



Licence plate recognition vehicle

Privacy impact assessment

February 2025

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

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Project summary

The Council is in the process of implementing the Parking Policy. Over time, on-street parking arrangements in both the city and suburbs will change significantly. There is an increasing workload for Parking Services (PS) as they are required to provide more frequent and consistent enforcement across the city and suburbs.

Parking meters have moved to an adaptable ‘Pay by Plate’ model, which utilises license plate recognition (LPR) technology. LPR technology can be utilised in several different ways, from handheld devices used by on street officers to static cameras and licence plate recognition vehicles (LPR vehicles). The shift towards using LPR technology is driven by the need to improve parking service levels in a changing operating environment, including, amongst others, the health, safety, and security of officers.

The deployment of LPR vehicles will improve operational performance, efficiency, effectiveness, and consistency, enabling PS to improve coverage and enforcement, meaning better parking equity outcomes for the public in a dynamically changing and challenging parking landscape.

LPR vehicles will significantly improve parking enforcement services for resident parking.

LPR vehicles have safety and security benefits for staff; they will reduce exposure to abusive behaviour, noting that staff will still respond and enforce on foot.

Funding for up to four LPR vehicles was approved in the Long-term Plan 2021. Four Mitsubishi Eclipse hybrid cars have been purchased for the PS fleet and fitted with the latest LPR technology.

Benefits are:

- More consistent enforcement in an environment where parking options are increasingly constrained.
- Public confidence that parking changes are being fairly enforced.
- A safer working environment for the PS team.

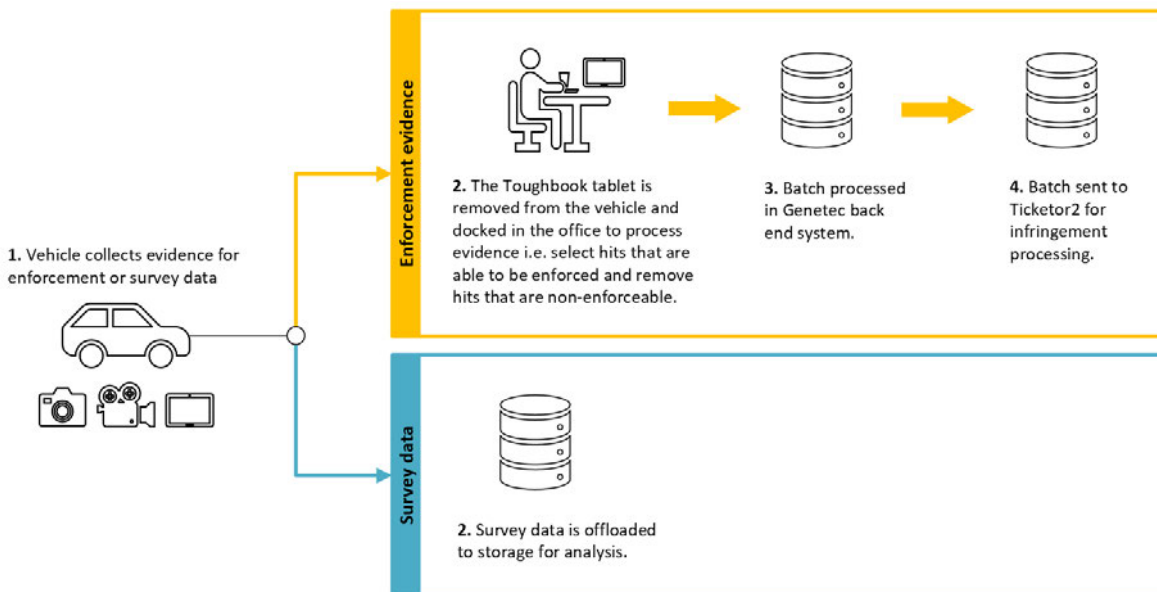
- Ability to take on an increased workload by improved productivity while maintaining current staffing levels.
- A replacement capability for parking surveys that previously used manual/on foot surveys and data from the now decommissioned smart park system.

The LPR vehicles will operate within the requirements of the Privacy Act. Images and video that are captured will be used for enforcement and evidential purposes only. All video and images from the LPR vehicles will be stored for a period and then automatically disposed of from the Council’s infringement system in line with the Council’s retention policy, as is current practice for images collected by on-foot parking officers and static cameras. Video and images used to issue infringements are disposed of after 90 days, 180 days (video), and 12 months, and infringements that progress to a court hearing are disposed of after 60 months (five years). Images and video that are not required to be retained for either (e.g., images of legally and correctly parked vehicles), will be destroyed after review, within 14 days.

Scope of the Privacy Impact Assessment (PIA)

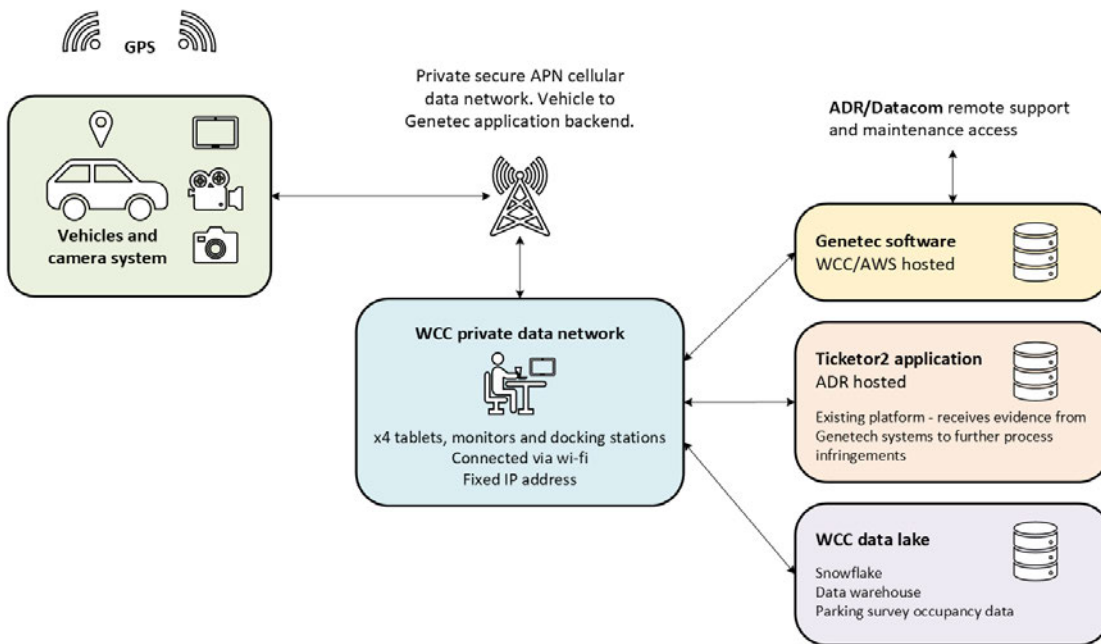
Scope

The overview of the end-to-end system is as follows:



The vehicles, Genetec, Ticketor2, and WCC data lake components shown in the following diagram are included in the scope of this PIA.

LPR Technology System



The information management processes the Privacy Impact Assessment (PIA) considers, includes the vehicle camera technology and the Genetec software systems that collect and store the captured evidence and associated infringement information into WCC's existing systems. The way information is managed under the WCC existing systems including Ticketor2 and Snowflake (the data lake) are also covered in this PIA.

The data collection camera system for LPR vehicles

Evidence information is collected using roof and side mounted cameras and GPS technology:

2 Dual cameras for:

- License Plate Recognition (LPR)
- Parking context image capture

2 Cameras for

Parking signage evidence capture



Cameras on both vehicle sides above the rear wheel arch:

For wheel position non-movement evidence e.g. valve stem position



How the system works

The LPR vehicle system (mostly) use the cameras on the left of the vehicle, i.e., keeping left and capturing image/video evidence to the left of the vehicle.

For one-way streets, the cameras on the right of the vehicle are used as well, but not simultaneously due to limitations of the system, that is, after a pass with the left-side cameras, a second pass is done capturing images/video evidence with the right-side cameras.

Left and right camera systems are controlled (started and stopped) by the parking officers managing the system from inside the vehicle.

When the LPR vehicle is in operation three cameras are available for use:

- A roof mounted dual camera captures the licence plates and associated context still images of parked cars.
- A second roof mounted video camera records parking signs to ensure parking rule signs are clearly displayed.
- A third camera mounted on the wheel arch records the wheel position still image (valve stem or other identifying features) of each vehicle it passes.







For surveying, the LPR vehicle captures still license plate and context images only and completes one run per route.



For enforcement, the signage camera is also used and still wheel images taken. Two runs of a route are completed and the two wheel images captured on each run are compared during processing to confirm

that the vehicle was parked and not in the process of turning or briefly stopped when captured on the first run. Signage video is captured during both runs also.

Evidence collected

An example set of evidence required for time restricted parking enforcement infringements is as follows:

<p>LPR Image Evidence (still) First Image/Read.</p>	
<p>LPR Image Evidence (still) Second Image/Read. For time restriction enforcement, such as P10 enforcement, this image is captured at least 10 minutes after the first image/read.</p>	
<p>Parking Context Image Evidence (still) First Image.</p>	
<p>Parking Context Image Evidence (still) Second Image.</p>	
<p>Wheel position non-movement evidence (still) First Position Image.</p>	
<p>Wheel position non-movement evidence (still) Second Position Image to confirm the vehicle has not moved.</p>	

<p>Parking Sign Evidence First capture (video).</p>	
<p>Parking Sign Evidence Second capture (video): To confirm signage is captured.</p>	

LPR vehicle evidence is captured in the context of different parking rules and scenarios, i.e., different combinations of time restricted parking, residents permit, coupon parking, and so on.

Other enforcement and survey functions used by the LPR vehicle and systems may include all or a subset of the evidence information capture detailed above, e.g., occupancy and parking turnover surveys.

The process

PS staff induction and training includes the Parking Services – LPR Vehicles Operational Policy so that all the WCC privacy requirements are clearly understood by staff. This ensures:

- Parking Officers trained in evidence processing comply with good practice, transparency and accountability including, but not limited to the relevant requirements and principles outlined in the Privacy Act 2020.
- Protection of the privacy rights of council officers and the public.
- Managed access to LPR images and camera footage.
- Correct storage and deletion of recorded data.

Wellington was the first council in Aotearoa to use an LPR vehicle, between July 2010 and January 2012. LPR technology and methodologies have significantly improved since then. Camera technology, for example, is now more targeted on the parking areas being enforced.

Over the last 12 years, several councils in Aotearoa have established LPR vehicle operations. LPR technology is used as part of multiple councils normal parking operations, including in Auckland, Hamilton, Hastings, Tauranga, and Lower Hutt, with Auckland now significantly increasing their fleet of LPR vehicles.

Reasons for increased use of LPR vehicles by councils include:

- The requirement for improved efficiencies as parking management and the enforcement workload grows while staffing levels remain static. An example of this is the increase in workload resulting from the Newtown/Berhampore parking management plan.
- Targeted enforcement on the types of illegal parking that are of most concern to the public (e.g., illegal use of resident parking spaces, exceeding parking time limits, exceeding paid parking time limits, not paying for paid parking, illegal parking that creates safety or access issues).
- In-house use of the LPR vehicles, rather than externally contracted service, enables close oversight and training of staff to ensure appropriate use of the LPR vehicles as part of WCC's team.

In this context, the rationale and focus of this PIA is the targeted use of LPR vehicle technology and the new systems that feed evidence into WCC's existing Ticketor2 and data lake systems.

The types of information used

Information used includes both business and personal information where necessary:

- Data already generated through existing parking enforcement systems and processes including location information, routes, congestion information, and images generated during enforcement (both still and body worn camera video where needed for evidence enforcement).
- Contact information of registered vehicle owners for infringement notification including information held by Waka Kotahi NZTA.
- Testing and survey information including images (still and video) captured during enforcement routes.
- Street, context, and signage images/information.

Parties involved

- Parking Services (Business Support Administrator, Senior Advisor, Senior Resolutions Officer, Project Managers).
- WCC Legal.
- WCC Information Management team (Smart Council) to ensure the correct and current retention policy is applied.
- WCC Official Information and Privacy team.

Organisations consulted

Auckland Transport	Detailed review of their use of LPR technology in a large-scale implementation
Hamilton City Council	Detailed review of their use of LPR technology as an integrated solution with ADR's Ticketor2 software solution
Tauranga City Council	Review of their uptake of Genetec LPR technology, and contact for further consultation
Office of the Privacy Commissioner	Reviewed an early draft of this PIA – comments received, considered, and incorporated into final PIA
Suppliers Arthur D Riley Ltd, Datacom, and Vodafone (via Smart Council)	Provide secure cellular internet communications (SIMS/plans)

Training & Usage Agreement

All Council officers involved in the collection, processing of infringements or appeals for the LPR vehicle and system enforcement operations, will undertake training which includes the Parking Services – LPR Vehicles Operational Policy and LPR vehicle standard operating procedures (SOPs) before being given access to enforcement systems.

Official Information and Privacy have and will continue to run targeted privacy training for each phase of the project to ensure early competence of privacy matters in the project team. Digital processing officers (DPOs) are required to complete the new and updated Privacy and Breach eLearning modules. This is a mandatory requirement for all Council staff.

Arthur D Riley Ltd (ADR) staff with required administrative rights will have access to the same personal information as Council officers. ADR staff undergo various security and privacy training regularly.

ADR staff that handle or work on any WCC computer hosted system have completed the following training programmes through ADR's PCI Compliance provider, Sprinto:

- GDPR Data Protection and Privacy Training September 2023
- PCI DSS Data Security and Awareness Training September 2023

ADR's entire development team complete yearly external information and cyber security training, delivered through Aura (Kordia), as well as undertaking stress testing externally for ADR's applications and development environments.

As part of ADR's internal IT processes, all staff are obliged to complete annual security awareness training through Wizer.

Additionally, all new staff joining ADR who have access to the WCC Database environment have restricted access while they complete their induction/training period. Only after several months have passed, when they have become more knowledgeable of ADR systems and expectations, do ADR gradually increase their access level, thus helping to protect sensitive data until they are fully trained.

A link to ADR's privacy policy is as follows: <https://www.adriley.co.nz/privacy-policy>

Schedule 3 in the Parking Solutions Delivery Agreement between WCC and ADR outline ADRs responsibilities regarding personal information they hold on behalf of WCC. Privacy breach process is stipulated and outlined in this agreement whereby if any breach of WCC personal information is found ADR have a responsibility to report this without delay to WCC, within 24 hours, or as soon as practicable.

Personal information

Implementation of enforcement and survey work

Testing of LPR vehicle systems began in 2024. Video footage and images were collected that can be used for a range of enforcement and survey operations:

- Occupancy and parking turnover surveys.
- Resident parking zones.
- Coupon parking zones.
- Unpaid time restricted parking zones.
- Paid time restricted parking zones.

Once the above LPR vehicle functions have become operational in 2025, further enforcement functions will be planned, including enforcement of:

- parking on yellow lines and other safety offences.
- registration and warrant of fitness checks.
- other proven LPR vehicle functions that become available via ADR/Datacom and/or as used by other New Zealand councils.

To ensure a smooth rollout, these additional enforcement functions are likely to be operationalised in mid to late 2025, and only after the initial functions as listed above have been tested and established. Details on function and vehicle rollout are documented in the LPR vehicle communications and customer engagement plan.

Personal information in context images and sign video

LPR vehicles capture a vehicle's registration plate, the context in which it is parked, and the associated parking signage information (relative to where the vehicle is parked) as required for infringement evidence purposes.

The various cameras are orientated to focus on evidence required for parking enforcement and survey work. The sign video cameras, for example, shoot high to capture parking signs. Requirements and criteria regarding sign evidence capture and processing have been worked through with WCC Legal, Official Information and Privacy, and Parking Services teams. Any future updates will be reflected in this PIA and will trigger additional sign off.

Human oversight is required to ensure this step in the process is reviewed and applied appropriately and falls in line with WCC legal and privacy requirements. Specific training is provided to parking and digital processing officers to ensure these criteria and requirements are met.

Steps have been taken to limit use of the signage video camera; cameras are only used when enforcing, and only in the enforcement area. That is, the signage camera is turned off when the LPR vehicle is travelling to/from the enforcement route, turned off between segments on a route, and turned off after the route is completed. There is a small risk that sign video cameras are accidentally left on/not turned off between enforcement zones, or to and from enforcement routes. As the cameras are manually managed (the process for managing these are provided in various Parking Services SOPs for Officers and processing staff), this risk is possible, however harm is unlikely. This is because captured information is reviewed at the end of the enforcement route, any accidental or unnecessary capture will follow the deletion pathway as necessary.

The raw sign video sign footage is required to confirm that relevant signage is present and clearly visible so that infringements can be issued on the routes driven. This video is only viewed by trained Parking Services staff. When signage video contains personally identifiable information (PII) or sensitive information, DPOs will enforce parking infringements as raw video is not included on the ticket (on the proviso that a clip of the footage can be extracted as evidence without exposing any PII).

In the event of an appeal or unpaid fine, staff extract a video clip from the raw signage video to confirm that relevant signage was present when the infringement was issued. These video clips are only viewable in court.

Signage capture is also currently a standard process for officers enforcing parking infringements on foot, using handheld camera and LPR devices.

When context images contain personally identifiable information (PII) or sensitive information, the policy for digital processing officers (DPOs) is to choose not to enforce because context images are included on the ticket sent to the vehicle owner.

Applying blurring technology, etc, is not currently being actively considered. This is due to relative scarcity of PII being captured in the context images. Current policy is to not enforce where PII is incidentally captured, and where that image would be necessary as evidence for enforcement.

Information and infringements

If information captured by an LPR vehicle leads to an infringement being issued, the vehicle's registration number is submitted to NZTA Waka Kotahi Motochek overnight to obtain the registered owner's name and address. This is loaded onto the ticket automatically and an infringement notice is posted to the registered owner at their registered address. This process is already used for Wellington bus lanes and bus stops enforced with static cameras and for infringements issued by officers on foot patrol.

The name and address details alongside vehicle information are requested from NZTA Waka Kotahi Motochek for the specific date of the offence, ensuring we receive the owner's details only for the date the offence occurred and not any previous owners.

The infringement information and owner's details are stored in Ticketor2 and are only accessible by trained and authorised parking staff.

The Genetec system (which is used by the LPR vehicles to collect/review/select or reject evidence) retains enforcement information for 90 days ('hit data'). Any information not used for enforcement, 'read data' is discarded during investigation processing within 14 days.

Current use of data and its retention/disposal is in line with WCC's internal Video Camera Recording Policy.

All images from the LPR vehicle cameras will be automatically disposed of from Ticketor2 in line with the existing retention policy and processes.

- Images data ('hit data') used to issue infringements and where infringement is processed and paid are held for 90 days and then disposed of.
- Enforced hit data where infringements are not paid are held for longer (exact retention varies and is being reviewed), from 12 months from date of issue but no greater than 5 years/60 months, to allow for Court and subsequent appeal processes.
- Footage of sign evidence is held for 180 days and disposed of. Snip images or clips taken from footage is held alongside other infringement hit data.
- If an infringement is issued, images used to issue infringements will be stored in accordance with the LPR retention and disposal diagram as follows:

Some meta data from each enforced infringement (either via the LPR or manual handheld system) is retained by ADR indefinitely.

LPR vehicle retention for surveys/turnover

Information type	Information classified for use	Stored location/system	Retention timeframe	Disposed
Still read images (context, plate)	Parking occupation	Toughbook and WCC	90 days	Live data backup to WCC deleted after 90 days from date of capture. Deleted from Toughbook on day of capture. Offloaded data disposed of 90 days after processing for survey report

LPR vehicle data retention for enforcement

Information type	Information classified for use	Stored location/system	Retention timeframe	Disposed
Still read images (context, valve stem, plate)	No infringement	Toughbook and backup	14 days	Deleted from Toughbook and backup from date of capture
Still read images (context, valve stem, plate)	Non-enforced infringement	WCC ADR/Ticketor2	90 days 7 days	
Still read images (context, valve stem, plate)	Offence confirmed	ADR/Ticketor2	Variable	In review (no greater than 5 years/60 months)
	Offence appealed successfully/unsuccessfully		Variable	In review (no greater than 5 years/60 months)
Raw sign video	Sign video captured on routes	WCC	180 days	Disposed
Video sign clip	Infringement appealed	WCC	60 months	Deleted upon payment
Video sign clip	Infringement proceeds to court	WCC	60 months	Disposed after 60 months
Video sign evidence clip	Unpaid fine	WCC	60 months	Deleted upon payment of fine

Personal information required		
Type of personal information	Source of information	Purpose of information for the project
Registered vehicle owner's name and address and associated information such as current vehicle registration information or referred ticketed individuals name and contact information.	NZTA Waka Kotahi Transport Agency MotoChek system.	The vehicle registration is used to obtain the owner's details for infringement and to make contact via post.
	From the registered owner of the vehicle in the event they have appealed an infringement ticket and referred us to another driver.	Referred personal information is required to charge the appropriate individual with the infringement.
Unnecessary personal information (risk)		
Inadvertent static images capture of people as seen in public.	Vehicle context, LPR, and wheel position (valve stem) cameras.	LPR vehicle static images containing people are not enforced.

Privacy assessment

The principles in the Privacy Act provide the legal framework that Council must consider. This section lets the decision-makers see whether the initiative will comply with the law.

Each row in the following table summarises the key requirements of each of the privacy principles and outlines some key questions or considerations Council should address. This table helps Council identify the initiative's privacy risks and considers how and what controls must best address and mitigate these.

<ul style="list-style-type: none"> • Privacy principle description 	<ul style="list-style-type: none"> • Summary of personal information involved, its use, and the process to manage 	<ul style="list-style-type: none"> • Assessment of compliance and rationale
<p>Principle 1 - Purpose of the collection of personal information</p> <p><i>Only collect personal information if it is necessary to do so</i></p>	<p>Name and address of vehicle's registered owner on date of the offence. This is used to identify the offender and impose infringement on them. This is mailed to their registered address to advise them of the offence.</p> <p>DOB (date of birth) is also obtained if recorded by NZTA Waka Kotahi Motochek. This is required to ensure individuals can be uniquely identified.</p> <p>Vehicle plate number: Although not considered personal information in isolation, when paired with other identifying information, the images of vehicle registration plates are collected and stored against the infringement for enforcement purposes, and are therefore considered as personal information.</p>	<p>The purpose of collection is required to mitigate against the risks and pressures associated with increasing cases of verbal and physical abuse of Parking Officers.</p> <p>The combined use of remote video-based evidence collection and NZTA Waka Kotahi Motochek has become the most appropriate and safe way to collect personal information for infringements captured by LPR vehicles. Personal information (PI) is shared with WCC by Waka Kotahi NZTA pursuant to Information Privacy Principle (IPP) 11 as disclosure is necessary to uphold/maintenance of the law.</p> <p>On issuing an infringement notice, the Land Transport Act 1998 No 110 (as at 01 March 2024), Public Act 139 Issue of infringement notice – New Zealand Legislation currently states that mailing the notice is acceptable, so address information is necessary. However, in cases where address information is out of date or invalid when acquired from Waka Kotahi Motochek, current parking infringement policy and processes should be considered in the first instance. This might require Parking Officers to contact Waka Kotahi and request further contact information such as alternative or electronic addresses.</p> <p>Information collected for this purpose is only accessed by authorised and trained PS staff to determine identity of individuals who may have the same name as someone else.</p> <p><u>Compliant</u></p>

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<p>Principle 2 – Source of personal information</p> <p><i>Get information directly from the person concerned, wherever possible</i></p>	<p>Name and address information is collected from NZTA Waka Kotahi Motochek. Council requires a licence with NZTA Waka Kotahi to obtain this information as an enforcement authority.</p> <p>The images of vehicle registration plates are collected and stored against the infringement for enforcement purposes.</p> <p>Personal information is then obtained from the registered vehicle owners in the event where infringement tickets are appealed and referred to another driver.</p>	<p>WCC PS are an enforcement authority and infringements are served on individuals who would not always be forthcoming with their details when receiving an offence notice. Information is obtained through a secure transfer mechanism that enables the infringement to be served to the vehicle owners.</p> <p>This information is shared with WCC by Waka Kotahi NZTA pursuant to IPP11 as disclosure is necessary to uphold/maintain the law. Sourcing information via NZTA Waka Kotahi Motochek is the most appropriate and safe way to collect personal information for infringements captured by LPR vehicles.</p> <p>Under the Land and Transport Act section 133(4)(c) the registered car owner is required to provide details of the driver to the best of their ability – when making a statutory declaration.</p> <p><u>Compliant</u></p>

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<p>Principle 3 – Collection of information from subject</p> <p><i>Tell them what information you are collecting, what you're going to do with it, whether it's voluntary, and the consequences if they don't provide it.</i></p>	<p>Registered vehicle owners name, address and DOB are loaded onto the infringement notice.</p> <p>Images of vehicles registration plates and their context (that lead to identifying individual owners of vehicles) are captured in public Council controlled environments including but not limited to streets, roads, carparking lots and buildings.</p> <p>Where inadvertent capture of identifiable individuals is clearly visible on still or video images, and the offending vehicle is being considered for infringement, the enforcement of that infringement is likely to be disregarded or reasonably edited and the images/video deleted to maintain the privacy of any nonrelevant individuals.</p> <p>The registered owner is advised of this when they are served the posted infringement notice and/or reminder notice 28 days later.</p> <p>The images of vehicle registration are collected and stored against the infringement for enforcement purposes.</p> <p>The WCC privacy statement explains how this collection of information is processed.</p>	<p>To defend any expectation of privacy in public, all possible steps are to be carefully considered for each case where inadvertent image capture includes personally identifiable information (PII), such as in the background of context images or signage evidence.</p> <p>Best practice in this scenario is to disregard any enforcement action, and the images follow the deletion process like that where enforcement was deemed unnecessary. Specific criteria for editing of images is acceptable where images can be obfuscated of PII and stored as part of the evidence for enforcement.</p> <p>On occasion where the registered owner is not the driver at the time of the offence, the owner should supply in writing (to the enforcement authority) the details (full name, current address, and DOB) of the driver at the time of the offence so the infringement can be assigned to that person.</p> <p>If this process is undertaken and accepted by WCC, they will receive confirmation in writing the infringement has been transferred and thus removes liability from the registered owner. If the registered owner cannot provide any driver information, then the owner is liable for the offence.</p> <p><u>Compliant</u></p>

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<p>Principle 4 – Manner of collection of personal information</p> <p><i>Be lawful, fair and not unreasonably intrusive in how you collect the information</i></p>	<p>Name and address information is collected from NZTA Waka Kotahi Motochek. Council requires a licence with Waka Kotahi NZTA to obtain this information as an enforcement authority.</p> <p>The images of vehicle registration plates are collected and stored against the infringement for enforcement purposes. There is no intention to capture PII.</p> <p>Only information relevant to the vehicle infringement is used to enforce WCC responsibilities.</p>	<p>There is the potential for a perception that LPR vehicles are intrusive and have an element of surveillance. Considering and applying criteria, policy, and transparent operating procedures is key to reassure and illustrate explicitly to the public how WCC is collecting PII in a fair and lawful manner.</p> <p>The published privacy statement about LPR vehicles is written to ensure transparency and address any concerns. Additionally, FAQs, criteria and requirements will echo how PII will be collected, processed, and handled.</p> <p>Concerns around unreasonable intrusion are addressed in how the information that is collected is limited to only that which is necessary to meet the enforcement purpose and is obfuscated or deleted to ensure anonymity.</p> <p><u>Compliant</u></p>

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<p>Principle 5 – Storage and security of personal information</p> <p><i>Take care of it once you've got it and protect it against misuse, loss, unauthorised, access, use, modification, or disclosure.</i></p>	<p>As per the standard Parking Services use of Ticketor2 for infringement processing:</p> <p>Footage and images are stored in SharePoint for prosecution purposes if required. Information can be audited.</p> <p>Static images are stored in TicketOr2 on the infringement.</p> <p>Registered owners name, address, and DOB are stored on TicketOr2 against the infringement. These are stored as per WCC's retention policy which ensures images are disposed of in either 3, 12, or 60 months as applicable and dependent on the infringement status and appeal or prosecution determination.</p>	<p>Information only accessed by authorised and trained Parking Services Staff.</p> <p>SharePoint folders are 'user access' restricted to those issuing infringements (role-based access training must be completed prior to granting access). Access restrictions and security applications are applied to prevent any interception, and to protect from internal or external attack.</p> <p>LPR vehicle infringements are only issued by trained parking officers from Parking Service's premises.</p> <p>WCC's code of conduct and static camera enforcement signed usage agreement ensures that staff adhere to the council's policy regarding privacy and any potential misuse of information.</p> <p>For the purposes of occupancy and turnover survey data the license plate details are retained for analysis purposes. This does not include the private details such as owner details or postal address.</p> <p><u>Compliant</u></p>

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<p>Principle 6 – Access to personal information</p> <p><i>People can request access to their personal information.</i></p>	<p>Registered owners can request copies of their information under the Privacy Act. Council is legally required to provide this information if it is held, upon request.</p> <p>The Ticketor2 system does not disclose the owners name and address information as it could potentially be accessed by other members of the public if they had the infringement and registration number. They can however view the infringement online and the associated evidential still images for the duration the infringement is unpaid.</p> <p>Any footage made available to the ticketed person is checked and redacted when it is not directly related to this person, prior to being made available. Evidence disclosure is likely to only be provided in Court.</p>	<p>Images can be viewed by the customer once validated with infringement number and registration.</p> <p>This can only be provided upon request. This enables WCC to take the time to ensure the appropriate checks and reviews can be undertaken before providing the requested information.</p> <p>The validation process in place for drivers to view an infringement online ensures that no personal details are disclosed, only the offence itself.</p> <p>Customers can seek additional information by submitting an information request. This is then managed and responded to by Parking Communications in Parking Services to disclose any additional specific and relevant information.</p> <p>Any additional information requested will not disclose the PII of others captured in images.</p> <p>Information requested by other agencies (such as law enforcement) will only be considered where the request is lawful and meets the collection purpose. PII of others will not be disclosed unless a relevant exception applies under the Act.</p> <p><u>Compliant</u></p>
<p>Principle 7 – Correction of personal information</p> <p><i>They can correct it if it's wrong, or have a statement of correction attached</i></p>	<p>Can be done in writing to the issuing authority (WCC), including nominating an infringement to the driver if the owner was not in possession of the vehicle at the time of the offence.</p>	<p>This is to ensure that records are up to date and relevant, and a full audit trail is maintained of any changes requested and/or made.</p> <p><u>Compliant</u></p>

<ul style="list-style-type: none"> • Privacy principle description 	<ul style="list-style-type: none"> • Summary of personal information involved, its use, and the process to manage 	<ul style="list-style-type: none"> • Assessment of compliance and rationale
<p>Principle 8 – Accuracy etc. of personal information to be checked before use</p> <p><i>Make sure personal information is correct, relevant, and up to date before you use it</i></p>	<p>Information (licence plate and associated registration details) is obtained from Waka Kotahi NZTA Motochek, this is reliant on a third parties validation process. This is a one-way system validation process. To avoid misreads, accuracy is confirmed through multiple verification steps such as licence plate number match with licence plate image capture, GPS location in relation to context and signage images.</p>	<p>Some spelling or postcode errors can occur because of importing registered owners’ information from the third-party Waka Kotahi NZTA Motochek system. WCC is reliant on Waka Kotahi NZTA maintaining accurate records. As this information is imported via an automated process it is difficult and impractical to review in the first instance.</p> <p>If the infringement is still unpaid after 28 days, WCC have a mitigation process in place where this data is manually reviewed by staff prior to reminder notices being sent out. This becomes a manual case by case process to ensure accurate information is being extracted. Any corrections are made manually as required.</p> <p>The license plate details are verified by a warranted parking officer before an infringement is issued to ensure accuracy and resolve any LPR misreads.</p> <p><u>Compliant</u></p>
<p>Principle 9 – Not to keep personal information for longer than necessary.</p> <p><i>Get rid of it once you’re done with it</i></p>	<p>Footage, images, and personal information are only kept in line with WCC’s retention policy as referenced in this document.</p>	<p>Any data or footage collected and not used for an infringement is disposed of within 30 days.</p> <p>With any infringements issued, relevant information associated to that case only will be retained for up to 12 months after the infringement was issued.</p> <p>If the infringement is referred to the court, information is retained for a total of 60 months (five years) to satisfy court and appeal processes.</p> <p><u>Compliant</u></p>

<ul style="list-style-type: none"> • Privacy principle description 	<ul style="list-style-type: none"> • Summary of personal information involved, its use, and the process to manage 	<ul style="list-style-type: none"> • Assessment of compliance and rationale
<p>Principle 10 – Limits on use of personal information</p> <p><i>Use it for the purpose you collected it for, unless one of the exceptions applies</i></p>	<p>Any images, footage, names, address, or DOB information is used solely for the purpose of enforcement and only to the specific infringement for which it was obtained. PII not relevant to the enforcement action is not collected and held. There will be no other or secondary use of the information unless an overriding exception applies.</p>	<p>If there is a repeat offence against the same vehicle and its associated registered owner, the information is requested again from Waka Kotahi NZTA. The same information previously obtained is not reused for new infringements. Each infringement has its own separate case file.</p> <p>PII captured for stated purpose will not be used or shared with other agencies for other purposes (for example NZ Police) unless an overriding exception compels WCC to provide this information.</p> <p><u>Compliant</u></p>
<p>Principle 11 – Limits on disclosure of personal information</p> <p><i>Only disclose it in limited circumstances, unless one of the exceptions applies</i></p>	<p>Information only accessed by authorised and trained Parking Services Staff. Official Information and Privacy will be consulted as to whether the release of an image is warranted. WCC privacy breach processes are in place should information be disclosed inadvertently.</p>	<p>The footage, images and/or personal information may be required for evidential purposes in the event the infringement is disputed. In this instance the information is disclosed to the defendant through WCC’s court prosecution process. Information will only be supplied to the named person. Or with written permission from the named person for it to be discussed or received on their behalf. Exceptions may apply where WCC is required/compelled to disclose under the Privacy Act or other legislation.</p> <p><u>Compliant</u></p>
<p>Principle 12 – Limits on disclosure of personal information overseas</p> <p><i>Only disclose offshore where equivalent protections are in place</i></p>	<p>Personal information will be stored with ADR and in internal folders in Sharepoint. Information will not be disclosed outside of approved locations, New Zealand and Australia.</p>	<p>Not Applicable.</p> <p><u>Compliant</u></p>
<p>Principle 13 – Unique identifiers</p> <p><i>Only assign unique identifiers where permitted</i></p>	<p>Not Applicable. Unique identifiers are not generated in this process.</p>	<p>Not Applicable.</p> <p><u>Compliant</u></p>

Summary / Findings

LPR video and images will be stored on systems with access limited to trained LPR evidence processors. Privacy training is a key component of their overall training programme.

LPR video and images will only be retained if they have been collected in accordance with parking enforcement and/or occupancy survey work as outlined in the Parking Services LPR Vehicles Operational Policy and various SOPs.

The use of images and footage must be carried out in accordance with the Privacy Act 2020. WCC retains the ownership of the cameras and equipment as well as retaining ownership of the footage and images captured.

Parking Services will have the overall responsibility for ensuring the system used is compliant with this impact assessment and policy. Wellington City Council's Official Information and Privacy team will have the overall responsibility regarding the release of information on behalf of Wellington City Council.

Any request made that does not directly relate to an infringement will be treated as a Privacy or Official Information Request under the Local Government Official Information and Meetings Act 1987 (LGOIMA). The request will be directed to parkingcommunications@wcc.govt.nz, the Business Advisor will consult with the LGOIMA and Privacy team as to whether the release of images and footage is permitted.

Risk assessment

Parking Services LPR enforcement processes will have and implement its LPR vehicle operational policy and various SOPs to help ensure compliance with the Privacy Act 2020. This is in conjunction with the Wellington City Council Employee Code of Conduct and all Parking Staff being required to comply with the WCC Video Camera Recording Policy and internal Privacy Policy.

Privacy risk mitigations required

• Identified privacy risk	• Recommendation	• Agreed Yes/No or due date
R-001: Controlled access to images	LPR vehicle camera images will be stored on systems with tight access controls. Access is limited to digital image processors who have the relevant training provided	Yes
R-002: Use of images for secondary purpose	Personal information will only be accessed and used for 'enforcement of the law' purposes under sections 237(2)(b) and 235(a) of the Land Transport Act 1998. LPR vehicle cameras will only be used to obtain evidence to issue infringements to stationary vehicles and carry out parking	Yes

	occupancy surveys. They are not used for other purposes such as city safety.	
R-003: Images held for longer than necessary	Storage of footage, and images is done in accordance with WCC's retention policy – as illustrated in the diagram referenced in this document.	Yes – review of long-term retention to be complete in May 2025.
R-004: Secure storage	Any information retained is secure and may not be used in contravention of the Privacy Act 2020. Storage systems are audited and regularly tested.	Yes
R-005: Collection is transparent	LPR vehicles will have standard WCC sign writing, with cameras clear mounted (i.e. not concealed as per the previous trial in 2010-2012). Transparent communication via media releases is ongoing.	Yes
R-006: Incidental capture of PII alongside necessary information.	Camera privacy masking will not be used on LPR vehicle cameras. Rather, cameras are oriented and targeted at the required evidential target, capturing video and images that might rely on cropping, blurring, or editing to protect the identity of individuals. Images that clearly identify individuals captured incidentally alongside necessary information, will result in no enforcement of offence.	Yes
R-007: Officer training, awareness and compliance	<p>Offences will only be issued to vehicles by Parking Officers:</p> <ul style="list-style-type: none"> • Who are warranted • Have been fully trained in issuing infringements by LPR images and videos • Have read and fully understood all operational policies and documentation • Have completed all necessary training and eLearning modules relevant to their roles/as officers of Wellington City Council. <p>Trained Parking Officers are required to sign a "LPR Camera Agreement" to acknowledge they understand and agree to the terms of the Operational Policy and the associated Standard Operating Procedure (SOP).</p>	Yes
R-008: Governance and responsibility	An earlier copy of this document (May 2024) has been provided to the CCTV Steering Group. An updated version will be provided after sign off by the senior responsible owner	Yes – by 'go live' in late February 2025
R-009: Transparency and consent	<p>Privacy statement updated to reflect new LPR vehicle cameras and what they are intended to monitor.</p> <p>A copy of this PIA is provided to the OPC (Office of the Privacy Commissioner) and is published to public facing WCC website.</p>	Yes – by 'go live' in late February 2025
R-010: Invasive surveillance	For each proposed enforcement route, careful consideration has been made prior to using the LPR vehicles to ensure viewpoint is not somewhere one might reasonably expect privacy e.g., into someone's private property. Although avoidance of this might not always be possible, incidental capture of this type of information is extremely rare, and highly unlikely. If it were to happen the option to not enforce is likely to be triggered if this footage is necessary to enforce an offence. Where the option to not enforce is chosen, the collected information will follow the standard deletion process.	Yes
R-011: Privacy risks are controlled through adequate resourcing	Make sure that privacy training is included in the implementation of new LPR vehicles given that privacy editing and non-enforcement is only considered as a backup control option (i.e., cameras are mobile, not fixed and masking is not feasible). Adequate staffing and resourcing is prioritised to ensure appropriate coverage to maintain implementation of controls.	Yes

