

Annexure 6 - Stage 2 Safety Camera Rollout

This annexure focuses on the activation of Stage 2 of the safety camera rollout programme. This stage involves having a fixed spot speed camera active on the roadside with appropriate safeguards in place, and a Waka Kotahi team capable of manually verifying and determining offences. It is part of the rollout that allows Waka Kotahi to pressure-test systems and processes on a smaller scale between 30 June – 30 November 2023 before the cameras go live and start enforcing speeding offences.

Stage 2 includes looking at the camera and the core camera management system and how data is captured, processed and verified. It will have a focus on:

- data transmission, how its captured, stored and being retained in Redflex (camera vendor) and Waka Kotahi systems,
- how offences are manually verified, and
- how infringement notices and traffic offence notices are made ready for issuing.

Stage 2 will also involve testing point-to-point (average speed) camera technology in a controlled (off-road) environment before being trialled roadside in Stage 3. Another annex to the PIA will be completed ahead of the Stage 3 roadside trial taking place.

Stage 2 will **not** involve:

- sending 'safety notices'
- issuing infringement or traffic offence notices
- point-to-point (average speed) cameras active on the roadside
- use of automatic number plate recognition technology on the roadside.

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Waka Kotahi intends to activate a new safety camera network starting with a rollout of new HALO spot speed cameras.

Background

The camera rollout programme comprises four stages:
Stage 1 – testing in a controlled environment
Stage 2 – operating roadside, verifying offences but not enforcing
Stage 3 – operating roadside, enforcing offences
Stage 4 - continue camera expansion, including transfer of camera assets from NZ Police
This annexure covers Stage 2 of the rollout.

Description of Stage 2

In this stage:

- one fixed spot speed safety camera will be installed roadside in Northland
- it will be formally certified as being accurate for that sit
- it will capture data on vehicles exceeding the camera's set speed threshold.
- this data will be used to test the manual verification process to identify whether:
 - a speeding 'offence' has been committed
 - the 'offending' vehicle is clearly identifiable (e.g. if there are two or more vehicles in the image, ensuring the offending vehicle is clearly identified, vehicle attributes such as make and model match those in the Motor Vehicle Register [MVR] for that registration plate etc.)
 - the image quality is sufficient for evidentiary purposes (e.g. no sunbursts, the plate is not blurred, etc).
 - the vehicle registration plate can be matched to the registered person in the MVR
 - there is an address where an infringement offence notice can be sent.
- The offence processing system will also be tested in so far as Infringement notices will be populated but not issued
- Data will also be collected for research and analytics purposes, such as measuring speeds during the test period
- This will involve data flowing from the camera into the camera management system and then into the verification and offence processing systems to pressure-test these prior to enforcing offences in Stage 3.

Personal Information

Images of the registration number of the vehicle which may lead to identifying the registered owner of the vehicle.

Meta data that includes time, date and location of images and direction of travel.

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Intended Controls

- **Clear purpose for camera use:** Stage 2 of the rollout has a clear purpose to have a camera roadside to collect vehicle details in 'test' mode to enable the pressure-testing of the manual verification and infringement issuing processes by Waka Kotahi – without issuing any infringement or traffic offence notices.
- **Governance:** Safety Camera Programme management will provide oversight and governance to ensure privacy obligations are adhered to throughout Stage 2.
- **No enforcement:** Personal information (in the form of registration plate details that will then be matched to the MVR in order to identify the registered person for each offending vehicle) will be collected but no enforcement action or infringement notices will be issued
- **Only critical data will be collected:** the 'offence' data may include still images and video footage with associated meta-data such as incident day of week, date of offence, time of offence, recorded speed, travel direction indicator, lane indicator, posted speed limit, site code, and a unique incident identifier.
Non-personal survey data would also be collected. This will include anonymised data such as vehicle counts, overall speed data, offences detected, and camera performance metrics.
- **Security:** This data will be encrypted in transit, and at rest. The images will be stored digitally and cannot be overwritten or altered.
- **Clear 3rd party accountabilities and responsibilities:** Both Redflex (camera vendor) and SICE (offence verification and offence processing system vendor) are contractually required to (among other things):
 - comply at all times with privacy laws
 - comply at all times with the Privacy at Waka Kotahi the NZ Transport Agency – A Guide for Suppliers and Service Providers (<https://www.nzta.govt.nz/about-us/about-this-site/privacy-guide-for-suppliers-and-service-providers/>)
 - meet Waka Kotahi security Standards
 - allow for independent security audits and action audit findings
 - take all reasonable steps to prevent security breaches or unauthorised use
 - notify Waka Kotahi if any breaches or unauthorised use occurs and take steps to identify those involved, stop the occurrence and prevent any reoccurrence.
- **Access to cameras** will be managed by security protocols built into the camera. On-site and remote (for users, machines, or administrators) access to cameras is protected by password sign on and multi-factor authentication.
- **User access will be logged:** The cameras record audit related data for access and operational mode changes by user ID. Audit logs are maintained for access and changes made in the camera management system. Access log information is stored and available for auditing in the camera management system. These logs will be reviewed and audited by the SCMS Programme at least weekly (TBC), or as often as needed depending on operational needs.
- **Data minimisation:** Throughout Stage 2 Waka Kotahi staff will have access to the vehicle data collected by the cameras for the sole purpose of testing and modifying if required the end-to-end verification/offence issuing process, do quality checks, and resolve issues. These staff will be made aware of their privacy obligations.
- **Six-month retention period:** Offence data collected in Stage 2 will only be retained up until, the end of Stage 2 on 30 November 2023 (i.e.) for a maximum of 5 month. Retention during Stage 2 is to enable re-testing of processes using the same offence data. For example, the same offence data could be used to re-test different verification scenarios. At the end of Stage 2, all offence data will be deleted. Anonymised survey data such as number of vehicles that passed the camera, and vehicle speeds will be retained longer for research and analytic purposes.
- **Public awareness:**
 - Iwi, hapu and local communities have been consulted on the roadside camera location
 - A public education strategy will support Stage 2. It will provide details on:

- what's happening
- why it is happening
- when it is happening, and
- what it means for the public/individuals
- Use will be made of existing Customer Service Centre processes, tools and systems to record and respond to requests regarding the personal information collected in Stage 2.
- **Use of data:** as noted above, the data will be used to collect vehicle details to enable the testing of the manual verification and offence issuing processes, and to collect anonymised survey data prior to enforcement getting underway in Stage 3.
- **Disclosure of data:** Vehicle details will not be shared with any 3rd party. Such details will solely be used to pressure-test the manual verification and offence issuing processes prior to the cameras being used for enforcement purposes.

Recommendations specific to Stage 2	Recommendation Reference	Date <ul style="list-style-type: none"> • Accepted • Implemented
Establish at an early stage the primary and directly related purposes for using a roading management camera system and collecting personal information.	R6	Implemented for Stage 2 (refer intended controls)
Establish policy or guidance for each targeted deployment of roading management cameras, that prescribes the expectations of data minimisation so that collection of unnecessary personal information is eliminated.	R7	Implemented for Stage 2 (refer intended controls)
Implement a transparency strategy to cover the deployment of a roading management camera system including comprehensive advice through appropriate agency channels.	R8	Implemented for Stage 2 (refer intended controls)
Establish technical security within the roading management camera system and storage that is commensurate with the agency's responsibility for security	R9	Implemented for Stage 2 (refer intended controls)
Develop a carefully designed set of user roles for access to retained information, ensuring that access to personal information is limited to the appropriate staff.	R10	Implemented for Stage 2 (refer intended controls)
Ensure the system logs access to and activity within the roading management camera data and the log is audited	R11	Implemented for Stage 2 (refer intended controls)
Ensure that accountabilities and responsibilities are reflected and passed on to 3 rd parties who undertake technical storage facilities or business processes on behalf of Waka Kotahi	R12	Implemented for Stage 2 (refer intended controls)
Support staff to use the roading management camera data appropriately through adequate guidance and/or training.	R13	Implemented for Stage 2 (refer intended controls)
Take steps to ensure that 3 rd parties recognise and report any data breach including near misses	R14	Implemented for Stage 2 (refer intended controls)
Create business processes that provide assurance that the technical system is accurate and reliable.	R16	Implemented for Stage 2 (refer intended controls)
Create business processes that provide for human oversight of roading management data that contributes to decision making	R17	Implemented for Stage 2 (refer intended controls)

Set retention periods for personal information collected by individual roading management camera systems.	R18	Implemented for Stage 2 (refer intended controls)
Create policy that defines the limited purposes for which the roading management camera system collects personal information and reflect the limited purposes in Waka Kotahi retention, use, and disclosure rules.	R21	Implemented for Stage 2 (refer intended controls)

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