



# CCTV Policy

---

## 1. Purpose

This CCTV (Closed Circuit Television) policy sets out how Auckland Transport (AT) will install, operate, and manage **CCTV systems**, and how it will collect, use and manage **CCTV footage** and **CCTV data**, to support its functions and activities.

## 2. Scope

This policy applies to all CCTV systems used, owned, operated or managed by AT, including CCTV on trains, roads, vehicles, carparks, airfields, drones, in buildings and body-worn cameras on AT staff, as well as the following CCTV systems, which are not managed by AT:

- CCTV systems operated on board ferries or busses that are owned and managed by the operator
- CCTV systems operated on State Highways and other transport assets which are managed by Waka Kotahi NZ Transport Agency (WK-NZTA), and operated through the Auckland Transport Operations Centre (ATOC)
- CCTV systems operated on ferry wharves which are not managed or operated by AT
- CCTV systems which are part of the Safer Cities vGrid network
- Local Boards' or other community based CCTV systems to which AT has access.

This policy must be complied with by:

- All AT employees and contractors
- AT representatives
- Service providers under the terms of contracts with AT (such as consultants)
- Agency temps (in accordance with the terms of their supplier agreement with AT)
- Staff on secondment to AT from other organisations/agencies
- Transport service operators who collect, use, or manage CCTV under the terms of contracts with AT.

This Policy does not apply to the use by WK-NZTA of CCTV systems it owns.

## 3. Policy Principles

### 3.1. Privacy

- AT will ensure that any personal information collected, retained and released through its CCTV systems is managed in accordance with the Privacy Act 2020
- Staff will respect the privacy of individuals when using CCTV, maintain confidentiality over what they observe, and comply with AT's Privacy Policy when dealing with personal information
- Staff will not use CCTV systems to view private property unless there is an approved purpose (see Clause 3.2) to do so.



### 3.2. Purposes of CCTV

AT uses CCTV systems to support its powers, functions, and duties under the Local Government (Auckland Council) Act 2009 or otherwise delegated to it, in the following ways:

- to support the safety and security of AT staff, AT customers and the public using AT premises and the Auckland transport system
- to provide travel information
- to support the protection and security of public assets and facilities
- to support inspections and remote working
- to support the prevention, detection, investigation, and enforcement of offences for which AT holds enforcement powers
- to support effective resolution of issues and complaints involving public services
- to support effective management and optimisation of the Auckland transport system through monitoring of traffic (including pedestrian traffic) on the transport network and the operation of public transport services
- to monitor and manage events and operations, such as construction projects and sporting events that have an impact on the transport network, to effectively manage the impacts and support smooth running of the network
- for statistical analysis and research to support AT's transport planning function
- for development of systems to improve the management, safety and optimisation of the Auckland transport system.

### 3.3. Need

CCTV systems will only be installed and used where there is a need to do so for one or more of the purposes identified under this policy and approved by the CCTV Operational Governance group. Any modification to the camera type or position must be approved by the CCTV Operational Governance group.

### 3.4. Public interest

- CCTV systems will be operated with consideration for people's privacy and their right to conduct lawful activities
- AT does not identify individuals in CCTV data or footage unless it is needed for lawful purposes
- Appropriate notification will be in place whenever practicable to inform the public that CCTV systems are in operation
- An effective system will be in place to deal with CCTV-related enquiries and complaints from the public, with the details published on AT's website, which will also contain information on CCTV operations
- CCTV may be streamed for public viewing for safety and security purposes onto local monitors or on the internet. This will enable the public to see the presence of people and trains, busses and ferries on or at platforms and quays and other locations as if they were at the location
- AT will ensure that CCTV live streaming is only viewed by authorised personnel. Any exception must be approved by the CCTV Strategic Governance group.

### 3.5. Recorded Imagery

- CCTV data collected or processed through CCTV systems owned or managed by AT is the property of AT
  - CCTV data collected on busses and ferries is owned by the respective operator (unless otherwise provided under contract with AT)



- The monitoring, retention, storage and destruction of CCTV data and images will be closely regulated using CCTV standards, procedures and guidelines agreed by the CCTV Strategic Governance Group
- CCTV data collected and retained must be accurate, relevant and must not exceed that which is necessary to fulfil the purpose for which it is collected
- Access to recorded images must be restricted to authorised persons only or as otherwise required by law.

### 3.6. Retention

- CCTV footage and CCTV data will be retained in accordance with AT's [Information and Records Management policy](#) and the [CCTV Standards](#)
- CCTV data will only be kept for as long as is necessary to fulfil the purpose(s) for its collection
- If CCTV data becomes a **Protected Record**, it is kept indefinitely (unless otherwise instructed by the Chief Archivist)
- Where the purpose of the collection requires CCTV footage or CCTV data to be retained for a longer period than specified in the CCTV Standard or where there is a legal requirement to do so, AT will remove personal information contained within such footage or data unless it is required for the purpose of the retention of the footage.

### 3.7. Release of CCTV information

- Release of CCTV footage and or CCTV data to organisations and individuals will be managed in accordance with CCTV procedures, and legislation including Privacy Act, and Local Government Official Information and Meetings Act (LGOIMA) requirements
- Release of CCTV data that is “structured data”, as defined in the AT Data Policy, must be in accordance with that policy
- Requests should be forwarded to the Customer Services Team as soon as they have been received
- The release of CCTV data must be approved by specifically authorised personnel. The Group Manager of ATOC and CCTV Product Owner for the rest of AT must approve or delegate approval for the release of CCTV images in accordance with AT standards and procedures
- When authorising the release of CCTV information the AT Privacy Policy and LGOIMA Procedures, as outlined in CCTV Procedures, must be followed
- CCTV footage will not be released if this is not permitted by law
- Any ongoing arrangements for access to CCTV systems or release of CCTV footage/data to third parties must be formalised in writing, approved by the CCTV Strategic Governance Group, and signed off in accordance with AT's Delegations.

### 3.8. Security of CCTV

- Staff using CCTV systems must meet high standards of probity and perform their duties in accordance with the AT CCTV Standards, Procedures, and Guidelines
- Appropriate security measures must be taken to protect against unauthorised access to, alteration, disclosure, loss or destruction of CCTV footage and/or CCTV data
- Security measures will include physical, technological and administrative means. These include ensuring only authorised persons have access to the CCTV software,



restricting permissions to those needed to perform their duties, and annual reviews of access rights.

### 3.9. Audit

The enforcement of this policy is reviewed by the CCTV Product Owner and audited on an annual basis.

## 4. Definitions

Term	Definition
Auckland transport system	<p>As defined in section 37 of the Local Government (Auckland Council) Act 2009 –</p> <p>(a) means –</p> <ul style="list-style-type: none"><li>(i) the roads (as defined in <a href="#">section 315</a> of the Local Government Act 1974) within Auckland; and</li><li>(ii) the public transport services (as defined in <a href="#">section 5(1)</a> of the Land Transport Management Act 2003) within Auckland; and</li><li>(iii) the public transport infrastructure owned by the Council; and</li><li>(iv) the public transport infrastructure owned by or under the control of Auckland Transport; but</li></ul> <p>(b) does not include –</p> <ul style="list-style-type: none"><li>(i) State highways;</li><li>(ii) railways under the control of New Zealand Railways Corporation;</li><li>(iii) off-street parking facilities under the control of the Council;</li><li>(iv) airfields.</li></ul>
AT premises	<p>This includes AT-controlled bus, ferry and train stations, Off street carparks controlled or managed by AT parks, AT offices and other premises that AT owns or controls or uses (under delegation or otherwise). Auckland Transport also manages two Great Barrier airfields on behalf of Auckland Council.</p>
CCTV	<p>Closed Circuit Television is a camera surveillance system that captures images which may include individuals or information relating to individuals.</p>



Term	Definition
CCTV data	CCTV data is the data collected by a CCTV system.
CCTV footage	The moving and static imagery captured by a CCTV system.
CCTV system	The CCTV system includes the recording equipment, display equipment, transmission system, transmission media and interface control.
Event	This includes planned and unplanned events.
Protected Record	A protected record as defined in the Public Records Act 2005.

## 5. Roles and Responsibilities

Role	Responsibility
<b>Approval Authority</b> Chief Executive	<ul style="list-style-type: none"> <li>Approves new and significantly amended CCTV policy</li> </ul>
<b>Responsible Executive</b> EGM Business Technology	<ul style="list-style-type: none"> <li>Has overarching responsibilities for the CCTV policy</li> <li>Oversees management of CCTV</li> </ul>
<b>Policy Contact</b> CCTV Product Owner <i>The subject matter expert in this policy area</i>	<ul style="list-style-type: none"> <li>AT owner for CCTV including strategy, policies, processes, business practices, guidelines, approvals, governance and oversight to enable effective implementation of CCTV solutions and a centre of excellence in New Zealand that can be used by other agencies</li> </ul>
<b>CCTV Strategic Governance Group</b>	<ul style="list-style-type: none"> <li>Advise on significant strategic AT CCTV changes, issues and risks, organisational priorities</li> <li>Advise on opportunities to improve operational and customer experience</li> <li>Review and advise on any items raised by the Operational Governance Group</li> <li>Provides a mechanism for reviewing and providing input into AT's CCTV-related policies and CCTV-related arrangements with third parties (such as MOUs), signage, and privacy impacts</li> </ul>



Role	Responsibility
<b>CCTV Operational Governance Group</b>	<ul style="list-style-type: none"><li>The Operational Governance Group's role is to discuss CCTV operational matters and review/approve/decline requests for CCTV based on agreed standards and in line with CCTV policy, guidelines, and procedures</li></ul>
All employees and representatives	<ul style="list-style-type: none"><li>Adherence and compliance with this policy and related procedures</li></ul>

Operational responsibilities of these roles can be found in Roles and Responsibilities document.

## 6. Supporting Information

<b>Legislative compliance</b>	<p>This Policy supports Auckland Transport's compliance with the following legislation:</p> <ul style="list-style-type: none"><li>Local Government Official Information and Meetings Act 1987</li><li>Privacy Act 2020</li><li>Public Records Act 2005</li><li>Local Government (Auckland Council) Act 2009</li></ul>
<b>Supporting documents</b>	<p>These are listed in the Policy Hub on the AT intranet.</p> <ul style="list-style-type: none"><li><a href="#">CCTV Standards</a></li><li><a href="#">CCTV Procedures</a></li><li><a href="#">CCTV Guidelines</a></li><li><a href="#">CCTV Roles and Responsibilities</a></li><li>AT Information and Records Management Policy</li><li>AT Information Security Policy</li><li>AT IT Access Policy</li><li>AT IT Acceptable Use Policy</li><li>AT Privacy Policy</li><li>AT Code of Conduct Policy</li><li>Body-Worn Cameras Operational Business Process</li><li>AT Discipline and Dismissal Policy</li><li>AT Data Policy</li></ul>
<b>Related documents</b>	<ul style="list-style-type: none"><li><a href="#">Civil Defence National Emergencies (Information Sharing) Code 2013</a></li><li><a href="#">Pointers for security cameras and drones, Office of the Privacy Commissioner guidelines</a></li><li><a href="#">Privacy and CCTV, Office of the Privacy Commissioner guidelines</a></li></ul>



## 7. Non-Compliance

Any breach of this policy may result in disciplinary action (as set out in AT's Discipline and Dismissal Policy), or the termination of a contractor's agreement. CCTV footage may also be used in disciplinary matters as set out in AT's Discipline and Dismissal Policy.

## 8. Approval & Review

**Policy Owner:** Executive General Manager Business Technology

**Policy Contact:** CCTV Product Owner

**Endorsed by:**

A handwritten signature in blue ink, appearing to read 'J. Jones'.

EGM Business Technology

**Approved by:**

A handwritten signature in blue ink, appearing to read 'R. Ewin'.

Chief Executive

**Effective date:** 1 February 2022

**Next review date:** 1 February 2024

AT reserves the right to review, amend or add to this policy at any time upon reasonable notice to employees and representatives.