

From: [McGuiness, Ian](#) on behalf of [Licensing](#)
To: [Bates, Phil](#)
Subject: FW: Cameras in Taxis!
Date: 10 June 2013 08:18:22

From: [REDACTED]
Sent: 07 June 2013 22:17
To: Licensing
Subject: RE: Cameras in Taxis!

Dear Mr Bates –

Thank you for this info which puts the situation in a different light, and one which I agree will benefit the trade and public alike.

Your time is appreciated....

[REDACTED]

From: Bates, Phil [REDACTED]
Sent: Friday, June 7, 2013 2:59 PM
To: [REDACTED]
Subject: RE: Cameras in Taxis!

Dear [REDACTED]

To confirm the systems we have allowed do not have a monitor for the driver to view so there is no distraction. The only time anything is viewed is when the criteria is met for a download, even then the driver does not get to see it.

Thank you for your responses but I must get on with some other work now. I will add your views to the consultation.

Phil Bates

Licensing Manager
Legal, HR and Democratic Services
Southampton and Eastleigh Licensing Partnership
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From: [REDACTED]
Sent: 07 June 2013 12:48
To: Licensing
Subject: RE: Cameras in Taxis!

Dear Mr Bates –

I thank you again for your time to explain the reasons behind this suggestion –

By extra responsibility I mean that to which driver concentration being compromised?
I have assumed that whatever is being recorded by the camera is seen by the driver on a monitor sited somewhere within his field of vision?
If so, then that picture could be distracting!!!

It is unfortunate that we seem to live in an age of ever increasing public disorders, but then history tells us that this is nothing new except perhaps there is more IT at the villain's disposal!!

It is good to know that some drivers see this as a positive move, and one which I trust will be able to be implemented safely.

Regards and again my thanks

From: Bates, Phil [REDACTED]
Sent: Friday, June 7, 2013 11:06 AM
To: [REDACTED]
Subject: RE: Cameras in Taxis!

Dear [REDACTED]

Apologies for mistaking your understanding of the system. As you say there is no such thing as 100% security but the measures in place I consider to be reasonable and stringent enough to prevent such abuse.

Sadly over the years there have been a number of assaults on drivers. In addition a number of drivers have been accused of serious offences including sexual offences that have allegedly occurred in the cab. The presence of the camera and audio recordings were seen as protection against assaults and would determine the guilt or innocence of allegations against the drivers. In fact since the cameras have been in a number of drivers have reported better behaviour from their fares.

I am not sure of the extra responsibility you mention unless you refer to the pressing of a panic button. I do not see this as being detrimental to the drivers ability. There is no other action the driver needs to take with regards the camera.

Phil Bates

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From: [REDACTED]

Sent: 07 June 2013 09:54
To: Licensing
Subject: RE: Cameras in Taxis!

Dear Mr Bates,

I am grateful for your response, but I do understand the technology!!

As you are aware, there are ways and means available to those who would wish to access secure data, although I agree that the possibility of doing so in these events is quite low - there is nothing in this world that prevents the 100% misuse of data to those intent on doing so.

What I do not understand is the thought behind this suggestion?
What events have led to the proposal?

Is it considered that drivers are capable of having this extra responsibility, and still be able to be safe driving?

I would forecast that a camera would be liken to holding up a red flag to a bull!

Regards and my thanks...

From: Bates, Phil [REDACTED]
Sent: Friday, June 7, 2013 9:28 AM
To: [REDACTED]
Subject: RE: Cameras in Taxis!

Dear [REDACTED]

Thank you for your response. I wish to explain briefly how the system works as your response suggests you misunderstand the security of the system.

A camera head is fitted to the car to record images from within the cab of the vehicle. There may be an option to have a panic button for the driver to press to allow audio recording to start for a short period of time. All of this data is recorded onto a secure data box within the car. The only people with access to this are the Council and possibly in the future the police. All the data is protected with a high level of security. Set criteria needs to be met before anyone can access the data. This prevents misuse of the data.

Phil Bates

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From: [REDACTED]
Sent: 06 June 2013 19:22
To: Licensing
Subject: Cameras in Taxis!

Whilst there is some merit in this event, it is intrusive to one's private life.
One uses a taxi or private hire to be transported from one place to another for a fee.

By placing CCTV in any licenced public vehicle, which would also probably have a recording device, a driver with ulterior motives could use it for his own illegal gain.

Other public vehicles I know, do have CCTV, but this is for a greater number of travellers than that which a taxi or private hire vehicle caters for, and does not present an opportunity for an ulterior motive as such.

It is also quite costly, and would present another event to drivers that they would have to be aware of, on top of their already driving awareness, and could lead to a situation leading to a form of carelessness!

Professional drivers learn to drive safely, this sort of diversion would interfere with that safety margin.

Regards
[REDACTED]

From: [Arm, Chris](#) on behalf of [Licensing](#)
To: [Bates, Phil](#)
Subject: FW: camera
Date: 03 June 2013 09:09:36

From: [REDACTED]
Sent: 02 June 2013 18:31
To: Licensing
Subject: camera

Hi Phil

I don't see the point of visual only cameras I never had a problem with audio on .
There are more cameras on the market now I have been told any expense of the camera
come off accounts.

Time for fitting should depend on how long taxi/ph has left if less than 12 months wait till
change 2-3 yrs
maybe within 6 months.

On some occasions you will not get the full story without any sound as I had myself on 1
occasion picked

up a customer asked to go to St Marys St when we got there he said I took him to the
wrong place he
wanted St Marys Rd.

No problem with data control
[REDACTED]

From: [REDACTED]
To: [Licensing](#)
Subject: taxi camera fitting
Date: 06 June 2013 16:29:54

I have been invited to give my views. If cameras will curtail the prevalent habit of speeding and poor driving standards among Soton taxi drivers, then it will be a very good idea of self monitoring.

--

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Licensing](#)
Subject: taxi cameras
Date: 09 June 2013 12:04:26

There's a compromise here, Private Hire cars are pre booked, the operator will have passenger name, pick up address, drop off address and the passengers phone number, with this amount of information it is very unlikely passengers will misbehave, also the passenger has the telephone number of the PH company should they wish to complain or if they are unhappy with the service provided they can simply change to another PH company, so considering the above cameras need not be fitted in PH vehicles.

The hackney however has none of the above safeguards so should be fitted with a camera.

Friday, 31 May 2013

Phil Bates
Licensing Manager
Legal, HR and Democratic Services
Southampton and Eastleigh Licensing Partnership
Southampton City Council

Dear Phil,

Re: In-Car CCTV Camera Systems in Southampton Licensed Vehicles.

My comments for consideration for the consultation are as an Owner of licensed vehicles and as Operator [REDACTED]

- 1) The use of CCTV in licensed vehicles is an extremely good aid to preventing and the detection of crimes that involve abuse of the driver and of any customer inside the vehicle. The decision to stop audio recording is, in my and many of my colleagues' opinion, a very backward step and makes the use of any camera system inside the vehicle next to useless. Any recording viewed without audio will not give any evidence as to why any incident occurred or any evidence as to what abuse was being carried out. Trying to lip read what was said will be impossible because the mouth of any persons in the vehicle will not be visible all the time. Trying to guess what went on would be grossly unfair on any person involved. I feel the decision was wrong on so many levels but mainly because unless an incident occurred none of the images recorded would ever have been looked at and therefore nobody's privacy was being invaded.
- 2) If there is to be a condition to have cameras then it is very important to have the facility to record the audio of any incident. However a panic button to start the recording is not likely to be always to right answer because nobody knows when the abuse or attack is likely to happen and it is too late after the event. Also although it seems some people think it is to protect the passengers the facts are most attacks are on drivers who are actually driving and have enough to worry about without try to activate a panic switch. To protect the passengers they would need a panic button at every seat location and as every driver knows any button or switch or lever available to some passengers will be abused and damaged so frequently they would never be able to keep up or even know they were not working. As drivers are not allowed to see the images they will never know if their systems are working or not.

It may be a case of investigation with suppliers to see if faster over writing of recordings is the answer but then there is still the question of who activates the saving of the incident.

- 3) The matter of the choice of camera is a major one and one that was never considered properly in the first place which has caused the original controversy and so should be thought carefully through this time. There are many different camera systems available and every one of them should have been considered to make the whole idea more acceptable to all concerned. The systems we have been enforced to use are very expensive to purchase and repair and are difficult to house in most modern vehicles. The fact that the owner of the vehicle is responsible for the upkeep of the system makes them the owner of the system and

therefore should have the right to chose which system they want in there vehicle albeit that it comes up to a required standard but if audio is not be used then there are hundreds of cameras systems available. Camera system that also have external facing cameras could be useful not only to reduce insurance claims and stop insurance scams that cost us all a lot of money for the owners, but could also determine if a driver has caused a complaint about their driving or route they took and it could possibly be a witness to any attack outside the vehicle.

- 4) Again because of the poor selection of camera systems the money would have gone further and would have been better spent and the whole fleet would have been covered easily long before now. The removal of any subsidy now will have a devastating effect on the owners of vehicles in today's financial climate if the present systems are the only ones allowed. The red herring about the cost being fully recoverable from the HMRC does nothing for those who have to pay for a system and wait a year or so to find they have not got to pay as much Tax for last year.
- 5) The system of fitting cameras when the vehicle is replaced is a fair system and should be retained. If an incident was to occur then those without cameras would have a harder time proving something did not occur. But if we only have vision and not audio it will be very difficult to prove anything other than physical action took place within the vehicle anyway but still doesn't answer why it took place.
- 6) If the camera is the property of the vehicle owner then those recordings are the owners and available to that owner to support any accusation against them. Of course it would also be to there advantage to make a recording available to the Licensing Dept. or the Police to prove their innocence as well. An owner should not be discriminated against when compared to any other licensed premises that have their own CCTV systems. Also if an owner possesses an ICO license that owner will be allowed to view those images for the detection of crime. As all owners and drivers are assessed to be a "Fit and Proper Persons" to hold Licenses then there should not be any concerns about their integrity but as with the rest of the country if any person is found to be using images improperly then they can be dealt with by the Courts in the normal way.
- 7) As above I believe for the Council to be the data controller they would need to be the owners of the equipment. To reduce their costs they should not be involved with the purchase of any equipment in the same way as taximeters, hire signs etc. the only involvement is in negotiating with the owners and appropriate suppliers for the correct standard of the equipment fitted to form the basis of any licensing condition. Therefore the Council should not be the data controller but should have a written agreement from every owner that they will be supplied with any evidence required to support any complaint or claim of a passenger or driver.

Yours sincerely



From: [REDACTED]
To: [Licensing](#)
Subject: taxi-camera consultation
Date: 13 June 2013 22:59:06

I think a visual only camera is not very useful as in many situations it is a verbal issue which causes the problem

I believe it would be better to have sound automatically activated at all times and a disable function/switch for Drivers when the car is used for personal use or at a customers request

There could be a larger choice of storage options and a more cost effective system as the subsidy is to be Removed

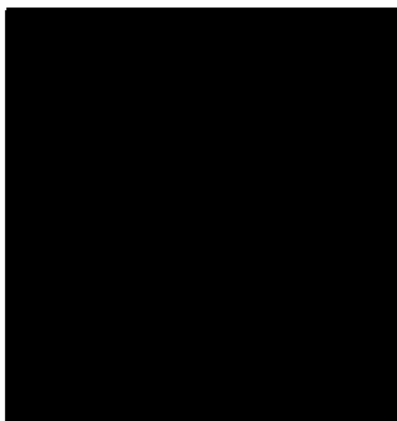
Information should be accessed for crime prevention complaints for and against drivers

I have no problem with the council as controller

I would like to say in the last few days I have spoken to a small no of hc drivers who were unaware of this consultation
Going on. and if they reply will be another issue as dealing with a computer is not always there way of communicating

Also when removing the sound from the verifeye cameras a lot of drivers thought that sound was needed
Only a small minority did not want sound or cameras in general mostly daytime people

I am responding on behalf of



From: [REDACTED]
To: [Bates, Phil](#)
Cc: [Licensing; John Havill](#)
Subject: RE: Taxi Camera Consultation
Date: 05 June 2013 09:56:00

1. Views on a mandatory condition to have visual only cameras? There is not a problem with either type of camera The key issue is the cost of the cameras at £600 - £700 (excluding subsidy) the market is very unfair in Southampton because Eastleigh registered private hire vehicles do not currently have to incur this cost nor are they restricted in the age of their vehicle which means they are able to put cheaper prices in for tenders which is what wins tenders in the current times. (Quality and age of vehicle does not win you points on e tendering sites for transport work it's all about price).
2. If there is a condition to have cameras how important is it to have some element of audio recording?
3. Are there any aspects of the old camera condition you think should be altered? Such as choice of camera.
4. The Council's ring fenced Licensing budget cannot subsidise the camera programme any longer. What impact will the removal of the subsidy have on you as the advice officers receive from HMRC is the full cost is recoverable in the first year as a legitimate expense?

The removal of the subsidy is very unfair if anything the cameras should be fully funded by SCC as Eastleigh private hire vehicles do not have this requirement it makes tendering uncompetitive. Can SCC please get the local neighbouring boroughs to agree to SCCs standards? It is clear to me that SCCs standards for Private hire vehicles are very good but the market is not a level playing field when a private hire company registered in Eastleigh can ply their trade in Southampton.

5. How do you view the proposal to have a requirement for all of the fleet to have a camera fitted within a shorter set period, perhaps 6 months?

The cost of these items is the key issue here. If SCC fund them fully then fine if not SCC should allow them to be fitted within 2 years.

6. If there is a condition to have cameras then it will be intended that data will only be disclosed on the report of a crime or a written (can be email) complaint or subject access request. What is your view on data only being accessed for complaints where the suspension of a driver is a possibility or are there any other conditions relevant? **None**
7. Do you have concerns with the Council being the data controller? **None**

From: Bates, Phil [mailto:[REDACTED]]
Sent: 30 May 2013 15:23
To: [REDACTED]
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Gold

[REDACTED] + J
non
ck

Subject: Taxi Camera Consultation

Dear all,

In March 2012 it was agreed there would be further consultation on the condition requiring vehicles licensed by Southampton City Council to have a taxi camera fitted. The conclusion of this consultation has been delayed pending the outcome of legal proceedings. As I am sure you are aware as a result of these proceedings the condition requiring the cameras has been temporarily suspended. The Council will be considering reinstating the condition in an amended form.

I am writing to you for two reasons:

1. To offer you a chance to provide comment on the below subject areas
2. To pass this message onto your drivers for them to provide comments on the below subject areas,

To allow time to prepare a report to the Council please submit any comments ***no later than 4pm on Friday 14th June 2013***

You are invited to comment on the following or any other aspect of the Taxi cameras. When responding please state in what capacity i.e. Driver, operator, owner:

8. Views on a mandatory condition to have visual only cameras?
9. If there is a condition to have cameras how important is it to have some element of audio recording?
10. Are there any aspects of the old camera condition you think should be altered? Such as choice of camera.
11. The Council's ring fenced Licensing budget cannot subsidise the camera programme any longer. What impact will the removal of the subsidy have on you as the advice officers receive from HMRC is the full cost is recoverable in the first year as a legitimate expense?
12. How do you view the proposal to have a requirement for all of the fleet to have a camera fitted within a shorter set period, perhaps 6 months?
13. If there is a condition to have cameras then it will be intended that data will only be disclosed on the report of a crime or a written (can be email) complaint or subject access request. What is your view on data only being accessed for complaints where the suspension of a driver is a possibility or are there any other conditions relevant?
14. Do you have concerns with the Council being the data controller?

The report will contain an option for an amendment to conditions to allow exemptions to

the requirement for a camera for a very small number of specialist vehicles employed in a particular manner, effectively Executive Chauffeur Services and some novelty vehicles.

Please reply to licensing@southampton.gov.uk

Thank you for your co-operation.

Phil Bates

Licensing Manager

Legal, HR and Democratic Services

Southampton and Eastleigh Licensing Partnership

Southampton City Council

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From: [REDACTED]
To: [Licensing](#)
Subject: Taxi Camera Consultation - Feedback/Comment
Date: 07 June 2013 14:57:05

Good afternoon,

I am responding to Phil Bates email requesting comment re. taxi cameras. As a retired police officer I feel that I am able to supply an experienced and valuable opinion that offers a balanced reasonable solution catering for most of the variables that affect both taxis and private hire vehicles.

1. Views on a mandatory condition to have visual only cameras?
2. If there is a condition to have cameras how important is it to have some element of audio recording?

Audio and visual are equally important as one compliments and corroborates the other.

Any incident that involves verbal abuse, threats, or unacceptable verbal conduct by either passenger or driver will not be evidenced by visual only recordings. You will merely obtain an impression based on body language and physical behaviour.

Conversely, without visual recording an allegation that involves assault, including intimidating or bad physical behaviour will not be recorded. Identifying an offender would also be compromised.

The value of both visual and audio recording would be of high value in the recent police request for taxi drivers assistance in tracing a recent dangerous male who had attacked a female.

3. Are there any aspects of the old camera condition you think should be altered? Such as choice of camera.

I am unable to comment, as a restricted private hire licence holder, I have been exempt.

4. The Council's ring fenced Licensing budget cannot subsidise the camera programme any longer. What impact will the removal of the subsidy have on you as the advice officers receive from HMRC is the full cost is recoverable in the first year as a legitimate expense?

I would be against any change as this would be unfair and unreasonable to expect an individual driver to cover the whole cost. I would suggest that there are many other systems that offer an equal standard at a far lower cost. I fail to see the necessity of systems that need to be wired into the vehicle through roof linings and units secured into the boot. I appreciate systems have to meet legal requirements to standardize the quality of recordings but a choice of two systems is restrictive and offers little choice.

If mandatory I suggest there should be a cheaper option with more systems that include portable recording units. Camera/s should be mounted at positions to record both driver and passenger/s.

5. How do you view the proposal to have a requirement for all of the fleet to have a camera fitted within a shorter set period, perhaps 6 months?

As a sole trader this would not affect me. For a company with a large fleet I can see that this will have a substantial financial impact.

6. If there is a condition to have cameras then it will be intended that data will only be disclosed on the report of a crime or a written (can be email) complaint or subject access request. What is your view on data only being accessed for complaints where the suspension of a driver is a possibility or are there any other conditions relevant?

Data is valuable for both of the above.

As a driver and, if subject to a spurious allegation, I would welcome the examination of data to support my rebuttal. The data would give a clear and unambiguous account of my behaviour.

7. Do you have concerns with the Council being the data controller?

No concerns with controlling the data. However, I would query as to how it will be administered and financed. If administered by the Licensing Department would any addition cost be transferred to licence fees etc.?

Recommendations.

Hackney carriages are particularly vulnerable and would benefit from both visual and audio recording equipment. A mandatory requirement would give uniformity and give protection to drivers and passengers as it would become generally known among the public using Southampton City Council vehicles.

Private Hire vehicles should be voluntary and dependant upon the operator's business. However, companies who transport children, on behalf of the local authority, and other vulnerable persons, should have recording equipment fitted as compulsory.

Chauffeur executive vehicles should be exempt or voluntary as it is highly unlikely that a driver or passenger will benefit from recording equipment. I suggest it would be detrimental to have camera and recording equipment fitted where a vehicle is used for wedding car hire. Certainly executives would be very wary and uncomfortable with recording equipment due to confidential conversations either by phone or with another passenger.

In my experience, as a restricted private hire license holder, I have never been in a situation that would have benefited from any recording equipment.

Recordings should be by audio and visual as both play an important part and each would be compromised if one was removed.

I hope my opinion and comments have assisted.

Kind regards,

