



02 May 2025

Parag Chaskar

s7(2)(a)

Dear Parag

Request for Information – Local Government Official Information and Meetings Act (LGOIMA) 1987

We refer to your official information request dated 1 April 2025:

“With regards to implementation of LPR Technology I would like to request following information:

- 1. What steps HC Council has taken to ensure that the individual road user in the HC area where this technology is operated are aware of this monitoring/recording activities using technology?*
- 2. How HC Council is informing the inform the public entering Hutt City Council areas that they are being recorded through LPR Technology?*
- 3. Confirm the locations where publicly visible signage/sign boards are located and if those were placed before the monitoring/recording activities were introduced.*
- 4. Privacy Impact Assessment done by HC Council for this Technology?*
- 5. Provide statistics of number of Privacy Breaches occurred and reported to relevant authorities after the introduction of this technology?”*

Answer:

1. Before the LPR trial began, Hutt City Council issued a media release across multiple platforms. Council’s Parking Services and the Communications team worked together to publicise the use of mobile LPR technology. The media release was in [Reddit](#), [RNZ](#), [Scoop](#), on [HCC’s Parking Services webpage](#), and also as a [news bulletin](#) on the HCC website.

2. Hutt City Council has updated the privacy statement related to parking and CCTV on its website.
3. The technology is a mobile car. It is not a fixed camera, therefore, there are no fixed locations with related signage/ sign boards.
4. By way of email dated 16 April 2025, our Head of Environmental Protection provided the Privacy Impact Assessment (PIA) to you, which we have attached for your reference. Please see attachment 1 of the response.
5. Only one privacy breach has been identified since the introduction of this technology. This was reported to Council's privacy team and is now resolved. The privacy breach involved the sharing of unredacted evidentiary photos with a customer. The approved PIA requires that, when sharing evidence photos, the Parking Services team redacts other vehicle license plates and the faces of any passersby.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Please note that this response to your information request may be published on Hutt City Council's website. Please refer to the following link: www.huttcity.govt.nz/council/contactus/make-an-official-information-act-request/proactive-releases

Yours sincerely,

Lakna Siriwardena

Legal Operations Advisor

PRIVACY IMPACT ASSESSMENT - INITIAL REPORT

LICENCE PLATE RECOGNITION – AERO RANGER

This report has been completed by the Head of Environmental Protection on behalf of the Parking Services Team.

The assessment summarises the privacy aspects of the proposed change and assesses the privacy risk.

The Assessment column key is:

- **S** = Satisfactory
- **MI** = More information needed
- **RM#** = Risk mitigation recommended (at the conclusion of this report).

This document will be endorsed by the Privacy Officer and Approved by the named Sponsor. As part of approval, the Sponsor undertakes to ensure all recommendations made are completed by the agreed due dates and report to the Privacy Officer on their completion.

Change Summary

Mobile (vehicle mounted) Licence Plate Recognition (LPR) camera technology, supplied by Aero Ranger via AD Riley. This technology will assist in better and more efficient parking enforcement. Thus, delivering fair and equitable outcomes with regards to the Council provided carparking resources.

This technology will support the Parking Services team in undertaking their monitoring and enforcement duties. Currently, the Wardens undertake their duties on foot and are required to cover a very large area across the Hutt.

LPR cameras are advanced traffic sensors used to instantly recognize, capture and analyse the license plate image. This technology is not new and has been utilized by the NZ Police for traffic enforcement for decades. This has been in the form of stationary (fixed or temporary) cameras to detect speed exceedances.

This technology has moved into the parking enforcement space. Instead of measuring vehicle speed, images are captured to timestamp and intelligently track the length of time that a vehicle has been parked in a particular location. The camera captures high-resolution photographic information about vehicles and visible parking signage as it drives around. Then, on its return, it can register whether a car should have moved. The LPR technology will also be able to determine which vehicles have paid for their park and which haven't. The technology can also access the NZTA database to determine which cars have up to date WOFs and REGOs, and it can also identify vehicles which have been registered as stolen.

The technology uses AI to assess the information that the

camera picks up and generate “potential” breaches for enforcement. This AI tool is about 95% accurate and all potential breaches are checked by a human before a ticket is issued, via mail.

An LPR vehicle can cover more distance, far more quickly than a team of on-foot Parking Wardens. All the while capturing images and generating “potential breaches” for subsequent review and enforcement.

Business Unit

Parking Services

Sponsor

Transport

Date Completed by Privacy Officer

Assessment Section	Summary	Assessment
Personal Information	<i>Is all personal information proposed to be collected and used in the change appropriate and necessary for the purpose?</i>	
	<p>Yes – The camera captures photographic information about vehicles and visible parking signage as it drives around. Once sufficient evidence is obtained, the integrated AI will generate “potential breaches or violations”. These “breaches” or “violations” will then be reviewed by a human, to check accuracy. If the AI was correct in its assessment, the officer/ administrator would then look up vehicle registration information on NZTA’s database to ensure enforcement is undertaken against the correct person at the correct address. At this point in the enforcement life cycle, Council can also check that Warrants of Fitness and car registrations are current and identify vehicles that have been registered as stolen.</p> <p>The camera might capture other incidental images in the background (e.g. other cars or bystanders). But this data is of no interest to Council. If a person or another vehicle is incidentally captured on camera, the technology has image blurring capabilities. This feature provides wardens with full control to blur any unintended captures, ensuring compliance with the Privacy Act 2020. Faces and other vehicle registrations will be blurred in any images shared with drivers who request details of the infringement.</p> <p>In the near-term, the intention is to only use images only for evidence gathering and enforcement. In the future, this tool may be used for collecting data about parking occupancy rates, to inform future parking management plans.</p>	S
Source of information	<i>Is collection of information from individuals appropriate and necessary?</i>	
	Yes	S
	<i>Is collection of information from direct third parties appropriate and necessary?</i>	
	Yes – we look up vehicle registration information on NZTA’s database to ensure enforcement is undertaken against the correct person at the correct address.	S
	<i>Is collection of information from other third parties appropriate and necessary?</i>	
	N/A	
Storage	<i>Is storage of personal information compliant with Council policies and standards?</i>	
	Yes. The information will only be accessible to the Parking Services staff via the Aero Ranger or TicketOr2 web portals. This is already the case with TicketOr2. Aero Ranger serves as an evidencing gathering and storage tool.	S
Security	<i>Has security of personal information been assessed and deemed compliant with Council policies and standards?</i>	
	Yes	S
Access and Correction	<i>Will individuals have ability to access and correct their information in a manner that is compliant with Privacy Act requirements?</i>	
	Yes. They will be able to contact the Parking Services team to	RM1

Assessment Section	Summary	Assessment
	request visibility of the evidence and/ or query the decision.	
Accuracy	<i>Are there adequate controls in place to provide reasonable assurance that information will be accurate and up to date prior to use or sharing?</i>	
	Yes. We are building a dedicated team to review the evidence and the decisions that are produced by Aero Ranger.	RM2
Use of Information	<i>Is the proposed use of information appropriate and consistent with the purpose of collection of information?</i>	
	Yes	S
	<i>Do we have appropriate consent or authority to use the information in this way?</i>	
	Yes. The evidence that is being captured is no different to the information that is currently being captured by on foot Parking Officers, warranted under the Land Transport Act 1998. The evidence that is being captured does not require consent and all officers are warranted. And the team will follow the principles set out in HCC's AI Policy.	S
	<i>Are risks associated with algorithms or automated decision-making being managed appropriately?</i>	
	Yes. As discussed, there will be a dedicated team to review accuracy of information, evidence, and decisions.	S
	<i>Has anonymisation or de-identification been applied appropriately for any intended research purposes (if required)?</i>	
	N/A	
	<i>Have individuals been adequately informed of how we will be using their information?</i>	
	Currently there is no privacy statement on the website, except the standard HCC privacy policy.	RM1
Information Sharing	<i>Is the purpose of sharing appropriate? Will any of the recipients be considered agents of Council per section 11 of the Privacy Act 2020?</i>	
	Yes, but only in two scenarios: 1) The offender requests the evidence. The offender has the right to see this evidence and they also have the right to appeal the ticket. But they would have to verify their identity before this information is shared. 2) Another regulatory agency or another HCC regulatory team requests evidence. But we can only share for the purposes of Section 11 or Section 10 of the Privacy Act 2020.	S
	<i>Is any overseas sharing of information compliant with the requirements of IPP12? (not</i>	

Assessment Section	Summary	Assessment
	<i>applicable where the recipient is an agent per section 11)</i>	
	N/A	
	<i>Do we have appropriate consent or authority to share in this way? (not applicable where the recipient is an agent per section 11)</i>	
	N/A	
	<i>Have individuals been adequately informed that we will be sharing their information? (not applicable where the recipient is an agent per section 11)</i>	
	N/A	
	<i>Are there appropriate protections in place to safeguard the information once shared?</i>	
	Yes – the team will implement blurring technology where necessary, to blur people's faces and the license plates of other cars. The team will verify the identity of recipients before sharing. Once shared, the agency or person receiving the info are then liable for the responsible storage/ use.	S
Retention and Disposal	<i>Is there a defined retention period and is it appropriate?</i>	
	The legal requirement for the storage of Parking infringement evidence is 1 year.	S
	Aero Ranger can define the retention period based on the Hutt City Council's requirements. Retention period proposed to be 7 years. This is because, in the future, the technology may also be utilised to gather data to inform 'Parking Management Plans'. The raw data associated with these exercises would not be sharable. The resulting report/ plan would be obtainable through public request or LGOIMA. And would be published on a public forum anyway.	
	<i>Is there a defined disposal method and is it appropriate?</i>	
	Aero Ranger can set the disposal method of the captured images according to the Hutt City Council's requirements.	RM3
Unique Identifiers	<i>Is any assignment of unique identifiers necessary and compliant?</i>	
	Yes. A unique reference number is assigned to each "event report" (i.e., potential "breach" or "violation"), which is a string of computer-generated letters and numbers.	S
	<i>Is any use of unique identifiers issued by other agencies consistent with their purpose of issue or a directly related purpose?</i>	
	Yes, the purpose of license plates is to assign a unique identifier to a particular vehicle and have the owner's details linked to this. The reason that the owner's details are linked is partly for enforcement purposes (e.g., speeding, parking, etc).	S

RISK MITIGATION

RM#	Identified Risk	Recommended Control / Mitigation	Due Date
RM1	Informing individuals about collection of their information and how to access and correct it.	Ensure that website contains an adequate privacy statement that includes letting people know how to access and correct information.	Prior to trial
RM2	Accuracy of information	Ensure dedicated reviewing team have adequate and documented processes and training. The processes they follow should include ensuring accuracy and addressing any bias (such as the reviewer assuming that the AI tool is correct because it's correct most of the time)	Prior to trial – this can be in draft to consider as part of the trial before finalising
RM3	Disposal method	Work with Aero-ranger to set up disposal in line with HCC's information management requirements.	Prior to trial

REVIEW AND APPROVAL

Privacy Officer Review

Comments If additional privacy considerations come up during the testing/trial period, please update the PIA

Report endorsed Yes/No

Date 26-09-2024

Name Laura Jamieson

Laura Jamieson

Sponsor Approval

Comments

Recommendations

As Sponsor, I confirm I will ensure all outstanding recommendations will be implemented by the agreed due date. I will provide details of implementation of each recommendation to the Privacy Officer as they are completed.

Approved Yes/No

Date 26-09-2024

Name Justin Roberts

Role Head of Environmental Protection

Justin Roberts

1. PURPOSE

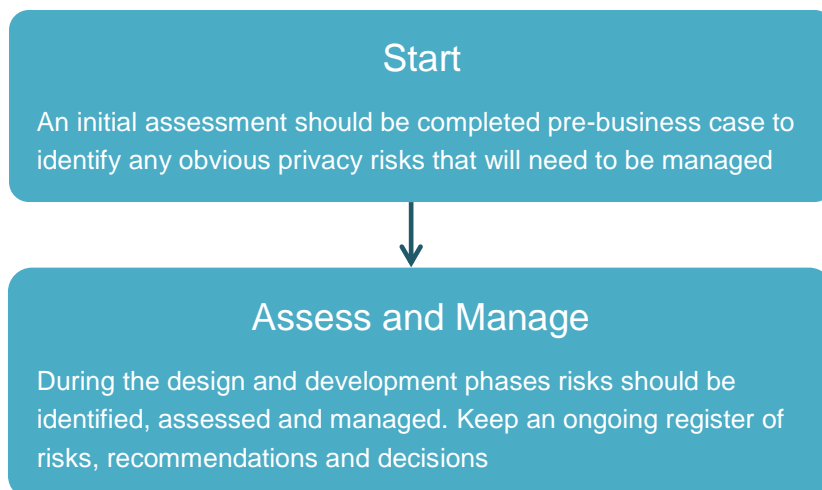
This Privacy Impact Assessment (PIA's) Guideline outlines how to assess risks to individual privacy when you are changing a process, system or implementing new products or services. PIA's are a tool to help you get it right. They are not a legal opinion or compliance exercise to tick off on your path to approval.

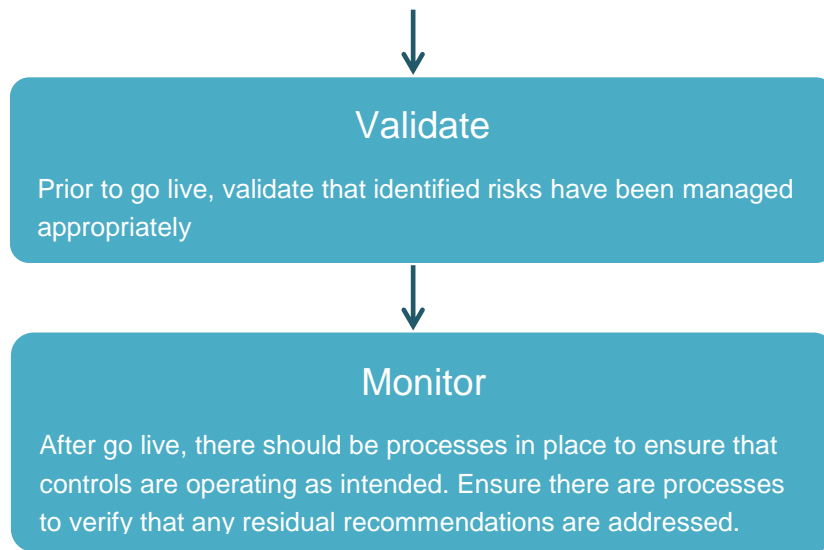
2. SCOPE

This process should be used by all groups, divisions, teams, providers, suppliers, councillors, board appointees, and employees of the Council and council-controlled organisations (including permanent and temporary employees, contractors and volunteers) when making changes to a process, system or implementing new products or services.

3. WHEN SHOULD A PIA BE DONE?

In order to maximise the value that you can get out of it, a PIA needs to be completed in parallel with design and development processes. A PIA should be considered across the following phases of a project/change:





4. PRIVACY IMPACT ASSESSMENT PROCESS

Every project/change at the Council should first complete an **Initial Privacy Assessment Questionnaire**. If there is no personal information involved, you can stop at the first question.

If there is personal information involved:

1. You briefly complete the questions with as much information as you know at the time and return it to the Privacy Officer.
2. The Privacy Officer will then complete an assessment and let you know if there is:
 - no privacy risk identified
 - some privacy risk identified, and this is being managed satisfactorily.
 - possibly high privacy risk involved, and you need to complete a full PIA.
5. If you need to complete a full PIA, the Privacy Officer will let you know how to go about it.

5. WHO TO CONTACT

For more information about this guideline and its application email the Privacy Officer:

InformationManagementTeam@huttcity.govt.nz