



Public Transport Group Camera Surveillance Policy

A policy to ensure camera surveillance systems across the Public Transport network are implemented and managed in line with GWRC's camera surveillance policy.

Policy owner	General Manager, Public Transport
Position administering this policy	Manager, Public Transport Policy
Date policy comes into effect	The first working day following the date of approval by the General Manager
Related policies and legislation	Privacy Act 1993 GWRC Privacy Policy GWRC Policy on the use of camera surveillance systems Privacy and CCTV – A guide to the Privacy Act for businesses, agencies and organisations (Privacy Commissioner, 2009) Releasing personal information to Police and law enforcement agencies: Guidance on health and safety and Maintenance of the law exceptions (Privacy Commissioner, 2017) Employee Code of Conduct
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Approved:


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1. Policy Purpose

The purpose of this policy is to define the camera surveillance systems operating within the Greater Wellington Regional Council (GWRC) Public Transport (PT) Group and to outline the mechanisms that protect the privacy of individuals.

The application of this policy will ensure that GWRC complies with its obligations under the Privacy Act 1993 and complies with GWRC's policy on the use of camera surveillance systems where either GWRC or GWRL controls the system.

The application of this policy will also ensure information is made available to individuals regarding systems which are not controlled by either GWRC or GWRL.

This policy aims to support best practices around personal information handling to ensure that any images captured, collected and stored are handled in an appropriate manner that protects an individual's privacy.

This policy covers both systems owned and controlled by GWRC or GWRL as well as those owned and operated by a third party.

2. Background

GWRC aims to provide a public transport network where customers, employees, and the general public feel safe. To achieve this, GWRC takes an integrated approach to the planning and provision of services, infrastructure, and information. One aspect of this is the prevention of crime and anti-social behaviour, which GWRC addresses in a number of ways, such as:

- Using crime prevention through environmental design principles (CPTED) when planning and building infrastructure, including the use of security lighting, fencing, security alarms, etc.
- Training staff in customer service and conflict management.
- Employing security patrols, which may be random, planned, or in response to incidents on the Public Transport network.
- Reducing or preventing graffiti (including patrols, use of anti-graffiti materials, prompt removal of tags, etc).
- Using monitored and unmonitored camera surveillance systems.
- Providing 'emergency call points' on trains and at railway stations.
- Co-operating with other agencies, including local councils, the police, KiwiRail, and public transport operators.

Complementing this, GWRC also aims to ensure that it collects the appropriate fare revenue for services utilised.

This policy deals specifically with the use of camera surveillance systems but should be understood in the wider context where camera use is one element of the overall approach to security.

A feeling of personal safety is highly correlated with overall satisfaction with public transport in GWRC's customer satisfaction surveys, and national research identifies that personal security concerns become common barriers to the use of public transport after dark by regular public transport users.

In this Policy "GWRC owned and operated Camera Surveillance" and "GWRC controlled camera surveillance systems" refers to camera surveillance systems owned by:

- Greater Wellington Rail Limited (GWRL) – in regard to surveillance systems used on the rail network; and
- GWRC, in regard to surveillance systems used on the bus network.

3. GWRC Owned and Operated Camera Surveillance

3.1. Purpose of Camera Surveillance

The purpose of public transport camera surveillance systems is to contribute to a public transport network where customers, employees and the general public feel safe, in particular by reducing criminal events such as violence, theft, property damage, and by allowing a quick response to emergency situations where systems are being monitored. Complementing this, GWRC also aims to ensure that it collects the appropriate fare revenue for services utilised.

Therefore, camera surveillance maybe used for the following purposes:

- Deterring criminal events, objectionable behaviours and safety incidents occurring whilst using public transport or on GWRC property.
- Immediately detecting criminal events, objectionable behaviours and safety incidents occurring whilst using public transport or on GWRC property.
- Collecting evidence for prosecution of criminal events occurring whilst using public transport or on GWRC property.
- Monitoring of patterns of travel behaviour in groups of customers where no individual customer is uniquely identifiable.
- Ensuring fare revenue is appropriately collected.

Camera surveillance systems in use on buses and at Wellington Railway Bus Hub are not controlled by GWRC and are therefore outside of the scope of this policy. However, GWRC do have access to footage contained within these systems in certain circumstances.

3.2. Responsible Officers

The following officers are responsible for the GWRC controlled camera surveillance systems in operation:

- Manager, Bus Network & Infrastructure – Cameras in operation at bus hubs and at other bus infrastructure sites owned or leased by GWRC.
- Manager, Rail Operations – Cameras in operation at stations and on trains.

3.3. Areas of Operation

Cameras controlled by GWRC may operate in the following locations:

- On trains
- At rail stations (including the station, carpark, bridges and subways)
- At bus hubs and other bus facilities.

All cameras must be positioned to ensure that they only collect information required. If any private property is included within the images permission must be sought from the property owner prior to use. Cameras will not be used to look into or monitor adjacent or nearby premises or buildings, unless it is explicitly for following participants in a situation of concern.

Appendix A contains a record of the current cameras in operation.

3.4. Equipment Selection

Across the network a variety of cameras are used, with varying technical capabilities including:

- Pan
- Tilt
- Zoom
- Operation in low light conditions
- Relocatable
- Remote operation.

The appropriate kind of camera must be selected to ensure the capabilities meet but don't exceed the required purpose of utilising a camera.

If audio recordings are proposed a detailed business case, reviewed by GWRC's Privacy Officer, must justify the use.

Intelligent surveillance technologies such as facial recognition must not be used.

3.5. Installation and maintenance of GWRC camera surveillance systems

GWRC camera surveillance systems are installed and maintained under two separate contracts:

- An installation and maintenance contract between GWRL (in regard to surveillance systems at railway stations) and the contractor; and
- An installation and maintenance contract between GWRC (in regard to surveillance systems at bus hubs) and the contractor.

At the date of this policy the contractor responsible for installation and maintenance of all GWRC and GWRL camera surveillance systems is Red Wolf High Level Security Limited (**Red Wolf**).

The current and any future installation and maintenance contracts will require that the matters set out in this Policy are understood by the contractor including (if necessary) by recording that the relevant contractor is responsible to ensure that its personnel that have access to camera surveillance footage must comply with this Policy.

3.6. Hours of Operation

The GWRC camera surveillance systems operate 24 hours a day, 7 days a week but specific cameras are only monitored as required:

- Cameras in public areas at stations, at bus hubs and in carparks can be monitored in real time and are recorded. However, they may not be monitored or recorded at all times.
- Cameras covering emergency call points at stations will be monitored whenever the call points are activated. Audio calls made from emergency call points may also be recorded.
- Cameras on trains are not monitored in real time but are downloaded and viewed as required in response to reported / suspected incidents.
- Cameras are also deployed in some staff areas. Access to footage from these cameras is restricted to the authorised persons only and cameras are not monitored in real time.

3.7. Usage of Footage

Footage from GWRC camera surveillance systems can only be used for the purpose for which it was collected.

Camera footage from non-monitored cameras must only be downloaded in response to an incident / request.

Footage may also be used, with the prior approval of the Responsible Officer, for these related purposes:

- Inquiries relating to the investigation of other criminal offences or safety incidents;

- Training of security staff and maintenance of the system;
- Research, such as into the nature of security incidents, patterns in station / vehicle use or travel behaviour, or evaluation of the operation of particular camera systems.

3.8. Monitoring Process

All GWRC camera surveillance systems will be monitored and operated in accordance with the principles of the Privacy Act 1993 and the NZ Security Association Code of Practice.

On the rail network the system is monitored by the contracted Rail Operator.

The GWRC camera surveillance system operating at bus hubs is not monitored proactively. However regular maintenance checks are made on the system by Red Wolf.

Where required, operators responsible for monitoring will be security vetted and licenced under the Private Security Personnel and Private Investigators Act 2010.

3.9. Incident Reporting

Incidents may be identified by the Rail Operator, Bus Operator's, contractors responsible for maintenance and security, GWRC staff, or by members of the public or other agencies such as the Police.

GWRC and the Rail Operator will ensure that when incidents are identified:

- Video of incidents may be transferred to secure media for storage (with both a master copy and working copy). There must be restricted access to these files.
- Details of every incident recorded will be documented.

The number of security incidents identified are also included in the Rail Operator's monthly report to GWRC.

3.10. Access to Images by Individuals

Any individual who is recorded by GWRC's surveillance cameras has the right to access that footage.

Any request by an individual to access footage will be assessed in relation to the ability to readily retrieve the footage and to maintain the privacy of any other identifiable individual in the footage. Where footage exists but is not able to be released due to issues with de-identifying others contained within the footage, a written record of the incident will be made available. Initial enquiries relating to access to images or information should be addressed to Metlink - 0800 801 700 or info@metlink.org.nz.

Any request by an individual to access footage on a system controlled by another party will be transferred to the relevant party.

3.11. Access to Images by Third Parties

In the event of some unlawful activity being carried out, and that activity being recorded on GWRC's surveillance cameras, GWRC or an authorised operator may pass the footage of that incident over to Police for the purpose of an investigation. Likewise, if the Police believe some unlawful activity was carried out that may have been recorded by GWRC then they may view or ask them to hand over any footage that may help in their investigation.

Requests for footage of any incident must be in writing and must specify (to the extent possible) the date, time, and location of the incident, and the reason for the request. The request will be assessed in regard to:

- The requirements of the Privacy Act and the Local Government Official Information and Meetings Act (LGOIMA).
- The purpose for which footage is collected.

Authorisation from the relevant Responsible Officer is required to supply footage captured to the NZ Police, the New Zealand Transport Authority (NZTA), the Transport Accident Investigation Commission (TAIC), or insurance companies.

Authorisation from the General Manager, Public Transport is required to supply footage to any other party.

Any request by a third party to access footage on a system controlled by another party will be transferred to the relevant party.

3.12. Security of Footage

GWRC controlled footage is secured to lessen the possibility of its loss, inappropriate access or disclosure. Safeguards include:

- Having an audit trail staff access to footage can be monitored.
- Limiting access to only authorised staff.
- Prohibiting removal of footage from its location of storage unless approved by a Responsible Officer.

3.13. Retention Schedule

Camera footage is automatically overwritten by new footage (usually within a fortnight). Only authorised staff can make copies of recordings, and copies are kept for a limited time in a secured network.

Copied footage is kept for up to 12 months unless subject to legal proceedings.

3.14. Public Awareness

To increase public awareness of GWRC's surveillance camera usage within the public transport network:

- The location of cameras is clearly apparent to the public with signage in the immediate vicinity of each camera.
- A list of all locations where cameras are operating is available on the GWRC website or on request (contact Metlink: info@metlink.org.nz or 0800 801 700).
- When station or bus shelter facilities are upgraded, the use (and location) of cameras is included in any stakeholder or community consultation.

Complaints in relation to any aspect of camera surveillance operations should be addressed to:

General Manager, Public Transport
 Greater Wellington Regional Council
 PO Box 11646
 Manners Street
 Wellington 6142
info@gw.govt.nz.

4. Third Party Owned and Operated Camera Surveillance

Third Parties (for example Bus Operators and Transdev) are responsible for their own compliance with the Privacy Act in regard to camera surveillance systems that they own even when operated within the public transport network.

4.1. Access to Images by GWRC

GWRC may have access to third party footage, on request, to enable GWRC to

- Investigate incidents;
- Ensure ticket revenue is appropriately collected; and
- Audit compliance with GWRC's contract for services.

If GWRC has a contractual a right to access third party footage, this right must be declared within the third party's privacy statement.

Any footage obtained by GWRC from a third party will not be shared by GWRC with any other party, including the Police and members of the public, unless mandated by law. Footage obtained by GWRC from a third party must be disposed of as soon as it is no longer required.

4.2. Access to Images by Individuals and Third Parties

Any request by an individual or third party to access third party footage must be transferred to the third party who operates the system. No third party footage must be provided by GWRC unless mandated by law.

4.3. Public Awareness

The location of all third party cameras should be clearly apparent to the public with signage in the immediate vicinity of each camera. Signage identifying third party cameras should clearly indicate the details of the relevant third party that owns and operates the camera.

The third party should make available to the public a privacy statement providing details regarding the system. GWRC should be provided the opportunity to provide feedback on the privacy statement and to provide a link to this privacy statement within the GWRC privacy statement.

5. Making the policy available

The policy administrator is responsible for ensuring that the policy is appropriately communicated to all staff who need to comply with it, and that a copy is supplied to Democratic Services for recording in the Policy Register.

6. Breaches to Policy

Any potential breaches of this policy by staff required to comply with it will be taken very seriously.

Any allegations or instances of potential breaches will be investigated fully by GWRC. During the investigation, GWRC reserves the right to temporarily suspend access to camera surveillance systems.

For GWRC staff, breaches of this policy may be considered misconduct or serious misconduct which could result in disciplinary action, and could include first warning, final warning or possible dismissal. Depending on the nature of the breach, the matter may also be referred to the police.

For non-GWRC staff, breaches could result in a permanent or temporary revoking of access to camera surveillance systems, and a formal complaint may be referred to the staff member's employer.

7. Audit Process

The Responsible Officers (with assistance from the GWRC Privacy Officer) oversee the operation of GWRC PT camera surveillance systems including reporting and overseeing the internal audit process and compliance with this policy.

The operation of remotely controlled cameras and the making of copies is audited to ensure cameras and footage are not misused.

Audits are undertaken of records of access to the system, copies, and the provision of images to external parties.

In addition, regular external audits are scheduled to occur as part of a wider security audit.

8. Appendix A - Schedule of GWRC Controlled Camera Surveillance Locations

i. Trains

All trains

ii. Stations with Camera Surveillance (as at 1 March 2018)

General

- Wellington station and carpark

Johnsonville Line

- Johnsonville station

Hutt Valley Line

- Ngauranga station
- Petone station and carpark
- Ava station
- Woburn station and carpark
- Waterloo station and carpark
- Epuni station
- Naenae station
- Wingate station
- Taita station and carpark
- Pomare station and carpark
- Manor Park station and carpark
- Silverstream station and carpark
- Heretaunga station
- Trentham station and carpark
- Wallaceville station
- Upper Hutt station and carpark

Kapiti Line

- Takapu Road carpark
- Redwood station and carpark
- Tawa station and carpark
- Linden station
- Kenepuru station
- Porirua station and carpark
- Paremata station and carpark
- Mana station and carpark
- Plimmerton station
- Pukerua Bay station
- Paekakariki station

- Paraparaumu station and carpark
- Waikanae station and carpark

Melling Line

- Melling station and carpark
- Western Hutt none

Wairarapa Line

- Maymorn station
- Featherston station and carpark
- Woodside station and carpark
- Matarawa none
- Carterton station and carpark
- Solway station and carpark
- Renall Street station
- Masterton station and carpark

iii. Buses

No buses. These are controlled by the bus operator.

iv. **Bus Hubs with Camera Surveillance** (note: planned rollout underway - anticipated all hubs to be fully operational by early 2019)

Courtenay Place

- Shelter Stop A
- Shelter Stop B
- Shelter Stop C

Wellington Hospital, Rintoul Street

- Shelter Stop A
- Shelter Stop B
- Shelter Stop C

Kilbirnie, Evans Bay Parade

- Shelter Stop A
- Shelter Stop B
- Shelter Stop C

Miramar, Miramar Avenue

- Shelter Stop A

- Shelter Stop B

Karori, Glenmore Street

- Shelter Stop A
- Shelter Stop B

Brooklyn, Cleveland Street

- Shelter Stop A
- Shelter Stop B
- Shelter Stop C

Johnsonville, Moorefield Road and Johnsonville Mall car park

- Shelter Stop A
- Shelter Stop B
- Shelter Stop C

v. Relocatable Cameras

Deployed anywhere on the public transport network in response to incidents or community concerns. Signage will be present.