

### General

We use the term Taxi to describe hackney carriages and private hire vehicles.

Hackney carriages can be hailed in the street and take passengers from a rank. Southampton hackney carriages are white in colour, will have a red and white licence plate on the rear of the vehicle as well as a small paper plate in the front windscreen positioned at the top on the nearside. They will have either a factory fitted taxi sign or a large roof box sign displaying the Bargate logo and the word TAXI.

Private hire vehicles have to be pre-booked through an operator. The driver can take no part in the booking process. Southampton licensed vehicles are any colour other than white, display a blue and white rear licence plate and a paper plate in the front windscreen. They will have approved door stickers on both front doors displaying the contact details of the operator.

As part of the vehicle conditions for hackney carriages and private hire vehicles Southampton City Council has a policy that all vehicles so licensed will be fitted with an approved taxi camera. A check that power is reaching the unit forms part of the annual compliance test.

The legislation does allow for taxis licensed elsewhere to operate in the city, very few authorities mandate the use of cameras so we recommend the public look for and use Southampton licensed vehicles

The council has conducted a Data [Protection](#) Impact Assessment (DPIA) to support this policy.

This policy sets out how these conditions will be applied.

### Ownership

The camera systems will be purchased by the vehicle proprietor and they will own the system. The data belongs to Southampton City Council who are the data controllers.

### Taxi camera specification

To manage the administration of the scheme Southampton City Council will approve no more than 5 systems at any one time. Each system will have to meet the [specifications](#) set by Southampton City Council.

Part of the specification is to have properly qualified approved fitters of the systems who will issue a camera certificate to confirm the camera has been fitted and meets the specifications set by Southampton City Council.

### Signage

The vehicles will be required to display in the window of each rear side door an approved double sided sticker advising the public that both visual and audio recording is taking place in the vehicle and contain SCC contact details for any enquiries.

### Audio Recording

Taxi cameras fitted in SCC licensed vehicles are required to be able to record audio for a period of 5 minutes when activated by a button operated by the driver.

After a challenge by the ICO in 2012 it was deemed there was not sufficient justification to allow the permanent recording of audio data in taxis, however there are times when audio recording is justified. When it is justified the current default position is that the driver will inform the passengers, they are activating the audio recording and explain why. It is acceptable not to announce this if the driver considers by doing so it will place either himself or another at risk.

To be properly prepared drivers should consider various potential scenarios and think of options on how they will deal with it in the safest manner.

## Taxi Camera Policy

It is not acceptable for drivers or passengers to be subjected to abuse or threats. Neither is it acceptable for taxis to be used to facilitate crimes.

The audio button should only be pressed:-

- When there is a conflict between parties.
- As soon as someone becomes abusive.
- As soon as someone becomes threatening.

The driver will announce at the time of activation

**FOR EVERYONE'S PROTECTION I AM NOW ACTIVATING THE AUDIO RECORDING WITHIN THIS VEHICLE. THE SYSTEM HAS BEEN RECORDING VISUAL DATA ALL THE TIME.**

Only if the driver considers it is not safe to make such an announcement should the announcement not be made and the passengers should be advised of the activation should it become safe to do so.

The driver can add that they have no access to the data, that SCC is the data controller and should be contacted ([licensing@southampton.gov.uk](mailto:licensing@southampton.gov.uk)) if they have any enquiries. That only specific staff have access to the data when it is necessary for them to do so. Details can be found on the council website [Taxi cameras \(southampton.gov.uk\)](http://southampton.gov.uk)

Drivers will be made aware of this policy and specifically the instructions on use of the camera system and acknowledge they have read it at the time of application/renewal.

## Download Policy

1. Licensed hackney carriages and private hire vehicles licensed by Southampton City Council are required, unless an exception is granted, to be fitted with an approved taxi camera. (See camera specification below but note the fitter and system needs to be approved)
2. The cameras are to be set up to activate and record permanently visual data when the ignition is turned on and remain on for a period of at least 20 minutes after the ignition is turned off. Audio data will only be activated by means of a button available to the driver.
3. All passengers are made aware of the fact that they are being recorded by notices strategically placed on the vehicles. These notices are placed on the rear windows adjacent to the B pillar on both sides and in purpose built vehicles also on the security screen that separates the driver and passenger. These labels clearly warn that both audio and visual recordings take place in the vehicle using wording and images of a camera and a microphone.
4. Data will only ever be downloaded on four occasions
  - (i) where a crime report has been made involving the specific vehicle and the Police have formally requested that data or,
  - (ii) when the authority is notified in writing of a complaint in relation to a specific vehicle or driver and the matter cannot be resolved in any other way.
  - (iii) where a Data request is received from an applicant e.g. police or social services, that has a legitimate requirement to have access to the data requested to assist them in an investigation that involves a licensed vehicle or driver or passenger.
  - (iv) Subject Access Request compliant with the General Data Protection Regulation.
5. To safeguard the data all downloads will be conducted in the presence of at least two relevant people. Relevant people are: a member of the Southampton City Council licensing team, a serving police employee or the driver or proprietor of the vehicle. This will generally be at the Council offices with a member of Licensing staff and the driver of the vehicle.
6. All requests must be in an appropriate format detailing the powers that allow the release of the data and providing all the information required. The request form for download must state the approximate time of the event/occurrence and only the timescale relevant to the specific incident will be downloaded, decrypted and thereafter stored.

## Taxi Camera Policy

7. On receipt of a download request to be conducted by SCC staff a member of the Licensing Team will confirm it is a legitimate request. If practical, arrangements will be made with the owner of the licensed vehicle for the vehicle to attend the Licensing Office. If it is not practical then a member of the Licensing Team will attend the location of the vehicle or data box to facilitate the download. Any download will be carried out in the presence of at least one other person if at the licensing office. If the download is taking place away from the licensing office then either an additional member of Council staff or a member of the requesting organisation i.e. police officer will be present in addition to the member of staff conducting the download.
8. A dedicated computer not linked to the council or any network will be used to facilitate the download from the data box. This computer will copy the downloaded footage onto its files. A master copy will be created from this computer and placed on the external hard drive dedicated for such use and retained by SCC Licensing Team. This hard drive will be kept secure to prevent loss of data. A working copy will be produced and either given to the requesting authority or subject or retained by the investigating officer. Data retained by SCC Licensing Team will only be retained for the following periods:
  - a. Cases leading to prosecution or suspension/revocations/refusal of a taxi licence 10 years from date of trial or determination.
  - 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.The file on the dedicated computer will be deleted once the master and working copies are produced.
9. Staff in the Licensing Team will conduct a review of material held on the hard drive each year in March and erase any material over one year old. Any working copies should be placed on the appropriate files and they will be weeded and safely destroyed with the files whose time limits mirror those set out above. Data will only be viewed by the person performing the download to the extent necessary to facilitate the download process. Data being used in any investigations will only be viewed by persons involved in that investigation but will be released to be used in court or for determinations if necessary.
10. After a period of time any data held by the system installed in any vehicle is automatically overwritten dependent upon the specification of the system installed. Typically, this will be within a period of 14 – 30 days.
11. Only systems approved by the Licensing Team may be installed by an approved installer – thereby ensuring that any equipment may not be tampered with, encryption is of a sufficient standard and data may not be interfered with or released to any third party / published.

## Exemptions to the policy

The private hire vehicle policy has a section on Specialist Vehicles where the service manager of licensing has discretion to apply an exemption to the requirement for a taxi camera. These will be very rare and only when justified with supporting evidence.

The exemptions will apply to vehicles solely used for high level executive hire, the vehicle will have to be a high end executive vehicle, the applicant will have to provide evidence and assurances the vehicle will only be used for contract work, namely not standard private hire work but work with known clients on a contract for a number of journeys and not just one or one and a return journey. Airport runs for non business purposes are not considered to be within this definition.

Anyone has the right to object to having their data processed. Any objections should be sent to [licensing@southampton.gov.uk](mailto:licensing@southampton.gov.uk) . Each case will be determined on the merits in accordance with relevant legislation and Southampton City Council Policies.

**Taxi Camera Policy**

## Taxi Camera Policy

### Technical Specifications

#### 1.0 Operational

Reference	Specification	Details
1.1	100% solid state design or a proven vibration and shock resistant system	The recording should be vibration and shock proof, i.e.: <ul style="list-style-type: none"> <li>- Flash-based SSD (100% industrial grade),</li> <li>- Hard disk with both mechanical anti-vibration and anti-shock mechanism and self-recovery and self-check file writing system.</li> </ul>
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 in-vehicle Camera system must be compliant with the Council Directives: <ul style="list-style-type: none"> <li>- 2014/30/EC on Electromagnetic Compatibility (CISPR 22/EN55022),</li> <li>- 2014/30/EC on Radio Interference (sections 6.5, 6.6, 6.8 and 6.9)</li> </ul> The Camera equipment should therefore be e-marked or CE-marked or UKCA marked with confirmation by the equipment manufacturer as being non-immunity related and suitable for use in motor vehicles as and where required by the regulations.
1.7	Absence of "on/off" switch	The system must be permanently wired to the power supply of the vehicle, and shall not be equipped with an on/off switch. Although facility to have an on/off switch fitted retrospectively is advised
1.8	First-in/first-out buffer recording principle	
1.9	Image export formats and media	Images must be exported to common commercially available formats.
1.10	Image protection during power disruption	Images must be preserved in the event of loss of power. Battery back-up will not be permitted
1.11	Image and audio data shall be recorded and stored in a unit separate from the camera head.	
1.12	The system must be capable of recording audio time synchronized to the recorded images.	
1.13	The system shall be programmed not to record audio unless triggered by an approved trigger.	The system needs to have the ability to start recording audio data by means of a panic button. Once audio recording is triggered the length of the audio recording needs to be able to be set to record for a duration of 5 minutes.
1.14	The audio playback, when triggered, shall be in 'real time' regardless of the image capture	

## Taxi Camera Policy

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1.15	Digital sampling of the audio signal must exceed 8KHz	
1.16	Digital resolution of the audio samples must exceed 10 bits.	
1.17	The audio microphone shall be integrated within the camera head.	
1.18	Audio data and image data must be stored together, not in separate files, and must be protected against unauthorised access or tampering.	
1.19	The system must support testing of the audio function for installation set-up and inspection purposes.	
1.20	The system must 'go to sleep' to reduce battery drain during prolonged idle time. It must be capable of immediate reactivation	

### Technical Specifications

#### 2.0 Storage Capacity

Reference	Specification	Details
2.1	Minimum of seven days of recording capacity	The camera system must be capable of recording and storing a minimum of seven days of continuous recording
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.

### Technical Specifications

#### 3.0 Camera Head

Reference	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 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 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	Images must be clear	System to provide clear images in all lighting conditions and allow different skin tones to be detected.
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.

## Taxi Camera Policy

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.
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### Technical Specifications

#### 4.0 Storage Device (Recorder)

Reference	Specification	Details
4.1	Impact and shock resistance	The recorder shall be impact resistant, sufficient to withstand 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 view and effectively inaccessible except by authorised personnel.
4.3	Download provision	Any new models are to have a removable drive that only allows access by approved persons, namely fitters, council staff and others authorised to carry out downloads. Existing models can be equipped with a communication port for downloading by authorised personnel or a removable drive.
4.4	Download port shall be located in an easily accessible location such as a glove compartment.	The recorder download port shall be located in a location that does not require the removal of panels and is accessible.
4.5	Download port cable length (1 foot minimum)	Download port cable 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	
4.7.1	Log to register camera system parameter modifications	
4.7.2	Log to register each image download session	
4.7.3	Log to register modification/manipulation of downloaded images	
4.7.4	Log to register exporting of downloaded images	
4.7.5	Log to register exporting of downloaded clips	
4.7.6	Log file protected against unauthorised access	
4.7.7	Time/date stamp	All stored images must be time and date stamped.
4.7.8	Vehicle ID number stamp	All stored images must have two fields for vehicle identification (VIN & number plate).
4.7.9	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.
4.7.10	Controller (Storage Recorder)	Manufacturer to supply Southampton City Council Licensing Team and Hampshire Police with a supply of specialized tool to allow for removal of the Controller and download of data when required.

## Taxi Camera Policy

### Technical Specifications

#### 5.0 Activation

Reference	Specification	Details
5.1	System to record when ignition switch is on.	System to record when ignition switch is in the accessory position and in the engine run position even if the engine is not running.
5.2	System to continue to record images when engine is off.	System must continue to record images for 20 minutes after engine is shut off.
5.3	System to record audio for a period of 5 minutes on activation of a button	Currently we only require a button for the driver but the system should be capable of allowing at least one other audio trigger, including another button.

### Technical Specifications

#### 6.0 Visual data quality

Reference	Specification	Details
6.1	System to record at least 4 frames a second and increase to a minimum of 10 frames per second on activation of any emergency button.	When starting system to record a minimum of 4 frames per second and to remain constant at the initial rate until the activation of an emergency button when it must record at least 10 frames per second for a period of 5 minutes.

### Technical Specifications

#### 7.0 Downloading

Reference	Specification	Details
7.1	Time to download complete memory not to exceed 30 minutes	Time to download to be accomplished in 30 minutes or less.
7.2	Provision of necessary software, cables, security keys to Southampton City Council Licensing Team and Hampshire Police	
7.3	Windows 10 compatible.	
7.4	Downloaded images stored in non-volatile media	
7.5	Downloaded images stored in secure format	
7.6	Verifiable image authenticity	Each image shall be stamped with controller ID and vehicle ID and be tamperproof.
7.7	Provision of technical support to Southampton City Council Licensing Team and Hampshire	To assist in accessing system in case of damage to the vehicle or to the system in case of accident within 1 hour during normal working hours and within 8 hours otherwise.



## Taxi Camera Policy

	Police when necessary.	
7.8	Wireless Download Prohibited	Unit must not allow for wireless downloads. Wireless diagnostic may be used. All wireless hardware to be disabled.
7.9	Filter the specific images for events and times for the approximate time of the incident	

## System Requirements

### 8.0 System Information

Reference	Requirement	Details
8.1	Provision of service log sheet with each unit shipped	The unit manufacturer shall have a service log shipped with the unit. The manufacturer shall also enclose detailed instructions for the drivers with each unit shipped. An installation manual shall also be furnished to authorised installers and fleet operators.
8.2	Serial number indication on service log	The unit will be marked with a serial number
8.3	Installation date indication on service log	The provision for the installer to indicate the installation date
8.4	Provision of driver instruction card with each unit shipped	
8.5	Provision of installation manual to installers and fleet operators	
8.6	Clarity of operating instructions	The system shall be provided with clear and concise operation instructions which are written with due consideration to varying levels of literacy.
8.7	Installation by authorised agents	The unit shall be installed by manufacturer's authorised agents.
8.8	Provision of authorised agents list to Southampton City Council Licensing Team	The manufacturer shall provide a list of all authorised agents to Southampton City Council Licensing Team.
8.9	Documentation	The manufacturer must provide clear and concise operating instructions which are written in layman's terms. (Details on how the system records the images)
8.10	Image Protection	All captured images must be protected using encryption software that meets or exceeds the current FIPS 140-2 (level 2) standard or AES 256 or equivalent.

## System Requirements

### 9.0 Vehicle Inspection Facility – Inspections

Reference	Requirement	Details
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.
9.2	Designed/Installed to be testable by Southampton City Council Licensing Team	The system shall be designed and installed such that the system may be easily tested by Southampton City Council Licensing Team staff to ensure that all features are operating and that images are being recorded as prescribed.

## Taxi Camera Policy

### System Requirements

#### 10.0 General

Reference	Requirement	Details
10.1	Vandal and tamper resistance	
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 Southampton City Council Licensing Team a Training and Technical Manual. Supply a working unit to Southampton City Council for testing purposes.
10.6	Software and Hardware	Manufacturer to supply Southampton City Council and Hampshire Police a supply of cables and software to be installed under the supervision of the City's authorised staff.