

APPENDIX 1

<i>Policy Section</i>	<i>Current Policy Wording</i>	<i>Modification/Modified Wording</i>	<i>Reason for Modification</i>
Appendix A			
4.1.8	None	Addition: An exception will be made for substitute vehicles following damage or an accident (for a maximum period of 1 month) if the substitute vehicle is licensed appropriately.	If a vehicle is damaged for any reason and a temporary vehicle is to be used, there should be a quick method for drivers to get back on the road without too much additional burden.
Appendix B – Vehicle Licence Conditions			
Appendix A 33	None	Addition: It shall be the proprietor's responsibility to ensure that the driver of the vehicle has been provided with clear and concise operation instructions.	To ensure drivers who don't own a vehicle are familiar with the operation of the system.
Appendix A 33	None	Addition: The vehicle proprietor shall make the vehicle available for the download of CCTV footage at the reasonable request of an authorised officer.	To ensure proprietors have a responsibility to present the vehicle for footage to be downloaded.
Appendix A 33	None	Addition: Upon the surrender or lapse of any vehicle licence the proprietor shall arrange for the vehicle to be presented at the Council offices for any data to be downloaded and/or disposed of securely. Failure to do so will be considered a serious data breach and further enforcement action may be taken.	To ensure data is appropriately controlled.

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Appendix C – Operational Specification				
1.8	First-in/first-out buffer recording principle	First-in/first-out buffer recording principle	The system must automatically overwrite to create a constant cycle of recording	To provide clarification of what this means
1.25	Images recorded by the system shall not be displayed within the vehicle.	Images already recorded by the system shall not be displayed within the vehicle.	Any monitor may only display live images as clearly visible by having a glance around as per ICO specifications, it must not display recorded images.	Following consultation with the Council's Data Protection Officers, there is no reason why live images cannot be displayed within the vehicle.
1.26	The system must have at least two emergency activation triggers (panic buttons).	One of the triggers / panic buttons must be capable of being operated by the driver – this must be independent of the audio recording activation switch. At least one other trigger / panic button must be capable	The system must have at least two emergency audio activation triggers (panic buttons). One of the triggers / panic buttons must be capable of being operated by the driver. At least one other trigger / panic button must be capable of being operated by a passenger from any passenger seat in the vehicle. Once activated,	Clarification that the panic buttons are audio trigger buttons.

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		of being operated by a passenger from any passenger seat in the vehicle. Once activated, this switch must trigger the recording of video and audio in accordance with section 6.1 below.		this switch must trigger the recording of video and audio in accordance with section 6.1 below.	
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.	Field of view to capture all passengers in the vehicle	The lens and 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.	Addition of the words ‘and position’ to clarify that the cameras must be positioned properly to capture the whole vehicle.
5.1	Video image recording on system	The system shall record images at the rate of four	Video image recording on system activation	The system shall record images at the rate of 25	Four images per second is very low and wouldn’t provide clear footage without the audio being

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	activation (when audio is not activated).	images per second.	(when audio is not activated).	images per second.	triggered. 25 is an industry standard.
6.1	The activation of a trigger button must provide for overwrite-protected image storage when activated by driver or passenger.	The system must be fitted with at least two trigger buttons that once activated will trigger the protected recording of audio and video (see also 1.17 and 1.26 above).	The activation of a trigger button must provide synchronised audio and video recording	The system must be fitted with at least two trigger buttons that once activated will trigger synchronised audio and video recording (see also 1.17 and 1.26 above).	Removal of requirement to have a separate storage facility for data stored when panic button is triggered. This is no longer a standard requirement for CCTV in taxis. The storage for the system is such that 24 hours continuous recording could take place for weeks before being overwritten. The emergency overwrite self-clear after 96 hours gives less time to download footage.
6.2	Emergency image overwrite protection capability	Image sequences resulting from emergency activation shall be recorded in an area of memory which is protected from being overwritten	<i>Deleted</i>		
6.3	Overwrite protection capacity for at least 3 activations		<i>Deleted</i>		

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6.4	Overwrite protection self-clear on 96 hr timer		<i>Deleted</i>		
7.1	Time to download complete memory not to exceed 30 minutes	Time to download to be accomplished in 30 minutes or less.	<i>Deleted</i>		This is impractical and poses a potential data risk. The facility to swap the SSD is a more practical solution.
7.7	Provision of technical support to NEDDC 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 1 hour during normal working hours and within 8 hours otherwise.	Provision of technical support to NEDDC 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	Modification to say 'within a reasonable time frame' rather than '1 hour during working hours and 8 hours otherwise'. Unnecessarily prescriptive.
7.8	Wireless Download Prohibited	Unit must not allow for wireless downloads. Wireless diagnostic may be used. All wireless	Wireless Download Prohibited	Unit must not allow for wireless downloads. All wireless hardware to be disabled.	Removal of provision which allows wireless diagnostics. This is to minimise security risk.

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		hardware to be disabled.			
7.9	Filter the specific images for events and times for the approximate time of the crime or complaint alleged.		Filter the specific images for events and times for the approximate time of the crime or complaint alleged.	The playback software must list the files in date and time slot order for ease of location of required file.	Clarification that the data should be in order for ease of finding.
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	Provision of service log	The unit manufacturer shall have a service log for each unit. The manufacturer shall also provide detailed instructions for the drivers with each unit. An installation manual shall also be furnished to authorised installers and fleet operators.	Updated to say provided rather than shipped.

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		installers and fleet operators.			
9.2	Mounting location of system status/health indicator to be seen by driver only	The indicators shall be mounted/installed for the driver's vision only. The indication system must be in accordance with section 9.3 and 9.4 below.	Mounting location of system status/health indicator to be seen by the driver and all passengers	The indicators shall be mounted/installed for the driver and all passengers to view. The indication system must be in accordance with section 9.3 and 9.4 below.	The health indicator should be visible to all so all passengers and drivers can see if the system is operational.
10.1	Vandal and tamper resistance		Vandal and tamper resistance	All component parts must be securely mounted, hard wired and small and discreet enough to remove the risk of tampering.	Clarification of the expectation for mounting components.
Appendix C – Driver Obligations					
14	None		Addition: CCTV System Operation The driver must ensure that any CCTV system installed in line with the Council's Taxi Licensing Policy: Hackney Carriages & Private Hire Vehicles (CCTV Supplement) is		To ensure compliance with data protection obligations and to put the onus on the driver to ensure the system is being used appropriately.

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		<p>operational at all times when the vehicle is being used for the carriage of passengers.</p> <p>The driver must ensure that any CCTV system installed in line with the Council's Taxi Licensing Policy: Hackney Carriages & Private Hire Vehicles (CCTV Supplement) is switched off at all times when the vehicle is being used for personal use.</p>	
15	None	<p>Addition: CCTV Inspection At any time when the vehicle is under the control of a licensed driver, the driver shall make the vehicle available for the download of CCTV footage at the reasonable request of an authorised officer.</p>	To put an obligation on a driver to present a vehicle for download in the event the vehicle proprietor is not in control of the vehicle.
Appendix D – Operator Obligations			
2.1	None	Addition (At the end of) 2.1: Whether CCTV is installed in the vehicle	To put an obligation on the operator to record which of their vehicles have CCTV installed.