



Llywodraeth Cymru
Welsh Government

GUIDANCE, DOCUMENT

Taxi and private hire vehicles: CCTV policy template for local authorities

Local authorities can use this template when setting policies around CCTV use in taxis and private hire vehicles.

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Overview

The use of CCTV systems in licensed vehicles is currently voluntary. But local authorities can opt to make CCTV a necessary part of its licencing conditions.

To help improve uniformity of approach across Wales, we have created a template that councils can use when creating a CCTV policy.

Wording can be replicated in full or in part. Highlight the text you need, and copy and paste it into your document.

Opportunities to personalise are indicated by square brackets, for example: **[insert council name]**.

Template

Introduction

CCTV can improve driver and passenger safety in licensed vehicles by:

- deterring the occurrence of crime
- reducing the fear of crime
- assisting the police/ local authority with investigations
- assisting insurance companies in investigating motor vehicle accidents

These requirements are designed to ensure that CCTV systems installed in licensed taxis or private hire vehicles (PHVs) are responsibly managed.

In this policy, we define a CCTV system as:

- any electronic recording device capable of capturing and retaining visual

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images and audio

- attached to the inside of a vehicle
- capable of capturing footage inside or both inside and outside a vehicle.

The policy applies to any licensed vehicle containing a CCTV system as described above.

Systems that record both internal and external images must also comply with [the taxi and private hire vehicles dash cam policy](#).

CCTV requirements

Any CCTV system must, as a minimum, meet the requirements set out in the specification in Appendix A of this policy. Only CCTV systems meeting these requirements can be installed into taxis and private hire vehicles.

A certificate of installation (or copy) must be produced to the local authority, confirming the installed system meets the required specification detailed in this policy.

The installation and operation of CCTV must also comply with the requirements of the Information Commissioner's Office (ICO): [In the picture: A data protection code of practice for surveillance cameras and personal information](#).

Signage

All taxis and private hire vehicles with CCTV must display signage to indicate CCTV is in operation.

Signs must:

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- be displayed at each passenger entry point, e.g. one at each door
- be visible to passengers before entering the vehicle
- cause minimal obstruction of vision from within the vehicle
- make it clear that audio recording may be carried out

This may also be verbally brought to the attention of passengers.

Drivers must verbally inform passengers with a visual impairment that CCTV is installed in the vehicle.

Additionally, internal signage should:

- identify who the data controller is
- inform passengers how they may access CCTV data

Audio recordings

Approved CCTV systems are permitted to record audio, however, cannot be capable of continuous sound recording.

Sound can only be recorded via a 'panic' button operated by the driver and passenger.

The driver should only operate the sound recording in the following circumstances:

- when they believe there is a risk to themselves or their passenger's safety
- when they are concerned about passenger behaviour (for example, someone is verbally abusive)
- to protect their livelihood e.g. disputes about payment, concern of potential damage to the vehicle.

Where audio recording is justifiable, signs must make it clear that the CCTV

system is capable of audio recordings. Passengers with a visual impairment must be informed of this verbally.

Maintenance and use

The maintenance and use of the system must be in accordance with the taxi/private hire vehicle licence conditions.

Download of data

Data will only be downloaded for the following purposes:

- a) in response to a legitimate data access request under the Data Protection Act 2018, in relation to the vehicle/driver
- b) in response to a Subject Access Request compliant with the Data Protection Act 2018
- c) where a complaint has been made to the Licensing Section regarding the vehicle/driver and the complaint cannot be resolved in any other method.

If your local authority has mandated CCTV in all vehicles, you should provide a link to your download policy.

Data retention

Data retrieved by the licensing authority for the above specified reasons will only be retained for the following periods:

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- a) cases leading to prosecution 10 years from date of trial
- b) formal caution 3 years from date of caution
- c) written warning or no formal action 3 years from date of decision
- d) Subject Access request 6 years from date of request.

Data controller

The information Commissioner's Office (ICO) defines a data controller as the body which has legal responsibility under the UK General Data Protection Regulation (GDPR) for all matters concerning the use of personal data.

The following paragraphs can be included:

If your local authority has mandated CCTV in all vehicles, please use this text:

[Insert council name] requires the use of CCTV within all its licensed private hire vehicles and taxis.

[Insert council name] will be the data controller for all CCTV in its licensed vehicles. The local authority will have a designated data controller registered with the ICO and the data controller will determine how access to the data will be controlled and used in compliance with the ICO guidance.

NOTE: Before mandating the use of CCTV in all licensed vehicles the local authority must produce a Data Privacy Impact Assessment (DPIA) to consider the need for CCTV, to ensure that the issue of privacy has been considered, and to put appropriate controls in place to both minimise any intrusion and to protect the data. Local authorities should publish the DPIA and where relevant share it with the ICO.

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If CCTV use in vehicles remains voluntary in your local authority, please use this text:

Voluntary CCTV installed in any **[insert council name]** licensed vehicle must comply with this policy.

[Insert council name] will not be named the data controller for any CCTV voluntarily installed in its licensed vehicles. The driver/vehicle proprietor or other person/ organisation who is in control of the data must be named the data controller and registered with the ICO. The data controller will determine how access to the data will be controlled and used in compliance with the ICO guidance.

Third party data processor

Where a service provider is used for the remote storage of CCTV data they will function as a data processor. A data processor, in relation to personal data, means any person (other than an employee of the data controller) who processes data on behalf of the data controller either by cloud or via a server, in response to specific instructions. The data controller retains full responsibility for the action of the data processor.

All CCTV systems in **[insert council name]** licensed taxis and private hire vehicles must be installed in compliance with this policy.

Appendix A: Licensed vehicle CCTV technical specification and system requirements

To be considered suitable for installation in a **[insert council name]** licensed

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vehicle, a CCTV system must meet the following minimum requirements:

1.0 Operational technical specifications

Ref	Specification	Details
1.1	100% solid state design or a proven vibration and shock resistant system.	<p>The system should not have any fan and the recording should be vibration and shock proof, i.e.:</p> <ul style="list-style-type: none">Flash-based SSD (100% industrial grade)Hard disk with both mechanical anti-vibration and anti-shock mechanism, self-recovery and self-check file writing system. <p>SD cards within the camera head will not be acceptable.</p>
1.2	8 to 36 Volts DC.	Operational between 8 and 36 volts DC.
1.3	Reverse polarity protected.	System must be protected against reverse voltage.
1.4	Short circuit prevention.	System to be protected against short circuits.
1.5	Over voltage protection.	System to be protected against high voltage transients likely to be encountered in the vehicle electrical system.
1.6	Automotive electromagnetic compatibility requirements.	The camera equipment must be UKCA-marked or CE-marked with confirmation by the equipment manufacturer as being non-immunity related and suitable for use in motor vehicles.

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Ref	Specification	Details
1.7	<p>System override switch to be located in a position where it is not accessible from inside the driver or passenger compartment of the vehicle (i.e. in the boot)</p> <p>The override switch must be illuminated when switched “on”</p>	<p>The system is required to be active when the vehicle is being used as a licensed vehicle. The override switch will allow the CCTV to be deactivated during times when the vehicle is being used for private purposes (e.g. domestic use). The switch that deactivates the system must not be located inside the driver or passenger compartment of the vehicle (e.g. the boot/ luggage compartment will be suitable)</p>
1.8	First-in/first-out buffer recording principle.	The system must automatically overwrite to create a constant cycle recording.
1.9	Access record.	A service log must be kept and maintained by the approved installer and the licensed vehicle proprietor.
1.10	Security, duration and auto-clearing of log files.	
1.11	Image recording formats and media.	Images must be encrypted to a minimum of FIPS 140/2.
1.12	Image protection during power disruption.	Images must be preserved in the event of loss of power. Battery back-up should be avoided where possible.

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Ref	Specification	Details
1.13	Unit must operate without the ignition being turned on.	<p>The Unit must have the ability to operate for at least 30 minutes without power from the ignition.</p> <p>The device must be hard wired to both constant and ignition supply.</p>
1.14	Image and audio data shall be recorded and stored in a unit separate from the camera head.	Self-contained storage cards within the camera head will not be acceptable.
1.15	GPS capability.	System must have GPS capability.
1.16	The system must be capable of recording audio time and synchronized to the recorded images.	If activated, the audio must record within the video file. Not in a separate file or folder.
1.17	The system shall not record audio except when audio recording is activated by means of an approved trigger/panic switch.	<p>The system should have the ability to start recording audio data by means of a trigger button/ switch.</p> <p>One trigger button must be capable of being activated from the driver seat. Once the trigger is activated the system must begin to record audio data. The system will continue to record audio until the same trigger is used to deactivate the audio (i.e. a trigger/ switch could be pressed to begin audio recording, pressing the same trigger/ switch again would stop audio recording)</p>

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The second trigger/ switch must be capable of being activated by the passengers from the main passenger compartment of the vehicle, independatly of the driver trigger/ switch.

Both audio activation triggers / switches must be independent of each other – this means that audio recording can only be deactivated by means of the same trigger / switch (driver or passenger) that was used to activate the audio recording.

1.18 Audio data and image data must be stored together, not in separate files, and must be protected against unauthorised access or tampering.

Protected by password access.

1.19 The system must support testing of the audio function for installation set-up and inspection purposes.

1.20 Images recorded by the system shall not be displayed constantly within the vehicle.

The monitor must display live images as clearly visible by having a glance around as per ICO specifications, it must not display images constantly.

1.21 The system must include a visual

This may take the form of an indicator LED built into the audio activation switch, or a remote LED that can clearly

Ref	Specification	Details
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	indicator that will clearly show when audio recording is taking place. This indicator must be visible to all passengers within the vehicle.	be seen by passengers.
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2.0 Storage capacity technical specification

Ref	Specification	Details
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2.1	Minimum of 28 days i.e. (28 x 24 hours) of recording capacity.	The camera system must be capable of recording and storing a minimum of 28 days of images of HD1 (720/288) size or better.
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2.2	Cameras must have a light contrast compensation system to allow images to be clear in all lighting conditions.	System to provide clear images in bright sunshine, shade, dark and total darkness. Also, when strong back light is present without the need of additional components.
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3.0 Camera Head Technical Specification

Ref	Specification	Details
3.1	Camera installation non-obstructive.	<p>The camera and all system components shall be installed in a manner that does not interfere with the driver's vision or view of mirrors or otherwise normal operation of the vehicle.</p> <p>The camera and components must not be fitted to areas of the vehicle that may damage or impede airbag deployment in the event of an accident.</p>
3.2	Protected camera disconnect.	The camera head shall be designed to disconnect for ease of removal and replacement only by maintenance personnel.
3.3	Special tools for adjustment/removal.	To prevent inappropriate interference only tools supplied to authorised fitters should be capable of conducting adjustments or removal.
3.4	Field of view to capture all passengers in the vehicle.	The lens or the position of the camera must be of a type that captures the driver and all passengers of the vehicle on the recorded image. The lens must be of a style not to create a "fishbowl" effect.
3.5	Compatible for use in vehicles with a partition (shield).	The camera system must be adaptable to provide clear images when a vehicle is equipped with a partition/ shield. This may be accomplished with the use of multiple camera heads.

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Ref	Specification	Details
3.6	Multiple cameras.	The unit shall be capable of supporting up to 4 cameras. Four cameras may be required to provide adequate coverage in larger vehicles and/or certain purpose-built vehicles or external images.

4.0 Technical specification: storage device

Ref	Specification	Details
4.1	Impact and shock resistance.	The recorder shall be impact resistant, sufficient to withstand a typical car accident, or striking with a large, heavy object such as a suitcase.
4.2	Controller in concealed location.	The storage unit shall be concealed from within the passenger compartment and effectively inaccessible except by authorised personnel (e.g. luggage area).
4.3	Download port provision.	The recorder shall be equipped with a communication port within the hard drive housing (caddy) for downloading by authorised personnel.
4.4	Download port shall be located in an easily accessible location.	The recorder download port shall be positioned in a location that does not require the removal of panels and is accessible to authorised personnel.
4.5	Where a download port is required, the cable length must be one (1) metre minimum.	Download port shall be at least one metre in length for ease of connectivity.

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Ref	Specification	Details
4.6	Recorder to be securely affixed to the vehicle.	
4.7	Log to register each user access.	
4.8	Log to register camera system parameter modifications.	
4.9	Log to register each image download session.	
4.10	Log to register exporting of downloaded images.	
4.11	Log to register exporting of downloaded clips.	
4.12	Log file protected against unauthorised access.	
4.13	Time/ date stamp.	All stored images must be time and date stamped.
4.14	Vehicle ID number stamp.	All stored images must have two fields for vehicle identification (VIN & vehicle registration number).
4.15	Controller non-modifiable ID code stamp.	Each recorded image shall be automatically stamped with a unique and non-modifiable code that identifies the controller that was used to record the image.

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5.0 Specifications for video and audio recording rate

Ref	Specification	Details
5.1	Video image recording on system activation (when audio is not activated).	The system shall record images at a minimum rate of 25 images per second.
5.2	Video image recording when audio is activated.	The system shall record images at the rate of twenty-five images per second during periods when audio recording is activated.
5.3	When activated, audio recording must be in real time and synchronised with the video recording.	When activated, audio recording must be in real time and synchronised with the video recording.
5.4	System to continue to record images (and audio when applicable) when engine is off.	System must continue to record images (and audio when applicable) for 30 minutes after engine / ignition or override switch is off.

6.0 Downloading technical specification

Ref	Specification	Details
6.1	Provision of necessary software, cables, security keys to the data controller.	Data controller must maintain these for access when required.

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Ref	Specification	Details
6.2	Downloaded images must be stored securely.	The data controller, and data held by the local authority will be stored in compliance with UKGDPR and [insert council name] privacy notice.
6.3	Downloaded images stored in secure format.	The data controller, and any data held by [insert council name] will be stored in compliance with UKGDPR and the authorities privacy notice.
6.4	Verifiable image authenticity.	Each image shall be watermarked with vehicle ID, and time and date, and be tamperproof.
6.5	Provision of Service Level Agreement (SLA) regarding technical support to [insert council name] licensing section, when necessary.	To assist in accessing system in case of damage to the vehicle or to the system in case of accident within a reasonable time.
6.6	Wireless download prohibited.	All wireless hardware to be disabled.
6.7	Filter the specific images for events and times for the approximate time of the incident/ data request.	The playback software must list the files in date and time slot order for ease of location of required file. The time taken to download such files should take no longer than 30 minutes.
6.8	Windows compatible.	Once downloaded and converted.

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7.0 Requirements in relation to system information

Ref	Specification	Details
7.1	Provision of service log.	The unit manufacturer/ supplier shall have a service log. The manufacturer/ supplier shall also enclose detailed instructions for the drivers with each unit.
7.2	Serial number indication on service log.	The unit will be marked with a serial number.
7.3	Installation date indication.	A certificate of installation must be provided which will indicate the installation date.
7.4	Clarity of operating instructions.	The system shall be provided with clear and concise operation instructions which are written or presented with consideration to varying levels of literacy.
7.5	Installation by authorised agents.	The unit shall be installed by manufacturer's authorised agents.
7.6	Provision of authorised agents.	The system shall only be installed by manufacturer or supplier authorised agents, or other installers approved by those agents.
7.7	Documentation.	The manufacturer or supplier must provide clear and concise printed/ written operating instructions. (Details on how the system operates).

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Ref	Specification	Details
7.8	Image protection.	All captured images must be protected using encryption software that meets or exceeds the current FIPS 140-2 (level 2) standard or equivalent.

8.0 System requirements in relation to vehicle inspection facility

Ref	Specification	Details
8.1	Provision of system status/health indicator.	The driver shall have an indicator showing when the system is operational and when there is a malfunction. This includes the images shown to verify the status of each camera.
8.2	Mounting location of system status/health indicator to be seen.	The indicator or monitor shall be mounted in such a way to allow for ease of view.
8.3	Design and/or installed to be testable as part of the vehicle compliance test. (or persons acting on behalf of [insert local authority name] (e.g. vehicle inspectors/ authorised licensing officers)	The system shall be designed and installed to allow the system to be easily tested as part of vehicle compliance checks (e.g. monitor to demonstrate the camera images) see specification 1.20

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9.0 General system requirements

Ref	Specification	Details
9.1	Vandal and tamper resistance.	All component parts must be securely mounted, hard wired, small, and discreet enough to remove the risk of tampering.
9.2	Written confirmation from the company or supplier installing the CCTV will be provided to the local authority.	In addition to a formal test of all aspects of this requirement specification, when installation is complete, a written/ printed installation certificate shall be provided to [insert council name] to confirm the CCTV system is compliant with this specification.
9.3	Reliability in operational and environmental conditions.	The system shall provide reliable and full functionality in all operational and environmental conditions encountered in the operation of taxis and private hire vehicles.
9.4	Programmability of image timing parameters.	It shall be possible to change timing and parameters without the requirement to change components.
9.5	Training, technical support and equipment.	Manufacturer or supplier must provide the data controller with technical support.
9.6	Software and Hardware.	Manufacturer or supplier to provide the data controller with a supply of cables and software required to access the data as and when required.
9.7	Agreement between the camera manufacturer or supplier and the data	Agreement to allow the data controller to access the relevant software.

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Ref Specification**Details**

controller.

- 9.8 All equipment must comply with any legislative requirements on respect of the Motor Vehicle Construction and Use Regulations.
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Appendix B: Licence conditions

Taxi/private hire vehicle driver and vehicle additional licence conditions when CCTV is installed in a licensed vehicle

The vehicle proprietor shall ensure that:

1. No CCTV system shall be installed in a licensed vehicle, unless it is of a type that is compliant with the specifications listed in Appendix A of the CCTV policy requirements approved by the licensing authority, The type of system, location and number of cameras shall not be varied without notification to the licensing authority.
2. The CCTV system is properly and regularly maintained and serviced in accordance with the manufacturer or suppliers instructions by a suitably qualified person. Written records of all maintenance and servicing shall be retained by the proprietor for a minimum of 12 months. Such written records shall be made available on demand by an authorised officer of the licensing authority or a Police officer.
3. The CCTV system must be fully operational at all times the vehicle is in use

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for hire or reward. If the system is not operational the vehicle must not be used for hire or reward until activated or it fixed and fully operational in accordance with the specifications in Appendix A.

4. The recording system and memory must be securely stored within the vehicle and away from public access.
5. The system or the footage that is contained within it must not be tampered or interfered with by any person except as would be expected in order to operate the system in accordance with the manufacturer or suppliers directions.
6. The images contained in the recording device may only be downloaded by authorised personnel.

Hackney Carriage/Private Hire Driver licence conditions:

1. The driver must ensure that the vehicle's CCTV system is operational before commencing taxi or private hire activity each day, the driver must check the monitor display to ensure the image displayed is clear and the CCTV device is not faulty. If the system is not operational the vehicle must not be used for hire or reward until repaired and fully operational in accordance with the specifications listed in Appendix A, or the CCTV device and signage are removed from the vehicle with the consent of the vehicle proprietor/s and **[insert council name]** are informed immediately (only applicable when CCTV is not mandatory).
2. Audio recorded must be activated by the driver any time the driver and passenger/s are in a dispute and/or the driver feels the need to record audio due to the language or behaviour of passenger/s.
3. The driver must not tamper or otherwise interfere with the system or the footage that is contained within it (nor must the driver allow the system to be tampered or interfered with by any person that does not have the suppliers authority to do so), except as would be expected in order to operate the system or perform maintenance in accordance with the manufacturer or

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