

# Privacy Policy

# Camera Surveillance System

Uzabus

Version 3.0 – March 2021

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# 1 Introduction

Closed Circuit Television Systems (CCTVS) are installed in our vehicles and our depots.

## 1.1 Purpose

This policy sets out a framework for the application of CCTV surveillance systems at Uzabus.

## 1.2 Scope

This policy applies to all employees of Uzabus, contractors and general public who may enter a Uzabus vehicle or depot.

## 1.3 Objective

Uzabus aims to provide a safe and secure environment by using CCTV to:

- To protect Uzabus assets, both during and after hours;
- To assist Senior Managers investigating student and/or staff related incidents;
- To support the Police in a bid to deter and detect crime, assist in identifying, apprehending and prosecuting offenders;
- To protect members of the public and private property;
- To assist in managing Uzabus, particularly assessing Health & Safety risks

# 2 Privacy Act

The operation of CCTV means that images and/or sound recordings of identifiable individuals may be collected, held and disclosed by Uzabus. Compliance with the Privacy Act is required by all Uzabus staff. The following Privacy Statements will be available to the public on the Uzabus website or in hard copy at any Uzabus depot.

- Appendix I applies to all Uzabus services excluding Metlink urban bus services
- Appendix II applies to the Metlink urban bus services in Kapiti.

# 3 Responsibility

The Managing Director and the Contract Manager will:

- Have overall responsibility for overseeing the implementation of this policy,
- Work with Depot Branch Managers and authorised personnel for the administration and implementation of this policy,
- Ensure Uzabus complies with the Privacy Act,
- Be responsible for deciding operating hours and locations of CCTV,
- Ensure that Uzabus staff are trained in respect of CCTV related matters.

## 4 The system

- 4.1 The system may comprise, but is not limited to, a range of: Fixed position cameras; Pan Tilt and Zoom cameras; Sound recorders; Monitors; Multiplexers; digital recorders; Public information signs.
- 4.2 Cameras will be located at various places in the vehicles and in the depot and may be relocated from time to time. CCTV may cover (but is not limited to):
  - 4.2.1 General circulation/Corridors/Hallways
  - 4.2.2 Areas where cash, high-value equipment, and high-value information are stored or handled.  
Areas where staff interact with the public
  - 4.2.3 Areas with high-risk equipment, processes, or chemicals
  - 4.2.4 Car parks
- 4.3 No camera will be hidden from view.
- 4.4 Signage advising of CCTV equipment will be installed at entry points to the vehicle or the depot and close to the cameras where practicable. See Appendix III for a sample. The Uzabus website will also notify visitors that CCTV is operating on Uzabus vehicles.
- 4.5 Any incidents or misconduct detected by CCTV will be handled in accordance with Uzabus Policies and Procedures.
- 4.6 Any criminal activity recorded on CCTV will be handled in accordance with Uzabus' Health and Safety policy.
- 4.7 The placement of any and all CCTV equipment will not unreasonably intrude on the privacy of individuals. That is:
  - 4.7.1 CCTV will not be used in areas such as bathrooms or changing areas.
  - 4.7.2 CCTV footage will only be viewed by authorised personnel who have first sought permission of the Managing Director or Contract Manager.
  - 4.7.3 Footage will be viewed in accordance with the purpose of the cameras as detailed in this policy.
- 4.8 Managers may view real time and recorded data that cover areas that they manage, but may not keep recordings without going through the access storage and use process set out in this policy. Managers must apply in writing giving reason(s) why they require real time and recorded data
- 4.9 Any or all cameras and sound recorders may operate 24 hours per day, 7 days per week.

## 5 CCTV footage access, storage and use

- 5.1 CCTV footage is stored on a secure hard drive or similar storage device.

- 5.2 Access to the server is restricted by Uzabus IT policies
- 5.3 CCTV footage will record on the hard drive for no more than 14 days before being overwritten in a continuous recording cycle. Where an incident or suspected incident has been identified, and with the approval of the Managing Director or Contract Manager or Branch Manager, a portion of the footage is to be retained for that incident.
- 5.4 Any written request by an individual for a copy of the footage identifying them personally will be referred to the Managing Director or Contract Manager for consideration. An application form is attached in Appendix IV for use by staff and public. Any response to a request will include considerations of the ease of access to the footage, and the need to protect other people's privacy. If a request for a copy of the footage is unable to be granted without unreasonably breaching others' privacy, a written description may be provided of activities in the footage pertaining to the individual requesting the information or a viewing of footage may be arranged. Any request will be responded to within 20 working days.
- 5.5 The Managing Director or Contract Manager or Branch Manager will only allow access of relevant CCTV footage to:
  - 5.5.1 Authorised personnel of Uzabus who have requested footage in terms of this policy.
  - 5.5.2 Contractors on site specifically to work on the CCTV equipment at the request of the Managing Director, Contract Manager or Branch Manager.
  - 5.5.3 New Zealand Police or other public sector agencies such as the Privacy Commissioner.
  - 5.5.4 Individuals who have formally requested information pertaining to themselves at the authorisation and direction of the Managing Director, Contract Manager or Branch Manager.
- 5.6 When a request for access to the CCTV has been received and if the footage can be located, Uzabus will take measures to ensure the relevant footage is saved.
- 5.7 Uzabus will take reasonable steps to ensure that public disclosure does not occur (i.e. not upload footage to the internet, not publish still images in newspapers, not circulate it widely by email) unless the Police want it public.
- 5.8 Uzabus staff will take reasonable steps to check CCTV images are accurate, complete, relevant and not misleading before using them.
- 5.9 All access to CCTV images will be logged where access is not by an approved Uzabus staff member.

## 6 Notifiable breach

- 6.1 In the unlikely event there is a breach of privacy where footage or images become accessible to the public which may risk harm to an individual or individuals Uzabus will as soon as practicable;
  - 6.1.1 Notify the Privacy Commission of the breach ([Link here](#))
  - 6.1.2 Make all reasonable attempts to contact the identifiable individuals which may include a public statement detailing the breach
  - 6.1.3 Review the controls in place which secure the data to prevent any future breach.

## 7 Complaints

Any complaint about the CCTV will be received in accordance with Uzabus' complaints process. Any complaint is to be forwarded in writing to the Managing Director.

## 8 Relevant legislation

This policy has been created by Management to protect the privacy of individuals and comply with its legal obligations under the Privacy Act 1993 and amendments. The policy aims to follow best privacy practice to ensure that any image captured, collected and stored are handled in a confidential manner that protects an individual's privacy. This policy deals with all CCTV installed on all Uzabus vehicles and depot.

# Appendix I - Privacy Statement

Uzabus operates CCTV on its vehicles and inside its depots. Footage on some of our CCTV does contain audio. This means information about what you are doing and saying on a Uzabus vehicle or depot will be collected by Uzabus and held by Uzabus.

## Purposes of CCTV Operation

The purpose of collecting information is to:

1. Deter criminal activity.
2. Increase personal safety of staff, and visitors.
3. Protect Uzabus property.
4. Assist Uzabus to investigate incidents.
5. Protect property owned by others.
6. Assist to manage Uzabus particularly in health in safety sensitive areas.

## Use of Your Information

Surveillance footage will only be viewed by authorised people in accordance with the purpose above or to ensure the system is operational.

## Disclosure of Information Held

The information collected may be disclosed to the Police and published by the Police if the Police decide that is desirable in the circumstances.

## Security

Uzabus will keep the footage secure and protect it in accordance with good industry practice.

## Retention of Your Information

We keep your footage for 14 days and then it is overwritten.

## Access to Your Information

Individuals captured on CCTV have the right to ask for access to footage about them and request that information be corrected. All requests will be dealt with under the Privacy Act. Anyone wanting to view footage about themselves need to sign the application form attached to the CCTV form.

Costs associated with the supply of the requested footage will be discussed with the individual at the time of the application. Payment of these costs will be required before the footage is released.

If you wish to receive a copy of your footage, please call 0800 UZABUS (0800 892287) option 4 then extension 8115 or email:

- Privacy Manager - [support@uzabus.co.nz](mailto:support@uzabus.co.nz)



# Appendix II - Privacy Statement - Metlink

## Information Collected from You

We operate camera surveillance on all Metlink bus services. When you use these services, we may collect footage of you whilst alighting, onboard and disembarking the bus.

The footage captured includes audio within the area approximately two metres around the driver.

Signage is available in areas where camera surveillance is in operation.

## Use of Your Information

We use the footage obtained from the camera surveillance system:

- As evidence for the prosecution of criminal events
- For investigating incidents
- To ensure ticket revenue is appropriately collected.
- To deter criminal activity
- To protect property owned by Uzabus
- To protect property owned by others
- Increase personal safety of staff, and visitors.

Surveillance footage will only be viewed by authorised people in accordance with the purpose it was collected for or to ensure the system is operational.

No attempt is made to identify individuals from footage except in relation to a reported or suspected incident requiring investigation.

## Access to Your Information

If you wish to receive a copy of your footage, please call 0800 UZABUS (0800 892287) then extension 8115 or email the Privacy Manager - [support@uzabus.co.nz](mailto:support@uzabus.co.nz)

Costs associated with the supply of the requested footage will be discussed with the individual at the time of the application. Payment of these costs will be required before the footage is released.

## Security

Uzabus will keep the footage secure and protect it in accordance with good industry practice.

## Information Sharing

In the event of some unlawful activity being recorded on our surveillance cameras, we may pass that footage of the incident over to Police for the purpose of an investigation. Likewise, if the Police believe some unlawful activity was carried out then they may view or ask us to hand over any footage that may assist in their investigation.

We may share any footage with Greater Wellington Regional Council to enable them to:

- Investigate incidents
- Ensure ticket revenue is appropriately collected
- Audit compliance with our contract with them for services.

We will not share the footage with any other party unless required to do so for law enforcement purposes.

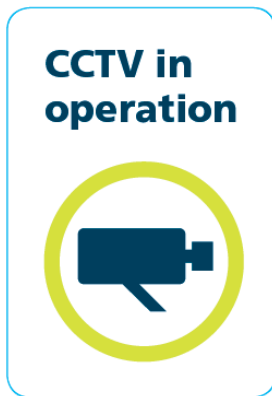
## Retention of Your Information

We keep your footage for 14 days and then it is overwritten.

## Who you can contact for further information or to make a complaint

If you wish to receive a copy of your footage, please call 0800 UZABUS (0800 892287) option extension 8115 or email the Privacy Manager - [support@uzabus.co.nz](mailto:support@uzabus.co.nz)

# Appendix III - Samples



## **WARNING**

### ***CCTV cameras in operation***

*Images are being monitored and recorded for the purpose of crime-prevention, the prevention of anti-social behaviour, the prevention of bullying, for the safety of our staff and passengers and for the protection of Uzabus and its property. This system will be in operation 24 hours a day, every day. These images may be passed to Police.*

*This scheme is controlled by Uzabus*

*For more information contact 0800 UZABUS or 0800 892287*

# Appendix IV - Application for Access to CCTV

Uzabus uses Closed Circuit Television (CCTV) systems for the purposes of crime prevention, the prosecution of offenders, public safety and for the objectives set out in Uzabus' CCTV Policy.

The Privacy Act 1993 gives you the statutory right of access to the CCTV images and any voice recordings we hold about you.

Please complete this form if you wish to access a CCTV image. If you require assistance please contact the Director Facilities & Risk management (details listed below). Please Note: Any footage or images provided will be edited to protect the identity of any individuals who may also appear in the footage.

Application for access to CCTV			
Name of person making the request:			
Address:			
Contact No.			
Email address:			
Date/Estimated time:			
Location:			
Reason for request:			
I acknowledge that the footage provided will only be used within the terms and purposes of the Camera Surveillance Policy and will not be published on the internet or given to newspapers.			
Date:		Signed:	
Please return this form to the Privacy Manager - <a href="mailto:support@uzabus.co.nz">support@uzabus.co.nz</a>			
On receipt of your completed form, we will respond to your request promptly, and in no more than 20 working days. If we encounter any difficulties in locating your image(s), we will keep you informed of our progress.			
Costs associated with the supply of the requested footage will be discussed with the individual at the time of the application, payment of these costs will be required before the footage is released.			
To be completed by Managing Director			
Request:		Approved / Declined (please circle)	
Reason declined:			
Details:			
Date:		Signed:	