

# Stage 2 Privacy Impact Assessment annexure 5 approval

<b>Focus Area</b>	Stage 2 Privacy Impact Assessment (PIA)
<b>To</b>	Tara MacMillan, Head of Strategic Regulatory Programmes
<b>Prepared By</b>	Craig Hill, Policy Lead, SCS Programme
<b>Date prepared</b>	6 June 2023

## Purpose

This paper seeks approval and publication of the Stage 2 Privacy Impact Assessment (PIA) annexure 5.

## Recommendations

It is recommended that you:

**Note** that the Stage 2 goal is to have a fixed HALO spot speed camera roadside, capturing vehicle details but not enforcing any speeding offences, by 30 June 2023

**Note** that Stage 2 will now involve the camera using automatic number plate (ANPR) technology to detect and match vehicles

**Note** that while a PIA is not a legal requirement, it is best practice for a privacy impact assessment to be done prior to the camera being activated to reflect that privacy matters have been considered prior to installation

**Note** that the attached PIA annexure will become annexure 5 of the wider Waka Kotahi roading management camera PIA

**Note** that further annexures will be developed over the coming months for Stage 3, the average speed camera roadside trial, and average speed camera in enforcement mode.

**Approve** the Stage 2 PIA annexure 5 and its publication on the Waka Kotahi website.

## Background

Waka Kotahi has developed an overall PIA for its various camera operations – including traffic management, tolling, and safety cameras. This PIA outlines the general privacy issues/risks associated with the operation of cameras.

As new camera types are stood up, an annexure to the wider PIA is prepared for each. This will focus on the privacy issues/risks associated with that specific camera type, and how these will be mitigated.

Thus far, annexures have been added for:

1. Inherent and residual risk matrix
2. Canterbury North corridor trial
3. Distracted driver/seat belt compliance trial
4. Automation of verification business rules

The proposed PIA for Stage 2 will become annexure 5 of the PIA. It focuses on:

- what personal information the first HALO spot speed camera on the roadside will capture,
- the use of ANPR technology to capture this personal information
- the purpose for such capture (testing not enforcing),
- how long we will retain that personal information for testing purposes, and
- who, if anyone, we will share that personal information with.

## Stage 2

Stage 2 of the safety camera rollout involves the installation and operation of a spot speed Halo camera. While the camera is operating roadside it is only collecting data, not issuing safety notices or infringement notices.

The main purposes of Stage 2 are to:

1. test the speed safety camera equipment, systems, and associated connectivity in a road-side environment
2. collect real world data to inform the development of supporting processes for safety camera infringement verification and offence processing.

A secondary purpose is to activate the ANPR functionality on the camera to enable early assessment and learnings about this capability. While ANPR functionality is not required to be installed on the camera for spot speed infringement detection, the particular camera being installed will have this functionality available.

## PIA annexure development/approval process

The development process, using the RAPID framework, has involved:

Role	Person	Date
INPUT	Technology SMEs: Nigel Robson Hayley Munro – Safety Camera domain Product owner Grant Mather	During development in May 2023
INPUT	V&DI Domain (verification process) Nigel Peacock – Product Owner	During development in May 2023
INPUT	Privacy Officer – Vicki Slater	During development in may 2023
INPUT	Two external reviews from Waka Kotahi privacy consultant – Simply Privacy  (a second review was undertaken after the decision was made to have the camera use ANPR, and for Waka Kotahi data storage to be in Australia)	May 2023
PERFORM	Craig Hill – Policy Lead, SCS Camera Programme	30 May 2023

Role	Person	Date
AGREE	Jo Gribble – SCS Product Manager	30 May 2023
	James Watson – Manager Safety Camera System	30 May 2023
RECOMMEND	Richard Stewart – SCS Programme Director	1 June 2023
RECOMMEND	Anna Cleary – Manager Regulatory Policy, Policy & System Planning	6 June 2023
DECIDE	Tara MacMillan – Head of Strategic Regulatory Programmes	

Once approved, the Stage 2 PIA annexure will be provided to the Office of Privacy Commissioner for their information, and published on the Waka Kotahi website. It is a living document and may be amended as processes/controls change.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982