Guidance and Technical Specifications for CCTV In Licensed Vehicles

The Council has set standards on the acceptable type of signage for Private Hire Vehicles and Hackney Carriages. These can be found in the Private Hire Vehicle/Hackney Carriages conditions set out in Additional Guidance on the operation of CCTV in Licensed Vehicles

Introduction

This guidance supports the Council's Hackney Carriage and Private Hire Licensing Policy 2025-2030. It applies where CCTV is voluntarily installed in a vehicle licensed by the Council.

A properly operated CCTV system may help to safeguard passengers and drivers, prevent and detect crime and disorder, deter inappropriate behaviour and provide evidence where an incident has occurred.

The Council does not approve or certify individual CCTV systems, suppliers or installers. Nothing in this guidance removes the responsibility of a licence holder, proprietor, operator or other person to comply with the law.

Installation of CCTV

Before installing CCTV, the proprietor should consider the purpose of the system, whether recording is necessary and proportionate, the intended camera coverage, storage and security arrangements, access controls, retention and procedures for responding to requests.

The system should be securely installed and maintained in accordance with the manufacturer's instructions. Cameras should not unnecessarily record areas outside the vehicle.

Data protection responsibilities

The person or organisation that determines the purposes and means of operating the CCTV system will normally be the data controller.

The data controller is responsible for ensuring that the collection, use, storage, retention, disclosure and deletion of recordings complies with applicable data protection legislation.

Before use, the data controller should document the purpose and lawful basis, consider whether a Data Protection Impact Assessment is required, establish a retention period, provide privacy information, establish request and disclosure procedures and implement appropriate security measures.

Data Protection Impact Assessment

The operator should consider whether a Data Protection Impact Assessment is required before installing or operating CCTV.

The assessment should address the purpose and extent of recording, the effect on passengers and drivers, less intrusive alternatives, security, access, retention, deletion and any audio recording. It should be reviewed where the system, purpose or method of use changes materially.

Signage and privacy information

Clear and prominent signage must be displayed whenever CCTV is operating. It should be visible on or before entry, state that CCTV is in use, identify the data controller or provide contact details, and explain how further privacy information may be obtained.

Where external areas are recorded, the data controller should consider whether external signage is appropriate. Signage must be kept clean, legible and secure.

Operation and maintenance

The proprietor should ensure the equipment is suitable for vehicle use, securely installed, accurately date and time stamped, capable of producing recordings fit for the stated purpose, access controlled and properly maintained.

The installation must not obstruct the driver's view, interfere with controls, mirrors, airbags or other safety equipment, or create an injury risk.

A temporarily unavailable voluntary system will not by itself prevent use of the vehicle. Passengers must not be told CCTV is operating when the system is known not to be recording.

Security of recordings

Recordings must be protected against accidental or unlawful loss, alteration, destruction, access or disclosure. Safeguards should include encryption, password protection, physical protection, restricted access, secure export procedures and an access and disclosure record.

Recordings must not be viewed, copied, shared or published for personal, entertainment or other incompatible purposes, including publication on social media.

Retention and deletion

Recordings must not be retained longer than necessary. The data controller should establish and document a retention period that is reasonable, proportionate and capable of justification.

Recordings relating to an incident may be preserved where necessary for an investigation, legal claim or other lawful purpose. Data must be securely deleted when no longer required.

Access and disclosure

Only authorised persons should access recordings. Disclosure may take place where lawful and necessary, including to the Police, another statutory enforcement body, the Council in connection with its licensing functions, under a court order, for legal claims or to an individual exercising data protection rights.

Each disclosure should be assessed and recorded, including the requester, purpose, lawful basis, material disclosed and authorising person.

Individual rights

The data controller is responsible for responses to individuals exercising rights under data protection legislation. Procedures should permit footage to be identified, the requester's identity to be verified, third-party personal data to be protected and requests to be answered within applicable timescales.

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The Council will not normally hold recordings from voluntary systems and cannot respond on behalf of the data controller.

Audio recording

The Council does not support routine recording of conversations in licensed vehicles. Audio recording must not be enabled by default.

Audio should only be used where a clearly defined purpose, lawful basis, necessity and proportionality can be demonstrated; visual recording alone is insufficient; risks have been assessed; occupants are clearly informed; and controls prevent continuous or unnecessary recording.

Where audio cannot be separately disabled or controlled, the operator should consider whether the system is suitable.

Requests from the Council

The Council may request information reasonably required to determine whether operation of the system complies with the Licensing Policy or raises a relevant public safety, safeguarding or licensing concern.

Information may include equipment details, camera locations, purpose, data controller details, lawful basis, DPIA where applicable, privacy information, signage, retention, access and disclosure procedures and audio controls. A request does not transfer responsibility for the system to the Council.

Licensing and enforcement

Each case will be considered on its own merits. A technical fault or isolated administrative error will not automatically result in licensing action.

The Council will take account of seriousness, risk or harm, the licence holder's response and relevance to public safety, safeguarding, fitness and propriety or suitability. Serious, deliberate or repeated non-compliance may be taken into account and may be referred to the Information Commissioner's Office or another relevant body.

Further information

Licence holders and operators remain responsible for obtaining any legal or specialist advice needed. Further information may be obtained from the Information Commissioner's Office, Department for Transport and the Council's Licensing Service.

The Council may amend this guidance to reflect changes in legislation, statutory guidance, case law or recognised good practice.

Operational Technical Specifications

Ref	Specification	Details
1.1	100% solid state design or a proven vibration and shock resistant system	The system should not have any fan and the recording should be vibration and shock proof, i.e.: - Flash-based SSD (100% industrial grade), - Hard disk with both mechanical anti-vibration and anti-shock mechanism and self-recovery and self-check file writing system. SD cards will not be acceptable
1.2	8 to 15 Volts DC	Operational between 8 and 15-volts DC
1.3	Reverse polarity protected	System to 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 taxi camera equipment must be e-marked or CE-marked with confirmation by the equipment manufacturer as being non-immunity related and suitable for use in motor vehicles.
1.7	System override switch to be located in a position where it is not accessible from inside the vehicle (i.e. in the boot) The override switch must be illuminated when switched "on"	The system is required to be active at all times that the vehicle is being used as a licensed vehicle. This will allow the facility for the system 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 be located within the vehicles luggage area (i.e. it must not be possible to deactivate the system from inside of the vehicle).
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 log must be kept and maintained by the approved installer and the local authority to record time/date/reason when data is accessed.
1.10	Security, duration and auto-clearing of access record.	Access record will be kept for 12 months.
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 will not be permitted
1.13	Unit must operate without the ignition being turned on.	The Unit must have the ability to operate for at least 30 mins without power from the ignition. The device must be hard wired to both constant and ignition supply.
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	If activated, the audio must record within the video file.

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	synchronized to the recorded images.	
1.17	The system shall not record audio except when audio recording is activated by means of an approved trigger / panic switch	The system should have the ability to start recording audio data by means of a trigger switch.
1.18	The audio playback, when triggered, shall be in 'real time' and synchronised with the images that are captured.	
1.22	Audio data and image data must be stored together, not in separate files, and must be protected against unauthorised access or tampering.	
1.23	The system must support testing of the audio function for installation set-up and inspection purposes.	
1.25	Recorded images by the system shall not be displayed 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 recorded images
1.26	The system must have a panic switch for audio activation	At least one trigger/audio activate button in the form of a rocker switch must be capable of being operated by the driver AND a passenger. Once activated, this switch must trigger the recording of video and audio in accordance with section 6.1 below. If more than one switch is installed, they must operate independently of each other.
1.27	The system must include a visual indicator that will clearly show when audio recording is taking place. This indicator must be visible to all passengers within the vehicle.	This may take the form of an indicator LED built into the audio activation switch which can clearly be seen by passengers.

Store Capacity Technical Specification

Ref	Specification	Details
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.
2.2	Images must 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 for additional components.

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Camera Head Technical Specification

Ref	Specification	Details
3.1	Camera installation non-obstructive	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.
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 carrying out 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.
3.6	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 shield. This may be accomplished with the use of multiple camera heads.
3.7	Multiple cameras	The unit shall be capable of supporting up to four (4) cameras. Four cameras may be required to provide adequate coverage in larger vehicles and/or certain purpose-built vehicles or external images.

Storage Device Technical Specification

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. For example, in the luggage area
4.3	Download port provision	The recorder shall be equipped with a communication port within the hard drive housing for downloading by authorised officer.
4.5	Download port cable length (1 foot minimum)	Download port shall be at least one foot in length for ease of download.
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	

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4.10	Log to register modification/manipulation of downloaded images	
4.11	Log to register exporting of downloaded images	
4.12	Log to register exporting of downloaded clips	
4.13	Log file protected against unauthorised access	
4.14	Time/date stamp	All stored images must be time and date stamped.
4.15	Vehicle ID number stamp	All stored images must have vehicle identification (VIN & or number plate).
4.16	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.
4.17	Controller (Storage Recorder)	Manufacturer to supply the Council with a supply of specialised tools to allow for removal of the controller and download of data when required.

Specification for video and audio recording rate

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 25 images per second during periods when audio recording is activated (either due to time requirement, or through activation by the driver trigger switch or passenger audio button).
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 switched off.

Specification for activation via driver or passenger trigger/ audio button

6.1	The activation of a trigger button when activated by driver or passenger.	The system must be fitted with at least one trigger button in the form of a rocker switch that once activated will trigger synchronised audio and video recording.

Downloading Technical Specification

7.2	Provision of necessary software, cables, security keys to the Council Licensing Team.	
7.3	Windows compatible.	Once downloaded and converted

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7.4	Recorded images stored in non-volatile media	
7.5	Recorded images stored in secure format	
7.6	Verifiable image authenticity	Each image shall be watermarked with vehicle ID, and time and date, and be tamperproof.
7.7	Provision of technical support to Rushcliffe Borough Council Licensing team 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 frame
7.8	Wireless Download Prohibited	All wireless hardware to be disabled.
7.9	Filter the specific images for events and times for the approximate time of the crime committed.	The playback software must list the files in date and time slot order for ease of location of required file.

Requirements in relation to System Information

8.1	Provision of service log	The unit manufacturer shall have a service log. The manufacturer shall also provide detailed instructions for the drivers with each unit.
8.2	Serial number indication on service log	The unit will be marked with a serial number
8.3	Installation date indication	A certificate of installation must be provided which will indicate the installation date
8.4	Clarity of operating instructions	The system shall be provided with clear and concise operation instructions which are written or presented with due consideration to varying levels of literacy.
8.5	Installation by authorised agents	The unit shall only be installed by manufacturer's authorised agents, or other installers approved by those agents
8.6	Provision of authorised agents list to the Council Licensing Team	The manufacturer or supplier shall provide a list of all authorised agents to the Council Licensing Team.
8.7	Documentation	The manufacturer must provide clear and concise operating instructions which are written or presented in layman's terms. (Details on how the system operates)
8.8	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.

System requirements in relation to vehicle inspection Facility – Inspections

9.1	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 should include the images as shown to verify the status of each camera.

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9.2	Mounting location of system status/health indicator to be seen	The indicators shall be mounted in such a way so as to allow for ease of view.
9.3	Design and or installation to be testable as part of the vehicle compliance test (or persons acting on behalf of the council – such as vehicle inspectors)	The system shall be designed and installed such that the system may be easily tested as part of vehicle compliance test as prescribed.

General System Requirements

10.1	Vandal and tamper resistance	All component parts must be securely mounted, hard wired and small and discreet enough to remove the risk of tampering.
10.2	Provision of statement of compliance	In addition to a formal test of all aspects of this requirement specification, a statement of compliance shall be provided and signed by an officer of the company.
10.3	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.
10.4	Programmability of image timing parameters	It shall be possible to change timing and parameters without the requirement to change components.
10.5	Training and Technical Support and Equipment	Manufacturer must provide Rushcliffe Council Licensing Team with a Training and Technical support
10.6	Software and Hardware	Manufacturer to supply the Council Licensing Team with a supply of cables and software to be installed under the supervision of Rushcliffe council's authorised staff.
10.7	Agreement between the Camera Manufacturer and Rushcliffe Borough Council	Agreement to allow Rushcliffe Council access to the relevant software from the supplier so that in the event the manufacturer goes out of business, council will be able to support the system.

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