



## Information Governance Team

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Dear Sir/Madam

### **Freedom of Information Act 2000 (FOIA)**

**Request ID: FOI731046189**

Thank you for your request for information relating to Vehicle Trackers in Coventry City Council Vehicles.

You have requested the following information:

### **Vehicle Trackers in Coventry City Council Vehicles**

#### **1. What service areas utilise vehicle tracker devices at the Council?**

All fleet vehicles and large items of plant are fitted with telematics. This is utilised by all service areas.

#### **2. What is the period of retention of vehicle Tracking data/info with due regard to Data Protection & GDPR requirements?**

We confirm that up to three months of data are held within the telematics systems. This rolling period of 3 months is automatically removed for viewing.

#### **3. What level of authorisation is required to allow viewing of vehicle tracking data/info?**

For operational purposes, with regards to fuel consumption, air quality and location of vehicles, access is provided to authorised officers within their specific role or service area. Officers must obtain permission in order to be given access. Internal Audit have access to view data for audit purposes, and to carry out investigations linked to fraud and corruption. Where access is required for other disciplinary/grievance purposes, authorisation is required from the Director of City Services.

**4. How many requests have been authorised to allow viewing of Vehicle Tracker data/info by service area between 14/07/2022 & 14/07/2025?**

**5. When were the relevant requests authorised between 14/07/2022 & 14/07/2025?**

In response to Questions 4 and 5, we confirm we do not hold this information, and we are informing you as per Section 1(1) of the Act. We do not record this information on our system.

### **CCTV Surveillance in Coventry City Council Buildings**

**1. How long are CCTV images recorded inside Council buildings retained for?**

There is a 28 day retention at which point CCTV images are automatically overwritten by the system.

**2. Is the period of retention of relevant CCTV images/camera footage extended in the event of ongoing investigations? and if so what is the maximum period of retention?**

**Q2 Clarification - By ongoing investigations I mean internal Council investigations that have not been completed within the normal retention period and are still in progress, and also other occasions when the Council's internal investigations have been completed, but investigations into a matter by external organisations such as External Auditors, the Police or The Security Service etc are still ongoing.**

Yes, in the event of ongoing investigations, CCTV footage may be secured and then retained for longer periods (i.e. until the case has been concluded), including any rights of appeal.

**3. How is authorisation to review CCTV footage obtained with due regard to Data Protection & GDPR requirements?**

Where there is a concern that employee misconduct may have occurred and CCTV footage is required to be viewed in order to investigate this, the "Processing CCTV footage: alleged employee misconduct" procedure applies, which ensures that data protection and GDPR implications are considered within the authorisation process.

**4. What level of Authority is required to authorise review of CCTV images?**

For cases of alleged employee misconduct, applications must be completed by the Chief Internal Auditor and authorised by the Director of Law and Governance.

**5. How many requests were authorised to allow viewing of CCTV images in Council buildings between 14/07/2022 & 14/07/2025?**

For cases of alleged employee misconduct, a total of five requests were authorised.

**6. When were the relevant requests authorised between 14/07/2022 & 14/07/2025?**

**7. What were the relevant Buildings where Requests were authorised between 14/07/2022 & 14/07/2025?**

In response to Questions 6 and 7, we confirm we hold the information you have requested. However, we are withholding the requested information as the Council considers that this information meets the definition for personal data set out in Section 3(2) and 3(3) of the Data

Protection Act 2018 (DPA) as:

*(2) personal data means any information relating to an identified or identifiable living individual (subject to subsection (14)(c))”*

*(3) “Identifiable living individual” means a living individual who can be identified, directly or indirectly, in particular by reference to –*

*(a) an identifier such as a name, an identification number, location data or an online identifier, or  
(b) one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.”*

The Council thus considers that the requested information is caught by the exemption to disclosure contained in Section 40 (2) of the FOI Act and the related first condition of Section 40 (3).

To advise further, a disclosure made under the provisions of the Act is judged to be a disclosure to the wider world and here the Council must consider disclosure of personal information in line with the provisions of the DPA. Releasing this information may lead to the identification of the employees involved. In this instance it is judged that the personal information relating to staff is being processed by the Council for the purposes of employment and not for any wider disclosure purposes.

The supply of information in response to a FOI request does not confer an automatic right to re-use the information. You can use any information supplied for the purposes of private study and non-commercial research without requiring further permission. Similarly, information supplied can also be re used for the purposes of news reporting. An exception to this is photographs. Please contact us if you wish to use the information for any other purpose.

For information, we publish a variety of information such as: [FOI/EIR Disclosure Log](#), [Publication Scheme](#), [Facts about Coventry](#) and [Open Data](#) that you may find of useful if you are looking for information in the future.

If you are unhappy with the handling of your request, you can ask us to review our response. Requests for reviews should be submitted within 40 days of the date of receipt of our response to your original request – email: [infogov@coventry.gov.uk](mailto:infogov@coventry.gov.uk)

If you are unhappy with the outcome of our review, you can write to the Information Commissioner, who can be contacted at: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or email [icocasework@ico.org.uk](mailto:icocasework@ico.org.uk).

Please remember to quote the reference number above in your response.

Yours faithfully

**Information Governance**