

### **3. DID ROTHERHAM TAKE AND CONTINUE TO TAKE SUFFICIENT STEPS TO ENSURE ONLY FIT AND PROPER PERSONS ARE PERMITTED TO HOLD A TAXI LICENCE?**

Inspectors were directed to consider whether RMBC took and continues to take sufficient steps to ensure only 'fit and proper persons' are permitted to hold a taxi licence.

#### **Background**

Licensing, regulation and enforcement functions exist to protect the general public from harm across areas ranging from food safety to houses in multiple occupation, to licensed premises for entertainment. Safety is one of the principles of licensing which informs legislation. 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. For this reason, taxi driving is a 'notifiable' occupation, so if a taxi driver is arrested, charged or convicted, or is the subject of a police investigation, the Licensing Authority must be informed.

#### **Judgement**

Inspectors have found that Rotherham has not taken, and does not take, sufficient steps to ensure only fit and proper persons are permitted to hold a taxi licence. As a result, it cannot provide assurances that the public, including vulnerable people, are safe. The inspection uncovered serious weaknesses and concerns.

#### **Licensing at RMBC**

The Licensing Authority for Rotherham is the Council. It processes applications and renewals for taxi licences, operator licences and vehicle licences. As such, it needs to:

- ensure that taxi drivers are 'fit and proper' to drive the public
- investigate any complaints about the conduct of drivers/operators and
- consider complaints when licences come up for renewal – or more urgently if need be
- ensure compliance with operator and driver licence conditions and vehicle conditions.

The licensing service in Rotherham reports to the Director of Housing and Neighbourhood Services in the Neighbourhood and Adult Services directorate

(NAS). Home to school transport has also been contracted out to taxi operators but is managed by a separate team.

There is a Member level Licensing Board which reports to full Council, and has delegated authority to determine policy and applications, suspensions and revocations of licence. The Board has recently been reduced from 25 to 5 Members. There is further delegation to the Director to undertake suspensions of licences. There is a right of appeal for decisions that are made by the Council to the Magistrates Court.

As at September 2014 there were 86 private hire operators, 840 vehicles, 52 Hackney carriages and 1158 licensed drivers in Rotherham.

In the past 5 years, the service has dealt with a total of 1100 complaints about taxi drivers. The annual level of complaints has been steady for the past three years at around 180. In the past five years the service has suspended 33 licences and revoked 26, with a further 29 revoked due to non-production of appropriate documentation.

### **A divided service**

The licensing service portfolio covers eight other licensing areas including gambling, alcohol and licensed takeaways. The taxi service is divided into two branches:

- the Policy team deals with policy, applications, renewals, suspensions and revocations
- The Enforcement team deals with complaints and investigations

The split of these functions is not common in other licensing authorities. Inspectors found evidence of conflict between the two branches, notably on what kind of evidence could be presented when the Licensing Board meets to consider whether to revoke or suspend a licence.

The two branches of licensing use different databases which do not interface, so information is not easily shared between Policy and Enforcement teams. This means that driver or operator records cannot be viewed in a single place, requires officers to request information from each other and has sometimes resulted in a licence being renewed without question when in fact the driver is being investigated following a complaint.

Inspectors found that enforcement staff do not always record complaints or information gathered on these data systems. This inconsistent recording of information on complaints has the consequence that because data on driver performance and conduct is not collected, trends are not identified and track record

data (for example identifying a series of complaints) may not be available at the point of licence renewal.

Meetings are rarely held across the entire service and some officers said that the visibility of senior leaders was poor. One officer stated that they had seen them for the first time at a briefing meeting shortly before Inspectors arrived.

### **Lack of policy**

A number of officers had worked in other Licensing Authorities and commented to Inspectors that RMBC was behind the times as the licensing service appeared to have few written policies and attempts to draw those up would be stymied. Inspectors found that the Council's bye-laws and conditions relating to vehicle, taxi driver and operator licences seemed not to have changed since 1976, bearing out this contention.

And although there is clear documentation around procedure, there is no indication of what 'serious concerns around the activities of a licensed driver' should prompt for example an immediate suspension of an individual driver. Managers refused to be drawn on this matter, insisting that each case was different and stating that they would act on evidence from police.

### **Trade influence and the role of Members**

Inspectors were often told that the private hire trade in Rotherham is vocal and demanding and some officers expressed the view that the licensing service seemed more geared towards facilitating the trade than protecting the public.

Members added to this pressure to support the trade. Some who had previously held taxi licences or 'badges' sat on the Licensing Board. At one point, the Board had been reluctant to hear any cases not related to matters showing up on DBS checks. That means where there were no actual convictions they would not suspend or revoke licences.

Licensing officers reported to Inspectors that they had received phone calls from Members over perceived delays in the processing of individual applications. Officers would be urged to 'stop wasting time'.

*"The taxi driver is the customer and no thought is given to the passenger."* An officer

There are instances of Members making representations on behalf of the trade or individual drivers. For example, one Councillor wrote to the Crown Court offering a reference on behalf of a driver who had his licence revoked. As noted earlier

Inspectors were also told that 'no notice' vehicle spot checks were changed to '10-day notice' checks after representations from the trade and a Member intervention.

### **Complaints and Investigations**

There are major concerns over the licensing service's ability to undertake thorough investigations giving rise to a perception of undue weight being given to the need to protect drivers' livelihoods over and above the safety of the public.

The inspection undertook an audit of 22 complaints and found 86 per cent to be inadequate. There is inadequate investigation of some complaints and lack of tenacity resulting in cases being closed before they are satisfactorily resolved. There seems to be a propensity for informal resolution of complaints, giving the trade the benefit of the doubt and not following up all lines of enquiry including the evidence of complainants. This included a number of cases in which drivers had refused to carry passengers with guide dogs.

There has been inadequate follow through and information exchange with Children's Services and with the police on individual cases. This is despite clear efforts by some individual officers to establish good working links with related services, such as home to school transport service. Inspectors noted frustrations expressed by officers concerning feedback from police on cases which had been referred on to them to pursue. Inspectors also noted – and share – concerns expressed by officers that the service is not routinely informed by police of potential CSE concerns including abduction notices.

Officers seemed to lack curiosity over whether there are particular operators where a large number of vehicles may have fallen below standard, or a large number of drivers may have attracted complaints. As a result there is no record of the service exercising its right to place any conditions on individual operator licences where recurrent issues have been identified.

The service has set too high a threshold of evidence before considering suspension and revocation of a licence. Officers are entitled to apply a 'balance of probabilities' test to alleged offences by drivers, but instead appear to apply a test of 'whether it would get past the CPS'. There are examples where the service appears to have closed cases because it believes the CPS thresholds for prosecution will not be met. There is an associated concern here that information which the service does not regard as 'evidence' may not be provided to other parties.

In addition, Members of the Licensing Board have not been given sufficient bespoke training on dealing with taxi hearings moreover after Member complaints the number and nature of documents being provided to Members in advance of

suspension/revocation hearings have been reduced which may diminish the quality of the judgements made and could lead to outcomes which place the public at risk.

#### 'Home to School' transport scheme

RMBC operates a ' Home to School' transport scheme enabling qualifying, potentially vulnerable, children and young people to travel to and from home to schools and colleges, often unaccompanied.

The use of taxis within this scheme relies on the Council's Licensing service to ensure that drivers, vehicles and operators are properly licensed and that a driver passes the 'fit and proper' person test.

Under one of these contracts, a 21 year old taxi driver was transporting a child with physical health difficulties to and from his place of learning. The boy wrote to the Council setting out some 20 complaints about this driver including that he was:

- Swearing and shouting abuse at other drivers
- Laughing at him and mocking his disability
- Showing him sexually explicit videos on his mobile phone
- Driving dangerously and at excessive speed
- Urinating in full view of him
- Telling the young man that he was involved in illegal drugs

On receipt of this complaint a multi-agency strategy meeting was held. It concluded that this alleged behaviour could have upset the passenger and he was offered appropriate support. The driver's contract was subsequently terminated and it was recommended that the licensing service investigate whether the driver was a 'fit and proper' person to hold a private hire driver licence.

Police investigated the complaint (after a period of time whilst the driver was abroad). They found no images on the driver's mobile phone. After an interview with him, they concluded that he was not a risk, that the complaint had been prompted by a relationship breakdown and aspects of the complaint were about 'laddish' behaviour. In relation to the other allegations there was insufficient evidence to bring any criminal charges.

The driver was also formally interviewed by the Council's licensing enforcement officer who prepared a file to be submitted to the Licensing Board. It was decided that the boy's allegations relating to graphic sexual images should not form part of case papers being presented. Only the following complaints were put before the Licensing Board:

- Insulting words towards a passenger
- Urinating in view of the passenger
- Conduct of driver
- Driving with an under inflated tyre

The case was presented to the Licensing Board hearing six months after the complaint was made. The driver was represented at the hearing and he was cross examined by Members in what can be best described as a light touch fashion.

The Board agreed that the driver was not a fit and proper person but only suspended his licence for three months leaving him free to operate as a private hire driver after that time had lapsed.

*"...it was strange to have a licence removed for three months. You're either a fit and proper person or you're not – you don't just become fit again after three months."* An officer

The details of this case were offered to the inspection as an example of improvement in licensing practice.

### **Pressure on staff**

Long term sickness has depleted the Principal Officer grade on the enforcement side for some time. An unresolved contractual issue over late working has meant there is no enforcement of licensing matters around the night time economy. Enforcement officer caseloads were unevenly spread and officers clearly felt understaffed, with one officer commenting that it was sometimes impossible to log off from a telephone which rang incessantly.

### **Licensing – a new policy?**

The Licensing Board in October 2014 agreed a draft revised policy for consultation. The policy brings together various existing policies into one document and introduces some changes including requirements for drivers to achieve BTEC level 2 certificate; extending to five years the requirement for holding a UK driving licence; tougher knowledge tests; more rigorous standards for the consideration of criminality including sexual offences concerning children and vulnerable people.

This new policy is to be welcomed. However it falls short in a number of respects:

1. The Council's general enforcement policy which underpins the proposed Licensing policy does not, in our view, give sufficient prominence to the need to protect the public.
2. The guidance suggests that the authority will not normally grant a licence if an applicant has more than one conviction for indecency or is on the sex offenders register. Inspectors find this unacceptable. One conviction should be more than enough to prevent a licence being granted.

In addition, there is no reference to how the service will deal with complaints/service requests where the complainant does not want to report the incident to the police or the police decide not to investigate or prosecute because of the criminal burden of proof. Our audit of complaints demonstrate that allegations relating to inappropriate behaviour including sexual harassment were not properly investigated. In our view, the reliance on convictions alone will not provide a strong message to the trade on acceptable standards or reassure parents and the public that drivers are safe to transport their children.

The timetable for implementation seems unnecessarily elongated with implementation not expected until April 2015 with no retrospection of standards. This will mean that full application of these measures to all drivers will take nearly three years. Given the high profile of public concerns and real evidence that children have not been properly protected when using taxis in Rotherham, this seems far too long.

### **Service Improvement Plan**

We understand that as a result of our inspection, the Licensing Service has sought to address some of issues we have highlighted by implementing a service improvement and performance management plan. The plans were not part of the inspection and we are therefore unable to comment on whether the actions identified are sufficient to address the findings of our inspection.

#### **4. TAXIS AND CHILD SEXUAL EXPLOITATION**

*'[I am working with a girl] she caught a taxi to her boyfriend's and she was let off the fare as she didn't have much money. He took her to McDonalds and bought her food...she realised he was much older, in his late 30s. He took her out to XXX in his taxi – she believes another young woman was locked in a room – he tried to have sex in the car...she has given the details in a statement to the police.....'*

*'It's not safe to use taxis.'*

Inspectors were directed to consider whether RMBC, in light of the Jay report which highlighted serious failings in the authority over a number of years with regard to the safeguarding of children, was and continues to be subject to institutionalised political correctness, affecting its decision-making on sensitive issues; to consider whether RMBC undertook and continues to undertake sufficient liaisons with other agencies, particularly the police, local health partners, and the safeguarding board and whether RMBC took and continues to take sufficient steps to ensure only 'fit and proper persons' are permitted to hold a taxi licence.

Concern around taxis remains pervasive in the town. Throughout the inspection, individual inspectors frequently heard that people did not feel safe using taxis. The well publicised link between taxis and CSE in Rotherham has and continues to cast a long shadow over the vast majority of law abiding drivers who make their living from the taxi trade. So it is not only to protect potential victims from unscrupulous drivers that RMBC needs to get their house in order and regulate taxis effectively, but also for the drivers who are damned by association.

Professor Jay deemed the prominent role of taxi drivers in CSE as a 'common thread' across England and noted that their involvement was evident from an early stage in Rotherham. *'Residential unit heads met in the 90s to discuss taxis collecting girls, school heads in early 2000s reported taxis picking girls up to provide oral sex in the lunch break'* she said.

The Jay report described how the Safeguarding Unit in the Council convened Strategy meetings from time to time on allegations of CSE involving taxi drivers. She described meeting minutes demonstrating how a single operator was the subject of four meetings in a seven week period, girls having disclosed information in 2010, recording how children were being sexually exploited for free taxi rides and goods and noted three cases of attempted abduction. She also recorded that RMBC had advised that taxi drivers had only been involved in a total of four CSE-related cases (between 2009 and 2012), which had all been dealt with appropriately by the Council's licensing authority.



### Licensing Authority – denial that they knew of a CSE problem

When conducting interviews across the licensing service, Inspectors asked for reflections on the Jay report, on CSE in Rotherham, on work with police and social care and on the awareness of indicators such as Abduction Notices in alerting officials that licensed drivers may have developed inappropriate relationships with underage girls. Inspectors were mindful that Licensing Authorities can suspend/revoke licences on the balance of probabilities and do not need to prove an allegation or complaint beyond reasonable doubt, or await a conviction.

In interview, the Director of Housing and Neighbourhood Services, who is responsible for the licensing service, expressed annoyance at the impact the Jay report had had on the Council and remained adamant that the four CSE-related revocations of licences quoted by Professor Jay represented the full extent of taxi driver involvement in CSE in Rotherham. He said that one of those revocations (in January 2011) had marked his first awareness of CSE as an issue. Since the inspection had been announced, he had reviewed a total of 1400 cases (on all kinds of complaints) and only eight had given cause for concern. He remained confident: *'our service is compliant with the best in the area'*.

Specifically, he stated that the concerns expressed in Strategy meetings about cases from 2010 described by Professor Jay were unfounded. He subsequently established that the information was correct; but intelligence from these meetings or from Responsible Authority meetings had not been fed up to him: *'I don't know what I don't know'*. When questioned about systems to ensure the Licensing service was made aware by police of any Abduction Notices issued against drivers, he responded *'Abduction notices mean no proof'*. Lack of 'proof' was a continuing theme: *"Rotherham is a village, professional gossip becomes fact the question for me is "what is veracity?"*" An officer

Less senior staff displayed some ambivalence. Most officers said they would not use a private hire taxi or allow their families to do so. Concerns were also expressed that children in residential units could be ordering taxis by mobile phone and that care workers could be powerless to stop taxi drivers from either grooming young women or transporting them to be exploited.

However, officers echoed the senior management view that the four cases where drivers had lost licences for CSE-related reasons represented the full extent of proven taxi driver involvement in CSE. Officers repeatedly stressed that if presented with evidence of CSE (preferably by police in the form of a conviction) they would act on it by suspending drivers. They appeared less able to grasp the notion that in the arena of CSE 'evidence' rarely appears fully formed and may need to be established by building a composite picture based on different sources of information.

## **Evidence that the Licensing Authority knew of taxis and CSE as a problem**

In trying to assess the level of concern around taxi drivers and CSE and whether the licensing authority at the Council knew about it and responded to that concern, the inspection mainly considered documentary evidence since 2010. All members of the current licensing team were in position at that point.

Inspectors found that the Licensing Manager and the Principal Environmental Health officer had attended a meeting of the Exploitation Steering sub-group in 2010 at which there had been wide-ranging discussions under the agenda heading 'Taxi Licensing and links to Sexual Exploitation'. In November 2010, it was agreed to 'collate a small short task and finish group... in order to investigate allegations that taxi and takeaways were using their position to engage with vulnerable children'. In February 2011, a Safeguarding Manager confirmed a link had been established and that they had attended a meeting with the Assistant Chief Executive where this has been confirmed. One of the recorded actions was to invite Members of the licensing board to a national sexual exploitation conference on the Operation Central lessons learnt, planned for April 2011. The Exploitation sub-group meeting minutes confirm that the Safeguarding Board had concerns in relation to taxis and CSE and that licensing staff were aware of these.

Licensing officers were also invited to attend meetings convened by the Assistant Chief Executive, which from 2010 had considered CSE. Officers told Inspectors they had sought permission from senior management when first approached to attend the meetings. Document bundles provided to the inspection include emails discussing these meetings; senior managers were aware of the Strategy meetings and the issues of CSE and taxis raised there. The service director maintains he was not made aware and Inspectors have seen no evidence to contradict this.

Licensing officers who attended recalled being asked not to take notes and being given scraps of intelligence and asked to check up on it and report back. They ran some information through their systems. Some meetings had been general, others had focused on specific young people at risk.

### **'Grid of concerns'**

A grid had been produced which itemised issues of concern raised at the meetings. The grid was later provided to the Inspection team by the Council. It covered Strategy meetings in 2010 and was accompanied by a letter to Inspectors from a Senior Licensing Manager stressing that no officials had attended the meetings in question, but confirming that the Licensing service had been provided with the grid back in December 2010. This would indicate that the specific cases itemised in the grid were known within the licensing authority from that date.

Over ten Strategy meetings were listed throughout 2010. Some were multi-agency. All the concerns related to named young people, a high proportion of whom were 'looked after'. There were three or four allegations relating to unidentified vehicles or drivers, or to premises outside Rotherham. Otherwise, most allegations identified specific operators (mainly Operators A, B and C) and in some cases named drivers. Some of the named girls were involved in live police operations then underway, so information came from the police.

Concerns were raised over:

- Taxi drivers harassing or attempting to abduct young people;
- Taxis behaving suspiciously in Clifton Park (a known hotspot for CSE);
- Taxi drivers collecting or dropping off young people from residential homes in a drunken state or in possession of skunk marijuana;
- Young people reporting that they or their friends had performed sex acts in taxis for cigarettes, alcohol or money – or had been asked to do so by taxi drivers; and
- An allegation of rape and serious abuse.

#### **Examples from the grid:**

1. Child protection referral on X, by Y at Z residential unit. X's peers say she is giving out large sums of money, sometimes up to £60 to other young people. She says she is receiving money, cigarettes and alcohol in return for providing sexual acts for drivers from operator C and others. Her parents have also reported an operator B taxi waiting outside the house to collect X more than once.

2. A 12 year old girl, part of a live police investigation disclosed rape and abuse of other young females by X and describes X and his brother as taxi drivers (at Operator B). She has also made allegations against his brother. Operator B taxis have also been seen parked outside her school.

3. Park warden reported two Operator D cabs reported outside Clifton Park museum at 7.30 at night, behaving suspiciously. Registration numbers were taken down and cars checked out as Operator D vehicles.

Setting aside conflicting accounts of whether officials attended any or all of these meetings, the Council's licensing management have formally stated to the inspection team that the grid of CSE concerns was provided to them in 2010, so the clear tenor and pattern of allegations and the focus on certain operators should have been clear to them.

## **Responsible Authority Meetings**

Responsible Authority (RA) meetings were set up in accordance with the 2003 licensing act as a forum for agencies to discuss matters in relation to licensed premises such as takeaways. The current Rotherham licensing manager chaired these meetings from 2010 and presciently chose to include taxis as a standing item on the agenda. She invited Risky Business to attend to provide intelligence on taxis and licensed premises in regard to CSE. A member of the Safeguarding board also attended most RA meetings as did a police liaison officer.

Concerns raised at RA meetings in 2010 include:

- Reports that operator E cabs are using unlicensed drivers who may be transporting underage girls around.
- Child missing over the weekend, an item of her clothing reported to be left in Operator B's office (February).
- Concerns raised by a local Councillor and local residents about a taxi transporting girls around the area who then indulge in sexual activity (Aug).
- Concerns about children conducting sexual acts for vodka or food at named shops, takeaways and pubs.
- An allegation made to police by a 13 year old against a named driver.
- A taxi driver taking two 'looked after' girls to Sheffield.
- Girls being taken to Clifton Park by taxi drivers again. Abduction Notices served against driver from Operators B and C.
- A missing 14 year old found at premises on Prince of Wales Road where an Abduction Notice had been served on the taxi driver.

## **Responses to concerns**

Inspectors interviewed officers about specific cases discussed at RA meetings and reviewed a selection of incident files. A number of these illustrated issues of concern to inspectors.

- A customer complained that operator E was using a driver whom s/he knew to be unlicensed and a criminal. An enforcement officer opened a complaint, then closed it the following day after calling the operator who claimed the driver was his son and alleged a malicious complaint from his son's ex-partner and family. No investigation was conducted despite allegations at RA meetings (see above) that the operator's son could be involved in CSE. No action was taken for allowing an unlicensed driver to drive a taxi. Five months later a further complaint was received relating to the operator's son again driving a taxi. The complainant further stated that the son had just come out of prison and that the licensing board had previously rejected his taxi badge application in 2008 and that he had also been disqualified from driving. The

operator was said to be allowing three other unlicensed drivers to use his vehicles. The case was closed on the basis of insufficient evidence to continue.

- A social worker reported that Z, an Operator C driver, had turned up at 5am at the house of a vulnerable client with learning difficulties and refused to leave until she had sex with him. After repeated episodes the client feared she had contracted an STD and the driver was now pressuring another vulnerable person. Licensing officers were asked to make interim measures while police were informed, but no action appears to have been taken.
- A mother complained that when her daughter struggled to open a taxi door the driver told her *'you could have been raped in the time it took you to do that'*. The daughter was very upset. The system records the case was closed after the driver said his comments were taken out of context and notes the *'informant was happy with that'*. It is unclear whether the daughter was spoken to.

Interviews conducted by Inspectors about licensing investigations coupled with analysis of documents, demonstrated a failure to follow through concerns and complaints into action. Inspectors were concerned that when an investigation was passed on to the police it no longer appeared as active on the licensing database/system. This means that no record of potentially serious cases could be built up or taken into account if further complaints were made against a driver. Investigations also appeared to have been halted on the basis of summary assessments of the quality of evidence and whether it would satisfy the CPS.

Moreover, where cases had been referred to the police, no further action by police was used as a basis for closing the case in the licensing team, even though (as has been noted above) licensing can apply lower thresholds of proof.

Officers demonstrated little inclination to take steps to convert anecdote or information into evidence, for example, by working with residential care homes to monitor taxi activities.

One senior manager cited a joint operation between licensing and neighbourhood safety officers to stand up allegations of CSE related activity in Clifton Park as an example of licensing *'going above and beyond'* in its attempts to gather evidence. The operation had run for several evenings until 10pm and found nothing. This was unsurprising as officials had held a meeting with the trade to alert them it would be happening.

Inspectors were concerned that on the basis of a single, flawed and short-lived surveillance operation licensing were prepared to give Clifton Park (and the taxis which congregate there) a 'clean bill of health' in perpetuity.

Inspectors noted a repeated downplaying of low level harassment claims, '*her mother said she was probably pissed*' an enforcement officer commented, of a complaint by a young woman that a taxi driver had put his hand on her leg unbidden. The young woman herself was not interviewed.

Although Strategy and RA meeting notes repeatedly cited the same few operators in relation to CSE linked issues, when asked if any operators gave particular cause for concern in this regard, officers could not think of any.

### **The case of Operator B**

Concerns were raised about this operator repeatedly in both Strategy and RA meeting minutes. Officers built a case (not based on CSE concerns) against the operator as 'not a fit and proper person', which was taken to the Licensing Board, which revoked both of the operator's licences (for operating and driving). A magistrate's court dismissed the operator's appeal against the revocations. However, in advance of a further Crown Court hearing RMBC accepted a deal whereby the operator relinquished his operator's licence, but kept his driver's 'badge'. Shortly afterwards a family member of his applied for an operator's licence, which was granted and the operator continued trading under a new name. Officials continue to deal with the original operator on licensing matters. In effect the operator carried on under a new guise in full knowledge of the licensing team.

### **Revocations and current practice**

Inspectors noted that only one of the four case studies handed over by RMBC showing revocations of licence (between 2009 and 2012) arose out of the investigation of a complaint. A mother complained after a driver followed her daughter home. Inspectors heard that the board initially refused to hear the case (because the daughter didn't attend herself) and refused to keep the driver and complainant separate when the hearing took place. Three others followed notification from police of arrests so they acted upon that notification.

Inspectors were also concerned at officers' attitude towards limousines. Limousines with over eight seats come under the jurisdiction of VOSA, not the licensing authority, but CSE related concerns had been raised at both Strategy meetings and RA meetings about one particular company. The Licensing Authority expressed disquiet that Children's Safeguarding had written to schools in advance of the prom season, advising parents that there had been CSE related concerns about limos.

This was seen as irregular and not based on 'fact', rather than an attempt to prevent a serious issue falling through a gap in RMBC's jurisdiction.

Inspectors noted that RA meetings are now chaired by a senior manager from the licensing section, who will exert 'tighter control' of the discussion and minutes. Inspectors also witnessed a discussion at a CSE tactical meeting in November 2014 during which a senior licensing manager challenged whether taxis and takeaways in Rotherham should be included as possible areas where CSE may be occurring. Both the Chair of the meeting and the CSE coordinator pointed out that taxi and takeaways were identified as a risk nationally and there had been a historic link with CSE in Rotherham. The senior manager did not accept that there was a current problem with CSE and taxis and takeaways. Inspectors are concerned that the services' refusal to accept a link with CSE is hampering its ability to take effective action, investigate complaints properly, share intelligence appropriately or contribute to building a composite picture enabling others to take action.

