



7<sup>th</sup> June 2017

Licensing Department  
Environmental Services  
Chesterfield Borough Council  
Customer Service Centre  
85 New Square  
Chesterfield  
Derbyshire  
S40 1AH

Dear Sir,

Hackney Carriage and Private Hire Licensing Policy

Thank you for the letter dated 23<sup>rd</sup> March about amendments to the above policy.

I would like to make some comments about the "CCTV in licensed vehicles" section. I have had a look at the case involving the Information Commissioner and Southampton City Council, and as far as I can see the main issue was that the City Council mandated the fitting of CCTV systems in local licensed vehicles, and it was the City Council that had sole access to the recordings.

It would seem to me that the situation in Chesterfield is entirely different. We fit CCTV of our own volition, and advise the Council accordingly (as stated in the Policy). We have warning signs in the car so the public are aware that CCTV is in use.

It would also seem to me that the kind of system which most drivers in Chesterfield have is a comparatively simple affair. From the description of Southampton's system, there are "panic buttons" fitted which can be activated by either the driver or a passenger which would switch on sound recording on demand. I certainly don't have that level of sophistication! I can turn off sound recording, but only by making a change using the software on my home PC, uploading the changed configuration to the camera's memory card which then uploads that configuration to the camera the next time it is turned on. Turning sound recording back on is the same process -- it can't be done in the vehicle when trouble is brewing.

Your letter stated that we should only have sound recording on when difficulties are anticipated. The main reason I have the CCTV at all is to guard against the passenger who, for whatever reason, takes an exception to me and decides after the event to report me for whatever alleged transgression they might care to fabricate. In that case, I wouldn't know that I was experiencing "difficulties" until much later, and that's why I keep recordings for a month before deleting them.

Could I humbly suggest that this section of the Policy needs a re-think please?

Yours faithfully

A handwritten signature in black ink, appearing to read "Jim Brookbank".

Jim Brookbank  
Badge CD1192