority in relation to premises licences (and some other authorisations – see specific sections for details) are based on the Act, relevant guidance, Codes of Practice, our Gambling Policy and the three licensing objectives. These objectives are:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

2.8. In the case of premises licences (and some other authorisations – see specific sections for details), the licensing committee will permit gambling only so far as it is reasonably consistent with these three objectives.

### **Publication of this Policy**

2.9. Licensing authorities have a requirement to develop, consult on, and publish a statement of licensing policy every three years with regards to the principles they propose to apply in exercising functions under the Gambling Act 2005.

- 2.10. The policy statement forms the licensing authority's mandate for managing local gambling provision and sets out how the licensing authority views the local risk environment and therefore its expectations in relation to operators with premises in the locality.
- 2.11. The authority is one of the 10 Metropolitan Districts of Greater Manchester. In Greater Manchester we have a shared aim reducing gambling related harms, our approach focuses on preventing gambling harms from occurring, as well as improving how we support our residents who are already experiencing harms, either directly or as a result of someone else's gambling. The renewal of licensing policies presents an opportunity for local authorities to embed these principles. Licensing leads across Greater Manchester have agreed to take a common approach to refreshing gambling licensing policies.
- 2.12. The following people and organisations have been consulted in preparing the statement:
- 2.13. [summary of consultees]
- 2.14. The Authority consulted upon this Policy before finalising at a full Council meeting held on the [enter date].

### **Description of the Area**

- 2.15 Trafford's population in 2011 was 226,6005 (Source: Census 2011). Trafford occupies an area of 10,608 hectares and comprises Stretford, Sale, and Altrincham, together with the former urban districts of Bowdon, Hale and Urmston, and the parishes of Carrington, Warburton, Dunham Massey and Partington.

## **2. General principles**

- 2.1 In making decisions on premises licences, the licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it:
- In accordance with any relevant code of practice issued by the Gambling Commission;
  - In accordance with any relevant guidance issued by the Gambling Commission;
  - Reasonably consistent with the licensing objectives; and
  - In accordance with the authority's statement of licensing policy

- 2.2 As the licensing authority, we will regulate gambling in the public interest, which will be reflected in this policy statement.
- 2.3 This policy statement does not undermine the right of any person to make representations on an application or to seek a review of a licence where provision has been made for them to do so.
- 2.4 This policy does not override anybody's right to make an application, make representations about an application, or apply for a review of a licence.
- 2.5 Each application will be considered on its merits in accordance with the requirements of the Gambling Act and without regard to demand.

### **Other regulatory regimes**

- 2.6 The licensing authority will avoid duplication with other regulatory regimes, so far as possible. A range of general duties are imposed on the self-employed, employers and operators of gambling premises, both in respect of employees and of the general public, by legislation governing health and safety at work and fire safety. Therefore, such requirements do not need to be included in the policy statement.

### **Responsible Authorities**

- 2.7 Responsible Authorities are generally public bodies that must be notified of all applications and who are entitled to make representations to the Council if they are relevant to one or more of the licensing objectives.
- 2.8 Section 157 of the Act defines those authorities. For this area they are: -
  - The Gambling Commission
  - Greater Manchester Police
  - Greater Manchester Fire and Rescue
  - The Planning Authority
  - The authority which has functions in relation to pollution to the environment or harm to human health
  - Trafford Strategic Safeguarding Partnership
  - HM Revenue and Customs
  - The Licensing Authority.
- 2.9 The contact details of all the Responsible Authorities are available are set out in Appendix 1.

2.10 The licensing authority has designated the Trafford Strategic Safeguarding Board as the body that is competent to advise it about the protection of children from harm. The principles that have been used in making this designation is that the board is:

- responsible for the whole of the licensing authority's area
- answerable to democratically elected persons

### Public Health

2.11 While for some gambling is can be an enjoyable activity, it is a source of harm for many.

Citizens Advice (2018) *Out of Luck - An exploration of the causes and impacts of problem gambling*. Available at: <http://www.citizensadvice.org.uk/about-us/policy/policy-research-topics/consumer-policy-research/consumer-policy-research/out-of-luck-an-exploration-of-the-causes-and-impacts-of-problem-gambling>

IPPR (2016) *Cards on the table: The cost to government associated with people who are problem gamblers in Britain*, IPPR. Available at: <https://www.ippr.org/research/publications/cards-on-the-table>

2.12 Research suggests that in a city-region like Greater Manchester there are approximately 39,000 people living with a gambling disorder, with a further 118,000 at risk, however we know that self-reported surveys underestimate true prevalence of harm given the unfortunately shame and stigma associated with gambling disorder. For every person who gambles, it is estimated that between six and ten people are 'affected others' and experience similar harms. These may be dependents, parents, partners, friends or colleagues.

Kenyon (2017) *Problem Gambling in Leeds: Report to Leeds City Council*. Leeds Beckett. Available at: <http://eprints.leedsbeckett.ac.uk/id/eprint/3945/1/Problem%20Gambling%20Report.pdf>

Area	Estimate of Adult Population 2016	Estimated number of problem gamblers	Estimated number of 'at risk' gamblers
Greater Manchester	2,148,660	38,676	118,176
Bolton	216,920	3,905	11,931
Bury	145,880	2,626	8,023
Manchester	416,480	7,497	22,906

Area	Estimate of Adult Population 2016	Estimated number of problem gamblers	Estimated number of 'at risk' gamblers
Oldham	173,900	3,130	9,565
Rochdale	164,820	2,967	9,065
Salford	192,840	3,471	10,606
Stockport	227,920	4,103	12,536
Tameside	173,960	3,131	9,568
Trafford	179,920	3,239	9,896
Wigan	256,020	4,608	14,081

2.13 Anyone who gambles is vulnerable to harm. Men, younger adults (aged 18-34) and adults from a lower socioeconomic or black and minority ethnic backgrounds are more likely to be classified as gamblers experiencing some level of harm. Gambling related harms are often described at an individual level, however these harms have a wider impact on communities and society with costs to the UK as a whole estimated at being between £260m and £1.16bn.

Dinos, S. et al. (2020) 'Treatment Needs and Gap Analysis in Great Britain',

GambleAware p. 45. Available at:

<https://www.begambleaware.org/sites/default/files/2020-12/treatment-needs-and-gap-analysis-in-great-britain-a-synthesis-of-findings-1.pdf>

2.14 People living with, or at risk of developing, a gambling disorder may experience stress, anxiety and depression, financial losses, debts and exhibit compulsive behaviours, such as chasing losses. Gambling related harms may accrue over a long period of time or very quickly at a time of crisis, many harms have a lasting legacy beyond initial recovery from gambling disorder. Harms associated with gambling include poor mental health and wellbeing, relationship breakdown, neglect of other priorities in life, poor performance at work or school and criminal activity. It is estimated that for every day of the year, one person takes their own life as a result of gambling disorder.

2.15 Awareness of gambling harms as an emerging public health problem has increased in recent years, however Public Health are not a responsible authority under the Gambling Act 2005. Nonetheless, the licensing authority will consult the Director of Public Health on all premises licence applications and will advise the Director of Public Health to consider the use of the Gambling Commission's toolkit for public health and

safeguarding: <https://www.gamblingcommission.gov.uk/for-licensing-authorities/Licensingauthority-toolkit/Public-health-and-Safeguarding-toolkit.aspx>

- 2.16 Greater Manchester has a gambling harms reduction programme (which aims to reduce the harms caused by gambling to the population. Licence applicants and holders will be expected to show how they are actively protecting the local population from gambling harms with their processes and operations, and consider how the location, opening hours and promotion of their activities can minimize opportunities for harm to the vulnerable groups listed above. Section [] of this document on protecting vulnerable groups highlights some of the standards licence holders are expected to meet to minimize harm to customers and local residents.
- 2.17 The licensing authority recognises that local authority public health teams can offer insights from those impacted by gambling harms and offer contextual information about treatment and support in the local area and can add value to the licensing application process where there are concerns raised about risk of harm to vulnerable groups locally.
- 2.18 Greater Manchester's gambling harms reduction programme is listening to residents with lived experience of gambling and is commissioning its own research to better understand problem gambling in the region. As findings from this research emerge, licence holders will be expected to support the delivery of recommendations to help minimize gambling harms to the local populations.

### **Determining whether a person is an interested part in relation to a premises licence, or an application for or in respect of a premises licence**

- 2.19 For the purposes of the Gambling Act, an 'interested party' is:
- a) Someone who lives sufficiently close to the premises to be likely to be affected by the gambling premises
  - b) Has business interests that might be affected by the authorised activities
  - c) Represents persons who satisfy paragraph (a) or (b)
- 2.20 Whether or not a person is an 'interested party' is ultimately the decision of the Licensing Authority which issues the licence or to which the application is made.
- 2.21 To determine who lives 'sufficiently close to the premises to be likely to be affected by the gambling premises', we will consider the following on a case-by-case basis:
- The size of the gambling premises

- The nature of the gambling premises
- The distance of the premises from the address of the person making the representation
- The potential impact of the premises (number of customers, routes likely to be taken by those visiting the premises)
- the circumstances of the person who lives close to the premises. This is not their personal characteristics, but their interests which may be relevant to the distance from the premises e.g. 'sufficiently close to be likely to be affected' could have a different meaning for (a) a private resident (b) a residential school for children with truanting problems and (c) a residential hostel for vulnerable adults
- The 'catchment' area of the premises (i.e. how far people travel to visit it).

2.22 Having a 'business interest' will be given the widest possible interpretation and include community and voluntary groups, schools, charities, faith groups and medical practices. The licensing authority will consider the following factors relevant when determining whether a person's business interests may be affected:

- The size of the premises
- The 'catchment' area of the premises (i.e. how far people travel to visit it)
- whether the person making the representation has business interests in the affected catchment area

2.23 In so far as who represents persons who satisfy paragraphs (a) or (b), this would include for example:

- i. Residents' associations and tenants' associations
- ii. Trade associations and trade unions
- iii. Any other person with written permission from somebody who satisfies paragraph (i) or (ii)
- iv. Local councillors and MPs

**Exchange of information between the licensing authority and the Gambling Commission (s29 and s30 of GA2005), and the exchange of information between the licensing authority and other persons listed in Schedule 6 of the Act**

2.24 The licensing authority may share application information received in the course of processing applications with the Gambling Commission, a constable or police force, an



enforcement officer, another Licensing Authority, her Majesty's Commissioners of Customs & Excise, The Gambling Appeal Tribunal, The National Lottery Commission, The Secretary of State or Scottish Ministers.

2.25 We will abide by the Freedom of Information Act and the General Data Protection Regulation (GDPR) in its safeguarding/release of information or data.

2.26 In the context of the Gambling Act, we will retain only that information which relates to the processing of applications for licences, permits, permissions and representations. Applications and representations in respect of applications are both in the public domain and are therefore available on request and may be published as part of our web register. Personal addresses/contact numbers attached with representations may also be released. Information may also be shared with other Gambling Act regulators or other parties prescribed by the Secretary of State.

2.27 Licensing authorities have statutory duties to notify the Commission as well as the applicant and other responsible authorities of the grant/rejection of applications (new, variations, transfers etc) as well as the revocation, surrender or lapse of a premises licence using the correct statutory forms.

2.28 We will inform the Gambling Commission without delay if:

- The Licensing Authority receives information that causes it to question the suitability of the person holding/applying to hold an operating licence
- There are persistent or serious disorder problems that an operator could or should do more to prevent, so that the Commission may consider the continuing suitability of the operator to hold an operating licence
- If it comes to our attention that: alcohol-licensed premises or clubs or institutes are playing bingo during the course of a week which involves significant stakes and prizes and makes it possible that the £2,000 in seven days is being exceeded.

2.29 The licensing authority will act in accordance with the relevant legislation and guidance from the Commission and will adopt the principles of better regulation.

**Functions of the licensing authority under Part 15 of the GA2005 with respect to the inspection of premises and the power under s346 of the Act to institute criminal proceedings in respect of the offences specified in that section**

- 2.30 Our principal enforcement role under the Gambling Act is to ensure compliance with the conditions of the premises licence and legal requirements in respect of other permissions the licensing authority regulates. However, we will also ensure that any unlicensed premises which are operating illegally are dealt with appropriately to ensure compliance. Where appropriate, we will work with the Gambling Commission in our enforcement activity. The Council will adopt a risk-based inspection and enforcement programme, which will mean giving greater attention to high-risk premises and a lighter touch for low-risk premises. In all cases we will ensure our inspection and enforcement programme is operated in accordance with any codes of practice issued by the Gambling Commission, in accordance with the Government's Enforcement Concordat and the Compliance Code.
- 2.31 The Council will take account of the Gambling Commissions guidance document issued in February 2015 (or any subsequent amendments) 'Approach to Test Purchasing' when considering making test purchases at gambling premises. The Council will also follow its own policies and procedures regarding the use of underage test purchasers.
- 2.32 This licensing authority will be guided by the Gambling Commission's Guidance for local authorities and will endeavour to be:

Proportionate	regulators should only intervene when necessary: remedies should be appropriate to the risk posed, and costs identified and minimised
Accountable	regulators must be able to justify decisions, and be subject to public scrutiny
Consistent	rules and standards must be joined up and implemented fairly
Transparent	regulators should be open, and keep regulations simple and user friendly
Targeted	regulation should be focused on the problem, and minimise side effects

- 2.33 Where there is a Primary Authority scheme in place, the council will seek guidance from the Primary Authority before taking any enforcement action. At the time of the

publication of this policy there were seven Primary Authority arrangements with host local authorities:

Operator	Primary Authority local authority
BACTA	Reading
Coral Racing	Milton Keynes
Ladbrokes	Milton Keynes
Paddy Power	Reading
Rank Group	City of Westminster
Sky Betting & Gaming	Wakefield
William Hill	Reading

- 2.34 Further information, including an index of all Primary Authority arrangements can be found at: [Primary Authority Register \(beis.gov.uk\)](http://beis.gov.uk)

### Commenting on a licence application

- 2.35 If ‘interested parties’ (see below for definition) or ‘responsible authorities’ wish to comment on an application for a premises licence relating to the licensing objectives, they can make a ‘representation’. The Licensing Authority can only consider representations if made by either an ‘interested party’ or ‘responsible authority’.
- 2.36 A representation is a statement that outlines any comments that the party making the representation wants to be taken into consideration by the Licensing Authority when determining the application. In all cases representations will need to be ‘relevant’. The only representations likely to be relevant are those that meet one or more of the following criteria:

- Relate to the licensing objectives
- Relate to relevant matters in our gambling policy
- Relate to relevant matters in the Gambling Commission’s Guidance to Local Authorities
- Relate to relevant matters in the Gambling Commission’s Codes of Practice
- Relate to the premises that are the subject of the application

AND

- Are neither frivolous nor vexatious nor will certainly not influence the authority’s determination of the application.

### Factors that will not be relevant

2.37 Any objections to new premises or requests for a review should be based on the licensing objectives of the Act. Unlike the Licensing Act 2003, the Act does not include the prevention of public nuisance as a specific licensing objective.

2.38 The licensing authority will not take into account representations that are:

- repetitive, vexatious or frivolous
- from a rival gambling business where the basis of the representation is unwanted competition
- moral objections to gambling
- concerned with expected demand for gambling
- anonymous

2.39 Details of applications and representations referred to a licensing sub-Committee for determination will be published in reports that are made publicly available and placed on the council's website in accordance with the Local Government Act 1972 and the Freedom of Information Act 2000. Personal details will however be removed from representations in the final website version of reports

2.40 Names and addresses of people making representations will be disclosed to applicants and only be withheld from publication on the grounds of personal safety where the licensing authority is specifically asked to do so.

### Split Premises

2.41 The Licensing Authority will always give the closest consideration to whether a sub-division has created separate premises meriting a separate machine entitlement. The Authority will not automatically grant a licence for sub-divided premises even if the mandatory conditions are met, particularly where the Authority considers that this has been done in order to sidestep controls on the number of machines which can be provided in a single premise. The Authority will consider if the sub-division has harmed the licensing objective of protecting the vulnerable. The Authority may also take into account other relevant factors as they arise on a case-by-case basis.

### Premises "ready for gambling"

2.42 A licence to use premises for gambling will only be issued in relation to premises:

- that the Authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use
- where they are expected to be used for the gambling activity named on the licence.

2.43 If the construction of a premises is not yet complete, or if they need alteration, or if the applicant does not yet have a right to occupy them, then an application for a provisional statement should be made instead.

2.44 In deciding whether a premises licence can be granted where there are outstanding construction or alteration works at a premises, this authority will determine applications on their merits, applying a two-stage consideration process: -

- 1) Whether the premises ought to be permitted to be used for gambling
- 2) Whether appropriate conditions can be put in place to cater for the situation that the premises are not yet in the state in which they ought to be before gambling takes place.

2.45 Applicants should note that this Authority is entitled to decide that it is appropriate to grant a licence subject to conditions, but it is not obliged to grant such a licence.

2.46 When dealing with a premises licence application for finished buildings, the licensing authority will not take into account:

- whether those buildings have to comply with the necessary planning or building consents;
- fire or health and safety risks.

2.47 Those matters should be dealt with under relevant planning control, building and other regulations, and must not form part of the consideration for the premises licence.

2.48 It is noted that S.210 of the Act prevents licensing authorities taking into account the likelihood of the proposal by the applicant obtaining planning or building consent when considering a premises licence application. Equally, the grant of a gambling premises licence does not prejudice or prevent any action that may be appropriate under the law relating to planning or building

### Applications and plans

2.49 The Gambling Act (s51) requires applicants to submit plans of the premises with their application, in order to ensure that the Licensing Authority has the necessary information to make an informed judgement about whether the premises are fit for gambling. The plan will also be used for the Authority to plan future premises inspection activity.

2.50 It is the local authority's policy that it will expect applicants for new premises licences and variations to provide a plan showing the indicative layout of the plan including, but not limited to:

- Machines, specified by category
- Staff counters

2.51 We consider that this information is appropriate, in conjunction with the premises' risk assessment, to effectively assess the provision of gambling facilities at the premises. Where this information is not provided, it is more likely that a representation will be made in order to enable the licensing authority to accurately assess the likely effect of granting the application relative to the LCCP and licensing objectives.

2.52 The premises plan in itself is only one means by which the licensing authority may seek reassurance that the requirements will be met. It may be that conditions attached to the premises licence regarding lines of sight between the counter and the gaming machines, staffing arrangements or security devices are a more effective method of doing so. Local circumstances and concerns and the layout of a particular premises may well determine what is most appropriate for an individual application.

### Tracks

2.53 Plans for tracks do not need to be in a particular scale, but should be drawn to scale and should be sufficiently detailed to include the information required by regulations. Some tracks may be situated on agricultural land where the perimeter is not defined by virtue of an outer wall or fence, such as point-to-point racetracks. In such instances, where an entry fee is levied, track premises licence holders may erect temporary structures to restrict access to premises. In the rare cases where the outer perimeter cannot be defined, it is likely that the track in question will not be specifically designed for the frequent holding of sporting events or races. In such cases betting facilities may

be better provided through occasional use notices where the boundary premises do not need to be defined.

- 2.54 This authority appreciates that it is sometimes difficult to define the precise location of betting areas on tracks. The precise location of where betting facilities are provided is not required to be shown on track plans, both by virtue of the fact that betting is permitted anywhere on the premises and because of the difficulties associated with pinpointing exact locations for some types of track.
- 2.55 Applicants should provide sufficient information that this authority can satisfy itself that the plan indicates the main areas where betting might take place. For racecourses in particular, any betting areas subject to the “five times rule” (commonly known as betting rings) must be indicated on the plan.

### 3. Determining Premises Licences

#### How the Licensing Authority decides whether to grant or refuse an application

- 3.1 Where we receive an application for a gambling premises licence, we will aim to permit the use of premises for gambling where it is considered:
- a) In accordance with any relevant code of practice issued by the Gambling Commission
  - b) In accordance with any relevant guidance issued by the Gambling Commission
  - c) Reasonably consistent with the licensing objectives (subject to a and b) and
  - d) In accordance with this policy (subject to a – c).
- 3.2 Where we receive an objection to the grant of a licence the matter will be referred to the Council's Licensing Sub-Committee for determination.
- 3.3 Each case will be decided on its merits but it should be noted that the Council cannot reject applications on moral grounds.
- 3.4 The Licensing Authority will not have regard to any demand issues for the premises.
- 3.5 Where an area has known high levels of organised crime the licensing authority will consider carefully whether gambling premises are suitable to be located there and whether conditions may be suitable such as the provision of door supervisors.
- 3.6 Rather than reject applications outright, wherever possible the Licensing Authority will look to work with gambling premises and tackle concerns with licence conditions that uphold the licensing objectives. However, where there are reasons that granting a licence would not be consistent with (a) - (d) above, the application will normally be refused.
- 3.7 In accordance with the Guidance from the Gambling Commission, we will circulate 'clear and comprehensive' reasons for any decision to all parties. We will also cite the extent to which decisions have been made in accordance with the Council's gambling policy and the Guidance from the Gambling Commission.

#### How the licensing committee decides what conditions to apply to premises licences

- 3.8 Premises Licences may be subject to any or all of the following:
- Conditions specified in the Gambling Act 2005



- Conditions specified in the regulations issued by the Secretary of State
- Conditions attached by Trafford Council's Licensing Committee following a hearing (where necessary).

3.9 With respect to conditions, licensing authorities are able to:

- Issue licences without modifying conditions set out in the Act and by the Secretary of State
- Exclude default conditions
- Attach conditions where it is believed to be appropriate
- Conditions may be general in nature (i.e. they attach to all licences of a particular premises type e.g. all casinos) or they may be specific to a particular licence.

3.10 We will ensure that any conditions we impose are:

- Proportionate to the circumstances which they are seeking to address
- Relevant to the need to make the proposed building suitable as a gambling facility
- Directly related to the premises and the type of licence applied for
- Fairly and reasonably related to the scale and type of premises
- Reasonable in all other respects.

3.11 There are also conditions, which the licensing authority cannot attach to premises licences:

- Conditions on a premises licence which make it impossible to comply with an operating licence condition
- Conditions relating to gaming machine categories, numbers, or method of operation
- Conditions that require membership of a club or body. (The Gambling Act specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)
- Conditions relating to stakes, fees, winnings or prizes
- Conditions relating to demand for the premises.

3.12 Decisions about conditions will be taken on a case-by-case basis considering Gambling Commission guidance, Gambling Commission Codes of Practice, the Licensing Objectives and our policy.

### Determining whether to review a licence

- 3.13 After a licence is granted, where the day to day operation of a gambling premises is not felt to be 'reasonably consistent with the licensing objectives', a review of the premises licence can be requested at any time.
- 3.14 A review may be initiated by the Licensing Authority or as a result of an application for review from an interested party or responsible authority. Where it is the Licensing Authority that initiate the review, they may do this for a whole class of premises e.g. all Adult Gaming Centres or in relation to particular premises. The Licensing Authority can review a licence for any reason it thinks appropriate.
- 3.15 Where an application for review is received from an interested party or responsible authority, as a licensing authority we must decide whether to go ahead with the review. The application for review will be considered based on the following:
- Does the request raise issues other than those found under the Gambling Commission's Guidance, Codes of Practice, the Licensing Objectives or our gambling policy?
  - Is it irrelevant, frivolous or vexatious?
  - Is it so minor that the authority will certainly not wish to revoke or suspend the licence or remove, amend or attach conditions?
  - Is it substantially the same as a previous application for review relating to the same premises?
  - Is the application for review substantially the same as a representation made at the time the application for a premises licence was considered?
- 3.16 If the answer to ANY of the above questions is 'yes', the request for review may be rejected. The purpose of the review is to determine if the licensing committee should take any action in relation to the licence. If action is needed, the options are to either:
- Revoke the premises licence •
  - Suspend the premises licence for a period not exceeding three months
  - Exclude a default condition imposed by the Secretary of State (relating to, for example, opening hours) or remove or amend such an exclusion
  - Add, remove or amend a licence condition previously imposed by the Licensing Authority

3.17 To decide what action, if any, needs to be taken following an application for review, the licensing committee will make its determination:

- In accordance with any relevant code of practice issued by the Gambling Commission
- In accordance with relevant guidance issued by the Gambling Commission
- In so far as it is reasonably consistent with the licensing objectives
- In accordance with the authority's statement of licensing policy

3.18 The committee will also consider any relevant representations and information given at the hearing. Codes or practice and the guidance referred to above may be obtained from the Gambling Commission.

## 4. Relevant factors when considering applications and reviews

4.1 In considering applications for new gambling licences, variations to existing licences and licence reviews the licensing authority will consider the following matters:

- the location of the premises
- the Local Area Profile
- the Local Risk Assessment (LRA)
- the views of responsible authorities
- the views of interested parties
- compliance history of current management
- the hours of operation
- the type of premises
- the operation of the premises in accordance with the expectations of the licensing authority, as set out in this policy
- the physical suitability of the premises
- the levels of crime and disorder in the area
- the level of deprivation and ill health in the area

4.2 The Licensing Authority believes that this list is not exhaustive and there may be other factors which may arise that could be considered relevant. The Licensing Authority will consider the relevance of any additional factors raised on a case-by-case basis.

### Location of the premises

4.3 The location of the premises will be an important factor as it can impact on all three of the licensing objectives. The Licensing Authority will consider very carefully applications for premises licences that are located in close proximity to sensitive premises such as:

- Schools, including universities
- Parks, stations, other transport hubs and places where large numbers of school children might be expected
- other premises licensed for gambling
- premises licensed for alcohol
- children's and vulnerable persons' centres and accommodation
- youth and community centres

- health and treatment centres
- leisure centres used for sporting and similar activities by young persons and/or vulnerable persons
- religious centres and public places of worship

4.4 The Licensing Authority expects each premises to produce and keep on the premises a local risk assessment, covering the areas set out in this policy.

#### **Gambling-related harm (See also Public Health at para. 3.7-3.11)**

4.5 Between 61 and 73 percent of British adults gamble to some extent each year. For the majority of these people, gambling is a harmless and sociable activity. However, between 0.4 and 1.1 percent of British adults are estimated to be 'problem gamblers' who experience harm as a consequence of their gambling. A further 4 percent are estimated to be 'at-risk gamblers' who may go on to become problem gamblers.[1]

4.6 Problem gambling has been defined as "gambling to a degree that compromises, disrupts or damages family, personal or recreational pursuits"[2]. Males are 5 times more likely than females to be problem gamblers. Problem gambling also varies by age with young people aged 16-24 the most likely to be affected. Problem gambling disproportionately affects people on low incomes and those from ethnic minorities. Individuals of Asian/Asian British heritage and Black/Black British heritage are more likely to be problem gamblers than people who identify as White/White British[3].

4.7 For problem gamblers, harms can include higher levels of physical and mental illness, debt problems, relationship breakdown and criminality. Problem gambling is also associated with domestic violence and substance misuse. Harms from gambling affect far more people than just the problem gambler: it is estimated that for every harmful gambler, between 6 and 10 additional people are directly affected (such as friends, family or colleagues)[4]. Problem gambling also has a significant impact on public finances due to increased costs to the welfare, housing, health and criminal justice sectors. For these reasons, gambling-related harm is increasingly recognised as a public health issue.

[1] Institute for Public Policy and Research (2016). Cards on the table. The cost to government associated with people who are problem gamblers in Britain.

[2] Lesieur, H. R. & Rosenthal, M. D. (1991). Pathological gambling: A review of the literature (prepared for the American Psychiatric Association Task Force on DSM-IV Committee on disorders of impulse control not elsewhere classified). *Journal of Gambling Studies*, 7 (1), 5-40.

[3] See 1 above.

<sup>14</sup> Local Government Association and Public Health England (2018). Tackling gambling related harm A whole council approach.

### Local risk assessments

4.8 Licensees are required to undertake a local risk assessment when applying for a new premises licence. Their risk assessment must also be updated:

- when applying for a variation of a premises licence
- to take account of significant changes in local circumstances, including those identified in a licensing authority's policy statement
- when there are significant changes at a licensee's premises that may affect their mitigation of local risks.

4.9 Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In undertaking their risk assessments, they must take into account relevant matters identified in the licensing authority's policy statement.

4.10 In conducting their risk assessment, the Licensing Authority will expect operators to follow the general principles of risk assessment:

- 1) Identify hazards (think about what may cause harm using the information provided below as a guide and any other matters you consider relevant)
- 2) Assess the risks (decide how likely it is that someone could be harmed and how serious it could be. This is assessing the level of risk). Decide:
  - i) Who might be harmed and how
  - ii) What you're already doing to control the risks
  - iii) What further action you need to take to control the risks
  - iv) Who needs to carry out the action
  - v) When the action is needed by
- 3) Control the risks (Look at what you're already doing, and the controls you already have in place.) Ask yourself:
  - i) Can I get rid of the hazard altogether?
  - ii) If not, how can I control the risks so that harm is unlikely?
- 4) Record your findings (record your significant findings), including:
  - i) the hazards (things that may cause harm)
  - ii) who might be harmed and how

iii) what you are doing to control the risks

5) Review the controls. (You must review the controls you have put in place to make sure they are working.) You should also review them if:

i) they may no longer be effective

ii) Also consider a review if your workers have spotted any problems or there have been any accidents or near misses.

iii) to take account of significant changes in local circumstances, including those identified in this policy statement

iv) when there are significant changes at the premises that may affect your mitigation of local risks

v) Update your risk assessment record with any changes you make.

4.11 The Licensing Authority considers the following as significant changes at the premises that may affect your mitigation of local risks:

- Staffing changes
- Layout of the premises
- Changes to gaming facilities provided

4.12 The Authority will expect the local risk assessment to consider the urban setting:

- The proximity of the premises to schools
- The commercial environment
- Factors affecting the footfall
- Whether the premises is in an area of deprivation
- Whether the premises is in an area subject to high levels of crime and/or disorder
- The ethnic profile of residents in the area.
- The demographics of the area in relation to vulnerable groups
- The location of services for children such as schools, playgrounds, toy shops, leisure centres and other areas where children will gather
- The range of facilities in the local area such as other gambling outlets, banks, post offices, refreshment and entertainment type facilities
- Known problems in the area such as problems arising from street drinkers, youths participating in anti-social behaviour, drug dealing activity, etc.
- The proximity of churches, mosques, temples or any other place of worship

4.13 The local risk assessment must show how vulnerable people, including people with gambling dependencies, are protected through:

- The training of staff in brief intervention when customers show signs of excessive gambling, the ability of staff to offer brief intervention and how the manning of premises affects this.
- Information held by the licensee regarding self-exclusions and incidences of underage gambling.
- Arrangements in place for local exchange of anonymised information regarding self-exclusion and gaming trends.
- Gaming trends that may mirror days for financial payments such as pay days or benefit payments.
- Arrangements for monitoring and dealing with underage people and vulnerable people, which may include:
  - dedicated and trained personnel
  - leaflets and posters
  - self-exclusion schemes
  - window displays and advertisements designed to not entice children and vulnerable people.
- The provision of signage and documents relating to games rules, gambling care providers and other relevant information be provided in both English and the other prominent first language for that locality
- The proximity of premises that may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, doctor surgeries, council community hubs, addiction clinics or help centres, places where alcohol or drug dependent people may congregate

4.14 The local risk assessment should show how children are to be protected:

- The proximity of institutions, places or areas where children and young people frequent such as schools, youth clubs, parks, playgrounds and entertainment venues such as bowling alleys, cinemas, etc.
- The proximity of place where children congregate such as bus stops, cafes, shops.



- Areas that are prone to issues of youths participating in anti-social behaviour, including activities such as graffiti, tagging, underage drinking etc.

4.15 Other matters that the assessment will include as appropriate: -

- Details as to the location and coverage of working CCTV cameras, and how the system will be monitored.
- The layout of the premises so that staff have an unobstructed view of people using the premises.
- The number of staff that will be available on the premises at any one time. If at any time that number is one, confirm the supervisory and monitoring arrangements when that person is absent from the licensed area or distracted from supervising the premises and observing those people using the premises.
- Where the application is for a betting premises licence, other than in respect of a track, the location and extent of any part of the premises which will be used to provide facilities for gambling in reliance on the licence.

4.16 Such information may be used to inform the decision the Authority makes about whether to grant the licence, to grant the licence with special conditions, or to refuse the application.

4.17 This policy does not preclude any application being made and each application will be decided on its merits, with the onus being upon the applicant to show how the concerns can be overcome.

### Local Area Profile

4.18 The Greater Manchester Gambling Harms Reduction programme is listening to residents with lived experience of gambling and is commissioning its own research to better understand problem gambling in the region. As findings from this research emerge, license holders will be expected to support the delivery of recommendations to help minimize gambling harms to the local populations. This research and evidence will be available online at: <https://www.greatermanchester-ca.gov.uk/what-we-do/health/gambling/understanding-gambling-related-harms/> and should be referred to in Local Risk Assessments.

### **How the premises will operate consistent with the licensing objectives**

- 4.19 We expect high standards from all gambling premises. Operators will be expected to demonstrate that they have given careful consideration to the licensing objectives and have appropriate measures in place to uphold them.
- 4.20 The following paragraphs indicate the physical and management factors that the licensing authority may take into account when considering applications for new, varied licence applications and reviews. These are not mandatory requirements but should be used as a guide to applicants and licensees as to the sort of arrangements that it should have in place and demonstrate these are in place through their bespoke risk assessment. Where an applicant or licensee can demonstrate that these factors are not relevant, or alternative arrangements are more appropriate, the licensing authority will take these into account.

### **Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime:**

- 4.21 The Gambling Commission play a leading role in preventing gambling from being a source of crime, through maintaining rigorous procedures that aim to prevent criminals from providing facilities for gambling, or being associated with doing so, as a result of the operating licence procedure.
- 4.22 However, as a Licensing Authority, we will take into account any local considerations that may impact with regard to this licensing objective, particularly in respect to the location of the premises, to ensure the suitability of the gambling premises. When considering whether a disturbance was serious enough to constitute disorder, we will have regard to the individual merits of the situation including, but not limited to, whether police assistance was required and how threatening the behaviour was to those who could see or hear it. We acknowledge that the Gambling Commission highlights in its guidance to local authorities that “disorder is intended to mean activity that is more serious and disruptive than mere nuisance”.
- 4.23 Whilst regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences; if there are persistent or serious disorder problems that we consider an operator could or should do more to prevent, we will bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence

4.24 Licensees and applicants will be expected to demonstrate that they have given careful consideration to preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime.

4.25 In addition to the need to consult a local Crime Reduction Officer, the operators of new premises/premises undergoing a refurbishment should also engage with the police's architectural liaison unit at the design stage to ensure crime prevention and detection.

4.26 We encourage that premises liaise with their Neighbourhood Policing Team to develop relationships at a local level and promote effective communication and co-operation. Additionally, operators are expected to actively support and participate in any local business partnership schemes, where any such schemes are in operation, and where such schemes are reasonably consistent with the licensing objectives.

4.27 The measures to be considered should include:

- The arrangements in place to control access (preventing unauthorised access shall not be limited to the provision of supervisory personnel; other options may include, but are not limited to, time-lock or maglock entrances)
- The opening hours
- The provision of registered door supervisors\*
- The provision of CCTV
- The number of staff on duty and effective staff training, especially in relation to lone working
- The provision of toilet facilities
- Prevention of antisocial behaviour associated with the premises, such as street drinking, litter, activity outside the premises including the management of clients leaving the premises
- Adequate lighting inside and out (appropriate to the premises in question) to ensure against robbery and other covert activity.

\* Only staff directly employed by Casinos and Bingo Clubs have an exemption from SIA registration. Where door supervisors are provided at these premises the operator should ensure that any people employed in this capacity are fit and proper to carry out such duties. Possible ways to achieve this could be to carry out a criminal records (DBS) check on potential staff and for such personnel to have attended industry recognised training.

### Ensuring that gambling is conducted in a fair and open way

4.28 Generally, this objective will be addressed by:

- The management of the gambling business (in conjunction with the Gambling Commission, who are responsible for issuing and enforcement of the operating licence).
- The personal licence holders proving their suitability and actions (which again is the responsibility of the Gambling Commission)

4.29 Where we suspect that gambling is not being conducted in a fair and open way, we will bring this to the attention of the Gambling Commission, for their further consideration, and work in partnership with their officers. In the case of those premises that do not hold an operating licence such as tracks, additional conditions may be required dependent on the risks outlined in the application.

### Protecting children and other vulnerable persons from being harmed or exploited by gambling

4.30 The Gambling Act defines 'children' as those persons under 16 years of age and 'young persons' as those persons aged 16 or 17 years of age. The term 'vulnerable persons' is not defined and what constitutes harm or exploitation will have to be considered on a case-by-case basis.

4.31 Gambling-related harms are the adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society. These harms are diverse, affecting resources, relationships and health, and may reflect an interplay between individual, family and community processes. The harmful effects from gambling may be short-lived but can persist, having longer-term and enduring consequences that can exacerbate existing inequalities.

4.32 Regard will be had to current evidence in relation to vulnerability to gambling-related harm. In 2015, Manchester City Council in partnership with Westminster Council commissioned research into this issue and published a report: Exploring area-based vulnerability to gambling-related harm: Who is vulnerable? Findings from a quick scoping review by Heather Wardle, Gambling and Place Research Hub, Geofutures 13th July 2015. Similarly, in 2016 Leeds City Council commissioned Leeds Beckett University to undertake research into Problem Gambling (Problem Gambling in Leeds;

Kenyon, Ormerod, Parsons and Wardle, 2016) looking specifically at identifying groups of the society that could be considered (more) vulnerable to problem gambling:

- Younger people, including students
- Those who are unemployed and/or with constrained financial circumstances
- Those from minority ethnic groups
- Those under the influence of alcohol or drugs
- Problem gamblers seeking treatment
- Homeless people
- Those living in areas of greater deprivation
- Those with other mental health issues and substance abuse/misuse disorders
- Those with poorer intellectual functioning
- Custodial and non-custodial offenders

4.33 Licensees and applicants will be expected to demonstrate they have carefully considered how to protect children and vulnerable persons from harm and have adequate arrangements for preventing underage gambling on their premises. The measures that should be considered where appropriate are:

- The provision of CCTV
- Location of entrances
- Restricted opening and closing times to protect residents vulnerable to harm
- Supervision of entrances
- Controlled access to the premises by children under the age of 18
- Dealing with pupils who are truanting, and policies to address seasonal periods where children may more frequently attempt to gain access to premises and gamble such as pre and post school hours, half term and school holidays
- Design layout/lighting/fit out to not attract children or vulnerable persons having a nationally-recognised proof of age scheme – Think 21/25
- The provision of registered door supervisors
- Clear segregation between gaming and non-gaming areas in premises frequented by children
- The provision of adequate signage and notices
- Supervision of machine areas in premises, particularly areas to which children are admitted

- Controlled opening hours
- Effective self-barring schemes
- The provision of materials for GamCare, Betknowmore UK or similar, Citizens Advice Bureau information, local public and mental health and housing/homeless associations, printed in languages appropriate to the customer base.
- Advertising local support services in the area such as Beacon Counselling Trust or the NHS Gambling Clinic.
- The number of staff on duty and effective staff training, especially in relation to the ability to effectively identify and engage with vulnerable persons, including primary intervention and escalation
- A requirement that children must be accompanied by an adult (in premises where children are allowed)
- Enhanced DBS checks of staff
- Obscuring windows where appropriate and labelling premises so it is clear that they are gambling premises
- Self-exclusion schemes

4.34 With reference to those persons with a mental impairment or mental health difficulties, operators would be well-advised to consult a suitable Mental Health Advisor and formulate a policy to protect this category of vulnerable person from being harmed or exploited by gambling

4.35 For multi-occupied premises consideration should be given to the arrangements for controlling access to children and the compatibility of the different uses. Separate and identifiable entrances may be required to ensure that people do not drift inadvertently into a gambling area.

4.36 Children are not permitted to use Category C or above machines and in premises where these machines are available and children are permitted on the premises the licensing authority will require:

- all Category C and above machines to be located in an area of the premises which is separated from the remainder of the premises by a physical barrier to prevent access other than through a designated entrance
- adults only admitted to the area where these machines are located
- adequate supervised access to the area where the machines are located

- the area where these machines are located is arranged so that it can be observed by the staff or the licence holder
- prominent notices displayed at the entrance to, and inside, any such areas there indicating that access to the area is prohibited to persons under 18

### **Expectations of operators: Staffing provision**

- 4.37 Staff in licensed gambling premises are recognised as being subject to risk in the workplace from violence and verbal abuse, especially if working alone. In addition, lone workers may not be able to sufficiently serve and supervise the customers, identify and prevent young people from gambling, protect vulnerable persons, deal with customers who may be consuming alcohol and prevent the premises being used as a source of crime or supporting crime.
- 4.38 We expect premises management to recognise and address this as part of their management arrangements, especially at times where it has been identified that there is a spike in crimes around the premises.
- 4.39 We expect there to be an adequate number of staff and managers on the premises to cover key points throughout the day, especially where premises are close to schools/colleges/universities, pubs, bars, shopping centres and stadia.

### **Expectations of operators: Data gathering and sharing**

- 4.40 Keeping track of the incidence and handling of problem gambling in Trafford is a key part of promoting the licensing objectives. We expect all gambling premises to maintain a log and share this and other information with the Licensing Unit upon request.
- 4.41 Data that we consider should be recorded and shared includes (but is not exclusive to) We would expect that all records including time and date along with a short description of the incident and action taken:
- 1) Customer interventions
  - 2) Cases where persons who have decided to voluntarily exclude themselves from the premises have tried to gain entry
  - 3) Mandatory exclusions needing enforcement
  - 4) Attempts to enter by those underage in a calendar month
  - 5) Attempts to enter by those underage in the company of adults
  - 6) Attempts to enter by those underage with complicit adults
  - 7) Incidents of 'at risk behaviour'

8) Incidents of 'behaviour requiring immediate intervention'

4.42 We expect that this application will be provided to the licensing authority annually.

4.43 A template for this information to be provided is at Appendix 2.

### **Expectation of applicants: Staff Training and Knowledge**

4.44 We expect all customer-facing and management staff in premises licensed under the Gambling Act 2005 to have sufficient knowledge to tackle risks associated with gambling and know how to promote responsible gambling. Amongst other elements, staff knowledge should include (where appropriate):

- 1) The importance of social responsibility (Premises may wish to seek an audit from GamCare in order to obtain a certificate of Social Responsibility)
- 2) Causes and consequences of problem gambling
- 3) Identifying and communicating with vulnerable persons: primary intervention and escalation, supported by high quality training given the challenging nature of these conversations.
- 4) Dealing with problem gamblers: exclusion (mandatory and voluntary) and escalating for advice/treatment including local treatment providers
- 5) Refusal of entry (alcohol and drugs)
- 6) Age verification procedures and need to return stakes/withdraw winnings if under age persons found gambling
- 7) Importance and enforcement of time/spend limits
- 8) The conditions of the licence
- 9) Maintaining an incident log
- 10) Offences under the Gambling Act
- 11) Categories of gaming machines and the stakes and odds associated with each machine
- 12) Types of gaming and the stakes and odds associated with each
- 13) Ability to signpost customers to support services with respect to problem gambling, financial management, debt advice etc.
- 14) Safe cash-handling/payment of winnings
- 15) Identify forged ID and bar those using forged ID from the premises
- 16) Knowledge of a problem gambling helpline number (for their own use as well as that of customers)



17) The importance of not encouraging customers to:

- (a) Increase the amount of money they have decided to gamble
- (b) Enter into continuous gambling for a prolonged period
- (c) Continue gambling when they have expressed a wish to stop
- (d) Re-gamble winnings
- (e) Chase losses.

4.45 Above and beyond this we expect managers to have an in-depth knowledge of all of the above and be able to support staff in ensuring the highest standards with regard to protecting children and other vulnerable persons from being harmed or exploited by gambling. In so far as training, we do not intend to duplicate any existing training requirement, such as may be required by the Gambling Commission's Code of Practice.

#### **Expectation of applicants: Gaming machines / layouts**

4.46 It is an operator's responsibility to ensure staff are able to effectively monitor gaming machine play for a number of reasons that are part of the operator's licence conditions. Age verification, customer interaction and self-exclusion policies all require operators to take into account the structure and layout of their gambling premises.

4.47 The Licence conditions and code of practice (LCCP) state: 'Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times'.

4.48 A screen or pod around a gaming machine, designed to increase the privacy of the player, could prevent staff in a gambling premises from effectively monitoring gaming machine play

4.49 Operators will be expected to be able to evidence to the licensing authority how they have considered the risk to the licensing objectives and implemented effective controls, prior to the introduction of any new machine arrangements.

4.50 It will be important to consider the means by which gaming machines are supervised (e.g. line of sight to counter, effective CCTV, mirrors or floor staff) and consider whether that is appropriate for that premises.

4.51 Whether amendments to a premises amount to a 'material change' warranting an application to vary the premises licence under s.187 of the Gambling Act is a matter for local determination and the licensing authority will adopt a common-sense approach.

## 5. Premises-specific considerations

### Adult Gaming Centres

- 5.1 Adult gaming centres (AGCs) are premises able to make category B, C and D gaming machines available to their customers. Persons operating an AGC must hold a gaming machines general operating licence from the Commission as well as a premises licence from the Council.
- 5.2 This licensing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises.
- 5.3 Where gambling facilities are provided at premises as a supplementary activity to the main purpose of the premises; e.g. motorway service areas and shopping malls. The council will expect the gambling area to be clearly defined to ensure that customers are fully aware that they are making a choice to enter into the gambling premises and that the premises is adequately supervised at all times.

### Casinos

- 5.4 Trafford Council has no licensed casinos.
- 5.5 The Gambling Act states that a casino is an arrangement whereby people are given the opportunity to participate in one or more casino games whereby casino games are defined as a game of chance which is not equal chance gaming. This means that casino games offer the chance for multiple participants to take part in a game competing against the house or bank at different odds to their fellow players. Casinos can also provide equal chance gaming and gaming machines.

### 'No Casinos' resolution

- 5.6 This licensing authority has not passed a 'no casino' resolution under Section 166 of the Gambling Act 2005, but is aware that it has the power to do so. Should this licensing authority decide in the future to pass such a resolution, it will update this policy statement with details of that resolution. Any such decision will be made by the Full Council.

### Bingo premises

- 5.7 The Gambling Act 2005 does not contain a definition of Bingo. It is to have its ordinary and natural meaning and the Act does stipulate that “bingo” means any version of that game, irrespective of how it is described. Two types of bingo may be offered:
- Cash bingo, where the stakes panel made up the cash prize that’s won; or
  - Prize bingo, where various forms of prizes is won, not directly relating to the stakes panel
- 5.8 Subject to the rules of individual operators, children and young people are allowed into bingo premises. However, they are not permitted to participate in the bingo and if category B or C machines are made available for use these must be separated from areas where children and young people are allowed.
- 5.9 Where category C or above machines are available in premises to which children are admitted then the council will ensure that:
- all such machines are located in an area of the premises separate from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance. For this purpose a rope, floor markings or similar provision will not suffice and the council may insist on a permanent barrier of at least one metre high
  - only adults are admitted to the area where the machines are located
  - access to the area where the machines are located is supervised at all times
  - the area where the machines are located is arranged so that it can be observed by staff
  - at the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to people under 18
  - children will not be admitted to bingo premises unless accompanied by an adult.
- 5.10 The Gambling Commission has provided Guidance for Licensing Authorities and Licence Conditions and Code of Practice which are applied to Operator’s Licences. The council will take this into consideration when determining licence applications for bingo premises.
- 5.11 Where certain measures are not already addressed by the mandatory/default conditions, the Gambling Commission Code of Practice or the applicant, the council may consider licence conditions to address such issues.

### Electronic bingo gaming machines

5.12 Where a premises intends on providing electronic terminals to play bingo, we will expect operators (as part of their application) to provide a breakdown of the number of electronic bingo terminals that will be provided at the premises

### Gaming machines at bingo premises

5.13 In addition to bingo, this premises licence will authorise the provision of a limited number of gaming machines in line with the provisions of the Act. Bingo premises licences authorise a maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4.

5.14 Bingo facilities in bingo premises may not be offered between the hours of midnight and 9am. However, there are no restrictions on access to gaming machines in bingo premises.

5.15 The LCCP requires (Social Responsibility Code Provision 9) that gaming machines are only made available in combination with the named non-remote activity of the operating licence. So, unless a bingo premises operator offers substantive facilities for non-remote bingo it should not make gaming machines available for use on the premises in question.

5.16 As the licensing authority, we will need to satisfy ourselves that a premises applying for or licensed for bingo is operating or will operate in a manner which a customer would reasonably be expected to recognise as a premises licensed for the purposes of providing facilities for bingo. Equally, we must ensure that a premises licensed for the purposes of providing facilities for bingo is operating as such and is not merely a vehicle to offer higher stake and prize gaming machines.

5.17 Therefore, we will expect operators (as part of their application) to provide information on:

- any times they intend to provide gaming machines at any times that bingo facilities are not provided
- how the premises will be recognised as a premises licensed for providing facilities for bingo
- A breakdown of gaming machine numbers (by category)

5.18 The licensing authority is concerned that later opening hours will attract the more vulnerable, such as those who are intoxicated or who have gambling addictions. The

licensing authority will expect applicants can demonstrate that robust measures will be in place to protect the vulnerable and the additional hours are not being sought to take advantage of the gaming machine entitlement.

5.19 The licensing authority will use their power to restrict the circumstances in which they are available for use when appropriate by way of conditions. When considering imposing conditions, the licensing authority will take into account, among other factors:

- the size and physical layout of the premises
- the number of counter positions and staff on the premises
- the ability of staff to monitor the use of machines by children, young persons under the age of 18 or vulnerable people

5.20 The licensing authority will not seek to limit the number of gambling machines by category as this entitled provision is defined in the Gambling Act. However, we will seek to ensure that the number and provision of gaming machines are only provided in a manner which a customer would reasonably be expected to recognise as a premises licensed for the purposes of providing facilities for bingo.

5.21 To contain the unavoidable risk to the licensing objectives associated with gaming machines, premises which offer machines must be appropriately supervised.

5.22 The licensing authority will information required from an applicant for a new premises or for a variation to an existing premises in order to satisfy themselves as to the matters set out at s153 of the Act. This includes the codes of practice and the Gambling Commission's guidance to licensing authorities.

### **'Entertainment' Bingo**

5.23 A phenomenon over recent years has been the evolution of businesses, such as Bongo's Bingo, providing facilities for high turnover bingo (the aggregate stakes or prizes for bingo in any seven day period may exceed £2,000); typically providing equal chance gaming at pubs and nightclubs, in reliance on the alcohol licence held by the premises, and therefore doing so under the rules for exempt gaming.

5.24 We note that it is a condition of some such companies' operator's licence that they must notify both the Commission and the relevant LA at least 28 days before any event takes place in new premises, by providing a description of the event taking place, a copy of the premises contract and any amendment to the rules of the bingo.

5.25 We would encourage venues hosting such events to promote responsible gambling messaging at them.

### Betting Premises

5.26 We encourage operators to participate in the Safebet Alliance in order to help ensure the highest standards for the safety and security of staff working at betting premises. Where an operator does not participate in the scheme, it is expected that they can satisfactorily demonstrate the security measures they incorporate are adequate.

5.27 Licensed betting premises are only permitted to offer gambling facilities between 7am and 10pm, unless the licensing authority has granted a variation application to extend these hours. The licensing authority is concerned that later opening hours will attract the more vulnerable, such as those who are intoxicated or who have gambling addictions. The licensing authority also has concerns that licensed betting premises operators may seek to extend the permitted hours for the primary purpose of making gaming machines available to customers for longer.

5.28 As a consequence, the licensing authority is unlikely to grant variation of hours' applications unless applicants can demonstrate that robust measures will be in place to protect the vulnerable and the additional hours are not being sought to take advantage of the gaming machine entitlement.

5.29 The licensing authority will use their power to restrict the number of betting machines (bet receipt terminals), their nature and the circumstances in which they are available for use when appropriate by way of conditions. When considering imposing conditions, the licensing authority will take into account, among other factors:

- the size and physical layout of the premises
- the number of counter positions and staff on the premises
- the ability of staff to monitor the use of machines by children, young persons under the age of 18 or vulnerable people

5.30 Betting machines - This licensing authority will, as per the Gambling Commission's Guidance, take into account the size of the premises, the number of counter positions available for person-to-person transactions, and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number/nature/circumstances of betting

machines an operator wants to offer. It is noted that that children are not able to go into premises with the benefit of a Betting Premises Licence.

### **(Licensed) Family Entertainment Centres**

- 5.31 The Act creates two classes of family entertainment centre (FEC). Licensed FEC's provide category C and D machines and require a premises licence. Unlicensed FEC's provide category D machines only are regulated through FEC gaming machine permits.
- 5.32 This licensing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority, for example, that there will be sufficient measures to ensure that under 18-year-olds do not have access to the adult only gaming machine areas. Operators should ensure that a proof of age scheme is in force.
- 5.33 This licensing authority will, as per the Gambling Commission's guidance, refer to the Commission's website to see any conditions that apply to operating licences covering the way in which the area containing the category C machines should be delineated. This licensing authority will also make itself aware of any mandatory or default conditions on these premises licences, when they have been published.

### **Occasional use notices**

- 5.34 Occasional Use Notices (OUN) are designed to allow licensed betting operators to provide betting facilities at genuine sporting events, such as point-to point racecourses and golf courses for major competitions, within the boundaries of the identified venue on a specific date.
- 5.35 An OUN must be submitted for EACH day that the betting activity will be conducted on the premises. For example, four notices for four consecutive days of betting and not one notice covering the four days.
- 5.36 We will liaise with the Gambling Commission should we receive an OUN that does not relate to a genuine recognised sporting event to ensure that OUN's are not misused, for example, venues seeking to become tracks through a contrived sporting event, utilising OUNs to solely or primarily facilitate betting taking place on events occurring away from the identified venue.

## 6. Permits and other permissions

### Alcohol Licensed Premises Gaming Machine Permits

- 6.1 Premises licensed to sell alcohol that have a bar and the alcohol is not ancillary to food for consumption on the premises, having more than two gaming machines, will need to apply for a permit and must also notify the Licensing Authority if they have one or two machines. In considering whether to grant a permit, the licensing authority will have regard to the licensing objectives, guidance issued by the Gambling Commission and any other relevant matters. Permits will not be granted to licensees who have failed to demonstrate compliance with the Gambling Commission's Code of Practice.
- 6.2 In addition to the requirements of the Gambling Commission's Code of Practice, the Licensing Authority expects applicants to:
- display adequate notices and signs, advertising the relevant age restrictions
  - position machines within view of the bar in order for staff to be able to monitor the machines for use by under age or misuse of the machines
  - challenge anyone suspected of being under age and refuse access
  - provide information leaflets and / or help-line numbers for organisations such as GamCare and Betknowmore UK.

### Prize Gaming Machine Permits

- 6.3 Prize gaming premises will appeal to children and young persons and weight will be given to child protection issues. Therefore, the licensing authority will expect the applicant to demonstrate that they are suitable to hold a permit (i.e. if the applicant has any convictions which would make them unsuitable to operate prize gaming) and the suitability of the premises.
- 6.4 The licensing authority expects applicants to set out the types of gaming machines that they intend to offer and be able to demonstrate that:
- they understand the limits to stakes and prizes that are set out in regulations
  - that the gaming offered is within the law
- 6.5 The Gambling Commission website gives advice on types of permits, conditions, stakes and prizes. See <https://www.gamblingcommission.gov.uk>



### Unlicensed FECs (uFEC)

- 6.6 Unlicensed family entertainment centres (FEC's) will perhaps be most commonly located at places such as airports and at motorway service centres, and will cater for families, including unaccompanied children and young persons. Unlicensed FEC's will be able to offer only category D machines in reliance on a gaming machine permit.
- 6.7 Where a premises does not hold a premises licence but wishes to provide gaming machines, it may apply to the licensing authority for this permit. It should be noted that the applicant must show that the premises will be wholly or mainly used for making gaming machines available for use (Section 238). As a result, it is generally not permissible for such premises to correspond to an entire shopping centre, airport, motorway service station or similar. Typically, the machines would be in a designated, enclosed area.
- 6.8 Given that the premises is likely to appeal particularly to children and young persons, when considering applications for permits we will give weight to matters relating to protection of children from being harmed or exploited by gambling and are keen to ensure that staff supervision adequately reflects the level of risk to this group. Therefore, we will generally expect such risks to be addressed through effective:
- Staff supervision and training
  - Detailed plan
  - Social responsibility policies
  - Staff being easily identifiable
  - Clear signage
- 6.9 As part of an application for a uFEC, it is our policy that a plan for the uFEC must be submitted.

### Small Society Lotteries

- 6.10 A lottery is small if the total value of tickets put on sale in a single lottery is £20,000 or less and the aggregate value of the tickets put on sale in a calendar year is £250,000 or less.
- 6.11 To be 'non-commercial' a society must be established and conducted:
- for charitable purposes,
  - for the purpose of enabling participation in, or supporting, sport, athletics or a cultural activity; or

- for any other non-commercial purpose other than that of private gain.

6.12 This licensing authority will adopt a risk-based approach towards its enforcement responsibilities for small society lotteries. This authority considers that the following list, although not exclusive, could affect the risk status of the operator:

- Submission of late returns (returns must be submitted no later than three months after the date on which the lottery draw was held)
- Submission of incomplete or incorrect returns
- Breaches of the limits for small society lotteries
- The eligibility of society as 'non-commercial'

## 7. Appendix 1 –Responsible Authorities

### **Licensing Authority**

Licensing  
Regulatory Services  
Trafford Council  
Trafford Town Hall  
Talbot Road  
Stretford  
M32 0TH  
Email: [Licensing@trafford.gov.uk](mailto:Licensing@trafford.gov.uk)

### **Environmental Health**

Environmental Health  
Regulatory Services  
Trafford Council  
Trafford Town Hall  
Talbot Road  
Stretford  
M32 0TH  
Tel: 0161 912 4916  
Email: [environmental.heath@trafford.gov.uk](mailto:environmental.heath@trafford.gov.uk)

### **Greater Manchester Police**

The Chief Superintendent  
Stretford Police Station  
Talbot Road  
Stretford  
M32 0XB  
Tel: 0161 856 7745  
Email: [Karen.Packer@gmp.police.uk](mailto:Karen.Packer@gmp.police.uk)  
Email: [Nicolas.Young@gmp.police.uk](mailto:Nicolas.Young@gmp.police.uk)

### **Safeguarding Board**

Children and Young People's Service  
Trafford Town Hall  
Talbot Road  
Stretford  
M32 0TH  
Tel: 0161 912 4009  
Email: [SafeguardingChildrenTeam@trafford.gov.uk](mailto:SafeguardingChildrenTeam@trafford.gov.uk)

**HM Revenue & Customs**

Excise Processing Teams  
BX9 1GL

**Planning**

Trafford Council  
Planning & Development  
Trafford Town Hall  
Talbot Road  
Stretford  
M32 0TH  
Tel: 0161 912 3149  
Email: [development.management@trafford.gov.uk](mailto:development.management@trafford.gov.uk)



## 9. Appendix 3 - Glossary

Term	Description
ATM	Auto teller machine or cash machine.
Betting	Betting is defined as making or accepting a bet on the outcome of a race, competition or other event or process or on the outcome of anything occurring or not occurring or on whether anything is or is not true. It is irrelevant if the event has already happened or not and likewise whether one person knows the outcome or not. (Spread betting is not included within this definition).
Betting Machines / Bet Receipt Terminal	Betting machines can be described as automated betting terminals where people can place bets on sporting events removing the need to queue up and place a bet over the counter.
Bingo	There are essentially two types of bingo: cash bingo, where the stakes paid make up the cash prizes that can be won and prize bingo, where various forms of prizes can be won, not directly related to the stakes paid.
Book	Running a 'book' is the act of quoting odds and accepting bets on an event. Hence the term 'Bookmaker'.
Casino games	A game of chance, which is not equal chance gaming. Casino games includes Roulette and black jack etc.
Chip	Casinos in the UK require you to use chips to denote money. They are usually purchased and exchanged at a cashier's booth.
Coin pusher or penny falls machine	A machine of the kind which is neither a money prize machine nor a non-money prize machine
Crane grab machine	A non-money prize machine in respect of which every prize which can be won consists of an individual physical object (such as a stuffed toy) won by a person's success in manipulating a device forming part of the machine so as to separate, and keep separate, one or more physical objects from a group of such objects.
Default condition	These are prescribed in regulations and will be attached to all classes of premises licence, unless excluded by the Authority.
Equal Chance Gaming	Gaming which does not involve playing or staking against a bank.
Fixed odds betting	If a gambler is able to establish what the return on a bet will be when it is placed, (and the activity is not 'gaming' see below), then it is likely to be betting at fixed odds.
Fixed Odds betting terminals (FOBTs)	FOBTs are a type of gaming machine which generally appear in licensed bookmakers. FOBTs have 'touch-screen' displays and look similar to quiz machines familiar in pubs and clubs. They normally offer a number of games, roulette being the most popular.
Gaming	Gaming can be defined as 'the playing of a game of chance for winnings in money or monies worth, whether any person playing the game is at risk of losing any money or monies worth or not'.
Gaming Machine	Any type of machine allowing any sort of gambling activity including betting on virtual events but not including home computers even though users can access online gaming websites.
Licensing Objectives	The licensing objectives are three principal goals which form the basis of the Act. Stakeholders who have an interest in the Act need to try and promote these objectives. The licensing objectives are: <ul style="list-style-type: none"> <li>• Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.</li> <li>• Ensuring that gambling is conducted in a fair and open way.</li> <li>• Protecting children and other vulnerable people from being harmed or exploited by gambling.</li> </ul>
Lottery	A lottery generally refers to schemes under which prizes are distributed by chance among entrants who have given some form of value for their chance to take part. A lottery is defined as either a simple lottery or a complex lottery. A simple lottery is one where people are required to pay to participate and one or more prizes are allocated to one or more members of a class and the prizes are allocated by a process which relies wholly on chance. A complex lottery is where people are required to pay to participate and one or more members of a class and the prizes are allocated by a series of processes where the first of those processes relies wholly on chance. Prize means money, articles or services provided by the members of the class among whom the prize is allocated. (It should be noted that the National Lottery is not included in this definition of lottery and is regulated by the National Lottery Commission).
Money prize machine	A machine in respect of which every prize which can be won as a result of using the machine is a money prize.

## APPENDIX 3

Term	Description
Non-money prize machine	A machine in respect of which every prize which can be won as a result of using the machine is a non-money prize. The winner of the prize is determined by: (i) the position in which the coin or token comes to rest after it has been inserted into the machine, together with the position of other coins or tokens which have previously been inserted into the machine to pay a charge for use, or (ii) if the insertion of a single coin to pay the charge for use enables the person using the machine to release one or more tokens within the machine, the position in which such tokens come to rest after being released, together with the position of other tokens which have previously been so released.
Odds	The ratio to which a bet will be paid if the bet wins, e.g. 3-1 means for every £1 bet, a person would receive £3 of winnings.
Off-course betting operator	Off-course betting operators may, in addition to premises away from the track, operate self-contained betting premises within a track premises. Such self-contained premises will provide facilities for betting on both events taking place at the track (on-course betting), as well as other sporting events taking place away from the track (off-course betting). In essence such premises operate like a traditional high street bookmakers. They will however only normally operate on race days.
On-course betting operator	The on-course betting operator is one who comes onto a track, temporarily, while races are taking place, and operates at the track side. On-course betting operators tend to offer betting only on the events taking place on the track that day (on-course betting).
Pool Betting	For the purposes of the Gambling Act, pool betting is made on terms that all or part of the winnings: 1) Shall be determined by reference to the aggregate of the stakes paid or agreed to be paid by the people betting 2) Shall be divided among the winners or 3) Shall or may be something other than money. For the purposes of the Gambling Act, pool betting is horse-race pool betting if it relates to horse-racing in Britain.
Regulations or Statutory instruments	Regulations are a form of law, often referred to as delegated or secondary legislation. They have the same binding legal effect as Acts and usually state rules that apply generally, rather than to specific people or things. However, regulations are not made by Parliament. Rather, they are made by people or bodies to whom Parliament has delegated the authority to make them, such as a minister or an administrative agency.
Representations	In the context of the Gambling Act representations are either positive statements of support or negative objections which are made in relation to a licensing application. Representations must be made in time, e.g. during a designated notice period.
Responsible authority (authorities)	Responsible authorities (RAs) are agencies which have been appointed by the Gambling Act or regulations to fulfil a designated role during the licensing process. RAs must be sent copies of all licensing applications and have the power to make representations about such applications. RAs also have the power to ask for licences to be reviewed.
Skill machine / Skill with prizes machine	The Act does not cover machines that give prizes as a result of the application of pure skill by players. A skill with prizes machine is one on which the winning of a prize is determined only by the player's skill – any element of chance imparted by the action of the machine would cause it to be a gaming machine. An example of a skill game would be trivia game machines, popular in pubs and clubs, which require the player to answer general knowledge questions to win cash prizes.
Spread betting	A form of investing which is more akin to betting, and can be applied either to sporting events or to the financial markets. Spread betting is regulated by the Financial Services Authority.
Stake	The amount pledged when taking part in gambling activity as either a bet, or deposit to the bank or house where the house could be a gaming machine.
Statement of principles document	A document prepared by the Authority which outlines the areas that applicants need to consider before applying for gaming permits.
Table gaming	Card games played in casinos.
Tote	"Tote" is short for Totaliser, a system introduced to Britain in 1929 to offer pool betting on racecourses.
Track	Tracks are sites (including horse tracks and dog tracks and stadia) where races or other sporting events take place

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## EQUALITY IMPACT ASSESSMENT - TRAFFORD COUNCIL

A. Summary Details		
1	Title of EIA:	Statement of Gambling Principles 2022-2025
2	Person responsible for the assessment:	Joanne Boyle
3	Contact details:	licensing@trafford.gov.uk
4	Section & Directorate:	Licensing, Place
5	Name and roles of other officers involved in the EIA, if applicable:	N/A
B. Policy or Function		
1	Is this EIA for a policy or function?	Policy <input checked="" type="checkbox"/> Function <input type="checkbox"/>
2	Is this EIA for a new or existing policy or function?	New <input type="checkbox"/> Existing <input type="checkbox"/> Change to an existing policy <input checked="" type="checkbox"/>
3	What is the main purpose of the policy/function?	This is an equalities impact assessment of the Council's revised policy for the licensing of gambling premises and permits. Under Gambling Act 2005 local authorities are responsible for issuing premises licences, permits and notices in respect of gambling premises. The Council are required to adopt a gambling policy every three years, the first of which came into effect on 31 January 2007. We now need to

prepare and publish a new policy by 31 January 2022.

Function of the Policy:

The gambling policy may be referred to by officers and members of committees when determining licensing applications and is available for all parties when applying for licences and submitting representations. As mentioned above this policy is relevant to various permissions and authorisations under the Gambling Act 2005 relating to gambling premises and permits, there are separate policies for other areas of licensing e.g. alcohol and entertainment, street trading, taxis and sexual entertainment venues.

The policy has served the council well and has not been subject to any challenge since implementation. The licensing of gambling related activities is a well-regulated low risk licensing function.

Licensing leads across Greater Manchester have agreed to take a common approach to refreshing gambling licensing policies. The revised policy has been amended to reflect this approach.

The legislation sets out a consultation process and framework which the council has a statutory responsibility to follow. The Licensing Authority's role is limited as we licence premises and related activities e.g. Amusements with prizes (AWP) machines in licensed premises.

The bulk of policy and operations are held with the Gambling

		<p>Commission, which licences and regulates the operators through issuing operating licences. Our experience of processing gambling act applications is that they are non-contentious. Since the legislation came into force only a small number of applications have been referred to the Licensing Committee for determination. These applications were for betting premises licences and representations were received from interested parties. The applications were granted by the Licensing Committee</p>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 151</p>	<p>4 Is the policy/function associated with any other policies of the Authority?</p>	<p>The Council has seven corporate priorities.</p> <p>The Licensing Policy can be linked to the priorities of: Children and Young People; Health and Wellbeing; and Successful and Thriving Places</p> <p>◆ Children and Young People - Licenses premises must be safe for all users and staff - public safety, the protection of children from harm and the prevention of crime and disorder are key objectives ◆ Health and Wellbeing - Licensed premises and their clientele should not cause undue noise and nuisance to neighbours - prevention of public nuisance is a key objective ◆ Successful and Thriving Places - The licensing regime has led to an increase in licensed premises which will help to boost the local economy which will bring new jobs and more prosperity to the Borough ◆</p> <p>The revised policy is intended to address issues in relation to living well, and is intended to help strike the right balance between the</p>

		development of town centres and its potential adverse impact on local residents.
5	Do any written procedures exist to enable delivery of this policy/function?	Yes, these are contained in a separate procedure manual.
6	Are there elements of common practice not clearly defined within the written procedures? If yes, please state.	No
7	Who are the main stakeholders of the policy? How are they expected to benefit?	<p>Licence holders • Potential licence holders • Residents or their representatives • Local businesses or their representatives • Government bodies and other external agencies, such as Police, Fire &amp; Rescue Service • Council departments, such as Planning Control and the Safeguarding Children Board, Pollution Control Team and Food Safety Team. • Councillors as the decision makers and representatives of residents.</p> <p>The benefits of the Policy are that it provides: a fair and consistent approach to licensing enforcement administration for any service user; easy to understand information regarding licence application and decision making processes to anybody who wants it; and enables any service user to understand and comply with current legislation.</p>
8	How will the policy/function (or change/improvement), be implemented?	<p>The Gambling Policy will be agreed formally by the Full Council in November 2021 and will become effective on the 31<sup>st</sup> January 2022.</p> <p>The Policy then has to be reviewed and renewed at least every 3 years.</p>

		<p>Once implemented guidance and information will be available for businesses.</p> <p>Guidance and advice will also be available to individuals who wish to make representations (objections) to an application.</p> <p>Unlicensed activity and compliance will be monitored by enforcement.</p>
9	What factors could contribute or detract from achieving these outcomes for service users?	No barriers identified
10	Is the responsibility for the proposed policy or function shared with another department or authority or organisation? If so, please state?	No

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### C. Data Collection on People Impacted by Policy or Function

1	Do you have monitoring data on the number of people (from different equality groups) who are using or are potentially impacted upon by your policy/ function?	<p>General</p> <p>The Council's Gambling Policy covers the whole of Trafford. Any resident of Trafford who engages in gambling with licensed operators has the potential to be affected.</p> <p>Licence or permit holders</p> <p>There is no data available specifically in respect of the demography of licence or permit holders in Trafford. This is primarily because</p>
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application forms are prescribed by the Home Office and currently do not request equalities information. Furthermore licence holders are often businesses. Therefore, when considering the impact on licence holders and the public we need to rely on data covering the whole of the area whilst bearing in mind that spatially the demography of Trafford varies.

The Gambling Commission gathers national data on gambling participation the last of which was published in April 2020, detailed below;

-46% of people have gambled in the last four weeks

-50% of men have gambled in the last four weeks

-43% of women have gambled in the last four weeks

-21% of people have gambled online in the last four weeks

#### Age

Children were explicitly identified as being vulnerable to harm in the Gambling Act 2005. National data indicates younger people are the age group most likely to gamble.

#### Health and lifestyle

Related Data GamCare is the leading national provider of information, advice, support and free counselling for the prevention and treatment of problem gambling. GamCare highlights the impact of gambling on mental health. ' According to the Royal College of Psychiatrists problem gamblers are more likely than others to suffer from low self-esteem,

develop stress-related disorders, to become anxious, to have poor sleep and appetite, to develop a substance misuse problem and to suffer from depression’.

#### Sex and gender

The Gambling Commission data indicates that both men and women gamble – men are about 5% more likely to gamble than women. GamCare data of 30,000 callers each year indicates that both men and women can develop problem gambling habits and men and women gamble in different ways. Men are more likely to use betting shops and women are more likely to use fruit machines and Bingo

#### Ethnicity

We do not have data on the ethnicity of people who gamble. The 2007 and 2010 British Gambling Prevalence Surveys have shown a consistent relationship between ethnicity and the people who gamble. In both studies, problem gambling prevalence rates were higher among those from non-White ethnic backgrounds. More recently, Gamcare have included information on the ethnicity of their 30,000 callers a year who report concerns about their own gambling, or the gambling of a family member or partner. This data indicates problem gambling affects people of all ethnicities therefore we can assume that Black, Asian and minority ethnic people gamble in similar proportions to their representation within the community.

Religion and belief Religions have differing views on gambling, and

		problem gamblers from some faith groups may be reluctant to seek help within their own community because it is forbidden. There is no data on what proportion of people with a faith and those with no faith participate in gambling.
2	Please specify monitoring information you have available and attach relevant information*.	The information required from applicants is set down in Regulations and does not include any form of profile monitoring. In essence the same is true of any residents who object to any application.
3	If monitoring has NOT been undertaken, will it be done in the future or do you have access to relevant monitoring data?	<p>There is no information currently available that adequately profiles users or beneficiaries.</p> <p>An action point from this assessment will be to consider what meaningful profiling can be done of service users that will inform future initiatives and policy to ensure there is no unequal impact on the relevant target groups.</p> <p>The EQIA will be reviewed in the event of any equalities issues being raised by respondents to the consultation and will be updated after the consultation is concluded</p>

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*\*Your monitoring information should be compared to the current available census data to see whether a proportionate number of people are taking up your service*

#### **D. Consultation & Involvement**

1	Are you using information from any	There is very little data regarding existing licensees available to inform
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	<p>previous consultations and/or local/national consultations, research or practical guidance that will assist you in completing this EIA?</p>	<p>this process.</p> <p>All local authorities have to use prescribed processes and forms produced by Central Government. The forms used do not include equalities issues.</p> <p>The Government have not permitted application forms to contain anything except that which is specified in the regulations. This has had implications not just for previous equalities impact assessments for licensing consultation but also monitoring all Council interventions under the act.</p> <p>The Council will not be in a position where it can proactively affect the profile of licence holders. The policy we adopt though will ensure that the process of obtaining a licence will be fair and free of discrimination.</p>
2	<p>Please list any consultations planned, methods used and groups you plan to target. (If applicable)</p>	<p>A public consultation took place between the 9<sup>th</sup> July 2021 and the 3<sup>rd</sup> September 2021. This the policy will be considered by the Full Council on 24<sup>th</sup> November 2021.</p>
3	<p><b>**</b>What barriers, if any, exist to effective consultation with these groups and how will you overcome them?</p>	<p>No barriers identified</p>

*\*\*It is important to consider all available information that could help determine whether the policy/function could have any potential adverse impact. Please attach examples of available research and consultation reports*

**E: The Impact – Identify the potential impact of the policy/function on different equality target groups**

*The potential impact could be negative, positive or neutral. If you have assessed negative potential impact for any of the target groups you will also need to assess whether that negative potential impact is high, medium or low*

	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
<b>General</b>  Page 158	<input checked="" type="checkbox"/>			No negative impact anticipated. The Act is a permissive regime and applications must be granted unless there are good reasons not to do so and each licence application, where representations are made, will be considered against the three key Gambling Act objectives, namely: 1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime, 2. Ensuring that gambling is conducted in a fair and open way, and 3. Protecting children and other vulnerable persons from being harmed or exploited by

				gambling.
<b>Sex</b>			<input checked="" type="checkbox"/>	There is some evidence to support a higher risk of problem gambling in men rather than women. In 2015-16 over 70% of calls to Gamcare support-line were from men, and the majority of calls from women were as an 'affected other'. <a href="http://www.gamcare.org.uk/sites/default/files/file_attach/GamCare%20Annual%20Statistics%202015-16.pdf">http://www.gamcare.org.uk/sites/default/files/file_attach/GamCare%20Annual%20Statistics%202015-16.pdf</a>
Pregnant women & women on maternity leave				No expected impact
Gender Reassignment				No expected impact
Marriage & Civil Partnership				No expected impact
<b>Race</b> - include race, nationality & ethnicity (NB: the experiences may be different for different groups)				The policy will ensure that all services are aware of the need to abide by the Equality Act (2010)
<b>Disability</b> – physical, sensory & mental impairments			<input checked="" type="checkbox"/>	No positive or negative impact anticipated but each licence application, where representations are made, will

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 160</p>			<p>be considered against the three key Gambling Act objectives, namely: 1. preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime, 2. ensuring that gambling is conducted in a fair and open way, and 3. protecting children and other vulnerable persons from being harmed or exploited by gambling. In the policy applicants are requested to have regard to the type of people that are likely to visit their premises in their application when identifying the steps they will take to promote the licensing objectives. Applicants will be expected to propose steps to ensure that the physical layout of the premises does not present any risks to 'vulnerable' people, some of whom may be disabled</p>
<p><b>Age Group</b> - specify e.g. older, younger etc.</p>	<p><input checked="" type="checkbox"/></p>		<p>This policy will have a positive impact on age. Actions and objectives are stated in the</p>

<p>Page 161</p>			<p>policy that will help protect vulnerable and young people. The policy at outlines what the licensing authority's duty is in and what the Council expects from licence holders in respect of protecting young people from harm. The policy makes provision for Children and Young Peoples services to act as the responsible authority for matters relating to the protection of children from harm and enables them to comment on variations/new applications and request reviews of licences</p>
<p><b>Sexual Orientation</b> – Heterosexual, Lesbian, Gay Men, Bisexual people</p>			<p>No expected impact</p>
<p><b>Religious/Faith groups</b> (specify)</p>			<p>Most religions do not condone gambling for money; consequently some sectors could view the gambling policy as an endorsement of this kind of activity. There is however no expected significant negative impact</p>

As a result of completing the above what is the potential negative impact of your policy?

High

Medium

Low

Neutral

**F. Could you minimise or remove any negative potential impact? If yes, explain how.**

Race:	N/A
Sex & Gender, including pregnancy & maternity, gender reassignment, marriage & civil partnership	N/A
Disability:	N/A
Age:	N/A
Sexual Orientation:	N/A
Religious/Faith groups:	N/A
Also consider the following:	
1	If there is an adverse impact, can it be justified on the grounds of promoting equality of opportunity for a particular equality group or for another legitimate reason?
2	Could the policy have an adverse impact on relations between different groups?
3	If there is no evidence that the policy <i>promotes</i> equal opportunity, could it be adapted so that it does? If yes, how?
	<p>N/A</p> <p>No</p> <p>The aims of the policy are: 1. Protecting the public and local residents from crime, anti-</p>

social behaviour and noise nuisance caused by irresponsible licensed premises;

2. Giving the police, licensing officers and responsible authorities the powers they need to effectively manage and police the night-time economy and take action against those premises that are causing problems;
3. Recognising the important role which licensed premises play in our local communities and economy by minimizing the regulatory burden on business, encouraging innovation and supporting responsible premises;
4. Providing a regulatory framework for alcohol which reflects the needs of local communities and empowers local authorities to make and enforce decisions about the most appropriate licensing strategies for their local area; and
5. Encouraging greater community involvement in licensing decisions and giving local residents the opportunity to have their say regarding licensing decisions that may impact upon them.

The policy itself is therefore intended to have an overall positive impact on the area and its residents, supporting the safe operation of licensed premises in the Trafford.

**G. EIA Action Plan**

Recommendation	Key activity	When	Officer Responsible	Progress milestones
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The policy has a statutory review process. The policy has to be updated at least every 3 years.	Keep the policy under review	On-going	Joanne Boyle	

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Please ensure that all actions identified are included in the attached action plan and in your service plan.

Signed *Joanne Boyle*

Lead Officer

Date 28/09/2021

Signed *A G Fisher*

Director

Date 28/09/2021



## TRAFFORD COUNCIL

**Report to:** Executive

**Date:** 22<sup>nd</sup> 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 24<sup>th</sup> November 2021.

### Recommendations

It is recommended that the Executive:

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. Recommend to Council that it approves 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 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:

Name: Adrian Fisher  
 Director of Growth & Regulatory Services  
 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.
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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 <b>Appendix 3</b> .
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 <sub>2</sub> 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 stranger<sup>1</sup>*

- 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

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.

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<sup>1</sup> Report of Inspection of Rotherham Metropolitan Borough Council, February 2015

- 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.

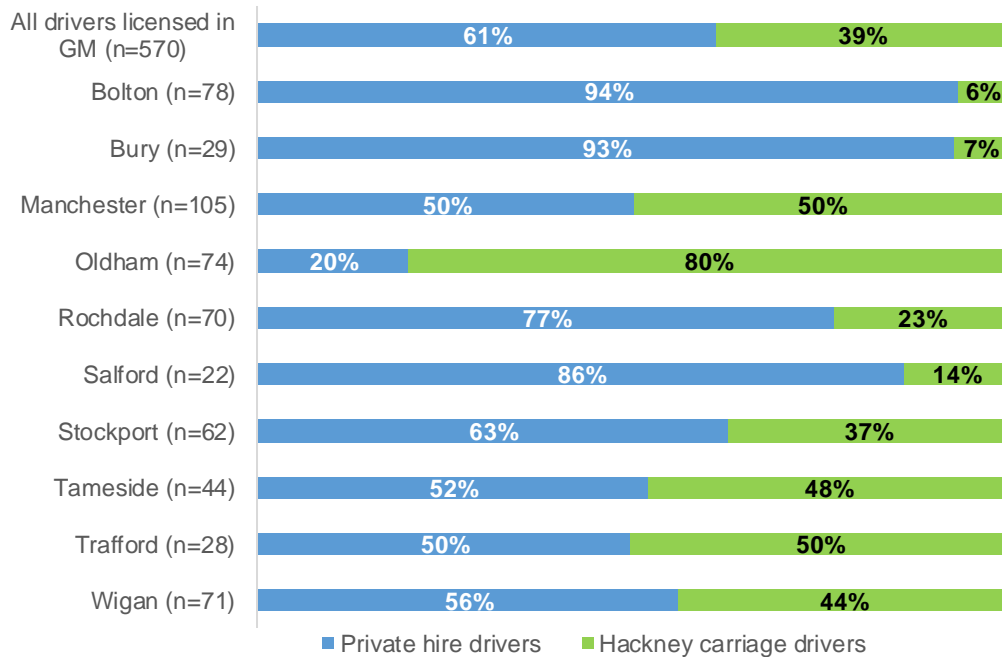
#### 5 The Consultation

- 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](http://www.gmtaxistandards.com)
- 5.3 The response breakdown for Trafford was as follows:

	Questionnaire*	Letter / email	Total	%
<b>General public</b>	83	0	83	70%
<b>Hackney drivers</b>	14	0	14	12%
<b>Private hire vehicle drivers</b>	14	0	14	12%
<b>Private hire operators</b>	5	0	5	4%

<b>Vehicle leasing companies</b>	1	0	1	1%
<b>Businesses</b>	1	0	1	1%
<b>Representatives</b>	0	0	0	0%
<b>Base</b>	<b>118</b>	<b>0</b>	<b>118</b>	<b>100%</b>

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 affection 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](http://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
<b>General Comments</b>	95	11	32	6	3	1	3
<b>Vehicle Emissions</b>	39	20	10	5	1	2	4
<b>Age of Vehicle</b>	82	78	84	8	1	1	10
<b>Vehicle Colour</b>	214	23	95	12	2	1	13
<b>Accessible vehicles</b>	54	38	1	1	1	0	4
<b>Vehicle Livery</b>	62	7	47	6	1	3	11
<b>Vehicle Maintenance and Testing</b>	44	20	31	4	0	0	2
<b>CCTV</b>	83	16	51	6	1	3	8
<b>Executive Hire and specialist vehicles</b>	8	0	5	2	0	0	1
<b>Vehicle Design</b>	9	4	0	0	0	0	1
<b>Vehicle Conditions</b>	24	1	3	2	0	0	0
<b>Base</b>	449	114	187	24	7	6	20
<b>Proportion of respondent type</b>	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**

<b>Standard 1 Accessible Hackney Carriages</b>	To retain the Council’s current standard that all licensed Hackney Vehicles be wheel chair accessible (WAV).  To defer the decision on side/rear loading at this time as the consultation response on this specific point was particularly low.
<b>Standard 2 Vehicle Age</b>	To implement the following as the minimum standard: <ul style="list-style-type: none"><li>• PHV – under 5 years on to fleet and 10 years off</li><li>• PHV WAV – under 7 years on to fleet and 15 years off</li><li>• Purpose built HCV– under 7 on to fleet and 15 years off</li></ul>

	<ul style="list-style-type: none"> <li>• 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</li> <li>• To remove the exceptional condition (age) test.</li> </ul> <p>That the standard be implemented for new to licence vehicles from the 1<sup>st</sup> January 2022; and that the existing fleet is compliant with the policy standard by 1 April 2024. This will mean that from the 1<sup>st</sup> April 2023 a vehicle licence will not be renewed if the vehicle does not meet this standard.</p>
<p><b>Standard 3 Vehicle Emissions</b></p>	<p>To require licensed vehicles to be compliant with the current Euro emissions standard as follows:</p> <ul style="list-style-type: none"> <li>• For new to licence vehicles from the 1<sup>st</sup> January 2022; and for the existing fleet vehicles are compliant with the policy standard by 1 April 2024.* This will mean that from the 1<sup>st</sup> April 2023 a vehicle licence will not be renewed if the vehicle does not meet this standard.</li> <li>• To note the strong ambition to move existing fleets to ZEC as soon as possible</li> </ul> <p>*vehicle must also be compliant with the age policy</p>
<p><b>Standard 4 Vehicle Colour</b></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"> <li>• London Style Taxis may be of the manufacturer’s colour</li> <li>• Advertising is allowed on London Style Taxis</li> </ul> <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><b>Standard 5 Vehicle Livery</b></p>	<p>To require that all vehicles will:</p> <ul style="list-style-type: none"> <li>• display permanently affixed licence plates on the front and back of the vehicle</li> <li>• display a ‘GM approved’ sticker on the bonnet</li> </ul> <p>To require that all PHVs will:</p>

	<ul style="list-style-type: none"> <li>• 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</li> <li>• display those stickers on both rear side doors and the back window</li> <li>• not use any magnetic stickers</li> </ul> <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>
<b>Standard 6 Vehicle Testing</b>	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.
<b>Standard 7 CCTV</b>	To approve the drafting of a CCTV policy for further consideration and consultation
<b>Standard 8 Executive Hire</b>	<p>The retain Trafford's current standards including the following conditions:</p> <ul style="list-style-type: none"> <li>• Bookings to be confirmed by written contract</li> <li>• Payments made in advance of the journey or by invoice afterwards</li> <li>• Stipulation on the types of vehicles to be licensed</li> <li>• Dress code</li> <li>• Business plan shared with licensing authority</li> <li>• Vehicles not to be fitted with data heads, radios or meters</li> <li>• Exemptions from plates and door signs only to be given when used exclusively for executive hire</li> </ul> <p>The standard to apply to new to licence and existing fleet from 1<sup>st</sup> January 2022</p>
<b>Standard 9 Vehicle Design</b>	<p>The following standards will apply:</p> <ul style="list-style-type: none"> <li>• all vehicles conform to the M1 standard (any modified vehicle at M2 standard must have an</li> </ul>

	<p>appropriate test to ensure conformity with single vehicle type approval)</p> <ul style="list-style-type: none"> <li>• No retrofitting of engines into older vehicles will be allowed. LPG conversions will be accepted</li> <li>• Where retrofit emissions technology is installed it shall be approved as part of the Clean Vehicle Retrofit Accreditation Scheme (CVRAS)</li> <li>• Specification for window tints will be: <ul style="list-style-type: none"> <li>○ Front windscreen – min. 75% light transmission</li> <li>○ Front side door glass – min. 70% light transmission</li> <li>○ Remaining glass or rear side windows (exc. Rear window) - allow manufacturer’s tint to a minimum 20% light transmission</li> </ul> </li> <li>• 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.</li> <li>• No roof signs permitted on PHVs</li> <li>• No advertising other than Council approved signage on PHVs</li> <li>• To defer the decision on swivel seats at this time as the consultation response on this specific point was particularly low.</li> </ul> <p>The standards to apply to new to licence and existing fleet from 1<sup>st</sup> January 2022 with the exception of written off vehicles which will apply from 1<sup>st</sup> April 2022.</p>
<p><b>Standard 10 Vehicle Conditions</b></p>	<p>A set of proposed conditions for Hackney Carriage and Private Hire Vehicles are set out at <b>Appendix 2</b>.</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 1<sup>st</sup> January 2022; and for existing fleet on renewal of the licence.</p>

- 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 the Executive recommend 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 Executive recommend that 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

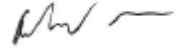
**If Key Decision, has 28-day notice been given?** N/A

Finance Officer Clearance PC

Legal Officer Clearance SL



**CORPORATEDIRECTOR'S SIGNATURE**

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

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

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**VEHICLE STANDARDS**

Vehicle Proposed Standard 1	Trafford Current standard
<p><b>Hackney Carriages</b></p> <p>It was proposed that all licensed hackney carriages should be wheelchair accessible vehicles (WAV), and that there is a consistent approach to makes and models of vehicles that will be accepted onto fleets as Hackney Carriages.</p> <p>It was also proposed for consultation whether a purpose-built HC vehicle should be side or rear loading.</p>	<p>Trafford's current policy is that all hackney carriages must be wheelchair accessible.</p> <p>Trafford does not have a policy in respect of side or rear loading vehicles; or swivel seats.</p>

**Reason for Proposal**

Currently not all GM authorities have a wheelchair accessible or purpose-built hackney carriage policy. Passengers with additional mobility needs should not have to wait for long periods at a taxi rank for a suitable accessible vehicle. Licensing Authorities need to ensure their policies are non-discriminatory and inclusive. This standard proposal seeks to ensure that there is sufficient availability of accessible vehicles for residents and visitors to the region, and that there is a more consistent standard across the conurbation for the makes/model and specifications of Hackney Carriage vehicle allowed onto the fleets.

**Consultation Response**GM level response:

This proposal elicited a fair number of comments compared to some other standards, as per the table below:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Accessible vehicles	54	38	1	1	1	0	4

This table breaks down those comments thematically across the respondent categories:

Comment Theme	General Public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
A mixed fleet (types of vehicles) is important	13	23	0	1	0	0	2

Accessible vehicles are expensive / need to be subsidised	3	6	1	0	0	0	0
PHV should have to have same rules about accessibility	1	0	0	0	0	0	0
More accessible vehicles are needed	34	6	0	0	1	0	3
More consultation with disabled people required	5	0	0	0	0	0	0
Problem with design of accessible vehicles	3	5	0	0	0	0	2
Base	54	38	1	1	1	0	4

34 members of the public commented that more accessible vehicles were needed as did 6 hackney drivers. Some members of the public shared how they often encounter difficulty booking wheelchair accessible vehicles due to their lack of availability, and those hackney drivers who have accessible vehicles noted how they are relied upon by many who do not have many other options for transport.

*“Accessible Hackney carriages - we have extreme trouble booking a taxi in advance that has wheelchair access as the taxi company do not always know when their wheelchair accessible vehicle will be available. In the past we have been asked to ring at the time an accessible taxi is needed - and in every occasion one was not and our family has had to pick her up instead - not an ideal situation for a young lady who would like some independence.” (Public, age 45-54, Bury)*

*“Make it all wheelchair accessible vehicles, known as a level playing field.” (Hackney Driver, Wigan)*

In contrast, 23 hackney drivers felt having a mixed fleet was more important, with some sharing how they feel some passengers are deterred by larger vehicles.

*“As a Hackney driver, I don’t agree for all Hackney carriage vehicles to be wheelchair accessible. Reason is for that we do, need mixed fleet for elderly people who do not like getting into bigger vehicles. I believe it will make them go to private hire offices and that will affect our business. Also, it’s more affordable to buy a normal electric car.” (Hackney Driver)*

One operator who took part in the focus groups specialises in the transportation of customers who need wheelchair accessible vehicles. He stated hackneys were not suitable for all.

*“On the black cabs and I’ve got two of them, okay. The ramps that come down, they come down on an angle and, you know, that ramp the wheelchairs cannot actually get up on them and also the people, when they’re sat in them, they’ll bang their head against the roof. So for some*

*reason licensing seemed to think that anybody who's in a wheelchair would fit in a black cab. It's not the case, so you might have two thousand black cabs out there and they could say, oh, they're all wheelchair accessible. They are for full manual wheelchairs. Electric ones they can't fit. (Operator, Trafford).*

Representatives also argued for a mixed fleet:

*"This is totally not acceptable because [it] is not meeting the needs of vulnerable or disabled [people]. Many old [and] disabled don't use wheelchair vehicles either [because] it's too high or [they] dislike it them". (Organisation, NPHTA)*

*"There is very little evidence to support the need for an entire trade to cater for wheelchair bound passengers, potentially at the cost of the majority of disabled passengers who are not confined to a wheelchair and therefore find it far more difficult to access the higher vehicles that are WAV, so a mixed fleet is a better approach". (Organisation, NPHTA)*

Some hackney drivers and operators expressed concerns with the design of wheelchair accessible vehicles, with 5 explaining their preference is for side loading accessible vehicles rather than rear loading and expressing their safety concerns.

*"All Hackney carriages should be side loading wheelchair accessible, rear loading takes up too much space on ranks, they are also dangerous when unloading passengers in the middle of the road." (Hackney Driver, Wigan)*

*"Accessible Hackney carriages: It is proposed that all hackney carriages should be wheelchair accessible. Agreed. Particularly important condition which will help to prevent the influx of out-of-town licensed saloon cars plated as Hackney carriages from working within the GMC area. Side and / or rear loading without the need for swivel seats: A policy as to whether purpose-built accessible vehicles should be side and/or rear loading without the need for swivel seats is being considered. The choice of entry location generally determines the floor plan available. Rear entry vehicles offer two floor plans for up to four or six passengers. A side entry van has more options when it comes to the floor plan. Side entry vehicles will lower the available space inside, as the maximum number of ambulatory passengers in this option is four including three in the rear bench seat. Swivel seats in taxis where fitted should remain as they are an additional feature making it easier to enter or exit the car without undue discomfort. For those who have conditions such as arthritis, multiple sclerosis, or osteoarthritis, which can limit their mobility will benefit as they reduce strain otherwise placed on the hips and back." (Operator, Manchester)*

*"I mean I have a sliding door on the side, two sliding ones and the rear loaded is the big door that comes up. Okay, there's a row of seats there, but the row of seats can be moved. I mean I do put, where the large wheelchairs fit and if I do one, because it can be that you can't get them through the side door, because there's a big person, so they have to go through the rear door. So, what you do is, you just push the seats right*

*forward, because they're all tracking, you just push them right forward. So, I would be fine.” (Licensed hackney driver – own my vehicle, Stockport)*

A further 6 hackney drivers felt wheelchair accessible vehicles were expensive or need to be subsidised if they are all required to be wheelchair accessible.

*“Vehicle emissions. what I can gather from the information available is that driver is responsible for all the costs involved. Accessible Hackney is very expensive it will put almost every Hackney driver out of business in Rochdale for sure even Euro six diesel is unaffordable.” (Hackney Driver, Rochdale)*

Concerns were raised by members of the public about the impact on the cost of using a hackney / PHV.

*“Wheelchair accessible vehicles are more expensive than normal cars. And that's tough for people who need them. One solution would be to provide a subsidy to anyone buying an accessible vehicle to use as a taxi. But what makes absolutely zero sense is to make the non-wheelchair-using public (the VAST majority of people) pay for accessibility features they do not need.” (Public, age 35-44, Manchester)*

Some users and drivers felt a few drivers use the fact they are transporting someone who needs an accessible vehicle to their advantage:

*“But a lot of the time they do treat you, you know, what they do is they charge, they put the timer on and if it takes you ages to get into the cab and put your belt on and everything, they charge you for all that, you know and getting out the cab, they don't always put seatbelts on properly and things like that, but then the private hire companies don't usually have accessible vehicles.” (User, Group 1)*

Others highlighted not all disabilities are visible:

*“More accessible vehicle design for disabled people. Not everyone with a disability you see looks disabled very important not to forget for drivers.” (Public, age 45-54, Oldham)*

Trafford Response:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Accessible vehicles	4	1	0	0	0	0	0

Two members of the public felt that a mixed fleet was important; other comments from the public were that accessible vehicles are expensive and need to be subsidised; there should be more consultation with disabled people and PHVs should be have the same rules about accessibility. One hackney carriage driver commented that more accessible vehicles are needed.

### **Comments and considerations**

All purpose-built Hackney Carriages are wheelchair accessible, but also have additional mobility and accessibility design features such as passenger compartment controls, additional lighting, additional space, visibility strips, audio loops, steps, swivel seats (may be built in as standard), wide doors etc.

As well as providing better access for those with additional needs, purpose-built Hackneys also make it much easier for the travelling public to distinguish between a licensed Taxi and a private hire vehicle. As such, 7 of the 10 districts currently only licence purpose built/Wheelchair Accessible vehicles as Hackney Carriages in their policy.

Where mixed fleets exist, and ordinary saloon cars are licensed as Hackneys, these are commonly permitted to have a hire light installed on the roof to enable them to legally ply for hire. However, in the current landscape where these vehicles can undertake pre-booked private hire work in other areas, and/or are more likely to be crossing local boundaries, it can serve to undermine local purpose built only Hackney policies, and potentially undermine the legitimate business undertaken by Hackneys in certain areas. The public observe saloon vehicles in one area legally plying for hire and not understand that this is not permissible in another area, and this serves to encourage illegal activity as confusion provides an opportunity for those looking to illegally ply.

Therefore, it should also be noted that a decision on this policy standard has knock on considerations/decisions for the following:

- Age Policy for Hackneys (WAV/non-WAV – standard Proposal 2)
- Colour and livery policies for Hackney vehicles (see Standards Proposals 4 and 5)
- Intended use policy for Hackneys (see Standard Proposal 10 – Hackney Carriage Vehicle Conditions)

As outlined within the proposal section above, this policy standard is not just about wheelchair accessibility. For a City Region like Greater Manchester, with ambition to licence a high-quality service offer that supports economic and business growth, including accessibility standards within the public transport network; it must therefore follow that all licensed Hackney Carriages are purpose built accessible vehicles, providing all the benefits to users that such vehicles do. The objective to ensure that no one with additional needs should ever have to wait on a rank for a suitable vehicle has considerable merit, and the policy has the added safety benefit of properly distinguishing licensed Hackneys and Private Hire vehicles in all fleets. An additional consideration is that there will be no better time to implement this transition, as the funding opportunity provided through the Clean Air Plan is unique and time limited providing much needed support to those that seek to make this transition.

### **Lead Officers recommendation**

To retain the Council's current standard that all licensed Hackney Vehicles be wheelchair accessible (WAV).

To defer the decision on side/rear loading at this time as the consultation response on this specific point was particularly low.

Vehicle Proposed Standard 2	Trafford's Current standard												
<p><b>Vehicle Age</b></p> <p>It was proposed that all licensed vehicles are under 5 years old at first licensing and no more than 10 years old.</p> <p>Views were sought on consideration of a different age policy for electric and wheelchair accessible vehicles (WAV).</p>	<p><b>On first application for a licence</b></p> <table border="0"> <thead> <tr> <th data-bbox="837 674 1134 712">TYPE OF VEHICLE</th> <th data-bbox="1203 674 1442 712">MAXIMUM AGE</th> </tr> </thead> <tbody> <tr> <td data-bbox="837 752 1126 790">Private Hire Vehicle</td> <td data-bbox="1299 752 1406 790">4 years</td> </tr> <tr> <td data-bbox="837 824 1102 898">Hackney Carriage Vehicle</td> <td data-bbox="1299 864 1426 902">10 years</td> </tr> </tbody> </table> <p><b>LICENCE RENEWALS</b></p> <table border="0"> <thead> <tr> <th data-bbox="837 1005 1134 1043">TYPE OF VEHICLE</th> <th data-bbox="1203 1005 1442 1043">MAXIMUM AGE</th> </tr> </thead> <tbody> <tr> <td data-bbox="837 1081 1126 1120">Private Hire Vehicle</td> <td data-bbox="1299 1081 1406 1120">6 years</td> </tr> <tr> <td data-bbox="837 1155 1102 1229">Hackney Carriage Vehicle</td> <td data-bbox="1203 1193 1326 1232">15 years</td> </tr> </tbody> </table> <p>All maximum age limits are subject to the proviso that if an older vehicle is deemed by the Council to be in exceptional condition for its age it can be eligible to be licensed.</p>	TYPE OF VEHICLE	MAXIMUM AGE	Private Hire Vehicle	4 years	Hackney Carriage Vehicle	10 years	TYPE OF VEHICLE	MAXIMUM AGE	Private Hire Vehicle	6 years	Hackney Carriage Vehicle	15 years
TYPE OF VEHICLE	MAXIMUM AGE												
Private Hire Vehicle	4 years												
Hackney Carriage Vehicle	10 years												
TYPE OF VEHICLE	MAXIMUM AGE												
Private Hire Vehicle	6 years												
Hackney Carriage Vehicle	15 years												
<p><b>Reason for Proposal</b></p>													
<p>The majority of GM districts have upper limits for both the age at which a vehicle must be under to be first licensed, and the age at which it will cease to be licensed, although these currently vary across the conurbation, with some districts having never implemented any age restriction on its licensed fleets. The proposal seeks to rationalise the variance across the conurbation and ensure that GM districts do not undermine each other's policies; deterring applicants from seeking the authority with a significantly lower standard in this regard.</p> <p>Licensed vehicles undertake significantly more miles than an average domestic vehicle, meaning they are likely to deteriorate more quickly and experience structural weaknesses over time which impacts on vehicle safety. Where vehicle testing data is</p>													



held by the local authority (as it is delivered inhouse), this generally evidences that the older a vehicle is, the more likely it is to fail tests, and usually with a higher number of major faults. So where vehicle age policies already exist within GM, this encouraged lower polluting vehicles, ensured higher levels of safety in vehicles and also supported the strategic objectives to have a better quality of fleet for residents and visitors within this key section of the transport network. The specific purpose of having an age limit for vehicles 'coming on to fleet' is to safeguard against having the majority of the licensed fleet at the older end of the age limit scale and is a common policy among licensing authorities nationally.

## Consultation Response

GM level response:

This proposal elicited a much higher number of comments:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Age of Vehicle	82	78	84	8	1	1	10

The following table sorts the comments by theme according to respondent:

Comment Theme	General Public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Agree with Age Limit proposals	18	1	7	1	1	0	0
Age limit should be higher than 10 years	4	37	16	1	0	0	2
Age limit should be less than 10 years	11	1	4	0	0	0	0
Electric cars should have same age limit as non-electric	7	4	0	1	0	0	3
No age limit or higher for electric vehicles	1	5	5	0	0	0	1
Minibus maximum age should be 15years	0	0	2	0	0	0	0
Age is not important	45	33	47	6	0	1	6
10 years isn't enough time to return investment	0	8	2	2	0	0	2

Suggestion of different Minimum age	2	4	13	2	0	0	0
Base	82	78	84	8	1	1	10

A relatively small number of comments were made (28) in support of the age limit proposals. Comments included the reference to the poor condition of vehicles not subject to an age limit:

*“I live in Bolton, and the current standard of taxis is appalling - it's like a rolling scrap yard. Other parts of Greater Manchester seem to have much nicer, newer taxis, but Bolton is full of decrepit, shonky old rust boxes, limping around the town, pumping out clouds of smoke and regularly breaking down. I sawan “S” reg taxi not long ago - registered in 1997! The car was older than it's driver! We pay good money to be driven around in these awful heaps, and it's about time something was done about it” (Public, age 45-54, Bolton)*

However, the vast majority of comments expressed a view that the age limit was either not important/not necessary or should be higher than 10 years, with significantly fewer responses supporting the proposal. A high number of comments were received expressing the age of a vehicle should not matter if the vehicle is well-serviced and maintained, with this being expressed by 33 hackney drivers, 47 PHV drivers, 6 PHV operators, and 45 of members of the public.

*“Vehicle age shouldn't matter as long as it is in good condition. We have two MOTs in a year, so the vehicles are good for customers”. (PHV Driver, Bolton)*

Some respondents commented about hackneys being more expensive to replace and upgrade, with some comparing the costs to PHVs. Therefore, 37 hackney drivers and 16 of PHV drivers felt the age limit should be higher. Drivers licensed in Manchester raised this more than any other area.

*“Age shouldn't be a problem as long as kept up with maintenance and repairs to a good standard. Personally, I think if a vehicle needs welding, it's past its best for the job, and licenses should be granted for 12 months after repairs to give drivers the time to invest in a replacement. Also, Hackney carriages cost a hell of a lot more money than a private hire car, £30.000 upwards whereas a new Dacia car can be purchased for £8000, so should be given 15-year age limit” (Hackney Driver, Stockport)*

Both the LPHCA and Unite Union did not feel the age standard was appropriate:

*“As a former qualified engineer and operator that had over 2,000 vehicles used, leased or owned by my business for Private Hire usage and as many experienced operators, taxi & PHV hirers will tell you – it is the condition of, not the age of a vehicle that is critical. A combination of condition and vehicle emissions requirements (as you have set out above) is a far better way to determine the fitness for a taxi or PHV to be licensed. It is reasonable to subject older PHVs to more frequent MOTs and other inspections whilst meeting established Euro Standards and Air Quality requirements, rather than the outdated and inappropriate use of age policies.” (Organisation, LPHCA)*

*Setting the hackney vehicle age limit at 10 years is a nonsense. It provides insufficient time for recovery on investment. And these vehicles will become scrap at end of arbitrary lifespans as numbers of charging CAZs increase and residual values disappear, accordingly. The upper age limit for hackneys should be 15 years". (Organisation, Unite the Union- Manchester Hackney Carriage)*

The same argument was strongly raised in the in-depth interviews with both users, drivers and operators arguing a vehicle should be able to be used regardless of age if it was fit for purpose and passed all the relevant tests.

*"And most people get cars maybe like every five or six years, so ten is quite old for a car. The more modern the car is, the less likely it is to have bad emissions and a lot of them have things put in place when they're being built to not release as many". (User, Group 15)*

The in-depth interviews with hackney and private hire drivers highlighted concerns about removing vehicles considered roadworthy and of a good standard from working. This was felt to be not only wasteful but forced drivers to replace their vehicles earlier than envisaged. This was particularly mentioned by drivers in Rochdale and Oldham as they currently have a longer age limit on their vehicles.

*"This will hit drivers hard in this area. You only need to look at the cars on the road currently to see that a lot of them will not meet this age criteria. No one has the money to update these cars, we are all still paying money off on them and getting no money in at the moment. Here is one of the most deprived parts of Manchester." (PHV Driver, Rochdale)*

Drivers and operators currently trading in the regions that are currently under standards of between 7 and 12 years for the age limit of their vehicle understood why ten had been suggested and felt it fell in line with their own district. A couple of drivers / operators highlighted specialist vehicles, i.e. adapted for wheelchair transportation should be given an exemption to the age standard due to the need for their type of vehicles.

*"Number one, the most important thing for me in my business, I need vehicles to be able to drive, okay, to be able to bring people. The maximum age of ten years for a vehicle in my opinion is going to wipe out, number one my company completely and 80% of the hackney carriage trade." (Operator, Trafford)*

Two operators mentioned the impact the standard would have on their operations as currently they are able to manage their fleet by moving older vehicles to other areas where the current age standards are lower for example, Manchester to Trafford, enabling them to stagger the replacement of their vehicles and therefore the finance needed to do this.

*"I usually move the vehicles from Manchester to Trafford once they hit their age limit in Manchester. I now will be able to keep them longer in Manchester but will get less out of them overall and won't be able to move them on to Trafford so I will now need to update more vehicles in a smaller timescale." (Operator, Trafford / Manchester).*

Trafford Response:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Age of Vehicle	7	4	3	0	0	0	0

More than half of the hackney drivers who commented about vehicle standards felt that the age limit should be higher than 10 years or that age was not important at all (n=2). This was also mentioned by PHV drivers (n=1 and n=1 respectively).

*"I purchased my vehicle in 2014 and was told no road tax due to low emissions. Now I'm being told its euro 5 and I will have to pay a charge if I drive it. I cannot afford to buy a new one and the grant of £2000 is not enough."* (PHV driver)

*"It would not be possible to run a Hackney Carriage business under these age restrictions. The end term of 10 years should be extended to a minimum of 15 years to give the proprietor a chance to make the buying of a suitable vehicle worthwhile and cost efficient."* (Hackney driver)

**Comments and considerations**

Upper age limits across GM currently vary from 7 years (for private hire) to 15 years (for Hackneys), with 3 authorities currently not having any upper age limit at all. As can be seen from some of the comments, this has resulted in older, more polluting and lower standard vehicles being passed to those authorities with higher or no age limits. This practice undermines the attempt by those authorities seeking to raise the quality and safety standard of its vehicle fleet and goes against the collaborative approach that GM districts wish to take. It also means that residents and visitors will have a significantly different experience depending on which district they live/visit and that is a scenario this project aims to address.

Many individuals within the trade expressed views that standards in relation to vehicle condition and emissions could negate the need for an age policy altogether. Whilst there initially appears to be some merit in this assertion, it is important to note that compliance with an emissions policy that required (for example) the vehicle to be of the current Euro emissions standard, would currently allow a vehicle registered in 2005 to be licensed on the fleet. Similarly, a significantly older vehicle can be fitted with retrofit technology to bring it into emissions standard compliance, but all the other risk associated with the vehicle age will continue to exist. There is also significant testing data to evidence that the older the licensed vehicle is (and the more mileage it undertakes), the more likely it is to fail mechanical tests.

It should also be noted that there is currently a wide variance across GM districts on how authorities monitor/test the condition of vehicles. Whilst some authorities carry out this function in house and can therefore conduct a full compliance check (ensuring

compliance with all licence conditions/policy as well as testing the mechanical structure) and be fully assured as to the mechanical and cosmetic condition of the vehicle; others permit proprietors to test vehicles at approved testing stations and usually only require the tester to perform a DVSA standard MOT, which will not consider whether the other aspects of the vehicle are compliant with relevant policies. Therefore in order to fully rely upon the testing regime to safeguard against the risk that vehicles that fall below the desired standard on the licensed fleets, a deeper review of the how this is harmonised and delivered across the conurbation would be required.

It is critically important for all districts, but primarily the trade themselves, that the Hackney and Private Hire sectors remain integrated into the sustainable transport network within GM, moving passengers with minimal environmental impact and remain a key transport mode of choice. To this end, it would be desirable to implement a limit to ensure a 'line in the sand' for all concerned and continue to promote the safety and quality that a younger fleet provides. However, officers are cognisant of the strong views expressed by the trade in relation to the capital cost and return on investment particularly with regards to purpose built and ZEC/EV taxis, as well as the ongoing impact of Covid.

Further research of other non-GM authorities policies in this regard provides that the majority of licensing authorities do impose an age limit (both for coming on to the fleet and for continuing to be licensed), including those authorities who are also subject to Clean Air Zone emissions requirements; further supporting the view that an age limit is a useful policy standard in ensuring a better quality fleet.

In considering all the consultation feedback and the relevant risks, it is proposed that the age limits are changed from that proposed to:

PHV – under 5 on to fleet and 10 years off  
PHV WAV – under 7 on to fleet and 15 years off  
Purpose built WAV HCV – under 7 on to fleet and 15 years off

Testing data (where held) will be reviewed periodically by the Licensing Network group, alongside air quality metrics to assess any negative impacts of these age policies on both the safety of vehicles and air quality. Any issues or future risks will be brought back to Members as necessary.

Subject to policy decisions (where relevant) with regards to the Hackney Carriage Vehicle Policy and Wheelchair Accessibility, a separate age policy for non-WAV Hackneys may also need to be introduced.

Members should be aware that some authorities in GM and beyond currently operate an 'Exceptional Use' or 'Beyond the Age Limit' or similar policy that enables vehicles of a determined condition and testing record to continue to be licensed as exceptions to the normal age limit policy. However, in recognition of the significant concession made on the age policy, it is proposed that such explicit exception policies are removed. As with any Council policy, it will always be within the gift of an individual to ask the authority to depart from policy.

#### **Lead Officers recommendation**

To implement the following as the minimum standard:

- 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 years 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.

That the standard be implemented for new to licence vehicles from the 1<sup>st</sup> January 2022; and that the existing fleet is compliant with the policy standard by 1 April 2024. This will mean that from the 1<sup>st</sup> April 2023 a vehicle licence will not be renewed if the vehicle does not meet this standard.

Vehicle Proposed Standard 3	Trafford's Current standard
<p><b>Vehicle Emissions</b></p> <p>It was proposed for consultation that all licensed vehicles must comply with the current Euro standard when they are first licensed with an ambition for a zero-emission capable fleet by 2028.</p> <p>The following was also proposed within the Timetable section of the consultation:</p> <ol style="list-style-type: none"> <li>i. New vehicles being licensed from 1 April 2021 will be required to meet the standards approved following this consultation</li> <li>ii. From April 2021, existing licensed vehicles will begin transitioning to comply with the standards approved following consultation</li> <li>iii. Transition periods will be determined by each district having considered existing local policies and impacts on the trade with an expectation that all vehicles will be compliant by 1 April 2024 (non-compliant vehicles will still be liable to pay the Clean Air Zone charge subject to any exemptions permitted under the Clean Air Plan) – this will be that all licences due for renewal from April 2023 onwards will need to have a compliant vehicle attached to be compliant by 1 April 2024.</li> </ol>	<p>No current vehicle emission standard</p>

- iv. From 2025 all new to licence would need to be Zero Emissions Capable (ZEC\*)
- v. From April 2028 onwards all vehicle licences would need a ZEC vehicle attached to the licence.

**Reason for Proposal**

It is important that taxi and private hire vehicle policies interrelate with other relevant policies, and in this case that the emissions standard requirement for licensed vehicles reflects the ambition set out in the Greater Manchester Combined Authority (GMCA) Environmental Plan which states:

*“We want Greater Manchester to be a clean, carbon neutral, climate resilient city region with a thriving natural environment and circular, zero-waste economy”.*

It was therefore proposed that all licensed vehicles comply with the vehicle emissions standards set out in the government’s Clean Air Zone framework and thereby will comply with the GM Clean Air Zone as proposed in the GM Clean Air Plan in the short to medium term.

In recognition of the fact that the GM Environmental Plan has also set the date of 2038 to be carbon neutral, it was proposed for consultation that all licensed vehicles should therefore be zero-emissions capable (ZEC) by 2028 (to take vehicle age requirements into account). The GM Environment Plan clearly indicates that this shift from vehicles powered by fossil fuels to ones that are ZEC is required as soon as possible in order to achieve carbon neutral targets within the set timeframe and it is important that licence holders understand these key dates to inform their business choices.

**Consultation Response**

GM level summary:

This proposal elicited one of the smallest number of responses across vehicle standards, with only 39 members of the public commenting and 42 members/representatives of the trades:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle Emissions	39	20	10	5	1	2	4

There was a mix of views in the comments, with some support for the timeline, particularly from the public, but many concerns expressed about the timings, funding support and charging infrastructure:

Comment Theme	General Public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Agree with timeline for a transition to a fully electric fleet	23	3	4	0	1	0	0
Should have a fully electric fleet earlier than proposed	8	1	0	0	0	0	0
Should give more time to switch to a fully electric fleet	3	3	5	2	0	2	1
Comment / concerns about suitability of some electric vehicles	2	7	3	1	0	0	3
Electric vehicles too new to understand suitability	1	1	0	1	0	0	0
Charging infrastructure needs improving / not yet ready	5	7	2	3	0	0	1
General Disagreement with Age	1	2	0	0	0	0	0
<b>Base</b>	<b>39</b>	<b>20</b>	<b>10</b>	<b>5</b>	<b>1</b>	<b>2</b>	<b>4</b>

Comments in support included:

*“Good to aim for fully electric fleet by 2028, but I feel taxi drivers should be offered grants and financial incentives to encourage early take up, therefore creating demand and bringing down the price.” (Public, age 35-44, Manchester)*

*“Agree with emission requirements given ample support is provided to upgrade vehicles.” (PHV Driver, Stockport)*

*“Vehicle emissions: what will it take to move to electric vehicles at a faster pace than proposed? I think the [proposal] is too loose around what's going to be expected of taxi operators so surely we should be looking for their commitment to move to electric as early as possible.” (Public, age 65-74, Stockport)*



Concerns expressed from the trade included detailed comments made during in depth interviews where drivers and operators describe purchasing a vehicle as an investment, budgeted for the expected lifespan of a vehicle. Therefore, drivers who have already invested in vehicles that haven't reached their expected lifespan cannot afford to replace them within the proposed timescale.

*"Vehicle Emissions. This is a very big step, and I think the GM Councils should allow more time to help operators safely and economically phase out old cars." (Operator, Trafford)*

*"Emissions should be allowed to come in as and when the vehicles are replaced so that over the coming years the fleet would naturally be replaced with zero emission vehicles. Retrofitting of emission kits on older vehicles should be allowed, as the money is not being earned by the drivers to be able to afford an electric taxi." (Hackney Driver, Trafford / Manchester and Salford)*

*"I think it's going to be unfair to say to someone your vehicle's not fit for purpose, you need to go and buy this vehicle now and it's just going to be really really difficult to do that to people who've been doing it thirty, forty years, they're struggling to make ends meet and it's hard work." (Operator, Bury)*

*"We agree with the first part but must point out the ambition for a zero-emission capable fleet by 2028, whilst sensible cannot at this stage form a policy as the supply, charging infrastructure, cost, ability for drivers to charge at home is uncertain, especially post-pandemic. There is also uncertainty on grant funding for drivers, so this aspiration needs to be kept under review as events become clearer." (Organisation, LPHCA)*

*"The effect on me in terms of additional crippling costs to comply with some of the proposals in terms of going electric will be detrimental, and restrictions on vehicle colour and age limit is questionable. If TfGM are willing to supply all the taxi industry with all new electric vehicles and guarantee a lifetime service and warranty, then we, the taxi industry, can consider the proposals. The support funding for drivers to switch to electric is nowhere near enough to cover the cost of these vehicles, and limited charging points which you can never match the fuelling stations accessibility and coverage for petroleum fuelling." (PHV Driver, Manchester)*

The in-depth interviews provided more detail of the industry's concerns with electric vehicles; the lack of electric charging points infrastructure and the lack of technological advancements in battery life, parts maintenance and overall servicing and trust in the lifespan of the vehicle.

*"A brand new electric cab, the bottom end is £55,000. So even if they gave you £17,500 towards one of those vehicles you're saddling somebody with a debt of almost £30,000." (Hackney Driver, Salford)*

*"70,000 miles he said he'd done, and his batteries are goosed and he didn't realise how much the batteries were. It's all right for 180 miles, then you*

*get 160 miles and as the batteries start to die and get weaker and weaker you start getting electrical problems, you're getting forty miles, fifty miles, you've got to replace them for new ones then. So that's the problem with having electric vehicles on, good for the environment, but rubbish for the job, unless Tesla with their million-mile battery come along with a decent priced vehicle." (Operator, Tameside)*

*"Right, because they've now set the standards of Euro 6, Euro 5 vehicles are not wanted, they're not worth the trade-in. I've enquired about this. The best they would offer me is three grand." (Hackney Driver, Stockport)*

*"I bought a very very clean 11 plate cab in February (right before COVID) and I paid £5,000 for it. I won't get £1,000 for that now, purely because of this." (Operator, Stockport)*

*"That's one of their standards, they've raised it to thirteen years now, but at the time, my vehicle was too old, so I asked specifically what vehicle I needed to get, they told me a Euro 5, I've gone out and got it and now they've moved the goalpost, Euro 6 or you pay this emissions charge." (Hackney Driver, Manchester)*

Trafford Response:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle Emissions	4	1	0	0	0	0	0

Two respondents had concerns regarding vehicle fraud. There were a number of comments about electric vehicles with two respondents agreeing with the timeline for transition; one felt that a fully electric fleet should be introduced earlier and another felt that there should be more time to switch.

**Comments and considerations**

Regardless of licensing policy, a required emissions standard for licensed vehicles will be implemented by way of the GM Clean Air Zone (where taxis and private hire vehicles feature in every zone category), and so it is important that the licensing regulatory framework complements those same requirements. It is also important in any event that local authorities do all they can to support the move towards a carbon neutral city region by 2038, and this means ensuring all council services and policies seek to reduce emissions at every possible opportunity, including our licensed vehicle sector.

In terms of the existing fleet becoming compliant with both this policy standard and the CAZ; in recognition of the challenge this poses to many of our vehicle licence holders who own their vehicles, the disparity across the districts, as well as the impact of the pandemic, the GM local authorities have worked closely with TfGM to secure essential

financial support from government totalling £19.7m (£9.5m for Taxis and £10.2m for Private Hire). This funding support will be managed through a Clean Taxi Scheme, where licensees will be able to apply for various grants ranging from £3k to £10k that will be paid directly to accredited suppliers of retrofit and replacement upgrade options. The higher-level grants are limited to replacing existing vehicles with ZEC or electric vehicles in order to support and encourage vehicle owners to transition as soon as possible.

To set a date in licensing policy for a requirement to be ZEC at this time poses a significant risk to authorities in the current regulatory landscape. If GM authorities require ZEC only vehicles on the fleet when this is not a national requirement, the risk is that existing fleets will use the GM funding scheme to upgrade to an emissions compliant vehicle, but then move to non-GM licensing authorities who do not require ZEC vehicles in their policies. Under current regulations, these private hire vehicles and drivers will be able to work and operate in GM, with a CAZ compliant vehicle (assuming the CAZ requirement remains as is) but not be governed by GM regulations and therefore the only disbenefit will be to GM licensing authorities who stand to lose income recovery and regulatory authority. Further discussions with government about these impacts of the current regulatory system need to be had.

Therefore, in consideration of this significant risk alongside the impacts of Covid on the trade, the proposal is that in the short to medium term authorities in GM will only require licensed vehicles to be compliant with the current emissions standard, and not to set a date at this time by which vehicles need to be ZEC. However, it is extremely important that the licensed vehicle trade understand that there is a pressing need to shift to ZEC only vehicles over the next decade, in order to achieve our carbon neutral targets and that it remains our joint ambition across the combined authorities to move existing fleets to ZEC in line with the GMCA Environment Plan. Proprietors would be wise to transition earlier wherever possible, using the funding available.

The policy to require licensed vehicles to be compliant with the current emissions standard is now proposed as follows:

- From the date local policy is determined; all new to licence vehicles (not temporary replacement vehicles on an existing licence), must be compliant with the current emissions standard.
- Local transition arrangements can commence for existing fleets to be current emissions compliant from the date the policy decision is confirmed – with all existing licenses required to have compliant vehicles attached to them by 1 April 2024.

In further recognition of the significant challenge posed by this policy change, the current proposal under the CAZ will be that all non-compliant GM licensed vehicles will be exempt from the daily CAZ charge until 31 May 2023.

Whilst the challenges of this proposal are acknowledged and efforts to mitigate the impact are proposed, the transport sector has to make significant changes at pace to support the reduction in harmful emissions and the achievement of carbon neutrality. As such, it is considered that the proposed timeline and support package will provide the existing fleet adequate time and opportunity to make suitable business choices going forward.

**Lead Officer recommendation**

To require licensed vehicles to be compliant with the current Euro emissions standard as follows:

- For new to licence vehicles from the 1<sup>st</sup> January 2022; and for the existing fleet vehicles are compliant with the policy standard by 1 April 2024.\* This will mean that from the 1<sup>st</sup> 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

\*vehicle must also be compliant with the age policy

<b>Vehicle Proposed Standard 4</b>	<b>Trafford's Current standard</b>
<p><b>Vehicle Colour</b></p> <p>It was proposed that all private hire vehicles should be white in colour and hackney carriages should be black with the following exceptions:</p> <ul style="list-style-type: none"> <li>• London style taxis which may be of the manufacturer's colour;</li> <li>• To allow advertising on some hackney carriages;</li> <li>• Executive hire (for example chauffeur services)</li> </ul>	<p>Trafford's current policy is that London style taxis may be any manufacturer's colour; but any other vehicle licensed as a taxi must be black.</p> <p>There are no colour restrictions for private hire vehicles other than the Mercedes Vito and Peugeot E7 which must be white or silver (this is to distinguish those vehicles from Mercedes Vitos and Peugeot E7s which have been licensed as hackney carriages).</p>
<b>Reason for Proposal</b>	
<p>The Standard was proposed primarily in the interests of public safety, to enable passengers to better distinguish (alongside other vehicle standard requirements) between a licensed Hackney Carriage and a licensed Private Hire Vehicle; to distinguish between a legitimately licensed vehicle and a bogus vehicle, and to better distinguish between a vehicle licensed by a GM authority and that from out of the area. The proposal also intended to bring a more uniform appearance to vehicles licensed in GM to support strategic objectives around the quality of offer withing the transport network.</p> <p>The exception to allow London Style cabs to be of the manufacturer's colour was in acknowledgement of the very recognisable and unique design of the traditional London</p>	

Style cab, which doesn't have to be black in colour to be clearly recognised as a Hackney Carriage.

## Consultation Response

GM level response:

This proposal provoked a significantly larger number of comments than other standards, particularly amongst the public and private hire trade as can be seen below:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle Colour	214	23	95	12	2	1	13

This table breaks down those comments thematically across the respondent categories:

Comment Theme	General Public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Agree with white colour proposals	46	2	3	0	1	0	2
Support one colour but not white	27	0	11	1	0	0	3
Don't think standard colours are necessary	138	20	68	10	1	1	8
Vinyl wraps should be allowed as well as full resprays	1	0	1	0	0	0	0
Driver should have a choice of colour	8	1	14	2	0	0	0
<b>Base</b>	<b>214</b>	<b>23</b>	<b>95</b>	<b>12</b>	<b>2</b>	<b>1</b>	<b>13</b>

Whilst there was some support for this proposal, the overwhelming majority of respondents that commented opposed the proposal of a colour policy. Not many comments referenced the proposal with regards to Hackney vehicles, although the following comments were made in relation to this which assumed that non purpose-built taxis will still be allowed to be licensed as Hackneys:

*“As Oldham, Rochdale and Wigan councils are allowed white saloon cars as Hackney, these white cars can be changed to black colour with minimum cost. Then black saloon cars can be easily blended with rest of Hackney fleets”. (Association Rep, Oldham)*

Most respondents only referencing the proposal with regards to private hire:

*“There will be a massive shortage in available white vehicles suitable for private hire use, and the few that are available (New or used) will be at premium cost. Will the licensing district be assisting in paying this extra cost or assisting to resolve the lack of supply.” (Organisation, Anonymous)*

*“There’s ten boroughs in the whole of Greater Manchester, right. Only one borough has got white colour private hire taxis, which is Manchester, so shouldn’t they come to our standard and be a normal colour, why should we go to their standard? I don’t understand, above the rules, so why are we being pushed to Manchester standards, when Manchester city, they can afford, they have the businesses, there, what do we have in Rochdale? You know, how can we sustain, how can they justify making us pay extra money to paint our car a white colour, what’s the benefit for the driver, tell me what is the benefit for our drivers? I’m sorry, but there’s no benefit, is there?” (Licensed private hire driver – own my vehicle, Rochdale)*

*“We are supportive of any measure that can assist in promoting the safety of private hire passengers and the public more generally. However, it is unclear to us how a single colour policy would contribute to the safety message and we are concerned that it could be detrimental to passenger safety and hinder the transition to a zero emission private hire fleet. By anchoring passengers to the belief that their private hire vehicle will be white, it potentially reduces the additional safety checks passengers will make prior to entering a vehicle. The limited supply of electric vehicles and wheelchair accessible vehicles in white will also exacerbate the shortage of suitable vehicles of these types forcing drivers into vehicles that do not support Manchester’s zero carbon ambitions” (PH Operator, Manchester)*

*“I think it’s an unreasonable request, because it doesn’t affect the running of the car, but I think certain companies like to have all their vehicles a certain colour and I think they’re the people who could dictate. It’s like corporate identity, really, it’s corporate identity and I think it would be wrong of the Government or any local authority to say this has to be this colour”. (Licensed private hire driver – own my vehicle, Trafford)*

This was also raised in the in-depth interviews as the following quotes illustrate:

*“Yeah, I just don’t understand that possibly spraying up to fifty thousand cars white is good for the environment.” (PHV driver, Wigan)*

*“What about the likes of like me who bought this two years ago, a couple of drivers have just bought new vehicles that are blue, there’s one company that’s bought twenty odd, dark blue and red minibus wheelchair vehicles, so have they got to spray all their vehicles white?” (Hackney Driver, Tameside)*

Many of the comments related to how quickly white cars become dirty. Not all PHV drivers were opposed to the idea of a common colour, but they were opposed to the colour white as the following quote illustrates:

*“With white cars, we struggle to keep them looking clean. There have been times where I’ve taken my white car for a wash in the morning, and by the*

*evening, the car is dirty from outside. I'm not saying that my silver car remains clean. However, I'd like to point out the fact that dirt stands out significant on white cars than it does on silver cars." (PHV driver, Manchester)*

The following comment was received about the risk to people with sight impairments:

*Guide Dogs welcomes the proposal for standardised colours and marking on private hire vehicles and taxis across Greater Manchester ... however some passengers with lowvision told us that they had concerns regarding the use of the colour white for PHVs, as it may make it more difficult to identify a PHV easily. This is because sunlight reflecting off a white car creates glare, which can, in the words of one GM guide dog owner, "cause white vehicles to blend into the background". Another regular taxi user with sight loss also expressed concerns that white isn't a colour that is easily identifiable." (Guide Dogs organisation)*

Most members of the public were also less concerned about colour of the vehicle:

*"I'm not concerned on the colour of the vehicles as long as they display the correct approval information (decals) on the bodywork" (Public, age 45-54, Bolton)*

*"Vehicle colour - I don't agree with. I don't understand why having a white car for private hire will improve the service and standards. What will be put on place to support drivers in replacing brand new vehicles?" (Public, age not provided, Bolton)*

However, a few members of the public did feel a consistent colour would make it easier to identify a PHV.

*"Vehicle colour - Would not improve driving standards but easier for public to identify" (Public, age 45-54, Bolton)*

Representatives also argued against the proposed standard colours:

*"With respect this is an extremely poor proposal, the few people within the PHV industry that I have spoken to that would accept this as being rational, either run or own white vehicles and even they accept that prescribing white only will almost certainly increase prices, reduce model availability and potentially create a shortage of available vehicles. Here are just some of the other reasons not to do this:*

- *Private Hire Vehicles are Privately booked not taxis*
- *A uniform colour will make PHVs look more like taxis*
- *Modern technology and the number plate identifies vehicles to customers*
- *Passengers will start approaching white vehicles (this is dangerous)*
- *Bogus drivers will use a white vehicle (this is dangerous)*

- *Passengers from neighbouring authorities will be confused*
- *Tourists travelling to multiple destinations will be confused*
- *Drivers who move into TfGM with a vehicle they used elsewhere won't be able to get licensed*
- *Electric and Hybrid vehicles are not predominantly white*
- *Colour schemes are unwelcomed by vehicle hirers, replacement vehicle suppliers and major trade suppliers*
- *Colour schemes for PHVs have been successfully challenged in the courts*
- *Some excellent PH industry vehicles are not available in white” (Organisation LPHCA)*

*“This approach actually promotes, encourages and support the issue of cross border hiring, since all 10 districts (and indeed further afield such as Rossendale and others.) will look identical, and therefore there will be very little to demonstrate to passengers whether the vehicle is correctly licensed or not” (Organisation, NPHTA)*

*“Making all the vehicles uniform in colour could result in some negative unintended consequences. Suddenly, a fleet of white GM private hire vehicles become taxis and many will exploit this by plying for hire without a relevant licence”. (Unite the Union - Manchester Hackney Carriage)*

Trafford Response:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle Colour	15	1	2	0	0	0	0

More than half of the comments regarding vehicle colour by the public (n=9) stated that they didn't feel the single colour was necessary as did one each of hackney and PHV drivers.

*“not sure that one is necessary - also would make cloning a car easier (i.e. you could buy two Skoda Octavia, both white, register one to licence team then clone the licence plate, and two drivers could use the "same car"” (Public, age 45-54)*

*“I don't think this is necessary, sometimes it can be helpful if looking for a specific colour if the company tells you what colour to expect” (Public, age 25-34)*

**Comments and considerations**



### Background in GM and the National landscape

It is generally accepted in licensing practice that in order to support and promote public safety, the public need to be able to clearly identify legitimately licensed Hackney Carriage and Private Hire vehicles; that licensed vehicles must be distinguishable from each other (clear demarcation between Hackney and Private Hire) and from other vehicles. As such, many licensing authorities have requirements on the types of vehicles that can be licensed as either a Hackney or Private Hire, have stipulations around signage/livery and plates, and have some element of colour policy (usually requiring Hackney's to be of a certain colour, and stipulating that private hire vehicles can be anything but that colour). Having clear identifiers for a legitimately licensed vehicle (and enforcing those policies) better mitigates the risks of travelling in a mode of transport that carries the highest risk for individuals and vulnerable passengers.

Across GM, policies relating to colour, make/model, roof signs, livery, stickers and plates vary widely. Within these proposals are other standards around vehicle specifications to bring about consistency of these identifying requirements. This standard proposal deals with colour only and as set out above, proposed that Hackney's be black and Private Hire be white in colour to support clear identification and public safety.

Most members may be aware that several GM authorities have had Hackney vehicle colour policies for some time; currently requiring within their Hackney Carriage Vehicle Policy that all licensed Hackneys (that are not purpose built taxis) must be black in colour. Purpose Built or London Style Hackney vehicles may be the manufacturer's colour.

Manchester City Council (MCC) also currently has a Private Hire Vehicle (PHV) Colour Policy, which appears unique in the industry (officers are not aware of any similar PHV policy in the UK). This policy was introduced in 2001 alongside other vehicle requirements in response to the death of student Rachel Thacker, who was brutally sexually assaulted and murdered in Manchester after getting into a vehicle posing as a licensed PHV after a night out in 1996. The policy intention was to improve public safety by making legitimately licensed PHVs more distinguishable and make it more difficult for an unlicensed driver to masquerade in the City. This approach was supported by the Suzy Lamplugh Trust, whose longest running campaign related to the regulation of the taxi and private hire industry. The Suzy Lamplugh Trust were also a member of the Task and Finish Group on Taxi and Private Hire Vehicle Licensing that presented its report to government in September 2018, and they state in their continued lobbying of government: "*National minimum standards should also strengthen requirements to ensure that the public are able to distinguish easily between taxis and PHVs, and licensed and unlicensed vehicles*".

Initially in 2001, MCC's policy stated that all licensed PHVs had to be white in colour (and gave over 5 years for the existing fleet at the time to transition). In 2003, the policy was amended following submissions by the trade about the increased cost of white vehicles as a direct consequence of the policy, as well as the availability of vehicles. The trade at the time suggested the inclusion of silver within the PHV colour policy and this amendment was accepted by the Committee at the time. The only subsequent change to the policy since 2003 was to clarify what would be acceptable as 'silver' due to wide variances from manufacturers. The trade have not expressed any major issues obtaining white or silver vehicles since 2003. The size of the licensed PHV fleet in MCC has

increased in that time from under 2000 to currently around 2860, having previously peaked at over 3400.

It is fair to say that there is no hard evidence by which to accurately assess the impact of MCC's colour policy and no data is held about enforcement activity 20 years ago by which to compare current data. From a proactive compliance point of view, it has certainly made it easier for officers to distinguish between an MCC and non-MCC licensed vehicle and anecdotally officers say there is some public awareness of this, but also there remains significant levels of ignorance of and/or apathy towards the policy amongst the public and particularly the younger generations within the night time economy. It is also fair to say that the policy has been undermined since its inception by the fact that vehicles from neighbouring districts (and more recently from further afield) with no colour and varying vehicle identifying policies, have always been able to enter the city to pick up, drop off or sub-contract; and this undermining has increased tenfold since the changes made in the Deregulation Act.

#### Response to specific concerns raised in the consultation

It should be noted that apart from generalised comments in relation to 'not thinking standardised colours are necessary', there were no specific comments disagreeing with the proposal for all licensed Hackney Vehicles to be black in colour (or manufacturer's colour for London Style cabs). Some comments have however been received with regards to extending the exception on manufacturer's colour to any Hackney Carriage that is purpose built as such by the manufacturer, which includes all the additional needs adaptations built as standard (and not converted to a Wheelchair Accessible Taxi after manufacture). Given the significant challenge to proprietors in acquiring second hand compliant purpose built/WAV Hackneys at present, it is considered reasonable at this stage to permit manufacturer's colour for any purpose-built Hackney.

All the following concerns outlined are in relation to the proposal for PHVs to be white in colour:

**Expense/Availability:** there were a number of comments raise in relation to the cost of vehicles of a specified colour increasing (as they did in response to Manchester's 2001 policy) or the cost of re-sprays to make vehicles compliant. This risk could be mitigated with the introduction of another specified colour, and/or the phasing of a transition period for existing licence holders (for example 5 years) should the policy proposal go ahead. However the availability of specific vehicles, particularly EV, Hybrid models remains limited on the market at present and it may be considered too onerous to have the additional requirement that it be a specific colour also at this stage.

**Uniformity would make PHVs look more like Taxis / reduce safety:** This is a relevant consideration and one which should be carefully considered. Whilst on the one hand without the policy standard it could be more difficult for members of the public to easily identify operators that use vehicles licensed within a GM district, on the other hand, the higher the number of PHVs operating within GM, the higher the possibility that members of the public don't perceive them as working for separate businesses or indeed as licensed by separate authorities. In turn it stands to reason that there also follows a higher possibility of illegal plying for hire, as the uniformity of appearance across a larger fleet comprising of all 10 districts could be perceived as 'taxis' by the public. Practically

this could also be a challenge for compliance officers, who may struggle to identify which district a vehicle is licensed by sight, and it could increase the possibility of cross border hiring.

The comments from the Guide Dogs organisation about the colour white being challenging for those with sight impairments have not been expressed previously in relation to MCC's current policy but will need to be given due consideration in the context of this proposal.

**Risk of licensees moving out of GM:** As this was one of the standards within the policy proposals that members of the trade most disagreed with, it can reasonably be inferred that there is a significant risk that existing PHV licence holders would move out of GM before they were subjected to the policy condition, possibly after already making use of the Clean Taxi Fund. Members will know that this won't preclude those licensees (both drivers and vehicles) from operating and working back within GM, but subject to the policies, conditions and checks conducted by other authorities. As well as losing recovery of costs within licensing regimes, the public safety assurances afforded by GM districts' policies will not necessarily apply. The further risk to licensing services business models is that given the strength of negative feeling in relation this policy, it could preclude GM districts attracting licensees back to their local area.

**Modern Technology and number plates identify vehicles to customers:** It is a relevant point that the technology that currently exists and is used by many PH Operators, was not available in 2001 when Manchester introduced its policy and there are now other means available to assist the public in ensuring they are entering the correct vehicle they have pre-booked. It should be noted that not all PH Operators make use of such technology and so this cannot be fully relied upon. It is also the case that despite these provisions and other identifying specifications, many passengers, particularly those travelling in the night-time economy, will still enter vehicles they have not pre-booked.

**Bogus drivers can still use the colour white:** It is a fact that a bogus driver with ill intent could just as easily access a white coloured vehicle and attempt to pose as a legitimately licensed driver. The colour policy alone was never intended to mitigate this risk in isolation, and it is alongside other policies relating to livery requirements that a colour policy would have more effect. However, as outlined above, the impact of such a policy can also be severely undermined if not implemented at a national level in the current landscape.

Other considerations:

In Manchester where the policy has existing for almost 20 years, intelligence from MCC's compliance officers suggests that bogus/unlicensed drivers has reduced significantly over that time, but this cannot necessarily be solely attributed to the policy in isolation and it is likely there are a number of factors contributing to this. MCC also conducts regular undercover operations with GMP (on average once a month) where plain clothed Special Constables, posing as potential customers, undertake journeys when approached by private hire drivers illegally plying for hire. Operations are run during peak periods into the early hours during of the night-time economy and often detect upwards

of seven offences each night, and since it has been running over the last four years, has detected no unlicensed/bogus drivers. Whilst it is not known that any licensed drivers illegally approaching customers without a booking have any malintent, clearly the existence of the colour policy in conjunction with other policies and a robust proactive compliance approach, does not sufficiently deter many drivers from approaching customers without bookings within a busy social economy.

There is a strong argument that the existence of other official livery requirements, i.e. properly attached and easily readable plates and non-magnetic Council issued stickers placed in specific locations on the vehicle, alongside other vehicle specifications should be sufficient to assist passengers in identifying a properly licensed private hire vehicle, particularly if they have any additional identifying information provided by the Operator when they book. Recommendation 5 helps fulfil this important consideration.

All of these concerns emphasise the importance of public awareness and personal responsibility around the risks posed by not properly pre-booking PHVs, and not checking the vehicle you are entering is the one dispatched by the Operator. There is another risk that passengers could overly rely on the colour policy and may be less likely therefore to make additional checks prior to entering a vehicle. Whilst licensing authorities can seek to mitigate the very real risks as much as possible, it is known that people are less inclined to take necessary precautions in particular circumstances, there is only so much that authorities can do to remove these risks entirely and continuing to raise public awareness to encourage individuals to make sufficient checks and supporting better travel choices is key to improving public safety.

Finally, if Members are not inclined to support this proposal either in part or whole, it is important to note that this will not preclude any authority from retaining or introducing a specific colour policy if they wish to do so.

#### **Lead Officers recommendation**

To retain the Council's current policy standard that all Hackney Carriage Vehicles should be black in colour with the following exceptions:

- London Style Taxis may be of the manufacturer's colour
- Advertising is allowed on London Style Taxis

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.

Vehicle Proposed Standard 5	Trafford's Current standard
<p><b>Vehicle Livery</b></p> <p>It was proposed that all vehicles will:</p> <ul style="list-style-type: none"> <li>display permanently affixed licence plates on the front and back of the vehicle</li> <li>display a 'GM approved' sticker on the bonnet</li> </ul> <p>It was proposed that all PHVs will:</p> <ul style="list-style-type: none"> <li>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</li> <li>display those stickers on both rear side doors and the back window</li> <li>not use any magnetic stickers</li> </ul>	<p>Trafford currently requires that licence plates are firmly affixed to the rear only of licensed vehicles.</p> <p>Trafford requires that all private hire vehicles display a roof sign showing the operator name and telephone number.</p>

**Reason for Proposal**

As outlined in Standard 4 above, having clear and consistent specification for livery that helps identify and distinguish properly licensed vehicles as either Hackney Carriages or Private Hire vehicles is a significant aspect of reducing the risk to public safety. Stipulating that officially issued plates and stickers have to be properly affixed is an important feature of this mitigation, so that stickers and plates cannot be easily transferred or used on non-licensed vehicles and help give assurance and confidence to the travelling public.

Specifying and standardising what stickers can be placed where also helps raise the aesthetic look of the fleet, ensuring consistency, neatness and guards against the use of inappropriate material or messaging that would fall below the standard the authority expects in representing the district.

**Consultation Response**

GM level response:

This proposal generated a fairly high number of comments compared to many other standards:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle Livery	62	7	47	6	1	3	11

This table breaks down those comments thematically across the respondent categories:

Comment Theme	General Public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle liveries should still be regulated	9	3	9	2	0	0	3
Problems with liveries e.g. distracting	3	1	27	1	0	2	0
Liveries cause devaluation	0	0	6	0	0	0	1
Use stickers / livery to make cabs identifiable	27	1	1	1	0	0	4
Large fines for improper use of liveries	2	0	0	0	0	0	0
Include GM branding e.g. bee / variation by district	9	0	0	0	0	0	2
Liveries can hinder driver ability to use vehicle for personal use	2	0	3	0	1	1	0
Disagree with livery - unspecified	12	2	7	3	0	0	2
Advertisement is a source of income	6	1	0	0	0	0	2
Base	62	7	47	6	1	3	11

27 Members of the public and 1 PHV operator agreed with use of stickers/livery to make vehicles more identifiable for customers and authorities equally, on the road and on CCTV. Some feel it will increase safety, such as making it easier for customers to hail hackney in the evening / when visibility is poor.

*“Vehicle livery - operator logo should also be displayed on bonnet to assist authorities in identifying taxi via CCTV when required.” (Public, age 35-44, Bury)*

*“I think it's very important that taxis still have their company logo on the side. When I personally order a taxi that's the first thing I look for before checking with the driver.” (Public, age 25-34, Stockport)*

There were some suggestions to include Manchester branding like “The Bee” symbol or have colour on bonnet based on the licensing authority.

*“Livery: I think it's important to recognise each vehicle especially at night-time and have Manchester Theme e.g. “the Bee” symbol. Name of operator or driver again may not be too visible at night” (Public, age 75+, Bolton)*

*"All private hire vehicle should be white with an identifiable stripe on the side/bonnet depicting a colour coordinating with the issuing authority. ie Stockport Mauve. Tameside Yellow, Bolton blue etc. This would identify the vehicle to that particular issuing authority, ensuring an easily identifiable vehicle correct to the area." (Public, age 55-64, Tameside)*

Eight respondents commented about how they felt livery could be a means of additional income to drivers, with some feeling advertisements add interest and support their use.

*"The advertisements that sometimes cover Hackney cabs can be interesting and eye catching to passengers. They make the city more colourful and interesting." (Public, age 25-34, Manchester)*

*"As regard to advertising on cabs this is a second source of income and a big part of diversity of generating revenue." (Hackney Driver, Tameside)*

However, PHV drivers raised issues with the use of livery including:

- **Use of vehicle for personal use:** PHV owners were concerned they will not be able to use their vehicle for personal use.

*"I think there is no need to slap stickers on private hire cars. We can't use that car for personal use or social, if I would out with family people would approach my car asking if it is their taxi. That's mean I have to buy another car for personal use causing more pollution and traffic on the road. I hope this makes sense. Greater London has no stickers on PHVs, which is much bigger in size and population. Thanks." (PHV Driver, Bolton)*

- **Lead to distraction:** liveries on vehicles may lead to distraction and take the essence of the hackney.

*"Another thing I don't agree with is that purpose-built black cabs e.g. London style only taxis would lose their prestige if stickers were put all over them and could cause a distraction if they are on the bonnet, as well as they don't slope away like in other vehicles." (Hackney Driver, Wigan)*

- **Vehicles become targeted:** liveries lead to vehicles being targeted by vandals, with some respondents expressing concerns about their vehicles being damaged deliberately.

*"Vehicle Livery - this is already an issue for Manchester licensed vehicles that become a target for vandals as they are easily recognisable. Stone throwing, egg throwing is commonplace on the streets of Manchester. I would like to see an alternative to the visible livery." (Vehicle leasing company, Manchester)*

- **Devaluation of Vehicles:** stickers affect the paintwork leading to devaluation of the taxis.

*"Vehicle livery I agree with this but NOT the placement of the bonnet sticker as a Manchester licence vehicle this has always been and caused issues with paintwork damage as any stickers on the bonnet and wings of a vehicle are the worst place you could choose to put them as the heat from the engine causes paint damage and discolouration when they are on for many years and cause vehicle depreciation value due to the paintwork*

*damage and in my honest opinion make the vehicles look horrible just stickers on the rear doors is good placement even the sticker in the rear window is sometimes now not suitable as with the shape and style of some vehicles rear window the sticker placement can cause issues with rear view through the rear view mirror when reversing a vehicle.” (PHV Driver, Manchester)*

*“Why is there a need to have a sticker on the bonnet? With licence plates front and back plus side stickers. The stickers cause damage to paint work plus discolouration.” (PHV Driver, outside Greater Manchester)*

Two representatives suggested including livery **advertisement as a source of income** within the current restrictions.

*“The restriction on livery has been long established, but there is merit in considering an exemption for public health or public interest livery pre-approved by the licensing authority. This could provide additional income to drivers who are faced with escalating costs and increased competition, and assist with public health campaigns; for instance, on Covid-19, smoking cessation or other important campaigns.” (Councillor/ Elected official, Oldham West)*

Trafford Response:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle Livery	9	1	6	0	0	0	0

The public liked the proposal as it would help them identify specific cars but drivers were concerned about damage to their vehicles and subsequent devaluation:

*“All taxis whether they are hackney carriages or private hire should be identifiable by the general public so mistakes are not made.” (Public, age 55-64))*

*“Big bold stickers are an eyesore. One has to also consider drivers utilise vehicles for personal use.” (PHV driver)*

**Comments and considerations**

As outlined above, the livery policies are integral to supporting the identification of properly licensed vehicles and help distinguish between the two sectors. The governing legislation simply requires that the council issue a plate and stipulate how it should be ‘exhibited on the vehicle’, but caselaw has determined that the design of the plate is a matter for the issuing authority and cannot be challenged by the licence holder. Most licensing authorities stipulate additional identification requirements in order to support proper identification, and therefore in turn support public safety.



This proposal requires both a rear and front plate to better enable the public and officers to identify properly licensed vehicles more readily. Requiring the plate to be properly affixed also safeguards against the plate being used on non-licensed vehicles and in turn supports public confidence in the regulatory regime. Too often licensed vehicles are seen with plates that are affixed with clips, Velcro or other temporary fixings from other authorities and this undermines our local efforts to safeguard the travelling public. Whilst the DfT did not refer to any specific vehicle standards in its Statutory Guidance published in 2020, it did make reference in its 'Best Practice Guide' March 2010 to it being helpful 'if licence plates are displayed on the front as well as the rear of vehicles', and it suggests that licence conditions requiring a sign on the vehicle in specified forms that help identify the operator, the licensing authority and some words such as 'pre-booked only' seem to be best practice. It stands to reason therefore that policies prohibiting the use of other signs/stickers would be preferable so as not to confuse the public and make identification a clearer process. The best practice guide also warns against the use of roof mounted signs on PHVs which are liable to cause confusion with a taxi.

Similarly, not permitting the use of stickers that are not permanently affixed has the same safeguarding intention. When officers are conducting proactive compliance on the streets, particularly within the night-time economy when passengers may be more vulnerable, it is much more effective if officers can easily identify a licensed vehicle, the authority it is licensed by and for PHVs, the Operator it is working for. Without this easier identification on the street, lengthy enquiries may need to be conducted and drivers/vehicles cannot be dealt with as quickly if there are concerns warranting the use of immediate action. If licensees can only use officially approved stickers for example (and in addition their distribution is effectively managed) it makes it much more difficult to obtain those stickers and pose as a legitimately licensed vehicle. Additionally, those drivers in vehicles that may not be as easily identifiable, may be subject to less scrutiny when in other districts and therefore less accountable to their licence conditions and responsibilities.

Some respondents in the consultation made a number of points in relation to stickers which are addressed in turn below:

**Personal Use:** Caselaw has determined that a private hire vehicle is always a private hire vehicle (*Benson v Boyce* 1997), even if it is being used for domestic/personal use and cannot be driven by a non-licensed driver; therefore there can be no scope for enabling licence holders to remove identification if they wish to use it for personal use.

**Licensed Vehicles being targeted:** Authorities are aware of allegations being made intermittently that licensed private hire vehicles are targeted with anti-social behaviour and therefore request the removal of identifying stickers. For all the reasons outlined above, most authorities in GM that have relevant sticker policies have resisted this. Anti-social behaviour in all its forms should be challenged and tackled directly by partners working effectively together to identify the offenders and take relevant action. The removal of identifying stickers that perform a safeguarding function in one respect in a bid to prevent/deter anti-social behaviour, only serves to weaken public safety. Additionally, whilst there is no doubt that some drivers have suffered targeted anti-social behaviour, it is unclear what the true frequency of such occurrences is and some suggestion by other members of the trade that this allegation of targeting is made in a

bid to allow PHVs to work for more than one operator at a time. Enquiries with relevant authorities with regards to reporting, and requests for specific information/evidence, have often resulted in very little information coming forward and concurrently a number of approaches have been made by drivers to relax sticker policies to enable working for more than one operator at a time. As such, on balance, it is considered the best approach that licensing authorities do not remove or relax safeguarding measures with regards to stickers, but instead work with drivers, operators and partners wherever anti-social behaviour is reported to hold those individuals to account and deter such behaviour.

**Devaluation of vehicles:** Whilst there may be some risk of discolouration or damage to paintwork from the use of adhesive stickers if they are left affixed for a long period, it is not considered a strong enough reason to allow the public safety risks associated with the use of magnetic stickers. A licensed vehicle is a business and just like any other business that may use vehicles (that will always depreciate in value in any event) as well as use identifiers on vehicles, should consider and build these costs into the business model.

Depictions of the proposals can be found at **Appendix 2**. It should be noted that colour of the vehicles is for illustrative purposes only, and exact branding has not been finalised; but the intention is that:

- required stickers be yellow in colour with an ambition to link to the wider Bee Network transport brand for Greater Manchester
- have the local authority crest/logo clearly identifiable
- plate colours and sizes will be specified by individual districts

#### **Lead Officers recommendation**

To require that all vehicles will:

- display permanently affixed licence plates on the front and back of the vehicle
- display a 'GM approved' sticker on the bonnet

To require that all PHVs will:

- 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

\*Specified design/dimensions and placement on vehicles to be provided

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 standards.

Vehicle Proposed Standard 6	Trafford's Current standard
<p><b>Vehicle Testing</b></p> <p>It was proposed that all vehicles more than 3 years old will be tested at least twice a year and that all vehicles will be tested against the DVSA MOT standard as a minimum. (This will be at cost to the vehicle licence proprietor/driver).</p>	<p>Trafford's current policy is to require vehicles to be tested on first application and every six months thereafter, irrespective of the age of the vehicle. All vehicles are tested against the DVSA MOT standard plus Trafford's Vehicle Compliance Manual.</p>

**Reason for Proposal**

The legal requirement for licensed vehicles is that they are subject to at least an annual test (MOT or equivalent) – for taxis this is always at least annually and for PHVs this is after the vehicle is 3 years old.

Those authorities within GM that have introduced a more frequent testing regime to the basic annual test required by law, have done so on the back of testing data that has evidenced high levels of testing failures in older vehicles.

Licensing figures would also suggest that with the increase of 'licence shopping' since the impact of the Deregulation Act, vehicle licence holders have sought out those authorities that have lower testing frequencies (alongside other lower policy standards) and so this proposal seeks to harmonise the testing regimes across GM to minimise the variance and better ensure the safety standard of vehicles carrying the public.

**Consultation Response**

GM level response:

This standard received a fair number of responses compared to some others:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle Maintenance and Testing	44	20	31	4	0	0	2

This table breaks down those comments thematically across the respondent categories:

Comment Category	General Public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Agree with proposed plan for vehicle testing	20	7	8	1	0	0	1
More vehicle testing required than proposed	3	1	0	1	0	0	0
Less vehicle testing required than proposed	10	4	16	2	0	0	1
Reporting unroadworthy vehicles should be simple	4	0	0	0	0	0	0
Maintenance spot checks should be performed	3	0	0	0	0	0	0
Stricter checks on testing centres	2	3	0	0	0	0	0
Need more places to be able to conduct tests	0	6	5	0	0	0	0
Cars that have been written off and repaired should be allowed to be licensed again	0	1	4	0	0	0	1
Testing frequency should be based on the vehicle mileage	5	1	0	0	0	0	0
<b>Base</b>	<b>44</b>	<b>20</b>	<b>31</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>2</b>

Most respondents that commented provided a general comment of support for the proposed standard:

*“Vehicle testing should be twice a year, main renewal and a 6-month inspection throughout the 10 years of licence as Manchester have 4 tests for vehicles over 5 years old which is ridiculous as the standard DVSA MOT test is valid for all road vehicles for 12 months by general public, so for taxis, twice a year is acceptable.” (PHV Driver, Manchester)*

*“Also, important that if we're mandating twice-yearly safety checks these are not prohibitively expensive or driver's may be priced out of operation.” (Public, age 25-34, Rochdale)*

Five respondents suggested more testing is needed than what is proposed, feeling the additional checks are needed due to the high mileage such vehicles generally do.

*“Vehicle testing should be more frequent; these vehicles are higher than average mileage vehicles so need more testing.” (Public, age 45-54, Oldham)*

Four hackney drivers, 16 PHV drivers and 10 members of the public felt less testing was needed. Drivers from an Asian background were more likely to give this comment.

*“Testing - Tests should not be conducted twice per year. This is overkill.” (Public, age 18-24, location not provided)*

*“Annual mot test seems adequate to me. As I have a 14-year-old car, I would be ok with a taxi over 10 years old.” (Public, age 65-74, Stockport)*

Some respondents suggested the amount of vehicle testing should depend on the age of the vehicle, with newer vehicles requiring less testing.

*“Vehicle age: having bought many vehicles for private hire. Usually around 3-4 years old, and financing over three years. Doesn't leave me with a finance free private hire vehicle for very long. So I would welcome the 10 years. The vehicle is being tested twice a year. Maybe the final one or two years could be three times a year.” (PHV Driver, Manchester)*

*“On vehicle testing, I think vehicles under three years old should have one test a year, and vehicles three years and over should have two.” (Hackney Driver, Stockport)*

*“Vehicle testing instead of making a car redundant at 10 years old. Why not change and at eight years old and put the cars on three tests per year at least then the vehicle stays in maintained condition and keeps the driver in work as there are enough taking taxpayers money without the councils making more unemployed.” (Public, age 55-64, Wigan)*

A small number of respondents, both members of the public and drivers, suggested testing frequency should be based on vehicle mileage.

*“Vehicle testing should be linked to the amount of mileage a taxi covers.” (Public, age 55-64, Rochdale)*

*“Vehicle testing - I believe a more onerous testing regime should be avoided. Speaking personally, I have seen the number of miles that I cover in a year reduce to a level that is less than most private cars, yet I have to produce my vehicle for two enhanced tests every year. Obviously, vehicles must be safe as a priority but so should every vehicle that is on the road.” (Hackney Driver, Stockport)*

Six hackney drivers and five PHV drivers felt more testing places were needed, and three Hackney drivers also felt stricter checks should be required at testing centres to ensure vehicles are roadworthy and safe.

*“Vehicle Testing Vehicles should be tested twice a year to a more rigorous test at a local authority test centre and not at a for profit MOT station. There should be less chance of favouritism and corruption.” (Hackney Driver, Wigan)*

*“Private hire should not look like a Hackney Hackneys should be the most versatile vehicle Testing Vehicles should be tested at least twice a year at the local authority testing facilities. At a higher standard than the MOT standard. And not at any MOT station or not for profit.” (Hackney Driver, Wigan)*

*“Vehicle testing should be allowed at any government approved testing station and not just be tested by local authorities so they can take advantage.” (Hackney Driver, Manchester)*

Three respondents suggested maintenance spot checks should be performed.

*“Vehicle conditions should be subject to an annual check to ensure fit for purpose and that spot checks should be made around the Borough to ensure these standards are maintained.” (Public, age 45-54, Rochdale)*

Four respondents felt the process for reporting unroadworthy vehicles should be simple.

*“Members of the public should have the ease of reporting the poor condition of a vehicle to the issuing authority easily through a call centre or web address instead of going through the hoops and jumps that occurs today.” (Public, age 55-64, Tameside)*

Trafford Response:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle Maintenance and Testing	3	0	3	0	0	0	0

Four of the respondents felt that there should be less testing than proposed and one respondent felt that there should be more.

**Comments and considerations**

In busier licensing authorities, where licensed vehicles may be more likely to conduct higher mileage compared to other less populated areas, it is considered reasonable to test vehicles more frequently than the minimum required by law – a view also supported by the DfT’s Best Practice Guidance March 2010. A quick review of several city and large town licensing authorities reveals a varied picture with 6 monthly tests as common as the basic minimum requirement.

In general, licensed vehicles undertake much higher mileage than domestic vehicles (a recent report from one GM authority shows that in 2018-19 both Hackneys and PHVs were conducted on average around 30,000 miles per annum) and therefore will wear more quickly (both mechanically and cosmetically). Therefore, in the interests of passenger and other road user’s safety, a more stringent maintenance and testing regime is required. A best practice guide for the Inspection of Hackney Carriage and

Private Hire Vehicles produced by the Freight Transport Association (published August 2012) on behalf of the Hackney Carriage and Private Hire Inspection Technical Officer Group, Public Authority Transport Network (PATN) (and supported by VOSA), states:

*The purpose of the HC and PHV test is to confirm vehicles meet these more stringent standards. Vehicles must be submitted fully prepared for the test. It is not intended that the test be used in lieu of a regular preventative maintenance programme. If, in the opinion of the vehicle examiner, the vehicle has not been fully prepared, the test will be terminated and a further full test shall be required. It is an offence under the road traffic regulations to use an unroadworthy vehicle on the public highway. HC proprietors and PHV drivers/owners and operators failing to maintain their vehicles in a safe and roadworthy condition may have their vehicle licence suspended, revoked or their licensing application refused by the local licensing authority. In addition, licence holders risk the suspension or revocation of their driver or operator licences by the local licensing authority. This best practice guide should be read in conjunction with Vehicle & Operator Services Agency (VOSA) publication 'MOT Inspection Manual – Private Passenger and Light Commercial Vehicle Testing', ISBN 978-0-9549352-5-2. This best practice guide provides a working document for those who inspect, maintain and prepare vehicles for inspection prior to being issued with a hackney carriage or private hire licence. Although detailed in its content the best practice guide is not exhaustive. However, in assessing the mechanical condition of a vehicle, it is more likely an item which would ordinarily pass an MOT test with an advisory note, could fail the HC and PHV test.*

As with many of these standard proposals, there is a risk that introducing more stringent requirements than other local authorities, may result in private hire licensees taking their business to other authorities of lower standards. As many other authorities already require more than the minimum annual test, this standard may be considered to present a lower risk than others. As with all proposals that seek to raise the quality and safety of the fleet licensed within GM, the key to effective implementation will be public awareness and continued lobbying of government to highlight the constraints and risks to authorities that strive to improve standards.

Authorities have a duty and must be able to assure the public with regards to the safety levels of its licensed fleet and it is considered that once a vehicle is over 3 years of age, it is reasonable to seek to ensure that both the mechanical and internal/cosmetic features of the vehicle remain to a standard expected by the authority.

#### **Lead Officers recommendation**

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.

Vehicle Proposed Standard 7	Trafford's Current standard
<p><b>CCTV</b> It was proposed that all licensed vehicles are fitted with mandatory CCTV to a standard yet to be determined.</p>	Trafford does not currently permit CCTV in hackney carriage or private hire vehicles.

**Reason for Proposal**

The presence of cameras can act as a deterrent to criminal behaviour and can protect both drivers and passengers. If the principle of a CCTV policy is agreed, it is proposed that audio as well as video recording is required, triggered by a panic button system.

**Consultation Response**

GM level response:

This proposal evoked a greater number of comments from both the public and members of the trade:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
<b>CCTV</b>	83	16	51	6	1	3	8

This table breaks down those comments thematically across the respondent categories:

Comment Theme	General Public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
<b>Agree CCTV should be mandatory</b>	46	6	12	2	0	0	3
<b>CCTV should not be necessary it's should be optional / no need for CCTV</b>	10	1	11	0	0	0	3
<b>CCTV is expensive / Council should help fund</b>	5	5	21	2	0	2	2
<b>All vehicles should also have a dash-cam filming outside of the car</b>	7	1	2	0	0	0	0
<b>CCTV should be used to assess driving standards too</b>	4	0	0	0	0	0	0



<b>Concern about privacy / data protection worries</b>	20	4	11	3	0	0	2
<b>Both drivers and passenger should have panic button</b>	5	0	0	1	1	1	1
<b>Base</b>	<b>83</b>	<b>16</b>	<b>51</b>	<b>6</b>	<b>1</b>	<b>3</b>	<b>8</b>

The majority of respondents were in favour of the proposal in principle:

*“CCTV if used in a way that doesn’t cause an invasion of privacy to the driver, is very important for the safety of the public. Any livery should be suitably visible for people with limited vision” (Organisation, Brandlesholme Community Centre)*

*“CCTV will be essential to ensure safety and crime prevention on both sides” (Public, age 25-34, Rochdale)*

*“I like the CCTV has this will help the trade in lots of ways including Panel Hearings” (Organisation, The Hackney Drivers Association Ltd)*

However, 5 hackney drivers and 21 PHV drivers expressed concerns about the cost of CCTV and felt funding should be provided via the council for this purpose. This was also raised in the in-depth interviews where drivers questioned the cost implications of the installation and maintenance of CCTV and what expense would be incurred to download and submit data when there was a problem.

*“It’s a very good idea having CCTV in the vehicle, because at the end of the day it’s safety for yourself and safety for your passengers, but you know, who’s going to pay for it, it’s about £1,500 for a CCTV in a vehicle, especially for licensed.” (PHV Driver, Rochdale)*

There were several concerns raised about privacy, GDPR, and the use and storage of recordings, with 4 hackney drivers and 11 PHV drivers raising concerns related to this, compared with 3 PHV operators and 20 members of the public.

*“CCTV is an invasion of the public privacy and I’m sure will be challenged in Court. whose paying for this, who under the GDPR is retaining the recordings? How long are those recording retained? Who gets to see them? (Operator, Trafford)”*

*“We support the introduction of mandatory CCTV in taxi and private hire vehicles and the role that it can play in protecting drivers and passengers and reducing the incidents of serious safety incidents. In order for CCTV to act as an effective deterrent it must be only accessible by the Local Authority, acting as Data Controller, to prevent unauthorised access, distribution or deletion of data by drivers or proprietors.” (Operator, several GM authorities)*

Two vehicle leasing companies suggested a panic button would be more effective.

*“More than CCTV a panic button is a more effective tool. Panic buttons which are connected directly to the police are important CCTV is not very clear when these incidents happen the perpetrators are always wearing caps and hoodies which makes them hard to identify. Therefore, panic buttons alone are more effective.” (Vehicle leasing company, Salford)*

In the in-depth interviews further concerns were raised by drivers about the responsibility for data storage and management. Queries were raised about whether drivers would be required to upload data to the authority and how will the data recorded be secure and managed by the drivers.

*“Who is going to be responsible for the data? Are we going to have to download the data all the time and provide it? At what cost? I understand why this is being considered but practically I’m not sure how this will work.” (Hackney Driver Manchester)*

Some drivers already had dashcams, which offered the additional benefit of lowering their insurance however, there are strict rules on ensuring the camera only points outwards of the vehicle and not into the car therefore protecting the privacy of the occupants. Questions were raised about the impact of CCTV on their insurance.

*“You see I have a dashcam as it is cheaper for my insurance, but it has to point outwards, my insurance is very clear on that. Will my insurance now accept this CCTV inside the car? (PHV Driver, Tameside)*

Trafford Response:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
CCTV	3	0	8	0	0	0	0

Three quarters of the comments from PHV drivers were about the CCTV proposals with some agreeing with them (n=3), but some expressed concerns at the cost (n=3) or concerns about data protection (n=2). Three members of the public commented on CCTV with one generally agreeing to the proposal, one suggesting additional uses for CCTV and one expressing concerns about data protection:

*“CCTV recording with audio if that is legal inside and outside recording is a must and should be made compulsory ASAP.” (PHV driver)*

*“I don’t want CCTV in my vehicle as I use personal with my kids and wife also I’m on monthly instalment with Santandar” (PHV driver)*

*“Having CCTV in the cars would be a good idea. I already have one & I strongly feel its a good safety feature, as long as its not going to come on a big price tag & a lot of minimum requirements” (PHV driver)*

*“The retention, distribution, access, security and ownership of recorded images and sound would need to be GDPR compliant and safeguarded from abuse.”*

(Public, age 45-54)
<b>Comments and considerations</b>
<p>A mandatory CCTV policy is a complex standalone piece of work and so the purpose of proposing this standard as part of the MLS project, was to consider whether the introduction of a mandatory policy would be supported in principle.</p> <p>It is clear that there is considerable support for such a policy, notwithstanding the concerns raised which would need to be addressed within a separate policy proposal, and this will now enable officers to draft a full policy for further public consultation.</p>
<b>Lead Officers recommendation</b>
To approve the drafting of a CCTV policy for further consideration and consultation.

<b>Vehicle Proposed Standard 8</b>	<b>Trafford's Current standard</b>
<p><b>Executive Hire</b></p> <p>It was proposed that the following conditions apply to executive hire vehicle (eg chauffeur driven) policies</p> <ul style="list-style-type: none"> <li>• Bookings to be confirmed by written contract</li> <li>• Payments made in advance of the journey or by invoice afterwards</li> <li>• Stipulation on the types of vehicles to be licensed</li> <li>• Dress code</li> <li>• Business plan shared with licensing authority</li> <li>• Vehicles not to be fitted with data heads, radios or meters</li> <li>• Exemptions from plates and door signs only to be given when used exclusively for executive hire</li> </ul>	<p>Trafford's Executive Hire policy is similar to the standard being proposed.</p>
<b>Reason for Proposal</b>	
<p>This proposal seeks to ensure that policies relating to Executive Hire services across GM are consistent.</p>	

## Consultation Response

GM level response:

Extremely few comments were received about this standard proposed:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Executive Hire and specialist vehicles	8	0	5	2	0	0	1

This table breaks down those comments thematically across the respondent categories:

Comment Theme	General Public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Executive hire should be exempt from colour regulations	0	0	1	2	0	0	0
Executive hire operators should have more duties of care	1	0	0	0	0	0	0
Executive hire should be exempt from CCTV	0	0	0	2	0	0	0
Should be exclusions for specialist vehicles	3	0	1	1	0	0	1
The exclusive use clause for executive hire vehicles may be unfair on owner drivers	1	0	1	0	0	0	0
Executive hire shouldn't have different rules	3	0	4	0	0	0	0
Base	8	0	5	2	0	0	1

Two operators provided comments citing executive hire vehicles should be exempt from CCTV:

*“Executive Fleet. This will raise a lot of issue with the high-end customers we pick up on daily basis. Celebrities, Corporate Staff and others who will surely object to being recorded in the vehicle. Privacy is very important to these individuals.” (Operator, Trafford)*

*“CCTV will break NDA's and client confidentiality and would be strongly opposed by clients who use executive hire services. Colour creates*

*issues within Chauffeur/Executive hire and would destroy industry if it resulted in having to have white cars.” (Operator, Bury)*

The two operators and respondents who took part in the focus groups gave the following arguments for why the colour standard should not be applied.

*“We believe there should be at least 2 vehicle choices. Executive Fleet. We work with lots of Global Travel agents and Executive Chauffeur companies and the most preferred colour for executive work is BLACK / SILVER. White colour for corporate Executive Fleet is a NO NO. Majority of such firms specifically ask that the vehicle be strictly Black or Silver in colour. White Executive cars are mostly in demand for Weddings etc but DEFINITELY NOT FOR CORPORATE SECTOR.” (Private hire operator)*

Two respondents felt executive hire operators should have more duties of care and they must maintain their high standards.

*“Executive hire operator should have greater operating duties as to drivers' hours records vehicle usage.” (Public, age 55-64, Tameside)*

*“Executive taxi operators must use latest technologies and way of communication with the customers and drivers to maintain the highest standards in the business, bringing in line with the European, American or Australian counterparts' standards.” (PHV Driver, Bury)*

However, five respondents (4 PHV drivers and 3 members of the public) felt executive hire should not have different rules, explaining the same rules should apply to all.

*“Why does “executive” hire get lower restrictions and some exemptions? It's elitist. Manchester is a city of Marx and Engels. All should adhere to the same standards. People with money should not be exempt from ANY rules or regulations. Why should their cars not have plates? But the working classes have? Zero justification.” (Public, age 35-44, Manchester)*

*“As for executive hire as far as I am concerned they should be treated in the same way as private hire as they are just a glorified taxi for people with a bit more money to waste such as councillors etc.” (Public, age 55-64, Wigan)*

*“It is also discriminatory as you have allowed executive vehicles to drive with door stickers, yet you have discriminated us normal PHVs. Why are executive taxis allowed to drive without signage and not us? They are pre booked so are we. We take care of our customers as much as them, by creating a separate rule for executive taxis, you have inadvertently discriminated against normal taxis and it promotes classism and shows that you have 2 different standards in your dealings with us. One for the rich and one for the poor. We should be allowed to drive without any livery at all.” (PHV Driver, Rochdale)*

Trafford Response:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Executive Hire and specialist vehicles	1	0	0	0	0	0	0

The one respondent felt that there should be exclusions for specialist vehicles.

**Comments and considerations**

Policies for Executive Hire (or Non-Standard Private Hire) are common amongst licensing authorities and a number of such policies already exist within GM and have done for some time. The purpose of such policies are to recognise the difference in business/service offer of specialised contract executive or chauffeur hire services. These services are markedly different to standard private hire, in the their business plans (for example prestige or vintage vehicles are often used with a much higher monetary value), clientele who may be in the public eye and require a higher level of security; and therefore in working with such companies, a separate set of licence conditions are determined in recognition of the very different type of service they operate.

Non-standard or Executive Private Hire vehicles are not permitted to also operate as standard private hire vehicles, which is how risk to public safety is mitigated.

This proposal seeks to bring about a level of consistency for these elements of Executive Hire policies across GM.

**Lead Officers recommendation**

The retain Trafford's current standards including the following conditions:

- 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<sup>st</sup> January 2022

Vehicle Proposed Standard 9	Trafford's Current standard
<p><b>Vehicle design</b></p> <p>It was proposed that:</p> <ul style="list-style-type: none"> <li>• 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)</li> <li>• No retrofitting of engines into older vehicles will be allowed. LPG conversions will be accepted</li> <li>• Where retrofit emissions technology is installed it shall be approved as part of the Clean Vehicle Retrofit Accreditation Scheme (CVRAS)</li> <li>• Specification for window tints will be: <ul style="list-style-type: none"> <li>a) Front windscreen – min. 75% light transmission</li> <li>b) Front side door glass – min. 70% light transmission</li> <li>c) Remaining glass (exc. Rear window) min. 70% light transmission</li> </ul> </li> <li>• 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 2021.</li> <li>• No roof signs permitted on PHVs</li> <li>• No advertising other than Council issued signage on PHVs</li> <li>• The question was also posed whether a swivel seat should be required in a Hackney Carriage vehicle</li> </ul>	<p>Trafford's current policy is as proposed in that 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)</p> <p>Specification for window tints is as proposed:</p> <ul style="list-style-type: none"> <li>a) Front windscreen – min. 75% light transmission</li> <li>b) Front side door glass – min. 70% light transmission</li> <li>c) Remaining glass (exc. Rear window) min. 70% light transmission</li> </ul> <p>Trafford currently allow written off vehicles to be licensed provided the owner submits an engineer's report confirming the vehicle is roadworthy.</p> <p>Trafford permits roof signs on PHVs.</p> <p>No advertising other than Council issued signage on PHVs</p>
<p><b>Reason for Proposal</b></p>	
<p>GM districts currently have fairly similar licensing requirements with regards to the type and design of vehicles permitted on fleets, however where some minor variations do exist, these proposals bring those into line and provide consistency for what will and won't be acceptable criteria for vehicles being licensed. Requirements relating to the categorisation of vehicles having had modifications or accidental damage are clearly aimed at ensuring the structural safety of such vehicles to carry passengers.</p> <p>Window tint requirements are for the safety of passengers and drivers; to ensure that compliance and other authorised officers (but also generally members of the public) can conduct a quick visual check inside the vehicle, view how many passengers are being transported, and safeguard against criminal activity taking place inside the</p>	

vehicle. Some passengers, particularly vulnerable passengers may feel safer if they can be seen from outside the vehicle.

At the time of consultation, the proposed effective date for written off vehicles not being renewed was 1 April 2021, and as this date has passed, it is proposed that this date now be amended to be effective immediately upon the determination of policy locally

Roof signs on PHVs give a false impression to the public that the vehicle is a licensed Hackney Carriage and works against our aim to ensure greater awareness among the public about the key differences between the two sectors and prevent/deter illegal ply for hire, so it is proposed that this cease to be allowed where it currently is.

In support of our objective to have a clearer and cleaner visual identity for vehicles licensed by GM districts, it is proposed that advertisements on PHVs are not permitted unless they are issued/approved by the relevant authority. Currently where there are no restrictions on this, vehicles can have advertising stickers placed in various places around the vehicle, often haphazardly, which really detracts from the image of a high-quality licensed fleet that authorities wish to promote. It will also safeguard against the use of material that could cause offence or be in poor taste.

It was also posed within the consultation document, whether Hackney Carriages should have a requirement to have a swivel seat or not.

## Consultation Response

GM level response:

This proposal received the second fewest number of comments within the vehicle standards:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle Design	9	4	0	0	0	0	1

Comments that were made, touched upon the following themes:

Comment Theme	General Public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
General Disagreement	6	1	0	0	0	0	1
Issue with the accessible vehicle	1	3	0	0	0	0	0
Roof top signs that light up to identify a PHV	2	0	0	0	0	0	0
Base	9	4	0	0	0	0	1



Those 12 respondents who expressed disagreement with the vehicle design standards and elaborated explained they felt the required standards were “too severe”, need “further consideration”, and the swivel seat requirement “restricts vehicle availability” and is not necessary or asked for by passengers.

*“I feel that the vehicle design propositions are too severe.” (Public, age 55-64, Manchester)*

*“I think the seats and loading rules appear to exclude virtually all private hire vehicles. This needs further consideration.” (Public, age 75+, Trafford)*

*“The swivel seat requirement needs to go. It restricts vehicle availability and is almost never requested out on the streets.” (Hackney Driver, Manchester)*

Trafford Response:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle Design	1	0	0	0	0	0	0

There was general disagreement from the one respondent to the proposals.

**Comments and considerations**

The general vehicle design specifications are mainly enshrining in a consistent policy many requirements that already exist throughout GM, and general requirements in law for passenger carrying vehicles. Whilst consultation responses were very low, it makes sense for all GM authorities to take a consistent approach to some of the more common design variations, particularly where they affect public safety.

One issue that trade bodies did raise strong objection to was the tint level allowed (or minimum light transmission) for rear side windows. Whilst purpose built taxis are manufactured without significant window tints as standard, standard saloon vehicles used for private hire work are not similarly purpose built, and manufacturers who are making vehicles for the wider market are increasingly manufacturing with a rear side window tint or ‘privacy glass’ as standard. As such, the private hire trade are finding it increasingly difficult to source a vehicle that complies with the tint requirements, and costs can be up to £1000 for window replacements, which in turn may then carry a safety risk dependent on the standard of replacement. Authorities have also acknowledged the intent to move to mandatory CCTV requirements for vehicles that would mitigate the safety concerns relating to tint. Therefore, in recognition of this fact, the significant additional cost to the trade within the context of the other costs associated with these proposals, and the risks of licence shopping if introducing significantly more stringent policies than other authorities for private hire, it is proposed to amend this part of the policy standard to:

- Remaining glass or rear side windows (excl. rear window) allow manufacturer's tint to a minimum of 20% light transmission

On reflection and in light of experience during the pandemic (where districts were happy to approve a use of a product i.e. NHS signage, but don't necessarily wish to issue), it is intended to amend the advertisement proposal from:

- No advertising other than Council *issued* signage on PHVs to:
- No advertising other than Council *approved* signage on PHVs

#### **Lead Officers recommendation**

The following standards will apply:

- 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:
  - 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<sup>st</sup> 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.

The standards to apply to new to licence and existing fleet from 1<sup>st</sup> January 2022 with the exception of written off vehicles which have been written of which will apply from 1<sup>st</sup> April 2022.

Vehicle Proposed Standard 10	Trafford's Current standard
<p><b>Vehicle Licence Conditions</b> A set of proposed conditions for Hackney Carriage and Private Hire Vehicles are set out at <b>Appendix 2</b>. The conditions cover a comprehensive set of expectations with regards to the livery, condition, fares and the responsibilities of the proprietor.</p>	<p>Trafford currently has conditions which are broadly similar to the proposed conditions.</p>

### Reason for Proposal

Each local authority already has licence conditions for each vehicle fleet, but they vary across the conurbation. The Licensing Managers Group reviewed their own conditions and collectively proposed a set of updated and revised conditions, that reflect proposed policy standards and complement conditions also required of drivers and operators, to set clear parameters by which licence holders can be held to account.

### Consultation Response

#### GM level response:

There were relatively few comments made with regards to the proposed vehicle licence conditions, with most coming from members of the public and only 6 comments coming from the trade:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle Conditions	24	1	3	2	0	0	0

Comments tended to centre around vehicle cleanliness. This table breaks down those comments thematically across the respondent categories:

Comment Theme	General Public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle cleanliness is important	24	1	3	2	0	0	0

Respondents discussed how vehicle condition is important, including interiors, condition of current vehicles, hygiene, smell, and general road worthiness.

*“Vehicle Conditions: in our geographical area, the condition of some of the vehicles are a disgrace - just by looking at them you can see they are not fit for purpose ie battered, worn tyres, rust, filthy and disgusting with drivers smoking in them and not maintaining them inside or out; some are totally unhygienic which, at the best of times is unhealthy but particularly now during the Covid-19*

*pandemic. Our suggestion would be that testing standards are raised and adhered to, to ensure, that only roadworthy and clean cars are licensed i.e. only the very best cars are licensed.” (Operator, Wigan)*

*“People should feel safe in the vehicle they are travelling in. Regular testing should be compulsory as well as a standard of cleanliness.” (Public, age 45-54, Oldham)*

*“Our suggestion would be that testing standards are raised and adhered to, to ensure, that only roadworthy and clean cars are licensed i.e. only the very best cars are licensed.” (Operator, Wigan)*

*“Vehicle colour is not particularly important. Emphasis should be on condition of vehicle both mechanically and inside.” (Public, age 55-64, Salford)*

Trafford Response:

Standard	General public	Hackney Drivers	PHV Drivers	PHV Operators	Business	Vehicle Leasing Company	Representatives
Vehicle Conditions	0	0	0	0	0	0	0

**Comments and considerations**

Whilst responses were relatively low, there were no strong objections to any specific aspects of the proposed vehicle licence conditions.

It should be noted that the requirement for a vehicle licence holder to undertake a basic DBS check will be added into both sets of licence conditions. This was recommended in the Department for Transport’s Statutory Guidance for Taxi and Private Hire Licensing Authorities in July 2020.

**Lead Officers recommendation**

To implement the standard as proposed with the addition of the DBS requirement for vehicle proprietors who are not licensed drivers.

**Standard Proposal 5: Livery**

*Illustrative examples (NB. Vehicle colour is not relevant):*





GREATER MANCHESTER TAXI AND  
PRIVATE HIRE VEHICLE STANDARDS



**APPROVED  
DRIVER AND  
VEHICLE**

Licensed by



**Oldham**  
Council

**ADVANCED  
BOOKINGS ONLY**

**Not insured unless booked**

## **PROPOSED PRIVATE HIRE VEHICLE CONDITIONS**

**The licensee shall at all times comply with the provisions of Part II of the local Government (Miscellaneous Provisions) Act 1976 and the conditions hereinafter provided.**

### **1. Definitions**

For a legal definition of the following terms, see the Local Government (Miscellaneous Provisions) Act 1976.

"Appointed Test Station" a garage approved by the Council for the purposes of carrying out a Vehicle Test

"Authorised Officer" any Officer of the Council authorised in writing by the Council for the purposes of the Local Government (Miscellaneous Provisions) Act 1976

"The Council" ..... Council

"Identification Plates" means the plates issued by the Council for the purpose of identifying the vehicle as a private hire vehicle

"The Licensee" means the holder of a private hire vehicle licence.

"The Operator" / "PHO" a person who makes provisions for the invitation and acceptance of booking / hiring for a Private Hire Vehicle.

"The Private Hire Vehicle" a motor vehicle constructed to seat fewer than nine passengers, other than a hackney carriage or public service vehicle which is provided for hire with the services of a driver for the purpose of carrying passengers

"The Proprietor" means the person(s) who owns, or part owns the private hire person who is in possession of the vehicle if subject to a hiring or hire purchase agreement.

"The Meter" means any device for calculating the fare to be charged in respect of any journey in a private hire vehicle by reference to the distance travelled or time elapsed since the start of the journey or a combination of both

"Test" a compliance test of the vehicle undertaken at an Appointed Test Station

Words importing the masculine gender such as "he" and "him" shall include the feminine gender and be construed accordingly.

Where any condition below requires the Licensee to communicate with the Council, unless otherwise stipulated, all communication must be to the Council's Licensing Department.

## **2. Identification Plates**

- 2.1 The vehicle front and rear licence identification plates must be displayed in the authorised plate holder, obtained from the Licensing Department; and the plate must be fixed in the plate holder using the clips provided, so as to allow them to be easily removed by an authorised officer. The plate holder should be securely fixed to the vehicle in such a way that neither it, nor the number plate are obscured; and that both are 100% visible. Cable ties are not an acceptable means of fixing plates to a vehicle or indeed to the plate holder.
- 2.2 The Licensee shall ensure that the 'Identification Plates' are maintained and kept in such condition that the information contained on the plate is clearly visible to public view at all times.
- 2.3 The Council has specified that the vehicle licence number, make, model and licence expiry date together with the number of passengers it is licensed to carry shall be placed on the identification plate attached to the vehicle. This plate must not be tampered with or amended by anybody other than an Authorised Officer.

## **3. Condition of Vehicle**

- 3.1 The Licensee shall ensure that the private hire vehicle shall be maintained in good mechanical and structural condition at all times and be capable of satisfying the Council's mechanical and structural inspection at any time during the period the vehicle is licensed.
- 3.2 The interior and exterior of the Private Hire Vehicle shall be kept in a clean and safe condition by the Proprietor.
- 3.3 The Licensee shall not allow the mechanical and structural specification of the Private Hire Vehicle to be varied without the written consent of the Council.
- 3.4 The Licensee of the Private Hire Vehicle shall: -
  - provide sufficient means by which any person in the Private Hire Vehicle may communicate with the driver during the course of the hiring;
  - ensure the interior of the vehicle is kept wind and water tight and adequately ventilated;
  - ensure the seats in the passenger compartment are properly cushioned and covered;
  - ensure the floor in the passenger compartment has a proper carpet, mat or other suitable covering;
  - ensure fittings and furniture of the Private Hire Vehicle are kept in a clean condition and well maintained and in every way fit and safe for public use;
  - provide facilities for the carriage of luggage safely and protected from damaging weather conditions.



- 3.5 All vehicles must undertake and pass any further Test at the Appointed Test Station in accordance with Council policy (Arrangements for vehicle testing are entirely the responsibility of the Licensee).
- 3.6 A daily vehicle check log must be completed by the driver of the vehicle at the beginning of each shift. The checks to be carried out are as follows:
- Lights and indicators
  - Tyre condition, pressures and tread
  - Wipers, washers and washer fluid levels
  - Cleanliness inside and out
  - Bodywork – no dents or sharp edges
  - Licence plates present and fixed in accordance with these conditions
  - Any internal discs on display and facing inwards so customers can see.
  - Door and bonnet stickers on display
  - Tariff sheet in display
  - Horn in working order

The Licensee shall record the above information and keep it in the vehicle at all times and make it available to an authorised officer upon request.

#### **4. Accidents**

- 4.1 The Licensee shall report to the Council, in writing, as soon as is reasonably practicable and in any case within 72 hours any accident causing damage materially affecting the safety, performance or appearance of the vehicle or the comfort or convenience of passengers. The report should contain full details of the accident damage including photos.

#### **5. Vehicle signage**

- 5.1 No sign, notice, flag or emblem or advertisement shall be displayed in or on any Private Hire Vehicle without the express permission of the Council.
- 5.2 The Licensee shall ensure that the Council issued mandatory bonnet and rear door and rear window signs are affixed permanently to the vehicle and are not removed whilst the vehicle is licensed.

## **6. Assistance Dogs**

- 6.1 The Licensee shall permit any assistance dog to ride in the vehicle (in the control and custody of the passenger) and allow it to be carried in the front passenger seat footwell of the vehicles if required.
- 6.2 The location of the assistance dog must be agreed with the passenger at all times.
- 6.3 The Licensee will ensure that any certificates exempting drivers of the vehicle from duties to carry assistance dogs, are displayed visibly and prominently as prescribed by the Council.

## **7. Other Animals**

- 7.1 Any other animal may be carried in the vehicle at the discretion of the driver and must be carried in the rear of the vehicle in the custody and control of the passenger.

## **8. Meters**

- 8.1 If the vehicle is fitted with a meter:
  - The licensee shall ensure the meter is of a type approved by the Council and maintained in a sound mechanical condition at all times
  - The licensee shall ensure the meter is set to display any fare table which may be adopted by the private hire operator
  - The Council may ensure calibrate and seal, at the expense of the licensee, any meter which is to be used in the licensed vehicle
  - The licensee shall ensure the meter is illuminated and is located in a position where any hirer can see the fare easily
  - The licensee shall ensure that the words 'FARE' shall be printed on the face of the meter in clear letters so as to apply to the fare recorded thereon
  - The licensee shall ensure that the meter and any connected equipment is fitted securely without the risk of impairing the driver's ability to control the vehicle or be a risk to any person in the vehicle
  - No meter shall be replaced without the consent of an authorised officer of the council.

## **9. Fare Tables**

- 9.1 The Licensee shall ensure that a copy of the current fare table is available, when not working for an 'app only' based operator, at all times, so it can be easily read by passengers.

9.2 The Licensee shall ensure that the fare table is not concealed from view or rendered illegible whilst the vehicle is being used for hire.

## **10. Licence**

10.1 The Licensee shall retain a copy of the original private hire vehicle drivers' licences of all drivers driving the private hire vehicle and produce the same to an Authorised Officer or Police Constable on request.

## **11. Convictions and Suitability Matters**

11.1 The licensee shall ensure they provide a relevant DBS certificate as required by the Council to assess their fit and proper status; and that it is kept up to date and remains 'valid' in line with the Council's policies.

11.2 The licensee will register and remain registered with the DBS Update Service to enable the Council to undertake regular checks of the DBS certificate status as necessary.

11.3 The licensee shall notify the Council if they are subject to any:

- arrest or criminal investigation,
- summons,
- charge,
- conviction,
- formal/simple caution,
- fixed penalty,
- criminal court order,
- criminal behaviour order or anti-social behaviour injunction,
- domestic violence related order,
- warning or bind over
- or any matter of restorative justice

against them immediately in writing (or in any case within 24 hours) and shall provide such further information about the circumstances as the Council may require.

## **12. Notifications and Licence Administration**

12.1 For the duration of the licence, the licensee shall pay the reasonable administration charge or fee attached to any requirement to attend training, or produce a relevant certificate, assessment, validation check or other administration or notification process.

- 12.2 The Licensee shall notify the Council in writing within 14 days of any transfer of ownership of the vehicle. The notice will include the name, address and contact details of the new owner.
- 12.3 The Licensee shall give notice in writing to the Council of any change of his address or contact details (including email address) during the period of the licence within 7 days of such change taking place.
- 12.4 If requested by an Authorised Officer the Licensee must provide, in the timescale requested, in writing, to Council the following information: -
- The name of the driver and their badge number;
  - The address of the driver;
  - The company for whom the driver works for;
  - The date and time you hired / lent / leased / rented your vehicle to the driver;
  - Whose insurance the driver will be using the vehicle under;
  - Whether the driver will have sole use of the vehicle; if not sole use whom else will have access to the vehicle;
  - The expected duration the vehicle will be hired / lent / leased / rented to the driver

### 13. CCTV

- 13.1 The licensee shall ensure that, in accordance with any Council policy, that CCTV cameras are fitted and in good working order.

**NB: This proposed condition is subject to change and further consultation if CCTV is mandated either by GM or the Government. At this stage further conversations will take place with the Surveillance Commissioner and relevant parties.**

# **PROPOSED HACKNEY CARRIAGE VEHICLE CONDITIONS**

This Licence is issued subject to compliance with the Council's current Hackney Carriage byelaws and the relevant provisions of the Town Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976.

## **1. Definitions**

"Appointed Test Station" a garage approved by the Council for the purposes of carrying out a Test

"Authorised Officer" any Officer of the Council authorised in writing by the Council for the purposes of the Local Government (Miscellaneous Provisions) Act 1976

"The Council" means ..... Council

"Hackney Carriage" has the same meaning as in the Town Police Clauses Act 1847

"The Identification Plates" the plates issued by the Council for the purpose of identifying the vehicle as a hackney carriage

The "Licensee" is the person who holds the Hackney Carriage Vehicle Licence

"The Proprietor" means the person(s) who owns or part owns the private hire person who is in possession of the vehicle if subject to a hiring or hire purchase agreement.

"Taximeter" any device for calculating the fare to be charged in respect of any journey in a hackney carriage or private hire vehicle by reference to the distance travelled or time elapsed since the start of the journey, or combination of both

"Test" a compliance test of the vehicle undertaken at an Appointed Test Station

"Vehicle" the vehicle licensed as a Hackney Carriage

Words importing the masculine gender such as "he" or "him" shall include the feminine gender and be construed accordingly.

Where any condition below requires the Licensee to communicate with the Council unless otherwise stipulated, all communication must be with the Council's Licensing Department.

## **2. Identification Plates**

- 2.1 The front and rear vehicle identification plates must be displayed in the authorised plate holder, obtained from the Licensing Department; and that the plate must be fixed in the plate holder using the clips provided so as to allow them to be easily removed by an authorised officer. The plate holder should be fixed to the vehicle in such a way that neither it nor the number plate are obscured; and that both are 100% visible. Cable ties are not an acceptable means of fixing plates to a vehicle or indeed to the plate holder.
- 2.2 The Licensee of the vehicle shall ensure that the 'Identification Plates' are maintained and kept in such condition that the information on the plate is clearly visible to public view at all times.
- 2.3 The Council has specified that the vehicle licence number, make, model and licence expiry date together with the number of passengers it is licensed to carry shall be placed on the identification plate attached to the vehicle. This plate must not be tampered with or amended by anybody other than an Authorised Officer.

## **3. Condition of Vehicle**

- 3.1 The Licensee shall ensure that the vehicle is always maintained in a good mechanical and structural condition and be capable of satisfying the Council's mechanical and structural inspection at any time during the period of the licence.
- 3.2 The interior and exterior of the Hackney Carriage shall be kept in a clean condition by the Proprietor.
- 3.3 The Licensee shall not allow the mechanical and structural specification of the vehicle to be varied without the consent of the Council.
- 3.4 The Licensee of the vehicle shall: -
  - provide sufficient means by which any person in the vehicle may communicate with the driver during the course of the hiring;
  - ensure the interior of the vehicle to be kept wind and water tight and adequately ventilated;
  - ensure the seats in the passenger compartment are properly cushioned and covered;
  - cause the floor in the passenger compartment to be provided with a proper carpet, mat or other suitable covering;
  - ensure fittings and furniture of the vehicle are kept in a clean condition and well maintained and in every way fit and safe for public use;
  - provide facilities for the carriage of luggage safely and protected from damaging weather conditions.

- 3.5 All vehicles must undertake and pass any further Test at the Appointed Test Station in accordance with Council policy (Arrangements for vehicle testing are entirely the responsibility of the Proprietor).
- 3.6 The Licensee must ensure that a daily vehicle check log must be completed by the licensee or driver(s) of the vehicle at the beginning of each shift. The checks to be carried out are as follows:
- Lights and indicators
  - Tyre condition, pressures and tread
  - Wipers, washers and washer fluid levels
  - Cleanliness inside and out
  - Bodywork – no dents or sharp edges
  - Licence plates present and fixed in accordance with these conditions
  - Any internal discs on display and facing inwards so customers can see.
  - Door and bonnet stickers on display
  - Tariff sheet in display
  - Horn in working order
- 3.7 The Licensee shall ensure that he or the driver shall record the above information and keep it in the vehicle at all times and make it available to an authorised officer upon request.

#### **4. Accidents**

- 4.1 The Licensee shall report to the Council, in writing, as soon as is reasonably practicable and in any case within 72 hours any accident causing damage materially affecting the safety, performance or appearance of the vehicle or the comfort or convenience of passengers. The report should contain full details of the accident damage including photos.

#### **5. Advertisements**

- 5.1 The Licensee may only display advertisements on the outside of a London Style Hackney Carriage which must comply with the Council's policy and for which consent has been provided by an Authorised Officer.

## **6. Vehicle Signage**

- 6.1 The Licensee will not allow any sign, notice flag, emblem or advertisement to be displayed in or from any Hackney Carriage Vehicle without the express permission of the Council
- 6.2 The Licensee will ensure that any mandatory signs be affixed permanently to the vehicle as directed by the Council and are not removed whilst the vehicle is licensed.

## **7. Assistance Dogs**

- 6.1 The Licensee shall permit any assistance dog to ride in the vehicle (in the control and custody of the passenger) and allow it to be carried in the front passenger seat footwell of the vehicles if required.
- 6.2 The location of the assistance dog must be agreed with the passenger at all times.
- 6.3 The Licensee will ensure that any certificates exempting drivers of the vehicle from duties to carry assistance dogs, are displayed visibly and prominently as prescribed by the Council.

## **8. Other Animals**

- 8.1 Any other animal may be carried in the vehicle at the discretion of the driver and must be carried in the rear of the vehicle in the custody and control of the passenger.

## **9. Taximeters**

- 9.1 The Licensee shall ensure the vehicle is fitted with a Council approved, tested and sealed Taximeter before plying or standing for hire and shall use the approved meter only.
- 9.2 The Licensee shall ensure that the Taximeter is located within the vehicle in accordance with the reasonable instruction of an authorised officer, and sufficiently illuminated that when it is in use, it is visible to all passengers.
- 9.3 The Licensee shall ensure that the authorised Taximeter is maintained in a sound mechanical/electrical condition at all times and programmed to calculate the fare in accordance with the current fares tariffs fixed by the Council.
- 9.4 The Licensee shall ensure that the 'for hire' sign is extinguished when the fare commences, and the taximeter is brought into operation.
- 9.5 The Licensee shall ensure that the 'for hire' sign is not illuminated when the vehicle is outside of its licensing district.



## **10. Tampering with Taximeters**

- 10.1 Taximeters must not be tampered with by anybody other than an Authorised Officer or an approved contractor approved by the Council.

## **11. Fare Table**

- 11.1 The Licensee shall ensure that a copy of the current fare table supplied by the Council is displayed and visible at all times so that it can be easily read by passengers.

## **12. Drivers Licence**

- 12.1 The Licensee shall retain copies of the hackney carriage drivers' licence of each driver of his vehicle and produce the same to an Authorised Officer or Police Officer on request.

## **13. Communication Equipment**

- 13.1 The Licensee shall ensure that any communication equipment, used to communicate with passengers, fitted to his Hackney Carriage is at all times kept in a safe and sound condition and maintained in proper working order.

## **14. Convictions and Suitability Matters**

- 14.1 The licensee shall ensure they provide a relevant DBS certificate as required by the Council to assess their fit and proper status; and that it is kept up to date and remains 'valid' in line with the Council's policies.
- 14.2 The licensee will register and remain registered with the DBS Update Service to enable the Council to undertake regular checks of the DBS certificate status as necessary.
- 14.3 The licensee shall notify the Council if they are subject to any:
- arrest or criminal investigation,
  - summons,
  - charge,
  - conviction,
  - formal/simple caution,
  - fixed penalty,
  - criminal court order,
  - criminal behaviour order or anti-social behaviour injunction,

- domestic violence related order,
- warning or bind over
- or any matter of restorative justice

against them immediately in writing (or in any case within 24 hours) and shall provide such further information about the circumstances as the Council may require.

## **15. Notifications and Licence Administration**

- 15.1 For the duration of the licence, the licensee shall pay the reasonable administration charge or fee attached to any requirement to attend training, or produce a relevant certificate, assessment, validation check or other administration or notification process.
- 15.2 The Licensee shall notify the Council in writing within 14 days of any transfer of ownership of the vehicle. The notice will include the name, address and contact details of the new owner.
- 15.3 The Licensee shall give notice in writing to the Council of any change of his address or contact details (including email address) during the period of the licence within 7 days of such change taking place.
- 15.4 If requested by an Authorised Officer the Licensee must provide, in the timescale requested, in writing, to Council the following information: -
- The name of the driver and their badge number;
  - The address of the driver;
  - The company for whom the driver works for;
  - The date and time you hired / lent / leased / rented your vehicle to the driver;
  - Whose insurance the driver will be using the vehicle under;
  - Whether the driver will have sole use of the vehicle; if not sole use whom else will have access to the vehicle;
  - The expected duration the vehicle will be hired / lent / leased / rented to the driver

## **16. Intended Use**

- 16.1 The Licensee of the Hackney Carriage vehicle licence shall ensure that an accurate and contemporaneous record is made and maintained either by himself or the driver of the vehicle, of all uses of the vehicle when being used to fulfil pre-booked hiring's on behalf of a private hire operator licensed by another local authority;

- 16.2 The accurate and complete record should include, as a minimum, the following information, and be recorded in a stitch or heat / glue bound book so as to provide a continuous record without breaks between rows: -
- date;
  - time of first pick up;
  - first 'pick up' point by location / name / address including house number;
  - destination point by location / name / address including house number;
  - the name and address of the operator on behalf of which the journey was being undertaken.
- 16.3 Each book shall legibly and clearly display the details of the vehicle to which it relates, including the make, model, registration number and vehicle licence number;
- 16.4 The record of journeys shall be available for inspection at any time by a Police Officer or PCSO; and an Authorised Officer of any local authority who through the course of their normal duties are authorised to inspect the licensed vehicle;
- 16.5 Each book, when full, shall be delivered to the Council's Licensing Department;
- 16.6 Where the Licensee wishes to maintain a record of use in any other format than set out above, prior approval must be obtained from an Authorised Officer.

## 17. CCTV

- 17.1 The licensee shall ensure that, in accordance with any Council policy, that CCTV cameras are fitted and in good working order.

**NB: This proposed condition is subject to change and further consultation if CCTV is mandated either by GM or the Government. At this stage further conversations will take place with the Surveillance Commissioner and relevant parties.**

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## Equality Impact Assessment

Title of the Assessment	GM Common Minimum Licensing Standards
Lead Officer for this initiative	John Garforth
Officer completing the analysis	Danielle Doyle
Phone	07789 508546
Email	danielle.doyle@manchester.gov.uk

Question 1	
What is the main aim and purpose of the activity?	The main purpose of the activity is to propose a set of taxi and private hire minimum licensing standards for adoption by Greater Manchester's ten local authorities. The purpose of this is to standardise licensing conditions and policies across Greater Manchester (GM) so that the travelling public can have greater assurance with regard to the safety and risk assessments that have taken place for licensed drivers and vehicles, including the emissions standard of vehicles they are travelling in. The activity will also provide a valuable platform from which to raise public awareness about the variance in standards nationally and deter the use of non-GM licensed vehicles within the conurbation, thereby protecting business within GM.

Question 2	
List the main elements of the activity?	The project includes a set of standards split into 4 main categories: Drivers, Vehicles, Operators and Local Authority. The standards are a set of policy requirements or licence conditions by which licence holders and local authorities have to adhere to.

Question 3	
What outcomes does the activity aim to achieve?	The project aims to: <ol style="list-style-type: none"> <li>1. Meet the requirements of the DfT's Statutory Guidance for Taxis and Private Hire</li> <li>2. Improve public safety</li> <li>3. Improve the customer experience (both passengers customers and licensee customers)</li> <li>4. Achieve clean air objectives</li> <li>5. Deter GM residents and visitors from using non-GM licensed vehicles</li> </ol>

Question 4	
Who are, or will be, the main beneficiaries of the activity?	Passengers who use taxi/PH services, taxi/PH operators, proprietors and drivers, and licensing authorities themselves.

Question 5	
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Do you need to consult with people who might be affected by it directly or indirectly? <i>Please justify your response</i>	Yes – a public consultation has already taken place, alongside targeted direct consultation with impacted groups.
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### Question 6

*Having due regard for the equality duty involves:*

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people;
- Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

*Please complete the table below and give reasons, evidence and comment, where appropriate, to support your judgement(s).*

*- Use the table below to record where you think that the activity could have a positive impact on any of the target groups or contribute to promoting equality, equal opportunities or improving relations within equality target groups.*

*- Use the table below to record where you think that the activity could have an adverse impact on any of the equality target groups i.e. it could disadvantage them and impact is high.*

*- Use the last column in the table below to give reason/comments/evidence where appropriate to support your judgement.*

#### Age

Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Children and Young People (aged 19 and under)	Highly likely	Very low likelihood	<p>Children and Young people are by definition 'vulnerable' individuals. Improvements to the way licence applicants are assessed and monitored for compliance can only serve to improve the quality and safety of the licensed fleets, and reduce the risk of harm to the travelling public, particularly those classed as vulnerable. The MLS should also serve to raise greater awareness of the risks of travelling in vehicles licensed outside of GM to unknown standards, with little to no proactive compliance activity within GM</p> <p>There is a risk that the higher standards across GM will result in higher licence fees and improved compliance across the board, and this could mean that whilst they are able to, GM based operators could still choose instead to obtain licences outside of GM authorities. These operators may provide school contract based services, and this could be a risk if the processes and compliance monitoring of other authorities are not as robust as the GM MLS. This risk could be mitigated by authorities amending their schools contracts to require the use of licensed vehicles in the area where the school is based only.</p>

Older People (aged 60 and over)	Highly likely	Medium - high risk	<p>Many older people are reliant on taxis and private hire vehicles to travel. Improvements to the way licence applicants are assessed and monitored can only serve to improve the quality and safety of the licensed fleets, and reduce the risk of harm to the travelling public.</p> <p>There is a risk of the activity causing a reduction in the Hackney licensed fleet (cost of vehicles meaning risk of individuals leaving this trade), and a risk of licensees going to authorities outside of GM to get licensed due to the applications criteria, standards, compliance and therefore cost being higher; so GM travelling public could be forced to travel in vehicles with drivers of a lower quality and assessment standard.</p> <p>The MLS (if adopted in full) will likely result in higher costs to some licensees as proposals include additional testing requirements (eg. enhanced driving test), additional processing/checking requirements in the application process (background checks), and in some areas additional compliance activity to ensure the integrity of the activity, which in turn will result in higher licence fees. Data we currently hold on the age profile of our licensed fleet of drivers shows that around 40% of our licensees are over the age of 50, with 13% of licensees over the age of 60.</p>
<b>Disability</b>			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Disability (people with physical impairments, communication or sensory impairments, a learning disability or cognitive impairment, mental health problems, longstanding illness/health condition, other disability impairment).	Highly likely	Medium - high risk	<p>Improvements to the way licence applicants are assessed and monitored for compliance can only serve to improve the quality and safety of the licensed fleets, and reduce the risk of harm to the travelling public, particularly those classed as vulnerable. The proposals also seek to increase the number of Wheelchair Accessible and Accessibility enhanced public hire vehicles (Purpose built Hackneys with sight and audio adaptations) across the conurbation which would result in reducing the risk of people with disabilities not being able to get a suitable vehicle on a public rank. The MLS also seeks to improve the quality of training required of</p>

			<p>licensed drivers, including their awareness of their responsibilities towards passengers with disabilities, as well as improve the level of proactive compliance to ensure these standards are being adhered to and improve public confidence to report, as complaints from people with disabilities are traditionally low.</p> <p>The MLS should also serve to raise greater awareness of the risks of travelling in vehicles licensed outside of GM to unknown standards, with little to no proactive compliance activity within GM.</p> <p>However, the proposed MLS also carries a fairly high risk of reducing the licensed Hackney fleet, thereby conversely increasing the risk of people with accessibility needs not being able to access a suitable vehicle either by pre-booking or on a public rank. The MLS will also likely lead to increased licence fees, which in turn will result in increased fares, potentially affecting people with disabilities disproportionately if the individual is more reliant on accessible vehicles not widely available in the private hire industry.or for public hire.</p>
<b>Gender</b>			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Men	Highly likely	Medium - high risk	<p>The positive impacts of MLS will affect all members of the travelling public that use Taxi and Private Hire services, by providing a higher quality fleet of drivers and vehicles that will be assessed and monitored to be safe and minimise risk to the public.</p> <p>If there are any adverse implications of the MLS proposals for licensees, then this will affect men more than women, as 97% of our licence holders are male* (identified from their stated title on their licence application).</p> <p>There is a risk that if the proposed MLS drives growth of non-GM licensed vehicles being used by operators within GM, then all passengers will be travelling in vehicles with drivers to unknown standards with minimal compliance.</p>



Women	Highly likely	Low /medium risk	<p>The positive impacts of MLS will affect all members of the travelling public that use Taxi and Private Hire services, by providing a higher quality fleet of drivers and vehicles that will be assessed and monitored to be safe and minimise risk to the public.</p> <p>There is a risk that if the proposed MLS drives growth or non-GM licensed vehicles being used by operators within GM, then all passengers will be travelling in vehicles with drivers to unknown standards with minimal compliance, and females are more vulnerable when travelling alone in that regard.</p>
Transgender People	Highly likely	Low risk	<p>The positive impacts of MLS will affect all members of the travelling public that use Taxi and Private Hire services, by providing a higher quality fleet of drivers and vehicles that will be assessed and monitored to be safe and minimise risk to the public.</p> <p>There is a risk that if the proposed MLS drives growth or non-GM licensed vehicles being used by operators within GM, then all passengers will be travelling in vehicles with drivers to unknown standards with minimal compliance.</p>
<b>Race</b>			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Asian or Asian British Backgrounds (This includes Pakistani, Indians and Bangladeshi, Chinese or any other Asian background)	Highly likely	Medium - high risk	<p>Whilst race and ethnicity data is not collected or recorded as part of the licensing process, but we know from seeing our applicants in person and our daily interactions that the vast majority of our licensed fleet are non-white males (both British and non-British); therefore any impacts, both positive and adverse will likely affect this target group disproportionately.</p> <p>BAME licensees are also more likely to live in Lower Super Output Areas (LSOAs) with higher levels of deprivation and this is borne out in the postcode data of our licence holders where the overwhelming majority have postcodes identified as LSOAs. It would be a reasonable inference that these licence holders are more likely to have socio-economic pressures and live in housing that is less likely to have</p>

			<p>private parking and the ability therefore for at home EV charging ; therefore requirements for more expensive fully electric vehicles carry an adverse risk to the viability of these individuals continuing in the industry.</p> <p>All sections of the travelling public should benefit from MLS.</p>
<p>Black or Black British Backgrounds (This includes Caribbean, African or any other black background)</p>	<p>Highly Likely</p>	<p>Medium - high risk</p>	<p>Whilst race and ethnicity data is not collected or recorded as part of the licensing process, we know from seeing our applicants in person and our daily interactions that the vast majority of our licensed fleet are non-white males (both British and non-British); therefore any impacts, both positive and adverse will likely affect this target group disproportionately.</p> <p>BAME licensees are also more likely to live in Lower Super Output Areas (LSOAs) with higher levels of deprivation and this is borne out in the postcode data of our licence holders where the overwhelming majority have postcodes identified as LSOAs. It would be a reasonable inference that these licence holders are more likely to have socio-economic pressures and live in housing that is less likely to have private parking; therefore requirements for more expensive fully electric vehicles carry an adverse risk to the viability of these individuals continuing in the industry.</p> <p>All sections of the travelling public should benefit from MLS.</p>
<p>Mixed /Multiple Ethnic Groups (This includes White and Black Caribbean, White and Black African, White and Asian or any other mixed background)</p>	<p>Highly Likely</p>	<p>Medium - high risk</p>	<p>Whilst race and ethnicity data is not collected or recorded as part of the licensing process, we know from seeing our applicants in person and our daily interactions that the vast majority of our licensed fleet are non-white males (both British and non-British); therefore any impacts, both positive and adverse will likely affect this target group disproportionately.</p> <p>BAME licensees are also more likely to live in Lower Super Output Areas (LSOAs) with higher levels of deprivation and this is borne out in the postcode data of our licence holders where the overwhelming majority have postcodes identified</p>

			<p>as LSOAs. It would be a reasonable inference that these licence holders are more likely to have socio-economic pressures and live in housing that is less likely to have private parking; therefore requirements for more expensive fully electric vehicles carry an adverse risk to the viability of these individuals continuing in the industry.</p> <p>All sections of the travelling public should benefit from MLS.</p>
White British Background (This includes English, Scottish & Welsh, Irish and Gypsy or Irish Travellers)	Highly likely	Low risk	Whilst all sections of the travelling public should benefit from MLS, there is little to no evidence to suggest that this target group would be particularly adversely affected over any other.
Non-British White Backgrounds (This includes Irish, Polish, Spanish, Romanians and other White backgrounds)	Highly likely	Low risk	Whilst all sections of the travelling public should benefit from MLS, there is little to no evidence to suggest that this target group would be particularly adversely affected over any other.
Arabs	--	--	Don't have the data to specifically address the factor but would otherwise say would be impacted in the same way as other BAME groups.
Any other background not covered by any of the above	---	---	Data on race and ethnicity not held so no data
<b>Religion/Belief</b>			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Buddhists			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Christians			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Hindus			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Jews			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Muslims			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Sikhs			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver

Others			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
<b>Sexual Orientation</b>			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Gay men			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Lesbians			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver
Bisexual			Data not held but all sections of the travelling public stand to benefit from the safety standards that MLS should deliver

<b>Question 7</b>	
Have you identified two or more high adverse impacts in the table above?	Yes

<b>Question 8</b>	
If you have identified one high adverse impact or any medium/low adverse impacts, what improvements to the activity could you make to mitigate high/medium/low adverse impacts? Please give details of the improvements you plan to make.	<p>The highest cost risk is that around the requirements for vehicles. Mitigation has already been identified in the form of a substantial Clean Taxi Fund and discussions are ongoing with central government with regards to additional funding support in this area. Engagement with the trades continues in order to understand the ongoing impacts and risks, particularly in the recovery from the pandemic.</p> <p>Further mitigation is proposed by way of an extended exemption period for the CAP, for GM licensed Hackneys and Private Hire vehicles.</p> <p>In order to mitigate the risk of introducing MLS in the absence of wider and meaningful national reform, a public awareness campaign is essential to encourage residents and visitors to use only GM licensed vehicles (and drivers) when travelling.</p>

<b>Question 9</b>		
Have you set up equality monitoring systems to carry out regular checks on the effects your activity has on the following groups?		
Equality Group	Has an equality monitoring system been set up? (Y/N)	Details
Age	N	Whilst we capture this data, we are not monitoring regularly. In order to monitor we'd have to change our Data sharing agreements to explain how this will be used.

Disability	Y	We currently monitor on a quarterly basis the number of complaints we get relating to a disability issue, so we can continue to monitor the impacts over the course of the activity.
Gender	N	We would have to have a clear reason for capturing in our DSA and to begin to capture and monitor this information would increase processing (and therefore licence fee) costs.
Race	N	We would have to have a clear reason for capturing in our DSA and to begin to capture and monitor this information would increase processing (and therefore licence fee) costs.
Religion/Belief	N	We would have to have a clear reason for capturing in our DSA and to begin to capture and monitor this information would increase processing (and therefore licence fee) costs.
Sexual Orientation	N	We would have to have a clear reason for capturing in our DSA and to begin to capture and monitor this information would increase processing (and therefore licence fee) costs.
Other	N	

#### Question 10

How will you measure the success of any equality monitoring systems identified in Question 9 above? How will you ensure that everyone involved in the activity knows and understands what improvements you intend to make and is able to put the activity into practice with those improvements?

Regular engagement sessions with trade representatives have taken place throughout the activity. Feedback and information gathered from these sessions helps inform the assessment of the identified risks. Ongoing engagement will ensure that any adverse impacts are identified and responded to.

#### Question 11

Are there any elements within this activity that require a separate Equality Impact Analysis?

#### Question 12

Is a Full Impact Analysis needed? If in Question 6 you identified two or more adverse impacts then you should either

- abort the activity, or
- carry out a full analysis

#### Question 13

List all of the information that you have taken into account in carrying out this Equality Analysis.

Data held on the Council's licensing business system. Information known by Service Managers through service delivery and daily interaction with customers.

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## TRAFFORD COUNCIL

**Report to:** Executive  
**Date:** 22 November 2021  
**Report for:** Decision  
**Report of:** Executive Member for Communities and Partnerships

### Report Title

GM VCSE Accord

### Summary

The GM VCSE Accord Agreement is a three-way collaboration agreement between GMCA, GM Health and Social Care Partnership and the GM VCSE Sector represented by the GM VCSE Leadership Group. The agreement has been refreshed and was signed off at the September GMCA meeting with an ask for each Council to consider approving and endorsing the new agreement. This report provides members with details of the new agreement and the implications of the commitments set out in the agreement for Trafford.

### Recommendation(s)

#### **It is recommended that the Executive:**

1. Consider the new GM VCSE Accord as presented in the attached annex, and the implications that the commitments it contains will have on work with the VCSE sector in Trafford.
2. Approve the new GM VCSE Accord and confirm endorsement on behalf of Trafford.

Contact person for access to background papers and further information:

Name: Dianne Geary  
Extension: 1821

Background Papers: None.

*Implications:*

Relationship to Policy Framework/Corporate Priorities	The GM VCSE Accord relates to: Trafford VCSE Strategy Trafford Council Corporate Plan  Along with the wider VCSE State of the Sector Report for Trafford
Relationship to GM Policy or Strategy Framework	The GM VCSE Accord is a separate and independent agreement. It is part of the wider suite of key strategic plans in the GM system including the wider Greater Manchester Strategy
Financial	None directly in signing the GM VCSE Accord. Trafford does contribute to the wider GM system through contributions and therefore signing would mean involvement in how this is driven and delivered. This is delivered through GMCA who have a budget of £408,400 through cultural and social impact fund and health and social care partnership.
Legal Implications:	The VCSE Accord is a partnership agreement which will involve all parties offering to bring resources (financial and non-financial) into the arrangement. It will enable shared delivery and shared accountability, as well as shared risk for the actions taken across the VCSE Leadership Group, GMCA and Health and Social Care Partnership.
Equality/Diversity Implications	An Equality Impact Assessment has been carried out for the GM VCSE Accord and is set out in the GMCA Cabinet Paper.
Sustainability Implications	N/A
Carbon Reduction	VCSE organisations make commitments to reduce the waste and increase reuse and recycling in their activities. Roads, parking and vehicle access may be impacted by the implementation of the Accord.
Resource Implications e.g. Staffing / ICT / Assets	No direct impact
Risk Management Implications	The majority of this approach is driven at a GM level and therefore there is a risk that if the GM VCSE Accord is not signed off that Trafford would not be able to be involved in shaping this for local delivery.
Health & Wellbeing Implications	No direct impact
Health and Safety Implications	No direct impact



## 1. BACKGROUND

- 1.1 In November 2017 and on behalf of the GMCA, an Accord Agreement was signed by the Mayor of Greater Manchester with the Voluntary, Community and Social Enterprise (VCSE) sector, which set out new, improved standards of working with VCSE organisations. The GM VCSE sector also entered into a Memorandum of Understanding (MOU) with the Health and Social Care Partnership. Since that time, a huge amount of collaborative work has taken place and the relationship between the public and VCSE sectors has increased in strength, particularly during the Coronavirus pandemic.
- 1.2 In September 2020, GMCA Members agreed to extend the scope of the Accord to embrace health and social care, replacing the previous MOU, and to work collaboratively with the GM Health and Social Care Partnership to co-produce this new agreement with the GM VCSE Leadership Group. At the same time, the GMCA also approved a proposal for investment in VCSE leadership and infrastructure in the Sector at a GM footprint.
- 1.3 At its meeting on 24th September 2021, the Combined Authority considered and approved: the (1) GMCA Cabinet Paper on the Refresh of GM VCSE Accord (Attached at Annex 1); and the (2) GM VCSE Accord Agreement (Attached at Annex 2).
- 1.4 The Combined Authority authorised the Mayor of Greater Manchester, the GM Portfolio Lead for Community, Co-operatives, Voluntary Sector and Inclusion and the Chief Executive of the Combined Authority to sign the Accord Agreement on their behalf. Furthermore, all the Leaders present at the Combined Authority also signed a copy of the Accord Agreement following the meeting.
- 1.5 The GM VCSE Accord Agreement ("Accord Agreement") is a tri-partite collaboration agreement between the Greater Manchester Combined Authority and the Greater Manchester Health and Social Care Partnership and the GM Voluntary, Community and Social Enterprise (VCSE) Sector represented by the GM VCSE Leadership Group, based in a relationship of mutual trust, working together, and sharing responsibility.
- 1.6 The Accord Agreement will act as a framework for collaboration involving VCSE leaders and organisations in the delivery of the Greater Manchester Strategy (GMS) and in the thematic strategies and delivery plans that will exist to deliver the GMS vision, including the development of the strategic plan of the new GM Integrated Care System. The purpose of the Accord Agreement is to further develop how we work together to improve outcomes for Greater Manchester's communities and citizens.
- 1.7 In the discussion at the meeting, Leaders noted that the Accord Agreement has an implication for the relationship of all local authorities with their local voluntary organisations, community groups and social enterprises. The success of the Accord Agreement and the shared commitments that it contains will rely on their recognition, adoption and action at a locality and neighbourhood level.

- 1.8 Combined Authority members felt that it was important that the Accord Agreement be debated in all GM districts with a view to adoption and endorsement of the Accord Agreement within each district.

## 2. GM VCSE ACCORD

- 2.1 As part of the recovery from the pandemic and to facilitate both the refresh of the Greater Manchester Strategy (GMS) and the development of the Integrated Care System, it would be advantageous to have a unified way of working between the local authorities, GMCA, the Integrated Care System and the GM VCSE sector, represented by the GM VCSE Leadership Group. This would allow a single conversation with the sector in relation to all aspects of the GMS and its partner strategies. It would also enable a focus on sustaining their valuable work in communities and creating a more resilient VCSE sector.
- 2.2 The development of this new Accord Agreement is the product of a series of structured conversations held in July and early August with stakeholders including;
- GM VCSE networks;
  - Local VCSE infrastructure organisations;
  - Local VCSE leaders;
  - GMCA;
  - GM Health and Social Care commissioners;
  - Local Authority policy leads; and
  - Other statutory sector stakeholders.
- 2.3 Development of the draft new Accord Agreement has also been informed by reflection on the success of the original VCSE Accord undertaken by the GM VCSE Leadership Group and officers at GMCA, as well as by learning gleaned from the evaluation report of the GM VCSE Engagement Programme for the GM Health and Social Care Partnership, carried out by Cordis Bright in early 2021.
- 2.4 Furthermore, the Accord Agreement has been developed following consideration of our learning and reflections from the Covid-19 pandemic, the 2021 report of the GM Independent Inequalities Commission, and the Marmot report 'Building Back Fairer in Greater Manchester'.
- 2.5 The Accord Agreement is intended to work in a number of ways:
- Through a shared understanding of the contribution that VCSE organisations make towards tackling inequality in society, creating a more inclusive economy and addressing the climate crisis.
  - Through the building of effective partnerships and relationships between the statutory sector with VCSE organisations across different geographies (for example GM-wide, district-wide, or in neighbourhoods and communities)
  - Through a shared vision, ways of working principles and set of commitments which underpin these partnerships and relationships
  - Through a 5-year iterative programme of enabling and developmental activities driven at a GM-wide footprint, which aims to maximise the ability of VCSE organisations to deliver beneficial outcomes.

2.6 There are a number of commitments contained in the Accord Agreement which are summarised below:

**Commitment 1:** We will work together to achieve a permanent reduction in inequalities and inequity within Greater Manchester, addressing the social, environmental and economic determinants of health and wellbeing.

**Commitment 2:** We will embed the VCSE sector as a key delivery partner of services for communities in Greater Manchester.

**Commitment 3:** We will build a financially resilient VCSE sector that is resourced to address our biggest challenges of ending poverty and inequality in Greater Manchester.

**Commitment 4:** We will grow the role of the VCSE sector as an integral part of a resilient and inclusive economy where social enterprises, co-operatives, community businesses, charities and microsocial business thrive.

**Commitment 5:** We will build on our existing strengths to build the best VCSE ecosystem in England.

**Commitment 6:** We will put into place meaningful mechanisms to make co-design of local services the norm, including expanding channels for service design to be informed by 'lived experience'.

**Commitment 7:** We will fulfil the potential for building productive relationships between the VCSE, public and private sectors to address inequity and build back fairer.

**Commitment 8:** We will put in place a comprehensive workforce programme to support organisational and workforce development for VCSE employers based on and facilitating a more integrated public facing workforce.

2.7 The Accord Agreement will be supported by a five-year implementation plan for work driven at a GM footprint and funding agreement for implementation of that plan, as well as a review of the operation and membership on the GM VCSE Leadership Group. The success of the Accord Agreement and the above commitments will rely on the adoption and action at a locality and neighbourhood level in Trafford.

### 3. CONSIDERATIONS FOR TRAFFORD

3.1 The Accord Agreement and the above commitments align with the vision, outcomes and priorities in the refreshed Corporate Plan. There are also a number of considerations to take into account listed below:

**3.1.1 Existing activity aligned with the Accord's commitments:** Broadly, activity between the Council and with partners is already delivering or working towards many of the commitments set out in the Accord; much of this activity is via the

delivery of the Locality Plan, development of the Integrated Care System and One System Board where the VCFSE sector have been a vital partner. Recent initiatives i.e. launch of the Poverty Truth Commission will also contribute to the commitments. A further review is required across all activity to ensure full alignment.

**3.1.2 Trafford representation:** At present, 6 of the 10 GM authorities are represented on GM VCSE Leadership Group. At this time Trafford are not part of this group. However, conversations have been underway between GMCA, the GM VCSE Leadership Group and the VCFSE infrastructure services in these four other local authority areas regarding greater representation. Trafford's VCFSE infrastructure support service provider has been involved in these conversations.

**3.1.3 Trafford VCFSE Strategy:** Key partners involved in developing Trafford's VCFSE Strategy include Thrive Trafford, Trafford Community Collective and Trafford Housing Trust; the Accord has been shared with these partners who are supportive and recognise the need to align the VCFSE Strategy with the commitments within the Accord.

**3.1.4 Long Term Strategic Commissioning of VCFSE Sector in Trafford:** VCFSE infrastructure services in other areas of GM are likely to drive the Accord forward with their local authority. The current Trafford VCFSE infrastructure support service contract is due to end in 2022 and a long term co-produced framework is currently under consideration which will direct the delivery of the Accord and further development of Trafford's VCFSE Strategy.

#### 4. OTHER OPTIONS

4.1 To not approve or endorse the GM VCSE Accord on behalf of Trafford– this would mean that Trafford Council, having signed off the previous Accord, would not sign off the refreshed version. Trafford would not have a role or ability to work with and shape the delivery of the Accord in the Borough or be able to influence the focus of the work and accompanying GMCA budget of £408,400. It would be a missed opportunity to try to align to Trafford's local priorities and wider VCFSE Strategy.

#### 5. CONSULTATION

5.1 The development of this new Accord is the product of a series of structured conversations held in July and early August 2021 with stakeholders as described in 2.2.

5.2 The Accord acts as a framework for the delivery of the vision set out in the Greater Manchester Strategy and as a result, the VCSE sector is engaged in the development, governance and delivery of the GMS including relevant consultation and co-design.

5.3 The Accord has also been considered by the GMCA Cabinet.

## 6. RECOMMENDATIONS

6.1 Consider the new GM VCSE Accord as presented in the attached annex, and the implications that the commitments it contains will have on work with the VCSE sector in Trafford.

6.2 Approve the new GM VCSE Accord and confirm endorsement on behalf of Trafford.

### Reasons for Recommendation

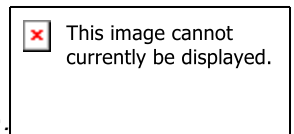
6.3 To enable Trafford to continue to have a role in shaping the delivery of the Accord in the Borough and retain the ability to influence the focus of the work and accompanying GMCA budget of £408,400.

**Key Decision** (as defined in the Constitution): Yes

**If Key Decision, has 28-day notice been given?** Yes

**Finance Officer Clearance** (type in initials).....GB.....

**Legal Officer Clearance** (type in initials).....DS.....



**DEPUTY CHIEF EXECUTIVE & CORPORATE DIRECTOR'S SIGNATURE:**

Sara Saleh

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

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## **GREATER MANCHESTER COMBINED AUTHORITY**

### **Paper for consideration by Cabinet at all GM Local Authorities**

**Subject:** Refresh of Greater Manchester VCSE Accord

**Background:**

At its meeting on 24<sup>th</sup> September 2021, the Combined Authority considered and approved the following paper concerning the new GM VCSE Accord. This is a tri-partite Agreement with the GM Health and Social Care Partnership and the GM VCSE Leadership Group on behalf of the VCSE sector in Greater Manchester.

In the discussion at the meeting, Leaders noted that this agreement has an implication for the relationship of all local authorities with their local voluntary organisations, community groups and social enterprises. As stated at section 2.7 in the report, the success of this Accord and the shared commitments that it contains will rely on their recognition, adoption and action at a locality and neighbourhood level.

CA members felt that it was important that the GM VCSE Accord be debated and supported in all districts.

The Combined Authority authorised the Mayor of Greater Manchester, the GM Portfolio Lead for Community, Co-operatives, Voluntary Sector and Inclusion and the Chief Executive of the Combined Authority to sign the Accord Agreement on their behalf. Furthermore, all the Leaders present at the Combined Authority also signed a copy of the Accord following the meeting.

**Request to all GM local authorities:**

Cabinet members are asked to:

1. Consider the new GM VCSE Accord as presented in the attached paper, and the implications that the commitments it contains will have on work with the VCSE sector in your district.
2. Approve the new GM VCSE Accord and confirm endorsement on behalf of your district.

BOLTON  
BURY

MANCHESTER  
OLDHAM

ROCHDALE  
SALFORD

STOCKPORT  
TAMESIDE

TRAFFORD  
WIGAN

# GREATER MANCHESTER COMBINED AUTHORITY

Date: 24<sup>th</sup> September 2021

Subject: Refresh of Greater Manchester VCSE Accord

Report of: Cllr Arooj Shah, Portfolio Lead Leader for Community, Co-operatives, Voluntary Sector and Inclusion; and Joint Portfolio Chief Executive Leads for Community, Co-operatives, Voluntary Sector and Inclusion

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## PURPOSE OF REPORT:

In November 2017 and on behalf of the GMCA, an Accord was signed by the Mayor of Greater Manchester with the Voluntary, Community and Social Enterprise (VCSE) sector, which set out new, improved standards of working with VCSE organisations. The GM VCSE sector also entered into a Memorandum of Understanding (MOU) with the Health and Social Care Partnership. Since that time, a huge amount of collaborative work has taken place and the relationship between the public and VCSE sectors has increased in strength, particularly during the Coronavirus pandemic.

In September 2020, GMCA Members agreed to extend the scope of the Accord to embrace health and social care, replacing the previous MOU, and to work collaboratively with the GM Health and Social Care Partnership to co-produce this new agreement with the GM VCSE Leadership Group. At the same time, the GMCA also approved a proposal for investment in VCSE leadership and infrastructure in the Sector at a GM footprint.

This report presents the new, single GM VCSE Accord for approval.

## RECOMMENDATIONS:

### The GMCA is requested to:

1. Approve the new GM VCSE Accord as a tri-partite Agreement with the GM Health and Social Care Partnership and the GM VCSE Leadership Group on behalf of the VCSE sector in Greater Manchester.
2. Authorise the Mayor of Greater Manchester, the GM Portfolio Lead for Community, Co-operatives, Voluntary Sector and Inclusion and the Chief Executive of the Combined Authority to sign the Accord Agreement on their behalf.

## CONTACT OFFICERS:

Andrew Lightfoot - Deputy Chief Executive, GMCA [Andrew.Lightfoot@greatermanchester-ca.gov.uk](mailto:Andrew.Lightfoot@greatermanchester-ca.gov.uk)









Warren Heppolette - Executive Lead, Strategy & System Development, GM Health and Social Care Partnership [Warren.Heppolette@nhs.net](mailto:Warren.Heppolette@nhs.net)

## **Equalities Impact, Carbon and Sustainability Assessment:**

*Results of the [Sustainability Decision Support Tool](#) to be included here:*

## Impacts Questionnaire

Impact Indicator	Result	Justification/Mitigation	
Equality and Inclusion	G	<p>The Accord enables involvement of a range of communities of identity, experience and geography, facilitating support and advocacy for particular communities.</p> <p>Key to the work of the VCSE sector under the Accord will be to enhance its ability to tackle poverty and disadvantage</p> <p>The Accord will facilitate the involvement of VCSE organisations in the service reform programme and 'services for people' in localities and neighbourhoods.</p> <p>The VCSE Accord will include work to increase co-design of services, support the GM Equalities Alliance and enable structures that allow communities to have a say in shaping decisions that affect them</p> <p>Involvement of VCSE organisations will be key to work to support community cohesion across GM, and this will be embedded in work to deliver the Accord.</p>	
Health	G	<p>Through key VCSE-led programmes like GM Moving, also through development of structures for the GM-wide Live Well service.</p> <p>The VCSE Accord will build from existing successes around VCSE-led low level mental health programmes.</p> <p>Through key VCSE-led programmes like GM Moving, also through development of structures for the GM-wide Live Well service.</p> <p>Through facilitation of key VCSE-led wellbeing programmes including development of structures for the GM-wide Live Well service.</p> <p>Improving referral pathways and connections for support, via VCSE organisations collaborating with statutory services</p> <p>The VCSE Accord will enable VCSE involvement in key healthy food programmes, and enable a support infrastructure and resilient forms of funding</p>	
Resilience and Adaptation	G	<p>The VCSE sector has an important role to play in creating environmental benefits, reducing carbon use, responding to emergencies and mitigating risks to communities.</p> <p>The VCSE sector has an important role to play in the Coronavirus recovery work</p> <p>The VCSE Accord describes the sector's role in supporting resilience of society and environment</p> <p>A strong agreement with the VCSE sector will enable involvement in key community safety programmes such as the Violence Reduction Unit.</p> <p>VCSE organisations play a significant role in enhancing and maintaining green and blue space in GM</p>	
Housing	G	<p>The VCSE Accord will build from strong experience around the Homeless Action Network, for example</p> <p>Through the VCSE-led community homes programme</p> <p>Through community ownership and management of redundant and underused buildings and public spaces</p>	
Economy	G	<p>The VCSE Accord contains a commitment around making a more inclusive and social economy</p> <p>The VCSE Accord contains a commitment around improvement of workforce capacity and capability, also seeking for the sector to have 100% employees paid the Real Living Wage</p> <p>The VCSE Accord contains a commitment around improvement of workforce capacity and capability, also seeking for the sector to have 100% employees paid the Real Living Wage</p> <p>The Accord will include work to support social enterprises and other social economy organisations to thrive</p> <p>VCSE organisations play a key role in social innovation activities</p> <p>The VCSE sector can leverage funds from charitable funders, social investors and other philanthropic givers.</p> <p>VCSE organisations play a key role in community learning programmes that wrap around statutory provision</p>	
Mobility and Connectivity	G	<p>Focus in the VCSE Accord on accessible services, facilitating the hearing of lived experience from communities and co-design of infrastructure</p> <p>VCSE organisations play a role providing low carbon transport schemes</p> <p>Focus in the VCSE Accord on accessible services, facilitating the hearing of lived experience from communities and co-design of infrastructure</p>	
Carbon, Nature and Environment	G		
Consumption and Production	G	<p>VCSE organisations make commitments to reduce waste in their activities</p> <p>VCSE organisations make commitments to increase reuse and recycling in their activities</p>	
Contribution to achieving the GM Carbon Neutral 2038 target		<p>The UKG are interested in bids which are particularly strong on the need for UKCRF projects to demonstrate a contribution to national net zero and carbon reduction ambitions and this forms a key part of the UKG's assessment criteria. GM priorities should contribute to our carbon neutrality and environmental objectives. We would welcome projects which are innovative, inclusive and support the</p>	
<b>Further Assessment(s):</b>		Equalities Impact Assessment and Carbon Assessment	
 <b>Positive impacts overall, whether long or short term.</b>	 <b>Mix of positive and negative impacts. Trade-offs to consider.</b>	 <b>Mostly negative, with at least one positive aspect. Trade-offs to consider.</b>	 <b>Negative impacts overall.</b>

Carbon Assessment		
Overall Score		
Buildings	Result	Justification/Mitigation
New Build residential	N/A	
Residential building(s) renovation/maintenance	N/A	
New Build Commercial/Industrial	N/A	
Transport		
Active travel and public transport		
Roads, Parking and Vehicle Access	N/A	These may result through implementation of the Accord
Access to amenities	N/A	
Vehicle procurement	N/A	
Land Use		
Land use	N/A	
No associated carbon impacts expected.	 High standard in terms of practice and awareness on carbon.	 Mostly best practice with a good level of awareness on carbon.
	 Partially meets best practice/ awareness, significant room to improve.	 Not best practice and/ or insufficient awareness of carbon impacts.

## Risk Management:

*This report is considered to have a low level of risk*

## Legal Considerations:

*The VCSE Accord is a partnership agreement which will involve all parties offering to bring resources (financial and non-financial) into the arrangement. It will enable shared delivery and shared accountability, as well as shared risk for the actions taken across the VCSE Leadership Group, GMCA and Health and Social Care Partnership.*

## Financial Consequences – Revenue:

*To support this work, a budget of £228,400 was approved by the GMCA in September 2020 from the Cultural and Social Impact Fund, with approval delegated to the GMCA Treasurer, in consultation with the Community, Co-operatives and Inclusion Portfolio Leader and Chief Executive to award grant agreements, subject to final agreement of GMCA budgets for 2021/22 onwards. The GM Health and Social Care Partnership has also agreed to provide £180,000 in the current financial year towards delivery of the new VCSE Accord.*

## Financial Consequences – Capital:

N/A

## Number of attachments to the report:

Annex 1 – Draft GM VCSE Accord

Annex 2 – Context and delivery of the Accord

## Comments/recommendations from Overview & Scrutiny Committee:

N/A

## BACKGROUND PAPERS:

Information about GM VCSE Leadership Group and VCSE Policy Paper –

<https://vcseleadershipgm.org.uk/our-work/>

TRACKING/PROCESS	
Does this report relate to a major strategic decision, as set out in the GMCA Constitution?	Yes / No
EXEMPTION FROM CALL IN	
Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency?	No
GM Transport Committee	N/A
Overview & Scrutiny Committee	N/A

## 1. INTRODUCTION/BACKGROUND

1.1 The work described in this paper is set within a period of extreme demand and dependence placed on both the public and VCSE sectors. It is also a time of great uncertainty. Local Authority and other public budgets are under immense pressure and that budgeting will have a *direct impact* on VCSE organisations in terms of grants and commissioning, but also an *indirect impact*– reductions and pressures in public services often displace need and put more pressure on charities and communities. Moving forwards, active involvement of voluntary organisations, community groups and social enterprises in places and neighbourhoods will be key if Greater Manchester is able to bring society and the economy back together and address the emerging priorities of tackling inequalities, building confidence, behaviour change, and co-design of a resilient city region. Put simply, there is a need to take a practical approach where responsibility and risk are shared, and the public and VCSE sectors work together to support the same places and communities.

1.2 As part of the delivery of the Greater Manchester Strategy (GMS), in November 2017 and on behalf of the GMCA, an Accord was signed by the Mayor of Greater Manchester with the VCSE sector, which set out new, improved standards of working with

VCSE organisations. The Accord acts as a framework for the delivery of the vision set out in the Greater Manchester Strategy and as a result, the VCSE sector is engaged in the development, governance and delivery of the GMS including relevant consultation and co-design.

1.5 VCSE leaders in GM have come together to form the VCSE Leadership Group<sup>1</sup>, which seeks to promote the role and involvement of the VCSE sector and communities in devolution and has given a broader group of VCSE leaders with which to work.

1.6 The GM VCSE Leadership Group also entered into a Memorandum of Understanding with the Health and Social Care Partnership, which has seen £1.2m of Health and Social Care Transformation Funding flow into the VCSE Leadership Group and the wider sector over the last 4 years.

1.7 As part of the delivery of the VCSE Accord, in January 2020 the GM VCSE Leadership Group published a Policy Paper for the future development of the sector, which is entitled '*Voluntary organisations, Community groups and Social Enterprises (VCSE) in Greater Manchester – the next 10 years*'. The paper describes the role of VCSE anchor organisations and local VCSE infrastructure organisations which support and facilitate the operation of the wider sector, as well as that of the specialist groups and organisations which support, represent and champion particular communities of identity or experience.

1.8 During the Covid-19 pandemic, the response of VCSE organisations has been incredible in its strength, its depth and the speed at which it has mobilized. Furthermore, community volunteers have offered and continue to provide their support and are integrating with emergency support structures at this time. The VCSE sector has been quick to adapt at pace and with a huge degree of accuracy and efficacy to meet the needs of GM communities.

1.9 However, this response has not been without its challenges, and VCSE leaders have identified a number of risks and issues which are inhibiting their capacity to work effectively as part of the emergency effort. On 29<sup>th</sup> July the *GM State of the VCSE Sector Report*<sup>2</sup> was published, providing a snapshot of the role and health of the VCSE sector in GM. The report shows that Greater Manchester is home to around 17,000 voluntary, community and social enterprise groups and organisations, and nearly 500,000 volunteers giving a total of 1.4 million hours each week. These groups, organisations and volunteers are well-networked with strong, distributed leadership, established communications channels and have evidenced their ability to convene and act together in the interests of Greater Manchester's communities. 71% of the VCSE sector are micro-organisations with an annual income under £10,000, and 57% of organisations work across specific neighbourhoods and communities across Greater Manchester. However, despite an increase in both the number of VCSE organisations and of volunteers since the last report in 2017, the overall turnover of the sector has decreased in real terms. Six key recommendations were made in the State of the Sector report and all were endorsed by the Mayor of Greater Manchester at the report's launch event.

## **2. GM VCSE ACCORD**

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<sup>1</sup> <https://vcseleadershipgm.org.uk/>

<sup>2</sup> [State of the Sector \(10gm.org.uk\)](https://stateofthesector.10gm.org.uk)

2.1 As part of the recovery from the pandemic and to facilitate both the refresh of the Greater Manchester Strategy and the development of the Integrated Care System, it would be advantageous to have a unified way of working between the local authorities, GMCA, the Integrated Care System and the GM VCSE sector, represented by the GM VCSE Leadership Group. This would allow a single conversation with the sector in relation to all aspects of the GMS and its partner strategies. It would also enable a focus on sustaining their valuable work in communities and creating a more resilient VCSE sector.

#### Co-production of the new Accord

2.2 The development of this new Accord is the product of a series of structured conversations held in July and early August with stakeholders including GM VCSE networks, local VCSE infrastructure organisations, local VCSE leaders and a range of GMCA and GM Health and Social Care commissioners, local authority policy leads and other statutory sector stakeholders.

2.3 Development of the draft new Accord agreement has also been informed by reflection on the success of the original VCSE Accord undertaken by the GM VCSE Leadership Group and officers at GMCA, as well as by learning gleaned from the evaluation report of the GM VCSE Engagement Programme<sup>3</sup> for the GM Health and Social Care Partnership, carried out by Cordis Bright in early 2021. Furthermore, the Accord has been developed following consideration of our learning and reflections from the Covid-19 pandemic, the 2021 report of the GM Independent Inequalities Commission, and the Marmot report 'Building Back Fairer in Greater Manchester'.

#### Draft Accord Agreement

2.3 **Annex 1** attached contains the draft GM VCSE Accord agreement for approval of the GMCA at this time.

2.4 **Annex 2** contains a technical annex to the Accord agreement, which describes the context surrounding the GM VCSE Accord, and an explanation of how it will be delivered.

2.5 The Accord is a three-way collaboration agreement between the Greater Manchester Combined Authority and the Greater Manchester Health and Social Care Partnership and the GMVCSE Sector<sup>4</sup> represented by the GM VCSE Leadership Group, based in a relationship of mutual trust, working together, and sharing responsibility. It will act as a framework for collaboration involving VCSE leaders and organisations in the delivery of the GMS and in the thematic strategies and delivery plans that will exist to deliver the GMS vision, including the strategic plan of the new GM Integrated Care System. It will also deliver the ambitions set out in the VCSE Policy Paper described at section 1.7 above.

2.6 The purpose of this Accord is to further develop how we work together to improve outcomes for Greater Manchester's communities and citizens. The agreement is intended to work in a number of ways:

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<sup>3</sup> <https://www.gmcvo.org.uk/publications/gm-health-and-social-care-vcse-engagement-project-evaluation>

<sup>4</sup> When we talk about the VCSE sector in Greater Manchester, we mean voluntary organisations, community groups, the community work of faith groups, and those social enterprises where profits will be reinvested in their social purpose

- Through a **shared understanding** of the contribution that VCSE organisations make towards tackling inequality in society, creating a more inclusive economy and addressing the climate crisis.
- Through the **building of effective partnerships and relationships** between the statutory sector with VCSE organisations across different geographies (for example GM-wide, district-wide, or in neighbourhoods and communities)
- Through a **shared vision, ways of working principles and set of commitments** which underpin these partnerships and relationships
- Through a **5-year iterative programme of enabling and developmental activities driven at a GM-wide footprint**, which aims to maximise the ability of VCSE organisations to deliver beneficial outcomes in communities and localities.

2.7 The success of this Accord and the shared commitments that it contains will rely on their recognition, adoption and action at a locality and neighbourhood level. This is a high-level agreement which builds from existing good practice to embed effective ways of working with the VCSE sector across all places in GM. It aims to achieve consistency without losing the uniqueness and innovation of voluntary organisations, community groups and social enterprises. As stated above, the actions invested in at a GM footprint aim to enable and facilitate what is happening in localities, neighbourhoods and communities. All commitments will be achieved in partnership. The Accord represents a commitment to ensure ‘fair’ representation from all ten boroughs in any decision-making processes affecting the VCSE sector, and acknowledgement that this may need different approaches for different places to accommodate this to happen. The Accord will recognise the different needs and requirements of each place and its populations in order to be successful in its aims.

2.8 The VCSE Leadership Group and the original Accord have been recognised as being nationally significant in terms of the progressive collaboration between VCSE organisations and their partners. However, this new Accord agreement will be groundbreaking in the ability of the statutory and VCSE sectors to move forward together in the post-Covid period. Already, new forms of collaboration are being developed, including the proposed VCSE-led Alternative Provider Federation, which it is hoped will sit as part of the new GM Integrated Care System. GM is leading the way in terms of the strength of its VCSE leadership and partnership working.

#### Implementation, governance and evaluation

2.9 The 5-year iterative programme of enabling and developmental activities driven at a GM-wide footprint will be outlined in an Implementation Plan supported by annual delivery plans which contain actions, responsibilities, timescales, targets and outcomes for delivery. This Implementation Plan will be used as the basis for a partnership funding agreement between the GMCA, Health and Social Care Partnership and the GM VCSE Leadership Group, which will cover the length of this Accord agreement, but be subject to annual review and confirmation of budgets for the GMCA and GM Integrated Care System.

2.10 The VCSE Accord will be signed off through individual ‘governance’ structures but will be owned jointly by the GM Combined Authority, the GM Health and Social Care Partnership (with approvals through the GM Partnership Executive Board and Health and Care Board) and the GM VCSE Leadership Group. Representatives from the three parties will meet every 3 months as a VCSE Accord Management Group to review progress made towards the shared objectives and targets set out in the Implementation Plan, to monitor the budget and spend, and to make any necessary adjustments to delivery.

The VCSE Accord Management Group will be jointly and equally accountable for the delivery and risk associated with the work in this agreement and will also be responsible for evaluation of the effectiveness of the Accord.

### **3. NEXT STEPS**

3.1 As this Accord is a tri-partite agreement, it must also be approved through the Health and Social Care System and by the GM VCSE Leadership Group on behalf of the wider sector. By the date of the GMCA meeting, it is anticipated that both these approvals will be in place.

3.2 It is proposed that the Accord is signed on behalf of the GMCA by the Mayor of Greater Manchester, the GM Portfolio Lead for Communities, Co-operatives, Voluntary Sector and Inclusion and the Chief Executive of the Combined Authority.

### **4. RECOMMENDATIONS**

4.1 Recommendations appear at the front of this report.



## GM VCSE Accord Agreement

This is a three-way collaboration agreement between the Greater Manchester Combined Authority and the Greater Manchester Health and Social Care Partnership and the GM Voluntary, Community and Social Enterprise (VCSE) Sector\* represented by the GM VCSE Leadership Group, based in a relationship of mutual trust, working together, and sharing responsibility. The purpose of this Accord is to further develop how we work together to improve outcomes for Greater Manchester's communities and citizens.

*\*When we talk about the VCSE sector in Greater Manchester, we mean voluntary organisations, community groups, the community work of faith groups, and those social enterprises where profits will be reinvested in their social purpose.*

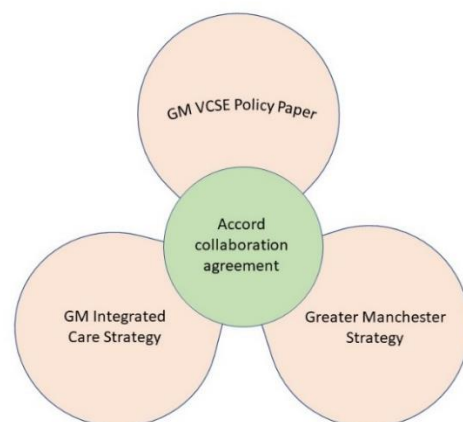
### 1.1 Introduction

VCSE organisations play a hugely valuable role in the economy and society of Greater Manchester. In 2021, their offer is more vital and relevant than ever, as shown through the ability to mobilise at scale during the recent pandemic. The reports of the Independent Inequalities Commission 'Good Lives for All' and the Marmot Build Back Fairer review make frequent reference to the VCSE sector's knowledge and its tested practical solutions to tackling entrenched inequalities, addressing environmental problems, and improving wellbeing. Local authorities, NHS and health systems have welcomed the role of the VCSE sector as a strategic partner in the emergency response and recovery efforts, and this Accord seeks to make the successful integration of VCSE groups, organisations and leaders the way we do business in Greater Manchester.

The attached *Annex* document contains further details of the context, governance and implementation of this Accord agreement.

### 1.2 Purpose and scope

The Accord will act as a framework for collaboration involving VCSE leaders and organisations in the delivery of the Greater Manchester Strategy (GMS) and in the thematic strategies and delivery plans that will exist to deliver the GMS vision, including the development of the strategic plan of the new GM Integrated Care System. VCSE representatives will be involved in the development, governance and delivery of these strategies, including co-design of relevant activities, and thereby take a key role in work to build a resilient local economy, tackle inequalities and inequities, and improve the health and wellbeing of the people who live, work and study in Greater Manchester. The Accord will also deliver the ambitions set out in the [VCSE Policy Paper](#), which was published by the GM VCSE Leadership Group in 2020 and sets out a developmental ambition for the VCSE Sector, as shown in Figure 1 (right).



This agreement is intended to work in a number of ways:

- Through a shared understanding of the contribution that VCSE organisations make towards tackling inequality in society, creating a more inclusive economy and addressing the climate crisis.
- Through the building of effective partnerships and relationships between the statutory sector with VCSE organisations across different geographies (for example GM-wide, district-wide, or in neighbourhoods and communities)
- Through a shared vision, ways of working principles and set of commitments which underpin these partnerships and relationships
- Through a 5-year iterative programme of enabling and developmental activities driven at a GM-wide footprint, which aims to maximise the ability of VCSE organisations to deliver beneficial outcomes.

### 1.3 Contribution of VCSE organisations

The 2021 [State of the VCSE Sector](#) report shows that Greater Manchester is home to around 17,000 voluntary, community and social enterprise groups and organisations, and nearly 500,000 volunteers giving a total of 1.4 million hours each week. These groups, organisations and volunteers are well-networked with strong, distributed leadership, established communications channels and have evidenced their ability to convene and act together in the interests of Greater Manchester's communities. 71% of the VCSE sector are micro-organisations with an annual income under £10,000, and 57% of organisations work across specific neighbourhoods and communities across Greater Manchester.

VCSE organisations work across every aspect of tackling inequality and inequity in Greater Manchester including skills, employment and enterprise; health and social care; housing and transport; environmental issues and carbon reduction; poverty reduction; inclusive economic growth and inclusive governance. They also work at a variety of footprints – from community and neighbourhood to GM-wide and national, as well as having their origins in business (such as charitable foundations) and the statutory sector (such as NHS charities) as well as in communities.

### 1.4 Tri-partite Agreement - Shared Vision and principles

*From this point on, where the words 'we' or 'our' or 'us' are used, this includes the three parties to this agreement acting with a single voice.*

**Our shared vision is for a thriving VCSE sector in Greater Manchester that works collaboratively and productively with the GM Integrated Care System<sup>1</sup>, the GM Combined Authority, its constituent local authority members and statutory partners<sup>2</sup>.**

This vision is based in our shared values, will be supported by a sustainable infrastructure and have strong leadership. We will operate on the basis of mutual trust, respect and transparency.

We will acknowledge the value to communities of place, identity and experience and understand the role of local people in leading, shaping and connecting VCSE organisations to create the 'ecosystem' described in the VCSE Policy Paper. We will work using the subsidiarity principle, meaning that decisions and issues are taken and addressed as close to communities as possible, coming together at a Greater Manchester level where there is a demonstrable benefit of doing so.

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<sup>1</sup> The final governance of the Integrated Care System is to be finalised, but will include Integrated Care Board, Integrated Care Partnership, GM NHS Trusts, other non-NHS Providers and delivery partners

<sup>2</sup> Including Transport for Greater Manchester

#### 1.4 Building from a strong track record of innovation and partnership

The Agreement does not start from scratch and is built on the strong foundations created over the last 5 years, since the previous GM VCSE Accord and Memorandum of Understanding with the Health and Social Care Partnership were put in place.

It is clear from recent evaluation exercises that VCSE sector representatives are “at the table” in the places where important decisions are made across the NHS, Health and Social Care and GMCA partnerships. Increased VCSE involvement means that people and communities are more likely to be discussed, and prevention and community engagement more likely to be considered across service planning and commissioning.

Substantial progress has been made on the strategic front, with the publication of a Policy Position Paper by the GM VCSE Leadership Group and specific responsibilities identified for the sector in the 2020 GM ‘Living with Covid’ Plan.

Furthermore, work led by VCSE-led groups such as the GM Social Enterprise Advisory Group, GM Equality Network (GMEq=al) and the GM Social Value Network, for example, have driven forward key policy improvements.

Products of the collaboration over the last 5 years include the GM VCSE Commissioning Framework, a powerful tool for public sector organisations to work effectively with VCSE organisations. There has been strong VCSE involvement and leadership in a number of joint programmes which explore the role of co-production in service reform and commissioning, and further information is contained in the *Annex*.

However, whilst the presence of VCSE organisations on decision making bodies represents progress, there is some way to go yet before the level of collaboration and co-production that we envisage is achieved. Furthermore, it is clear that the level of VCSE engagement and involvement differs between localities. The journey towards becoming equal partners needs a further shift in power, in resources and a greater amount of truly collaborative activity. This new Accord sets out 8 commitments, which aim to continue the transition towards greater parity in the relationship between the VCSE and statutory sectors. We recognise that the shift in the balance of power and how we will work together will also require each of us to take different responsibilities – for example in our investment, delivery, or engagement – but we will share the delivery and the accountability for our actions.

In order to maximise the VCSE contribution, the GM statutory sector will recognise, incorporate, and invest. VCSE leaders and organisations will focus on developing their workforce capacity and capability, on diversifying the income base and creating new partnerships and collaborations within their ‘ecosystem’. The Accord will build from and work with existing structures across each locality, and recognise the different needs and requirements of each place and its populations in order to be successful in its aims.

#### 1.5 Shared commitments for 2021 – 2026

The success of this Accord and the following shared commitments will rely on their recognition, adoption and action at a locality and neighbourhood level. As stated above, the actions invested in at a GM footprint aim to enable and facilitate what is happening in localities, neighbourhoods and communities. All commitments will be achieved in partnership and equitable involvement from all 10 districts of Greater Manchester.

**Commitment 1:** *We will work together to achieve a permanent reduction in inequalities and inequity within Greater Manchester, addressing the social, environmental and economic determinants of health and wellbeing.*

**Our aim is to ensure active VCSE participation and parity in strategic work to enhance equality, equity and wellbeing.**

**Examples of routes through which this commitment will be supported at a GM footprint include:**

- Effective representation of the VCSE sector on relevant groups including: the GM Integrated Care Partnership, the GM Health and Care Board, GM Commissioning Hub, Joint Commissioning Board, Population Health Board, Reform Board, Tackling Inequality Board, Vulnerable and Marginalised Women's Board, Justice and Rehab group, Employment and Skills Advisory Board, Gender Based Violence Board, GM Accessible Transport Group and 5-year Environment Plan Forum, for example.
- Programmes set up to address key inequalities issues, such as food poverty, fuel poverty, homelessness, accessible transport, active travel, digital and environmental exclusion and abuse/hate crime, which bring together the GM VCSE sector with public and private sector partners to drive action through collaboration.
- Involvement of the VCSE sector in the development and delivery of the revised GM Strategy and GM ICS Strategic Plan.
- Further development of the capacity of the GM Equality Alliance as a coalition to connect communities to policy makers, and vice versa, and to assist with strategic equality and diversity work within the city-region

**Commitment 2:** *We will embed the VCSE sector as a key delivery partner of services for communities in Greater Manchester*

**Our aim is to ensure that VCSE organisations are seen as integral to the delivery of services in communities, alongside statutory-run services and commissioned contracts.**

**Examples of routes through which this commitment will be supported at a GM footprint include:**

- Embedding of learning and recommendations from the review of GM emergency structures and ensuring the VCSE sector plays a key role in local and GM wide recovery programmes, including VCSE involvement in responses that relate to specific communities or places
- Development of the Alternative Provider Federation as a place-based partnership of social enterprise and charitable organisations operating at scale across the ICS footprint.
- Building from the VCSE leadership around mental health to embed VCSEs in governance of Local Care Organisations (through the Mental Health Leaders Group).
- Increasing understanding of each other; building knowledge and understanding of the diverse VCSE sector across the public sector, promoting understanding of GM structures in VCSE organisations and furthering the potential to drive forward strategies and action plans on a GM footprint.

**Commitment 3:** *We will build a financially resilient VCSE sector that is resourced to address our biggest challenges of ending poverty and inequality in Greater Manchester.*

**Our aim is to work together to maximise new funding sources, ways of contracting and grant-giving arrangements.**

**Examples of routes through which this commitment will be supported at a GM footprint include:**

- Develop and put into place an investment approach based on long-term, core funding to support strategic VCSE capacity and infrastructure in delivering the visions of the GMS and GM Integrated Care System. This should explore principles and guidelines, as well as models for investment brokerage, asset transfer and spatial planning for the VCSE sector
- Fully implement the principles of the GM Commissioning Framework in all parts of the GM system
- We will grow VCSE infrastructure capacity in each of the 10 districts of Greater Manchester and at a Greater Manchester level. This will enable VCSE organisations to act as funding anchors, playing a strategic role of grant-giving to VCSE organisations channelling public money and raising investment for communities
- Put in place 'core funding' pilot projects to understand how this will enable improved outcomes, more effective VCSE services and enhanced sustainability for the sector

**Commitment 4:** *We will grow the role of the VCSE sector as an integral part of a resilient and inclusive economy where social enterprises, co-operatives, community businesses, charities and microsocial business thrive.*

**Our aim is to increase the market share of social economy organisations in Greater Manchester.**

**Examples of routes through which this commitment will be supported at a GM footprint include:**

- Create a Community Wealth Hub to support and grow co-operatives, mutuals, social and community enterprises, staffed by people from the co-operative and community sector who understand the market.
- Put in place support for the further development of the Alternative Provider Federation as an alliance of non-extractive organisations (of all sectors) to address new market opportunities beyond health and care and into other neighbourhood services.
- Set up a Community Investment Platform to tap into local savings, unlock community investment and build-up assets to share wealth with everyone in Greater Manchester.

**Commitment 5:** *We will build on our existing strengths to build the best VCSE ecosystem in England*

**Our aim is to enable VCSE organisations to become 'anchors' for their place or their community, creating resources, support and connections for them to thrive.**

**Examples of routes through which this commitment will be supported at a GM footprint include:**

- Formally adopting the principles of the GM VCSE Policy Paper and embed its recommendations within the refreshed GM Strategy and GM ICS Strategic Plan
- Agreement of and investment in the development of a clear arrangement of Greater Manchester, locality and neighbourhood 'infrastructure' of community anchor organisations, including 'fair' representation from all ten boroughs in any decision-making processes.
- Agreement of minimum standards of involvement for leaders from VCSE organisations in partnerships and delivery governance across each of the 10 local authority areas

- Further develop the role of the VCSE Leadership Group at the heart of a collaborative representative 'social architecture' for the VCSE sector at a GM level, recognising the complexity and diverse nature of the sector

**Commitment 6:** *We will put into place meaningful mechanisms to make co-design of local services the norm, including expanding channels for service design to be informed by 'lived experience'.*

**Our aim is to create arrangements to enable local people, groups and organisations to be involved in the design of the services which are provided for them.**

**Examples of routes through which this commitment will be supported at a GM footprint include:**

- We will work together to further implement the principles of GM Model Reform White Paper, including neighbourhood pilots in 10 pathfinder deprived communities.
- Support VCSE infrastructure organisations in localities to engage with LCOs, PCNs and local NHS/health governance within the ICS structure
- Helping to create the Greater Manchester 'Live Well – Beyond Social Prescribing Plan' in partnership with existing social prescribing providers and communities.
- Continue and build on leadership from and lived experience facilitated by the VCSE sector around specific programmes of work (including mental health, homelessness, food poverty, carers and digital inclusion for example) to act as catalysts and connectors for communities in GM

**Commitment 7:** *We will fulfil the potential for building productive relationships between the VCSE, public and private sectors to address inequity and build back fairer*

**Our aim is to work closely with local businesses as well as the public sector to increase their focus on social value and addressing inequalities**

**Examples of routes through which this commitment will be supported at a GM footprint include:**

- Work together with all Greater Manchester Local Authorities and public sector organisations to put in place Employer Supported Volunteering, secondments, work shadowing and other arrangements in conjunction with their local VCSE infrastructure, to enable the sharing of expertise and knowledge between sectors
- Developing collective responsibilities for achieving outcomes against equality objectives, which include an increased role for neighbourhood level political leadership alongside local communities, VCSE organisations, local businesses and public bodies
- Facilitate increased collaboration between population health and inclusive economy colleagues to highlight the intersectionality of population health and economy, and how the VCSE can contribute, lead and innovate
- Fully utilise the GM ICS structures to facilitate collaboration between partners in a place across health, care services, public health, and voluntary sector to overcome competing objectives and improve outcomes

**Commitment 8:** *We will put in place a comprehensive workforce programme to support organisational and workforce development for VCSE employers based on and facilitating a more integrated public facing workforce*

**Our aim is to improve capacity, capability and employment standards across the paid and voluntary VCSE workforce in Greater Manchester**

**Examples of routes through which this commitment will be supported at a GM footprint include:**

- Develop and deliver GM VCSE Race Equality Action Plan
- Develop the skills of VCSE Leaders. increase opportunities for peer support and learning for system leaders in the VCSE sector and create more opportunities for multi-agency connection and increasing awareness of good practice in VCSE leadership
- Achieve our ambition for 100% of VCSE organisations in Greater Manchester to pay the real Living Wage
- Increase VCSE organisations' involvement as Supporters, Members and Advocates for the sector in the GM Good Employment Charter
- Enhanced leadership support for those at the forefront of networks of VCSE organisations who represent particular communities of identity and marginalised groups
- Link the VCSE workforce programme with GM workforce development programme, ensuring that the VCSE workforce is able to benefit from access to Higher Educational Establishments funding and placements.

The content of this Agreement has been developed following a series of structured conversations with key stakeholders in the Accord through the spring and summer of 2021, including VCSE organisations from across the whole of Greater Manchester, as well as representatives from the Greater Manchester Combined Authority, the GM Health and Social Care System, NHS and local authorities.

The final version of the Accord has been shared for sign off by the GM VCSE Leadership Group, the Combined Authority and Health and Social Care Partnership governance structures. It will be supported by a five-year implementation plan for work driven at a GM footprint and funding agreement for implementation of that plan, as well as a review of the operation and membership on the GM VCSE Leadership Group.

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## TRAFFORD COUNCIL

Report to: Executive  
Date: 22<sup>nd</sup> November 2021  
Report for: Decision  
Report of: Executive Member for Health, Wellbeing and Equalities

### Report Title

**The Carer Confident Quality Standard**

### Summary

**A self-assessment is required to be undertaken in order to achieve the Carer Confident Quality standard, via membership of the GM Employers for Carers Consortium, facilitated by Carers UK.**

**The standard demonstrates a commitment as an employer to improve working conditions for employees who have unpaid/informal caring responsibilities.**

**This report provides Members with further details regarding the quality accreditation and it sets out proposals which would enable Trafford Council to progress the quality accreditation attainment.**

**The report does not constitute a Key Decision at this point, but actions which result from implementing the Carers Confident Quality Standard may constitute a key decision at a later date**

### Recommendation(s)

**It is recommended that the Executive:**

- **Approve the proposals which would enable Trafford Council to progress the quality accreditation attainment; and**
- **Approve the proposals to embed quality principles within commissioning practices across the Council, once the quality accreditation is attained.**

Contact person for access to background papers and further information:

Name: Lindsey Mallory  
Extension: 07970 301 479

Background Papers: *None*



Implications:

Relationship to Policy Framework/Corporate Priorities	<ul style="list-style-type: none"> <li>• Health and Wellbeing – supporting the health and wellbeing of our employees</li> <li>• Successful and Thriving Places – ensuring carers can successfully find and maintain work alongside their caring responsibilities</li> <li>• Green and Connected – supporting employees with caring responsibilities to maintain and develop social connections in order to maintain their wellbeing</li> </ul>
Relationship to GM Policy or Strategy Framework	<ul style="list-style-type: none"> <li>• This proposal relates to the NWADASS Carers Network Priority around preventing carer breakdown</li> <li>• It also relates to the GMCA Carers Network priority to support carers to gain and maintain employment</li> </ul>
Financial	We have already committed £5,000 from the adult budget to fund membership of EfC. A further £500 is required to pay for the assessment/accreditation process. The budget for the additional £500 has not yet been agreed
Legal Implications:	No legal implications-the process simply assesses our current policies, procedures and systems and does not require any changes to them
Equality/Diversity Implications	The proposal relates to unpaid and informal carers. Whilst this group of people are not formally recognised as a protected group, there is informal recognition that they are disproportionately disadvantaged by their caring responsibilities Furthermore data shows that unpaid/informal carers are more likely to be women and older people
Sustainability Implications	The Carer Confident Quality Mark is live for 5 years after completion of the self-assessment
Carbon Reduction	Not applicable
Resource Implications e.g. Staffing / ICT / Assets	This project will require project management resource from the Modernisation Team and will also require resource from our Human Resources department, including the skills and development team
Risk Management Implications	<p><b>Human Resource Risk:</b> the assessment process will impact across the Council, but will also require project management resource, most likely from HR professionals and possibly from the Modernisation team. This risk cannot be mitigated</p> <p><b>Human resource risk:</b> The proposal may require further human resource and possibly training and development resource if the recommendations</p>

	<p>from the assessment indicate that changes are required to the Council's policies, procedures and training for staff and managers. This risk is potentially mitigated by the fact that we have the option not to pursue the accreditation following the assessment</p> <p><b>Financial risk:</b> there is a risk that the changes outlined above may result in additional cost to Trafford Council, for instance if there are recommendations to change our workforce conditions. This risk is mitigated by the fact that we have the option not to pursue the accreditation following the assessment. This risk is further mitigated by evidence from Carers UK which demonstrates that achieving the Carer Confident Quality Standard often leads to a reduction in sickness absence and improvements in staff retention</p>
Health & Wellbeing Implications	The proposal will support improved health and wellbeing outcomes for Trafford Council employees
Health and Safety Implications	None

## 1.0 Background

- 1.1 The Carer Confident Quality Mark is hosted by Carers UK. The Carer Confident benchmarking scheme ("The Scheme") supports employers to build a positive and inclusive workplace for staff who are, or will become, carers and to make the most of the talents that carers can bring to the workplace.
- 1.2 The Scheme is intended to provide a practical framework to assist employers to:
- Develop and implement a package of support for carers, whatever size or sector; and
  - Identify and measure the impact of workplace policies and practices which can support carer (and wider workforce) retention, engagement and productivity; and
  - Heighten profile and reputation as an 'employer of choice' for the growing numbers of people looking to work more flexibly (whether carers, former carers, older workers, returners or others).
- 1.3 The certificate of achievement will be presented to employers with a UK presence who demonstrate they have built a positive and inclusive workplace where carers are recognised, respected and supported. It demonstrates the organisation's commitment to supporting people with unpaid or informal caring roles outside of their paid employment
- 1.4 The Scheme has three levels:
- Level 1: Active in addressing carer support;
  - Level 2: Accomplished in providing carer support; and
  - Level 3: Ambassador for carer support both internally and externally.

The Scheme has been designed be clear and simple, based on a straight-forward self-assessment process, with employers describing how they meet the criteria expected at each of the three levels and providing relevant evidence.

- 1.5 Each of these 3 levels is measured across the following 5 key criteria:
- Preparation – how are you enabling carers to identify and recognise themselves?
  - Policy and guidance – how are you making your support for carers transparent?
  - Practical support – what practical provisions and arrangements are available for carers?
  - Peer support – how are you connecting and engaging carers?
  - Promoting support – how are you communicating carer support?

1.6 The Carer Confident Quality Mark is achieved by an organisational self-assessment process.

1.7 The fee for each level of Carer Confident Quality Mark is £500 + VAT.

## 2. **Benefits of Carer Confident Quality Mark.**

2.1 There are several advantages to pursuing the quality mark, including those listed below:

- a. The quality mark shows our employees and potential employees that we are a caring organisation so that we can retain and attract the right people to work for us;
- b. The quality mark raises awareness of unpaid carers and promotes understanding across the organisation;
- c. The assessment process will highlight areas for improvement which will further improve conditions for unpaid carers;
- d. The additional resources available to us through Carers for Employers will help us to train managers and staff to recognise caring responsibilities and to support employees so that they can remain in paid employment, thereby maintaining their quality of life and reducing the costs associated with recruitment of new employees;
- e. The quality mark may encourage carers to be more open about the issues they face, so that managers can be flexible about their working arrangements, where this suits the needs of the business, and this could in turn reduce sickness and other absence and improve productivity;
- f. The quality mark allows us to set an example to our partner organisations and encourage them to achieve the quality mark whilst also taking advantage of the umbrella membership afforded by Carers UK. This will further help our partners to achieve their social value ambitions and add value to the contracts they hold with Trafford Council;
- g. The quality mark is aligned with our ambitions to promote equality and diversity across the organisation and across Trafford

## 3. **Position Statement**

3.1 Trafford Council has already signed up to membership of the GM Employers for Carers Consortium which is also hosted by Carers UK. AS part of our membership we have access to a range of online tools as well as face to face consultancy support, to help us to be supportive employers for people with caring responsibilities. The membership can also be extended to organisations working in partnership with Trafford Council, including commissioned service providers

- 3.2 Membership provides access for all staff at Trafford Council to a members' platform, EfC Digital. This platform provides a range of online practical resources, tools and e-Learning to support the carers in our workforce. Membership also includes a free 'lunch and learn' or similar session and virtual Members Networking Events.
- 3.3 Trafford Council currently has in place a range of policies, procedures and other activities which support our unpaid carer workforce. These include: carers leave, flexible working options and an employee led Carers Network.
- 3.4 Having met with Carers UK and conducted a brief review of policies and procedures, Trafford Council is confident that it can evidence achievement of level 1 of the Scheme and the Council could realise further benefits by completing the level 2 self-assessment stage of the Scheme, for the following reasons:
- it remains that unpaid carers often struggle to meet the demands of their caring and work responsibilities and as a result, many find it impossible to work and as a result, will suffer financial hardship and the mental health issues associated with social isolation and money or housing worries.
  - Furthermore Trafford Council may lose several work days each year due to absence as a result of emergency leave requirements resulting from caring responsibilities or sickness absence as a result of poor health resulting from the pressure to meet work/caring responsibilities. Some of this will be hidden because employees will fear that their employment may be affected if they are honest about their situation.

#### 4. Carer Confident Quality Mark Proposals

- 4.1 It is proposed that Trafford Council completes the self-assessment process for Level 2 of the Scheme and to submit an application, together with the self-assessment fee of £500 plus VAT, to attain a certificate of achievement for Level 2 of the Carer Confident Quality Mark. The rationale for this being that we are confident that our existing policies, procedures and workforce terms and conditions would already comply with the Level 1 standard and we wish to build on this. Further consideration would be required at a later date, with regard to our commitment to complete the Level 3 self-assessment
- 4.2 Once the Level 2 Carer Confident Quality Mark is attained, it is proposed that the following steps to embed quality principles within commissioning practices across the Council, will be taken:
- Encourage and support organisations currently commissioned to deliver services on behalf of Trafford Council, to achieve the Carer Confident Quality Standard; and
  - Require organisations to complete the Carer Confident Quality Standard as a condition of being awarded future contracts to provide services on behalf of the Council. This will require further consideration in partnership with STAR procurement colleagues

#### Other Options

1. **Do not complete the self-assessment process in order to achieve the Carer Confident Quality Mark:** The outcomes include a self-assessment fee cost saving of £500 plus VAT and lack of knowledge about how we support our unpaid carers.

- This would also mean that we cannot hold commissioned providers to account in terms of how they support unpaid carers and would require no HR or PMO resource
2. **Delay completing the assessment process:** this would result in a delay in the cost of the £500 plus vat self-assessment fee, a lack of knowledge about how we support unpaid carers who are our employees, a delay in holding commissioned providers to account in this respect and a delay in the requirement for HR and PMO resource
  3. **Source an alternative quality mark:** this would lead to delay in achieving the quality mark because we would need to research the availability of an alternative. It would also mean that we are not making full use of the membership fee we have already paid as part of the GM Employers for carers consortium which is a waste of Council resource already committed

**Consultation**

There are no public consultation requirements in respect of this report. Consultation with the Carers Partnership Board with regard to this proposal has been undertaken.

**Reasons for Recommendation**

1. We have already committed to membership of the GM Employers for Carers Consortium and this will help us to maximise the membership benefits
2. We believe that we are able to demonstrate that we can achieve level 2 of the Carer Confident Quality Mark and this will add to the benefits of working for trafford Council
3. It will raise awareness of the issues for employees with caring responsibilities so that we can be supportive and retain our employees
4. This will allow us to hold our commissioned providers to account by improving conditions for their employees
5. This in turn will support more Trafford residents with caring responsibilities to maintain or gain employment and improve their financial and emotional wellbeing
6. The quality mark is a tangible way of demonstrating our commitment to equality and diversity
7. By attracting unpaid carers into the workforce we are also improving the economic wellbeing of Trafford residents

**Finance Officer Clearance** (type in initials).....HZ.....

**Legal Officer Clearance** (type in initials).....DS.....



**[CORPORATE] DIRECTOR'S SIGNATURE** (electronic)...

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

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## TRAFFORD COUNCIL

**Report to:** Executive

**Date:** 22<sup>nd</sup> November 2021

**Report for:** Information

**Report of:** The Executive Member for Finance and Governance and the  
Director of Finance and Systems

**Report Title:**

Budget Monitoring 2021/22 – Period 6 (April to September 2021).

**Summary:**

The purpose of this report is to inform Members of the current 2021/22 forecast outturn figures relating to both Revenue and Capital budgets. It also summarises the latest forecast position for Council Tax and Business Rates within the Collection Fund.

**Recommendation(s)**

**It is recommended that the Executive:**

- a) note the updated positions on the revenue budget, collection fund and capital programme.

**Contact person for access to background papers and further information:**

David Muggerridge, Head of Financial Management    Extension: 4534

Background Papers: None

Relationship to Policy Framework/Corporate Priorities	Value for Money
Relationship to GM Policy or Strategy Framework	Not Applicable
Financial	Revenue and capital expenditure will be contained within available resources in 2021/22.  In respect of the resourcing of the capital programme a number of capital receipts from the disposal of surplus land have been reprofiled to later years. This has given rise to some additional temporary borrowing the cost of which has been

	contained within the treasury management budget.
Legal Implications:	None arising out of this report
Equality/Diversity Implications	None arising out of this report
Sustainability Implications	None arising out of this report
Resource Implications e.g. Staffing / ICT / Assets	Not applicable
Risk Management Implications	Not applicable
Carbon Reduction	Not applicable
Health & Wellbeing Implications	Not applicable
Health and Safety Implications	Not applicable

## EXECUTIVE SUMMARY

1. The approved budget for 2021/22 agreed at the 17 February 2021 Council meeting was £179.304m. This was subsequently increased by £168k to £179.472m as a result of a minor late change in the financial settlement relating to resources to support the Public Health budget and agreed at the Council meeting on 28<sup>th</sup> July 2021.
2. In determining the budget for 2021/22 an overall gap of £25.44m was addressed by a combination of additional resources of £5.20m from Council Tax, use of reserves, £8.34m to address COVID-19 pressures and £2.80m for business as usual pressures, and a net £9.10m of service savings and additional income.
3. **Summary of outturn**

**There is a net estimated outturn pressure of £2.42m at Period 6, an adverse movement of £238k since Period 4.**

This mid year monitor for the financial year provides a forecast outturn based on patterns of expenditure and income from the first six months of the year. Outturn patterns have started to emerge, however there still remains some broad assumptions on future demand and the ongoing impacts of the pandemic. The impact of the end of the Government's Job Retention Scheme, the recent increase in headline inflation rates and the unprecedented increase in energy and fuel price increases, add yet further uncertainty into the financial landscape both for the current and future years.

At this stage in the current financial year, the fact the estimated outturn has deteriorated, demonstrates an unfavourable direction of travel and given the size mitigating actions may need to be prioritised, such as an expenditure freeze, to mitigate against any further adverse movement.

The following issues are worthy of being highlighted:-

- Children's placements £1.075m (£833k period 4) overspend due to an increase in cases;
- Adults placements £767k overspend, an adverse movement of £463k since period 4; £579k of the pressure is due to savings now not expected to be achieved, alongside an underlying pressure of £597k due to an increase in costs of care packages and new cases. The balance consists of a net underspend on the Hospital Discharge Programme of £409k.
- Assumptions on demand remain uncertain, and contingency balances of £607k (£1.14m period 4) and £673k (£1.2m at period 4) are included for future demand in Children's and Adults Services. Sizeable balances have been released since period 4 to address the increases in demand.
- Staffing budgets net underspend of £1.470m, consisting of underspend of £1.89m in Children's and Public Health, largely due to delays in recruiting and service redesign, offset by pressures in Adults of £0.420m as a result of COVID-19 and exceptional circumstances within the Supported Living service.

- Strategic Investment Programme – These investments are budgeted to generate a net revenue benefit in 2021/22 of £7.61m although revised forecasts show a potential reduction in receipts generated of £1.339m (£995k at Period 4). This is largely COVID-19 related due to delays in developer loans being drawn down, lower income from debt facilities due to lower interest rates, delays in schemes in the pipeline and lower trading income due to COVID-19 at retail investment sites;
- COVID-19 related pressures in Place and central services directorates of £751k (£1.335m period 4), largely related to income pressures in traded services and lower sales, fees and charges as a result of the economic impact of the pandemic lasting longer than the first quarter assumed when setting the budget. Examples of pressures include parking fees and fines £486k, property rentals £300k, outdoor media advertising £302k, planning fees £420k. Significant improvements of £470k have been seen in estimated income from planning fees since period 4.
- Local Government Pay award – The final pay award offer, currently rejected by the trade unions, for local government at 1.75% for all staff being in excess of budget by £980k. This would require the use of the council wide contingency, leaving a balance of £100k for other unknown pressures during the year.
- Other favourable movements of £41k

#### 4. **2021/22 Savings Programme**

The latest forecast shows that the savings programme is currently expected to deliver savings of £9.06m, which is £2.86m below target. This shortfall has been included in the overall estimated outturn. To date £7.52m has been achieved with £1.54m still to be achieved. Whilst there still remains a risk in the delivery of the programme, the majority of savings are classified as Amber indicating an element of management action is still required to deliver the savings before the end of the year.

Of the savings that won't be delivered in the current year, exception reports for each of those will be included in the period 8 budget monitor report. This position has been considered when developing the 2022/23 budget plan with a figure of £959k relating to schemes which are unlikely to be delivered, including pressures in Adults Social Care of £606k and £323k in Place Directorate.

#### 5. **Council Tax**

The Council Tax budget was reduced temporarily in 2021/2022 to reflect the ongoing impact of the pandemic. The outturn is largely in line with budget, however there is a level of uncertainty in the forecast, particularly surrounding the continued demand for Council Tax Support both in the current and next financial year.

Consideration will be given in future monitors if there is a need to bolster a Council Tax reserve to smooth any volatility in demand for Council Tax Support in next financial year.

## 6. **Business Rates**

Projecting business rates is by its nature complex and prone to variation, in addition the impact of COVID-19 has added further uncertainty to the accuracy of projections. Government support has been extended for retail, hospitality and leisure businesses along with a discretionary scheme for other businesses. At this stage, assumptions continue to be in line with budget. Discussions will commence with the Greater Manchester Combined Authority regarding the business rate growth pilot sharing agreement, which could result in an increased share of rates growth being retained locally to alleviate the in year pressures.

## 7. **Managing the Risk**

Although the estimated outturn is adverse and has deteriorated by £238k since period 4 and is a potential cause for concern, primarily around the delivery of the remaining savings programme and increases in client demand in Adults and Children, the following actions and mitigating actions have been identified to support the in-year budget position:-

- A number of contingency items are included in the outturn which have yet to be released. Although these have been partially utilised since period 4, they stand at £607k and £673k (period 4 £1.14m and £1.2m) in Children's and Adults services for potential client demand. There is also £502k (£816k period 4) in Council Wide relating to the balance of £1.5m set aside for unknown COVID-19 pressures.
- Discussions have commenced with Greater Manchester Combined Authority to review centrally held reserves and the potential to review the local sharing agreement of the Business Rates Growth Pilot monies. Currently £2.7m is forecast to be paid over to GMCA.
- A review of all earmarked reserves has started to challenge and identify potential uncommitted resource. This ongoing exercise will determine the extent the Council could partially meet the forecast outturn pressures for 2021/22 and in addition offer a temporary solution to the 2022/2023 budget gap. This will be completed in parallel with the preparation of the final budget report for 2022/23.
- As previously reported in order to maintain robust challenge and focus attention on the delivery of the savings programme, the regular budget monitoring reports are supplemented by monthly updates on all demand led budgets and the savings programme are considered by the Corporate Leadership Team.
- The Corporate Leadership Team will also review all non essential spend, including a vacancy freeze for back office functions and close monitoring and control of any other expenditure over the budget provision.
- The Council continues to provide regular monitoring returns to the Government Departments which will be used at a national level to inform the debate on whether additional resources will be required over the medium term relating to COVID-19 pressures.

## 8. Capital Programme

There has been an increase in the general capital programme since period 4 of £1.01m to a total of £166.69m for the period 2021/2024. This change relates to an increase in highways funding following negotiations with the GM Combined Authority which broadly matches the grant reductions announced by Government at the time of setting the budget.

The revised capital programme budget for this financial year is £48.44m which is net reduction of £0.55m from the P4 position of £48.99m as a result of minor rephasing.

The overall programme is currently overprogrammed by £3.82m over the three years, which is an increase of £2.0m from period 4 and relates to a reduction in estimated capital receipts.

The issue of over-programming will be addressed as part of the current capital programme bidding round.

## REVENUE BUDGET

9. Detailed below in Table 1 is a summary breakdown of the service and funding variances against budget, with Table 2 providing an explanation of the variances:

<b>Table 1: Budget Monitoring results by Service</b>	<b>2021/22 Budget (£000's)</b>	<b>Forecast Outturn (£000's)</b>	<b>Forecast Variance (£000's)</b>	<b>Percentage</b>
Children's Services	42,456	42,795	339	0.8%
Adult Services	52,447	53,738	1,291	2.46%
Public Health	12,661	11,786	(875)	(6.91)%
Place	31,155	32,903	1,748	5.61%
Strategy & Resources	5,445	5,282	(163)	(2.99)%
Finance & Systems	7,683	7,910	227	2.95%
Governance & Community Strategy	6,164	6,310	146	2.37%
<b>Total Directorate Budgets</b>	<b>158,011</b>	<b>160,724</b>	<b>2,713</b>	<b>1.72%</b>
Council-wide budgets	21,461	21,169	(292)	(1.36)%
<b>Net Service Expenditure variance</b>	<b>179,472</b>	<b>181,893</b>	<b>2,421</b>	<b>1.35%</b>
<b>Funding</b>				
Business Rates (see para. 22)	(62,459)	(62,459)	0	
Council Tax (see para. 19)	(105,869)	(105,869)	0	
Reserves Budget Support	(2,803)	(2,803)	0	
Reserves to Support COVID-19	(8,341)	(8,341)	0	
<b>Funding variance</b>	<b>(179,472)</b>	<b>(179,472)</b>	<b>0</b>	<b>0.00%</b>
<b>Net Revenue Outturn variance</b>	<b>0</b>	<b>2,421</b>	<b>2,421</b>	<b>1.35%</b>
<b>Dedicated Schools Grant</b>	<b>150,236</b>	<b>152,149</b>	<b>1,913</b>	<b>1.27%</b>

## Budget Adjustments and Virements

A number of virements across Directorates are detailed in Appendix 1.

### Main variances, changes to budget assumptions and key risks

10. The main variances contributing to the projected overspend of £2.421m, any changes to budget assumptions and associated key risks are highlighted below:

Table 2: Main variances	Forecast Variance (£000's)	Explanation/Risks
Children's Services	339	<p><b>Projected outturn variance £339k adverse, an adverse movement of £394k from Period 4.</b></p> <p>The impact of the coronavirus pandemic is and will continue to have a significant bearing on the service both in terms of its service delivery and finances.</p> <p>Below is the projected position on children's placements and other budget areas:</p> <ul style="list-style-type: none"> <li>• £1.075m over budget on Children's placements (note 1), an adverse movement of £242k;</li> <li>• £1.220m under budget on staffing (note 2), an adverse movement of £53k;</li> <li>• £484k over budget on other running costs and income across the service, an adverse movement of £99k (note 3).</li> </ul> <p><b>Note 1</b> Children's placements currently projects an overspend of £1.075m, an adverse movement of £242k.</p> <p>Over the two month period there has been a number of changes within Children's placement from costs for new placements £559k and delays in the step down of other placements £216k. The total cost of these over this two month period was £775k. However the contingency set aside to be utilised during this period of £533k was not sufficient to cover the above, resulting in an adverse movement of £242k.</p> <p>The above position also projects that £369k of planned reductions in placement's costs are still to take place.</p> <p>Therefore there is a contingency of £607k included in the above projections to cover any further demand and potential timeline changes to the anticipated planned reductions mentioned above.</p> <p>The numbers of children as at the end of September compared to those at the end of July are as follows:-</p>

	<ul style="list-style-type: none"> <li>• children in care 382, no change</li> <li>• child protection is 179, no change</li> <li>• children in need 880, an increase of 35</li> </ul> <p>To date £1.304m of the £1.5m savings included in the budget has been achieved. The remaining savings for placements is currently anticipated to be achieved, however continuous scrutiny in this area will be applied and projections on deliverability of savings may be subject to change.</p> <p>At this stage it is important to note that the service continues to operate with a high degree of uncertainty due to the potential consequences the pandemic will have around future demand.</p> <p><b><u>Note 2</u></b>  A favourable variance in staffing of £1.220m which is due to delays in recruiting and are one-off in nature as the service undertakes its service redesign which will be in place during 2021/22. The adverse movement of £53k from P4 is due to additional agency costs.</p> <p>The staffing savings included in the budget of £580k are expected to be achieved this year due to the delays in recruiting as mentioned above. However this will be reviewed throughout the year as to their permanency as the service redesign takes place.</p> <p><b><u>Note 3</u></b>  The adverse variance in running costs and income across the service is £484k, an adverse movement of £99k, as outlined below:-</p> <ul style="list-style-type: none"> <li>• £283k adverse variance on Home to school transport, an adverse movement of £26k. This is due to increased demand in transport for out of borough placements (£188k) and additional staffing costs (£69k) to cover passenger assistants who are shielding;</li> <li>• £74k adverse variance on Partington nursery, an adverse movement of £37k. This is due to a low uptake at the nursery resulting in a shortfall in income.</li> <li>• £207k adverse variance on income, an adverse movement of £79k. This is mainly due to the impact of COVID-19 (£167k), and a loss of service level agreement income with schools (£40k).</li> <li>• £121k favourable variance on grant income, a favourable movement of £36k due to the receipt of a grant for the school improvement service which it was not anticipated would continue.</li> <li>• £41k adverse variance on minor variances across the service, a favourable movement of £7k.</li> </ul>
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		<p><b><u>Note 4</u></b></p> <p>In addition to this there are further estimated costs due to COVID-19 as outlined below which are met by additional income:</p> <ul style="list-style-type: none"> <li>• £499k for the COVID Local Support Grant (CLSG) which will be met by a government grant.</li> <li>• £372k for contain outbreak management which will be met by government grant.</li> </ul>
Adult Services	1,291	<p><b>Projected Outturn variance £1.291m adverse an adverse movement of £542k from period 4.</b></p> <p>The impact of the coronavirus pandemic and supporting the NHS in dealing with the backlog of patients waiting for treatments continues to have a significant bearing on the service both in terms of its service delivery and finances.</p> <p>The projected position on adult clients and other budget areas is as follows:</p> <ul style="list-style-type: none"> <li>• £767k adverse position on Adult clients, an adverse movement of £463k from period 4 (Note 1)</li> <li>• £524k adverse position on staffing and running costs, an adverse movement of £79k from period 4 (Note 2)</li> </ul> <p><b><u>Note 1</u></b></p> <p>Adult Clients currently projects a £767k overspend, an adverse movement of £463k from period 4.</p> <p><b>Savings</b> - £579k pressure a £275k adverse movement.</p> <p>This is due to a further deterioration in savings anticipated to be achieved, the total amount in this area is a shortfall of £579k. To date £1.032m of the £1.866m saving proposals in this area has been achieved. The service is, however, always looking to identify other savings to mitigate the projected shortfall. Continuous scrutiny in this area will be applied and therefore projections on deliverability of savings are subject to change.</p> <p><b>Discharge to Assess</b> - £409k favourable, a favourable movement of £409k.</p> <p>At the time of the Period 4 monitor, estimated costs of the programme of £1.4m had been included in the outturn, however since the announcement of the continuation of the HDP to 31<sup>st</sup> March 2022 they have reduced.</p>

	<p>However, not all of the discharge to assess costs are met by the HDP for the following reasons:-</p> <ul style="list-style-type: none"> <li>• if services provided are required for more than the maximum allowed under the HDP scheme</li> <li>• those beds that are paid for on block but not occupied.</li> </ul> <p>The above costs are shared on a sharing agreement, which was still under negotiation at period 4. This has now been concluded and the Council and CCG have agreed to a 50/50 risk share agreement to the 31<sup>st</sup> March 2022 on those costs that cannot be met by the HDP and that exceed £1m. The first £1m will be met by the council as the budget included this amount for this type of service.</p> <p>The impact of the updated sharing agreement and changes in demand result in a favourable movement of £409k since that reported in period 4.</p> <p><b>Packages of Care</b> – £597k pressure an adverse movement of £597k This is due to the following:</p> <ul style="list-style-type: none"> <li>• Increases in costs to existing packages of care £1.922m (244 clients). This is mainly due to increasing client needs/complexity and changes to clients’ financial assessments.</li> <li>• Reductions in costs to existing packages of care £2.049m (218 clients). This is mainly due to reductions in care required, clients that have deceased and changes in clients’ financial assessments.</li> <li>• New packages of care - the gross increase was £1.284m reducing to £724k after applying £560k for contingencies. This will include previous self funders whose savings have fallen below £23,250.</li> </ul> <p>The service is experiencing significant increased demand for Learning Disability support and mental health with new placements and both average hours of support per client and average hourly rates continuing to rise.</p> <p>It is also important to reiterate that the service continues to operate with a high degree of uncertainty due to the potential risks of coronavirus infections, its impact on the care sector and the consequences the pandemic will have around further future potential demands on Mental Health provision. In addition to this is the increase in demand on services in supporting the NHS in dealing with the backlog of patients waiting for treatments.</p> <p><b>Contingency</b> - within the projection there is a contingency of £673k set aside for additional increases in demand/cost pressures throughout the rest of the financial year.</p>
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		<p>Further work is currently underway to understand if this will be sufficient for the rest of the year and also the potential impact on budgets for 2022/2023 given the increase the service has experienced between period 4 and 6.</p> <p><b>Note 2</b> The current forecasts indicate there is an adverse variance of £524k on staffing and running costs, an adverse movement of £79k from period 4 which is due to the following:</p> <ul style="list-style-type: none"> <li>• £420k adverse variance on staffing, an adverse movement of £28k. This adverse variance is due to additional resource requirements to respond to increased pressures on the service as a result of COVID-19 and due to exceptional circumstances within the Supported Living service;</li> <li>• £231k favourable variance on client equipment, repairs and maintenance, an adverse movement of £19k. This is due to the impact of COVID-19 and the low number of referrals being received;</li> <li>• £348k adverse variance due to projected underachievement of savings, an adverse movement of £24k. This is as a result of delays to changes in legislation and staffing pressures on the service;</li> <li>• £13k favourable variance on minor variances, an adverse movement of £8k.</li> </ul> <p><b>Note 3</b> In addition to this there are further estimated costs due to COVID-19 as outlined below which are met by additional income:</p> <ul style="list-style-type: none"> <li>• £4.177m which will be met by the CCG from their allocation given by NHSE for HDP;</li> <li>• £2.334m for infection control and Rapid Testing for care providers which will be met by government grant, this is subject to change due to the announcement that funding is to continue however details are yet to be released from government;</li> <li>• £451k for the clinically extremely vulnerable which will be met by government grant;</li> <li>• £705k for contain outbreak management which will be met by government grant;</li> <li>• £494k for self-isolation support which will be met by government grant.</li> </ul>
Public Health	(875)	<p><b>Projected Outturn variance £875k favourable, a favourable movement of £94k from period 4.</b></p> <p>Currently there is a projected favourable position of £875k as a result of:</p>

		<ul style="list-style-type: none"> <li>• £670k favourable position on ‘business as usual’ staffing costs, a favourable movement of £5k, as the service continues to lead and support the contain outbreak management response to the pandemic;</li> <li>• £82k favourable position on activity based budgets, a favourable movement of £10k.</li> <li>• £123k favourable position on running costs and other minor variations, a favourable movement of £79k.</li> </ul> <p>Currently activity based budgets are projected to be £82k below budget. However there is a further possibility that underspends on these budgets may increase further as a result of low levels of activity, due to the impact of COVID-19 throughout the financial year.</p> <p>In addition to this there are further estimated costs of £2.647m due to COVID-19 for contain outbreak management and this will be met by a government grant.</p>
Place	1,748	<p><b>Projected outturn variance £1.748m adverse, a favourable movement of £238k.</b></p> <p><b>This includes gross COVID-19 pressures of £3.714m, which is a favourable movement of £593k, offset by £3.370m included in the approved budget/reserves – a net COVID-19 pressure of £344k which includes:</b></p> <ul style="list-style-type: none"> <li>• COVID-19 related gross income losses are £3.475m (reduced by £594k), of which £1.470m is included in the approved budget and £1.7m earmarked in reserves relating to Leisure. This gives a net COVID-19 income pressure in the forecast outturn of £305k;</li> <li>• The gross COVID-19 related income losses include parking fees and fines £486k, property rentals £300k, outdoor media advertising £302k (reduced by £98k), planning fees £420k (reduced by £470k), licencing fees £80k, building control fees £61k, highways permits and grants £24k, street trading £20k (reduced by £30k), pest control £34k (increase of £4k) and trade waste £48k. There is also £1.7m in forecast support for ongoing trading deficits of the Trafford Leisure CIC due to the ongoing effects of the various COVID-19 restrictions, which will be funded from existing earmarked reserves. Trafford Leisure continue to work closely with the Council to monitor finances and mitigate these budget pressures as far as possible within the various operational restrictions, including successful bids for grant funding;</li> <li>• COVID-19 related gross expenditure pressures are £239k (increase of £1k), of which £200k is included in the approved budget, giving a net pressure of £39k in the forecast outturn. The overall gross pressure includes £150k in additional waste</li> </ul>

		<p>disposal costs and £50k related to waste collection, £7k highways/grounds maintenance, £32k operational buildings (increase of £1k);</p> <ul style="list-style-type: none"> <li>• There are also additional costs fully offset by additional specific COVID-19 grants of £305k Community Engagement and £328k for Public Protection/Economic Growth “pandemic contain” funding.</li> </ul> <p><b>Other Forecast Variances £65k adverse, an adverse movement of £11k.</b></p> <p><b>Strategic Investment Programme £1.339m adverse, an adverse movement of £344k:</b></p> <p>The Strategic Investment Property Portfolio will deliver a net benefit to the revenue budget in 2021/22 of £6.24m. This is £1.339m lower than budgeted and is due to economic factors affecting some of the income, particularly from the town centre investments (see paragraph 37 for further details).</p>
Strategy & Resources	(163)	<p><b>Projected outturn variance £163k favourable, a favourable movement of £213k.</b></p> <p><b>This includes gross COVID-19 pressures of £526k, an adverse movement of £8k, offset by £481k included in the approved budget – a net COVID-19 pressure of £45k:</b></p> <ul style="list-style-type: none"> <li>• Gross trading losses in the overall forecast outturn includes £268k in Catering (reduced by £6k), £119k in Cleaning (increase of £11k) and £49k in the Music Service (increase of £9k). There is a forecast net loss of income from staff parking of £60k and £15k expected loss of SLA income. There are also £15k of staff costs (reduced by £5k);</li> <li>• There is also £1.422m of forecast additional staff costs relating to the Modernisation, Communications and Human Resources teams which are wholly funded from COVID-19 related grants up to the end of March 2022.</li> </ul> <p><b>Other Forecast Variances £208k favourable, a favourable movement of £221k, including:</b></p> <ul style="list-style-type: none"> <li>• Staff costs are £252k less than budget across the Directorate (favourable movement of £202k) based on actual and forecast vacancies across the whole year, which is 3.8% of the total staffing budget;</li> <li>• SLA and other income above budget £108k (increase of £47k);</li> <li>• Other minor variances are net £26k overspent (adverse movement of £28k related to Breavement services offset by income above). These are offset by the budgeted Directorate-wide efficiency saving target of £126k, which is expected to be achieved in full.</li> </ul>

<p>Finance &amp; Systems</p>	<p>227</p>	<p>These are offset by the budgeted Directorate-wide efficiency saving target of £126k, which is expected to be achieved in full.</p> <p><b>Projected outturn variance £227k adverse, an adverse movement of £3k.</b></p> <p><b>Forecast COVID-19 Pressures £211k, adverse movement of £39k:</b></p> <p>This relates to additional unplanned costs associated with ICT staff, equipment and systems directly related to the COVID-19 pandemic.</p> <p>There are also additional costs fully offset by additional specific COVID-19 grants totalling £656k in Exchequer Services and £66k in ICT.</p> <p><b>Other Forecast Variances £16k adverse, a favourable movement of £36k:</b></p> <ul style="list-style-type: none"> <li>• Staff costs are £176k less than budget across the Directorate based on actual and forecast vacancies for the whole year, which is 2.2% of the total staffing budget, and an increase of £40k ;</li> <li>• Non COVID-19 related running costs are underspent by £21k, a favourable movement of £12k;</li> <li>• Income is £25k under budget, excluding the COVID-19 grant income above, a favourable movement of £8k.</li> </ul> <p>These are offset by the budgeted Directorate-wide efficiency saving target of £188k.</p>
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Governance & Community Strategy	146	<p><b>Projected outturn variance £146k adverse, a favourable movement of £46k.</b></p> <p><b>This includes gross forecast COVID-19 pressures of £391k offset by £240k included in the approved budget, a favourable movement of £38k – a net COVID-19 pressure of £151k:</b></p> <ul style="list-style-type: none"> <li>• Projected gross income losses due to COVID-19 are £307k (reduced by £22k) and includes £223k relating to Sale Waterside Arts Centre, £13k for events including Flixton House (reduced by £11k), land charges £31k and Registrar’s now £10k above budget (reduced by £10k). There is also a £50k loss of income expected from library lettings (reduced by £1k);</li> <li>• cost pressures total £84k (reduced by £16k) and relate to legal costs for fees and additional agency staff required due to the increase in caseload £100k, which is in line with budget, and an underspend in Library running costs due to grants of £16k.</li> </ul> <p><b>Other Forecast Variances £5k favourable, a favourable movement of £8k:</b></p> <ul style="list-style-type: none"> <li>• Forecast staff costs are £308k less than budget across the Directorate based on actual and forecast vacancies across the whole year, which is 5.5% of the total staffing budget. This is an increase of £55k;</li> <li>• Running costs are forecast to be underspent by £45k, which has reduced by £20k. The underspend includes a reduction in court fees in legal services.</li> <li>• There is a projected shortfall in income of £156k compared to budget excluding the COVID-19 pressures above, which is £27k higher than last reported. The overall shortfall includes £34k in capital fee income which is related to staff vacancies, £75k shortfall in traded services (£27k increase) and £45k reduced grant income in electoral registration service.</li> </ul> <p>The above is offset by the budgeted Directorate-wide efficiency saving target of £192k.</p>
Council-wide budgets	(292)	<p><b>Projected Outturn variance, £292k favourable, a favourable movement of £149k since Period 4</b></p> <p><b>Treasury Management</b></p> <p>Income totaling £392k was forecasted to be received during 2021/22 from monies invested in Manchester Airport Group in 2020 by the Council along with the other 9 Greater Manchester LAs for the provision of a new car parking facility. As a result of the current COVID-19 pandemic, returns will not be forthcoming and it is envisaged that once the current restrictions on air travel are relaxed then an income stream from this project will start to be received. To reduce the impact this will have on the treasury management</p>

projected outturn for 2021/22, a contribution from the Council's COVID-19 contingency budget will be applied. No change since period 4.

#### **Greater Manchester Advance Pension Payment**

A greater than expected saving of £150k above budget from the three yearly advance pension payment is forecast. A favourable movement of £50k since period 4.

#### **Housing Benefit**

The Housing Benefit budget is notoriously difficult to predict. At period 6 a pressure on the net Housing Benefit budget (payments made, less subsidy and overpayment recovery) of £279k is estimated, although there is a wide margin for error given the unknowns. It was considered prudent at the end of the last financial year to bolster the Housing Benefit Reserve by a figure of £500k and this will be drawn on to cover this in-year pressure, so no impact on the Council-wide outturn figure above. As the year progresses the accuracy of forecasts will improve.

#### **Members Allowances**

There is a projected saving of £25k on Members Allowances and running cost budgets, no change since P4.

#### **External Audit fees**

Following the approval of its 2020/21 audited annual report, the Public Sector Audit Appointments has redistribute a total of £5.6m amongst its members. For Trafford this refund will be £18k.

#### **Council-wide Contingencies**

##### **a) Pay Award**

On 27 July 2021 the National Employers, who negotiate pay on behalf of local authorities, made an improved, final pay offer to Council employees, a pay increase from 1 April 2021 of 1.75% (with 2.75% for those on the bottom pay point). However, this latest offer was rejected by the Unions and negotiations are still on-going.

The cost to Trafford of the above pay offer, had it been accepted, would be £1.145m. This would leave a shortfall of £980k above current budget assumptions, which would need to be met from within the general Council-wide contingency budget. This would now only leave £100k in the contingency budget for other unknown pressures during the year.

##### **b) Sales, Fees and Charges Compensation Grant**

Council-wide holds the budget provision for the Sales, Fees and Charges Compensation Grant to recompense the council for COVID related income losses limited for the first quarter of 2021/22. Income losses during the first quarter were lower than budget subsequently



		<p>resulting in a lower compensation grant estimated at £566k. This is an adverse movement of £314k since period 2. The shortfall will be met from the COVID-19 contingency of £1.5m.</p> <p><b>c) Greater Manchester Temporary Resting place</b></p> <p>£40k potential COVID-19 related costs above budget. This shortfall will be met from the COVID-19 contingency. No change since period 4.</p> <p><b>d) COVID-19 Contingency (temporary)</b></p> <p>The Council-wide contingency budget for 2021/22 includes £1.5m specifically for potential COVID-19 pressures. The current commitments against this allocation identified above leaves a balance of £502k remaining, an adverse movement of £314k since period 2.</p> <p><b>e) Transport Levy</b></p> <p>The final GMCA Transport levy set is lower than the budget agreed in February by £99k.</p> <p><b>f) Savings Programme</b></p> <p>The savings from the Voluntary Redundancy/Voluntary Severance scheme of £919k over the two year period 2021/23 (£708k in 2021/22 and £211k in 2022/23) is projected to fall short by £50k.</p> <p>Also, the take up from the 9-day Fortnight scheme has been lower than expected and the saving of £60k will not be fully realised, leaving a shortfall of £50k.</p> <p>However, these savings shortfalls will be managed within the pay element of the Council-wide contingency budget, which includes an allowance to cover the reduced savings from the lower than expected take up of the Voluntary Leave Scheme in 2021/22, £100k compared to the budget of £250k.</p>
Dedicated Schools Grant	1,913	<p>There has been an adverse movement of £703k on the DSG since Period 4.</p> <p>Underspends are expected in the Schools, Central Schools Services and Early Years blocks of £155k.</p> <p>The High Needs Block is currently projected to overspend by £2.07m (an adverse movement of £644k from P4). This will result in an estimated DSG reserve deficit relating to high needs of £2.07m at year end.</p> <p>The movement largely relates to £750k in out of borough placements, due to no capacity in borough and increasing complexity of needs and £140k favourable in SEN due to increased income from the Virtual School to cover tuition costs.</p> <p>There is a negative high needs block reserve of £181k, leaving an estimated overall DSG deficit of £2.251m at year end.</p>

		The service are reviewing what mitigations can be put in place to provide longer term savings with the intention to consult with the School Funding Forum in November and Executive in January.
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## MTFP SAVINGS AND INCREASED INCOME

11. Given the financial pressures the Council continues to face, as identified in the Medium Term Financial Strategy, it is important that as much of the current savings programme is achieved in order to avoid recurrent shortfalls cascading into future years and increasing the budget gap.
12. The 2021/22 budget is based on the achievement of permanent base budget savings and increased income of £11.926m. A detailed review of the status of each saving is now undertaken on a monthly basis and a classification has been made using a “traffic light” system to highlight schemes at risk of not being achieved. Whilst some savings will be achieved through one-off alternative means/mitigating actions in the current year, a status has also been included on the risk of non-delivery falling into 2022/23.

Category	No of Schemes	% Schemes	Budget (£000's)	Forecast (£000's)	Variance (£000's)	Actuals Achieved to date (£000's)	Balance of Actuals (£000's)	Potential ongoing Impact on 22/23 (£000's)
Red	19	36%	(1,850)	(458)	1,392	(401)	(57)	929
Amber	16	18%	(4,242)	(4,142)	100	(2,658)	(1,484)	30
Green	26	46%	(5,834)	(4,463)	1,371	(4,459)	(4)	0
<b>Total</b>	<b>61</b>	<b>100%</b>	<b>(11,926)</b>	<b>(9,063)</b>	<b>2,863</b>	<b>(7,518)</b>	<b>(1,545)</b>	<b>959</b>

The latest forecast shows that the programme is currently expected to deliver savings of £9.06m, which is £2.86m below target, an adverse movement of £441k since Period 4. To date £7.52m has been achieved with £1.55m still to be achieved.

As previously reported in order to maintain robust challenge and focus attention on the delivery of the savings programme, the regular budget monitoring reports are supplemented by monthly updates to the Corporate Leadership Team. Alongside this, exception reports for savings yet to be achieved will be included in the period 8 monitor.

## RESERVES

13. The usable reserve balance (unaudited) brought forward as at 1 April 2021 was £165.42m, excluding schools and capital reserves. Although the balance is substantial, the majority of this relates to COVID-19 reserves which are ring fenced to meet the 2020/21 Collection Fund shortfall. In addition, current budget plans have already assumed that £22.24m of reserves will be drawn down, including £2.80m in 2021/22 from the Budget Support Reserve and £8.34m in 2021/22 and £7.10m in 2022/23 from the COVID-19 General Reserve.
14. Details of the estimated balances and movements over the next three years was last presented in the draft budget report for 2022/2023 and a commitment was made to undertake a review to challenge and identify potential uncommitted resource as part of the final budget report. This ongoing exercise will also be used to indicate the extent that any balances could be used to partially meet the forecast outturn pressures for 2021/22.

## COLLECTION FUND

### Council Tax

15. During 2020/21 the challenges faced by COVID-19 placed considerable pressure on the Council Tax Collection Fund, largely related to a reduction in collection rates and an increase in Council Tax Support. The budget for 2021/2022 was set using assumptions that the impact of the pandemic would continue and an overall reduction of £3.24m was built in to reflecting higher take up of local council tax support, delays in new properties coming on line and lower collection rates. The Council's budget includes a Government backed Local Council Tax Support Grant of £1.65m to offset some of the costs associated with the higher take up of the scheme.
16. The discretionary Council Tax Hardship Scheme was extended for a further year, enabling all existing working age Council Tax Support (CTS) recipients registered as at 31st March 2021 to claim a discretionary Hardship award equivalent to the value of their 2021/2022 liability. The cost of this extension was met from an underspend from the Government sponsored hardship grant received in 2020/21. There are no plans to extend the scheme beyond the current financial year.
17. As at period 6, the projected outturn is in line with budget, however there is still a level of uncertainty in the forecast largely due to the volatility of the tax base and uncertainty in take up of the Local Council Tax Support Scheme, particularly given the wider economic uncertainty and the end of the Government's Job Retention Scheme. A prudent estimate has been made for the remainder of the year to arrive at the overall breakeven forecast. If the situation improves in the remaining six months of the year, this may deliver a positive outturn.
18. At this stage in the financial year the estimated outturn would be used to inform the changes in the base budget for the following financial year. There is an expectation that the overall reduction in 2021/2022 is one off and that the

Council Tax income will revert to prepandemic levels. Given that the Government's support grant of £1.65m will cease in 2022/2023, there is a risk of an ongoing budget pressure if the Local Council Tax Support Scheme does not reduce proportionately at the start of the next financial year. To reflect this risk a figure of £500k has been included in our draft budget plans for 2022/2023. Furthermore, consideration will be given in future monitors that any positive outturn as mentioned in the previous paragraph, be directed into a Council Tax reserve to smooth any volatility.

## **Business Rates**

19. The 2021/2022 budget included anticipated growth in retained business rates, related S31 grants and redistribution of prior year surpluses of £7.8m. Projecting business rates is by its nature complex and prone to variation, in addition the impact on COVID-19 has added further uncertainty to the accuracy of projections.
20. In order to support businesses with the impacts of COVID-19, the Government provided various rate relief packages, with 100% relief being given to retail, hospitality and Leisure sites until July 2021 and thereafter 66% until March 2022. The Council will be compensated for the loss in rates income via a Section 31 Grant paid into the General Fund. In addition, further Government support is being offered to businesses via a discretionary scheme administered by the Council for other businesses falling outside of the 100% relief scheme, however details of the scheme have yet to be finalised. Whilst the extension of such reliefs is welcomed news, it has added to the complexity of business rate monitoring.
21. When the budget for 2021/22 was set, an assumption was made that there would be a reduction in income from businesses of 5% over the year, this resulted in a reduction in the budget of £3.49m.
22. As at period 6, cash collection rate is better than anticipated, however this has been offset by an increase in empty properties and a reduction in the base income due to properties either being redeveloped or a change in use. Whilst estimates are still difficult to predict at this stage, the period 6 monitor is largely in line with budget. The volatility in the system, particularly the emerging pattern of the increase in the number of empty properties, will need to be considered as part of the final budget planning for the 2022/23 and beyond.
23. The estimated outturn figure includes a net contribution of £2.77m to the Greater Manchester Combined Authority (GMCA) under the business rates growth pilot scheme. Given the overall uncertainty in the financial landscape, discussions are ongoing with GMCA concerning the sharing arrangement and potential for a higher proportion of growth to be retained by each local authority as was the case in 2020/21.

## **Impact of COVID-19**

24. The impact of the pandemic on the council's finances is anticipated to last for many years and the budget for 2021/2022 includes additional resources of £8.341m to help manage the continuing impact of the pandemic. Pressures were anticipated in client demand, lost income from our strategic investments in the Manchester Airport Group and from Sales, Fees and Charges. These were offset by Government backed support and use of reserves, based on assumptions at the time, that the pandemic would last for the first quarter of 2021/2022.
25. Due to the uncertainty of the impact of the pandemic the forecasting of pressures was particularly difficult in 2020/2021 and this situation continues to be the case. The COVID-19 pressures have become increasingly difficult to separate from business as usual activity and for ease of reporting, have only been shown within the service narratives where they can be isolated rather than a separate breakdown as was the case in 2020/21.
26. The Council continues to provide regular monitoring returns to the Government Departments which will be used at a national level to inform the debate on whether additional resources will be required over the medium term.

## CAPITAL PROGRAMME

### Approved Budget

27. The revised value of the indicative capital programme for 2021/22 to 2023/24 as at P4 was £437.67m which included £271.98m of asset investment fund and £165.68m relating to the general programme. Since then there has been an increase in the general programme of £1.01m to a total £166.69m relating to an increase in highways grant funding. The revised overall budget is now £438.68m
28. The revised capital programme budget for this financial year is £48.44m which is net reduction of £0.55m from the P4 position of £48.99m. This will be rephased into future years and will be reviewed as part of the budget monitor throughout the year. Table 4 below details the service analysis of the revised budget (P4) and current revised budget for 2021/22 (P6).

<b>Table 4 - Capital Programme 2021/22</b>	<b>P4 Revised Approved Programme £m</b>	<b>Current Revised Programme £m</b>	<b>Period Movement £m</b>
<b>Service Analysis:</b>			
Children's Services	12.79	12.79	-
Adult Social Care	4.49	4.49	-
Place	30.37	29.82	(0.55)
Governance & Community Strategy	0.08	0.08	-
Finance & Systems	1.26	1.26	-
<b>General Programme Total</b>	<b>48.99</b>	<b>48.44</b>	<b>(0.55)</b>

29. The current revised position of £48.44m (a reduction of £0.55m) is a result of the period 6 monitoring exercise, with the following the areas of re-profiling as follows;
- Place
    - New Chapel and Resomation Cremators scheme has re-profiling of £950k into future years as a result of significant delays in transferring the water retailer contract to meet waste requirements. Once the correct waste licences are in place, work on the resomation cremators can begin.
    - Net increase of £400k for Highways in year, due to the new grant referenced above. The remainder of the £1.01m is being re-profiled over later years in the programme.

## **Status, Progress of Specific Major Schemes**

30. Updates will be provided on specific issues where there is a significant impact on delivery of the forecast programme in terms of timescales or within approved resources. In addition updates on larger schemes will be provided throughout the year.

### **Specific Issues**

- **Additional Highways Grant**

When the initial budget was set in February 2021 the assumed level of highways grant was based on previous year's allocations.

When the formal notification for 2021/2022 was received, from the Department for Transport via GMCA there was a reduction of approximately £1.2m on the approved budget. This was an impact felt across other GMCA authorities and representation was made to GMCA on how this shortfall could be addressed. As a result GMCA have reallocated some of the Integrated Transport Block to provide each authority with an uplift in grant to minimise the impact of this reduction; this has led to additional grant now being received of £1.02m. The allocation of the grant will be the subject of a future report to the Executive.

- **Carrington Relief Road**

The current assumed costs of this scheme is £29.2m, with £15.1m of the funding currently included within the Capital Programme. This is funded from a combination of Homes England grant, Growth Deal and TFGM funding in addition to Section 106 contributions from the Council.

The Council will be undertaking a procurement for further design work to progress the scheme, costing £250k. This will be funded by an early drawdown of the approved grant, provisionally agreed by Homes England, as reported to the Executive in September 2021.

- **Basic Need**

At Executive in September 2021 an update was provided on the current position regarding school places required across the borough with an approved recommendation that the following schools expansions be delivered as part of the Capital Programme;

- Willows Primary School - £3.0m
- Templemoor Infant School - £1.8m
- Moorlands Junior School - £4.0m
- Davyhulme Primary School - £3.0m

## Resources

31. The general capital programme is resourced by a combination of both internal and external funding and is detailed in the shown below (table 5):

<b>Table 5 - Capital Programme Resources 2021-24</b>	<b>P4 Revised Approved Programme £m</b>	<b>Revised Programme £m</b>	<b>Variance £m</b>
<b>External:</b>			
Grants	29.07	30.08	1.01
Contributions	2.32	2.32	0.00
<b>Sub-total</b>	<b>31.39</b>	<b>32.40</b>	<b>1.01</b>
<b>Internal:</b>			
Receipts requirement	5.61	5.00	(0.61)
Borrowing	10.28	9.33	(0.95)
Reserves & revenue contributions	1.71	1.71	0.00
<b>Sub-total</b>	<b>17.60</b>	<b>16.04</b>	<b>(1.56)</b>
<b>Total Resourcing</b>	<b>48.99</b>	<b>48.44</b>	<b>(0.55)</b>

32. The movement in resources of £0.55m relates to re-phasing of the Resomation scheme, £0.95m, and the addition of new highways grant, £1.01m, and related schemes £0.4m.
33. The Land Sales and Development Programmes are continuously reviewed and are updated for any know changes within the programme. A number of sites have recently been marketed and the results of the exercise will be reported in the the P8 monitor.

At Executive in September 2021 a revised appraisal for Sale Magistrates was approved. This report recommended the inclusion of increased levels of social rented housing and an increased level of sustainability which with their associated costs and a revision to the overall construction costs to deliver a planning compliant scheme has led to a reduction in the assumed receipt from £3.0m to £1.0m. This has increased the overall deficit within the capital programme by £2.0m.

34. The current position now indicates an over-programmed level within the capital programme of £3.82m which is an increase of £2.91m from £913k that was in the original three year budget that was approved in February 2021. An update on this position will be provided as part of the next monitoring report and will take account of a number of sites that have recently been marketed.
35. The table below (table 6) highlights the overall level of over-programming and the in year surplus and deficits managed over the three year period of the



programme. The issue of over-programming will be addressed as part of the current capital programme bidding round.

<b>Table 6 - Capital Programme Resources</b>	Budget 2021/22 £m	Budget 2022/23 £m	Budget 2023/24 £m	Budget Total £m
<b>General Programme Investment</b>	<b>48.44</b>	<b>77.24</b>	<b>41.01</b>	<b>166.69</b>
Grants	30.08	59.51	26.05	115.64
External Contributions	2.32	3.60	2.80	8.72
Revenue and reserves	1.72	0.15	0.01	1.88
Prudential Borrowing	9.33	8.82	0.65	18.8
Shortfall in 20/21 Receipts	(3.38)	-	-	-3.38
Forecast Capital Receipts	5.93	5.60	9.68	21.21
<b>Total Funding</b>	<b>46.00</b>	<b>77.68</b>	<b>39.19</b>	<b>162.87</b>
<b>Surplus / (Deficit)</b>	<b>(2.44)</b>	<b>0.44</b>	<b>(1.82)</b>	<b>(3.82)</b>

### Asset Investment Fund

36. In February 2020 approval was given to increase the Asset Investment Fund to £500m, supported by prudential borrowing, to support the Council's Investment Strategy. The transactions that have been agreed by the Investment Management Board to date have a total committed cost of £381.13m. The facility agreements at The Crescent (£44.26m) and phase one of the Hut Group (£30.20m) were repaid in 2020/21, and phase two of the Hut Group (£32.25m) was repaid in June 2021. This means the balance of the approved £500m which is available for further investment is £163.13m (table 8 next page).
37. These investments were budgeted to generate a net revenue benefit in 2021/22 of £7.61m. The forecast net income is £6.27m, a deficit of £1.34m compared to budget. Details of the components of the variance are shown in Table 7.

<b>Table 7 - Asset Investment Strategy Period 6</b>	<b>Budget Variance £000</b>
Net Income target	(7,609)
Pipeline Recycling Target	2,454
Variable Interest Rates	853
Joint ventures	950
HUT Group delay	632
Castle Irwell earlier draw	(194)
Reduced reserve contributions	(1,651)
HUT Group reserve smoothing	(632)
Pipeline Schemes	(1,073)
<b>Net Income after mitigations</b>	<b>(6,270)</b>
<b>Deficit to income target</b>	<b>1,339</b>

38. As part of the income shortfall mitigation, the Council has reviewed schemes currently in its pipeline, but not yet brought forward, for likelihood and benefit. From that review a prudent income forecast of £1.1m has been included against those schemes in 2021/22. This is reduction from the £1.4m forecast in the period 4 monitor, due to a reprofiling of pipeline schemes.

<b>Table 8: Asset Investment Fund</b>	<b>Prior Years</b> £m	<b>Repayments</b> £m	<b>Commitment</b> £m	<b>Total</b> £m
<b>Total Investment Fund</b>				<b>500.00</b>
<b>Property Purchase:</b>				
Sonova House, Warrington	12.17	-	-	12.17
DSG, Preston	17.39	-	-	17.39
Grafton Centre incl. Travelodge Hotel, Altrincham	10.84	-	-	10.84
The Fort, Wigan	13.93	-	-	13.93
Sainsbury's, Altrincham	25.59	-	-	25.59
<b>Sub Total</b>	<b>79.92</b>	<b>-</b>	<b>-</b>	<b>79.92</b>
<b>Property Development:</b>				
Sale Magistrates Court	4.80	-	-	4.80
Brown Street, Hale	6.79	-	2.04	8.83
K Site, Stretford Equity	11.00	-	1.25	12.25
Former sorting office, Lacy Street, Stretford	0.87	-	0.09	0.96
Care Home Purchase	2.23	-	-	2.23
Various Development Sites	0.43	-	-	0.43
<b>Sub Total</b>	<b>26.12</b>	<b>-</b>	<b>3.38</b>	<b>29.50</b>
<b>Equity:</b>				
Stretford Mall, Equity	8.82	-	-	8.82
Stamford Quarter, Equity	16.69	-	-	16.69
<b>Sub Total</b>	<b>25.51</b>	<b>-</b>	<b>-</b>	<b>25.51</b>
<b>Development Debt:</b>				
Bruntwood; K site	10.90		1.35	12.25
Bruntwood Shopping Centre	25.57	-	-	25.57
CIS Building, Manchester	60.00	-	-	60.00
The Hut Group	62.45	(62.45)	67.50	67.50
Castle Irwell, Salford	11.28	-	7.72	19.00
<b>Sub Total</b>	<b>170.20</b>	<b>(62.45)</b>	<b>76.57</b>	<b>184.32</b>
<b>Total Capital Investment</b>	<b>301.75</b>	<b>(62.45)</b>	<b>79.95</b>	<b>319.25</b>
Albert Estate Investment	17.62		-	17.62
<b>Total Investment</b>	<b>319.37</b>	<b>(62.45)</b>	<b>79.95</b>	<b>336.87</b>
<b>Balance available</b>				<b>163.13</b>

## Issues / Risks

39. A key risk is the ability to deliver the revised capital programme in 2021/22, and this will continue to be closely monitored and reported throughout the year and as any significant issues may arise.
40. In addition, there is the risk that the level of Capital receipts that will be realised in the year and in future will be insufficient to fund the relevant schemes in the capital programme. A prudent approach to estimating these asset receipts and development returns will continue to be taken with only receipts that have a significant level of certainty being included in the resource forecasts.

**Recommendations**

41. It is recommended that that the Executive:

- note the updated positions on the revenue budget, collection fund and capital programme.

**Other Options**

No Applicable.

**Consultation**

Not Applicable

**Reasons for Recommendation**

Not Applicable

**Finance Officer Clearance**      **DM**.....

**Legal Officer Clearance**      .....**JL**.....

**DIRECTOR'S SIGNATURE ...**

*G. Bentley* .....

Appendix 1

Service Review/Virements	Children's (£000's)	Adults (£000's)	Place (£000's)	Strategy & Resources (£000's)	Finance & Systems (£000's)	Governance & Community Strategy (£000's)	Council-wide (£000's)	Total (£000's)
<b>Period 4 Outturn Report</b>	<b>42,456</b>	<b>65,108</b>	<b>31,065</b>	<b>5,539</b>	<b>7,666</b>	<b>6,160</b>	<b>21,478</b>	<b>179,472</b>
<b>Disposals:</b>								
↳ Making Tax Digital budget - realign to Service					17		(17)	0
↳ Events budget (Communications) to Customer Services (Access Trafford) – net running cost adjustment				(4)		4		0
THRIVE Contract budget			90	(90)				0
<b>Total movements</b>	<b>0</b>	<b>0</b>	<b>90</b>	<b>(94)</b>	<b>17</b>	<b>4</b>	<b>(17)</b>	<b>0</b>
<b>Period 6 Outturn Report</b>	<b>42,456</b>	<b>65,108</b>	<b>31,155</b>	<b>5,445</b>	<b>7,683</b>	<b>6,164</b>	<b>21,461</b>	<b>179,472</b>

