

Video Point of Impact Systems (VPIS) Policy “Dash Cams”

VPIS systems also known as vehicle dash cams are external facing cameras that record footage external to the vehicle. They are used to capture footage in the event the vehicle is involved in a road traffic incident.

They have many advantages such as identifying who is responsible for causing an accident, providing evidence, resolving disputes, and in some instances, it may lower insurance premiums.

Vehicle proprietors of licensed hackney carriages and private hire vehicles that wish to install a VPIS system must do so in accordance with this policy and conditions.

VPIS/dash cams are subject to the General Data Protection Regulations (GDPR), and before purchasing a system, vehicle proprietors are advised to read the Information Commissioners Office Code of Practice for Surveillance Cameras and Personal Information and Guide to GDPR, further information can be found at: <https://ico.org.uk/>

It should be noted that the vehicle proprietor is the data controller of the system and is responsible for the data **unless the system incorporates internal CCTV cameras** (please see CCTV policy for further details).

Systems that record both internal and external images, must comply with this policy and the Licensing Authority's CCTV policy and specification.

Conditions to be attached to Hackney Carriage and Private Hire Vehicle Licence:

1. No VPIS system shall be installed in a vehicle unless it carries a CE marking and conforms to Council Directive **93/68/EEC or equivalent**.
2. The vehicle proprietor must produce a VPIS/dash cam policy that clearly identifies the lawful basis for the processing of personal data collected, and the retention period of the data. The purpose of the system should be communicated to any driver of the vehicle.
3. The vehicle proprietor shall notify the Licensing Authority within 7 days of having a VPIS system fitted. Such notification shall be in writing and will contain details of the vehicle the system has been fitted to and the make, model and CE marking number (or equivalent) of the VIPS system
4. An advisory notice, provided by the supplier, shall be displayed inside the vehicle on each of the rear side passenger windows. The notices shall be positioned in a

prominent position where they can be easily read by persons both inside and outside of the vehicle. The proprietor shall ensure that the notices are maintained in a clean and legible condition.

5. The proprietor shall ensure that the system is properly and regularly maintained and serviced in accordance with the manufacturer's instructions by a suitably qualified person. Written records of all maintenance and servicing shall be made and 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.
6. Upon request for image retrieval by an officer of the Licensing Authority or a police officer the proprietor shall ensure that the VPIS system is made available to the system administrator, as soon as reasonably practicable, and in any event within 7 days of the request.
7. The proprietor of the vehicle shall take all reasonable steps to ensure that any driver of the vehicle is made aware of every condition in relation to any installed VPIS system and has been given adequate instruction regarding the need for the system to be made available as soon as reasonably practicable, and in any event within 7 days of any authorised request for any image retrieval.
8. The proprietor shall, where necessary, ensure that notification is lodged with the Information Commissioner to cover the purposes for which the VPIS system is used