

BIRMINGHAM CITY COUNCIL

REPORT OF THE ACTING DIRECTOR OF REGULATION AND ENFORCEMENT TO THE LICENSING AND PUBLIC PROTECTION COMMITTEE

20 JUNE 2018
ALL WARDS

CONSULTATION ON PRIVATE HIRE VEHICLE SIGNAGE

1. Summary

- 1.1 During December 2017 a public survey was hosted to consider some of the issues raised by members of the trade regarding the current signage requirements. More than 100 responses were received.
- 1.2 There was no clear consensus for change identified by the survey. However, some popular themes did emerge, which members may wish to explore further. Of those themes, the most obvious is the desire expressed by many respondents, the majority identifying themselves as private hire drivers, to see the use of semi-permanent door signs discontinued. An interesting and contradictory position was offered by a smaller group identified primarily as private hire operators, who wish to see the semi-permanent signs retained and amended to include the operator's details.
- 1.3 Beyond the bare figures, a lot of comments were included which help to illustrate the thought processes and reasoning of the respondents. There are some interesting suggestions and a small number of respondents have made additional submissions in response to the survey outside the scope of the online questionnaire.

2. Recommendation

- 2.1 An officer and members working group should be set up to look at the issues raised and to consider the changes which it may be appropriate to make to the existing signage requirements.

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3. Background

- 3.1 Officers have previously discussed signage requirements at trade meetings and at specially convened meetings with private hire operators. This survey was initiated in order to give drivers, passengers and other interested parties an opportunity to comment and offer their opinion.
- 3.2 At the meeting of the Licensing and Public Protection Committee held in April 2015, the current signage regime was discussed and compared with the signage requirements employed by Transport for London (TFL) and the other core cities. It was found with the exception of TFL, the majority of other cities require a highly visible signage regime, not dissimilar to that required here in Birmingham.
- 3.3 Prior to the survey officers were aware of a number of issues raised by vehicle proprietors, for example allegations the semi-permanent door signs damaged paintwork and identified vehicles to opportunistic thieves looking for change. Officers were also aware having the name of the proprietor on the rear plate was unpopular with some vehicle proprietors, so it was not unexpected that such issues would be raised in the survey.

4. The Survey

- 4.1 The full results of the survey, including questions posed and a summary of the responses are attached as an appendix to this report, however, some of the questions and answers are detailed below to give an indication of the findings.
- 4.2 The first and possibly most fundamental question relates to the colours used for Birmingham private hire vehicle signage. In this case 60% of respondents were in favour of retaining the current black and yellow livery. Two responses were received from individuals representing two different organisations involved in promoting the interests of blind and partially sighted people. One advocated a switch to black and white as a higher contrast option, the other advised black and yellow was best as it has good contrast and for individuals suffering from progressive sight loss, yellow was the last colour to be lost.
- 4.3 Question 5 asked if semi-permanent door signs are necessary. 61% of respondents said they were not.
- 4.4 Question 8 asked if the details of the operator should be displayed and nearly 73% of respondents were in favour.
- 4.5 Question 9 asked whether the operator sign should be magnetic or semi-permanent. Almost 63% of responses indicated they should be magnetic.
- 4.6 Question 11 asked if the front windscreen plate is necessary, approximately 71% of respondents said it was. Question 13 asked if the windscreen sign should be replaced with a hard plastic plate fixed to the front of the vehicle, nearly 64% said no.

- 4.7 At question 15, we posed the question about information to be displayed on the rear plate. With 87% in favour, the registration number was the favourite, but somewhat surprisingly the owners name came in as the second most popular suggestion, with 45% of respondents stating it should be included on the plate.
- 4.8 Question 17 asked about relaxing restrictions on commercial advertising, 55% of responses indicated advertising should be allowed. A related question at 19, asked if restrictions on operator advertising should be relaxed and almost 54% of respondents were in favour.

5. Interpreting and Applying the Results

- 5.1 There is more to the survey than simply the bare figures, narrative comments were actively sought and as can be seen from the number of comments indicated in the summary for each question, plenty were forthcoming.
- 5.2 It is apparent some element of collaboration was employed in the completion of the survey, as some comments are repeated word for word in a number of individual entries. Whether this was an example of collaborative thinking, or multiple entries by the same individual it is difficult to say.
- 5.3 52% of respondents identified themselves as private hire drivers. This is perhaps unsurprising, as they have strong views on the issue of signage and they are the individuals most frequently and most obviously affected by these requirements.
- 5.4 A smaller number of licensed private hire operators were also identified as having responded, accordingly the views of the trade may represent as much as 60% of the response. This could be even higher when consideration is given to those responses which do not identify as coming from the trade, but display a high degree of awareness of trade issues and even duplicate comments appearing in other responses.
- 5.5 Whilst the trade has a perfectly reasonable interest in responding and every right to do so, it must be remembered the trade is regulated by this authority. Accordingly a judgement must be made as to whether an expressed desire on the part of the trade is in the interest of the wider public and compatible with the regulatory framework and licensing regime agreed by your Committee.
- 5.6 A good example is provided by the response to the semi-permanent door sign question, 61% of respondents consider them unnecessary, but it should be remembered semi-permanent signage was introduced in 2007 as a response to drivers anonymising their vehicles by removing all signage. It was a move opposed by the trade at the time, but considered necessary by the former Licensing Committee.

5.7 In contrast some of the private hire operators favour retaining the semi-permanent signage, but want their details to be included on the signs. Clearly their position is at odds with the majority of respondents, but their comments and additional submissions make interesting reading and should be given due consideration.

5.8 A private hire vehicle is a working vehicle and must display the signage required by the appropriate licensing authority. It is your Committee which considers signage requirements and sets those standards for Birmingham. For this reason, officers recommend the establishment of an officer members working group to look more closely at the comments and additional submissions made in response to this consultation, with the aim of identifying what changes (if any) should be recommended to the wider Licensing and Public Protection Committee.

6. Consultation

6.1 Over the last two years officers have consulted with trade representatives, licensed operators and now via an open survey, with drivers, members of the public and other interested parties.

7. Implications for Resources

7.1 Signage costs are factored into the fees charged for vehicle licences; accordingly any additional costs incurred in modifying signage will be taken into account when licence fees are set for the following twelve months.

8. Implications for Policy Priorities

8.1 The contents of this report contribute to the protection, safety and welfare of residents and visitors to the City by promoting improvements in the standards of services provided by licence holders and is compatible with our mission statement: Locally accountable and responsive fair regulation for all – achieving a safe healthy, clean, green and fair trading city for residents, business and visitors.

9. Public Sector Equality Duty

9.1 High contrast signage is especially important to assist the partially sighted members of the public in identifying licensed vehicles and when necessary identifying individual vehicles by licence number.

ACTING DIRECTOR OF REGULATION AND ENFORCEMENT

Background Papers: Signage responses via online survey

Additional signage responses (not submitted via online survey)