

PRIVACY ANALYSIS: SMART CHRISTCHURCH 'MULTI-MODAL COUNTING' TRIAL POLICY

1. Project description

The objective of the trial is to convert our current 20th century method of counting pedestrians to a smarter, more efficient method that uses 21st century technology and approaches.

An automated pedestrian counting solution will answer questions such as:

- What lanes do people travel through?
- Where do they like to sit and rest?
- Which precincts, facilities, or events attract the most people?

Pedestrian counting already occurs in the city and is typically done by a group of university students with 'clickers' counting and taking notes about peoples' direction of travel and dwell time over the summer holidays.

This trial presents an opportunity to create a public-private collaboration that uses existing city infrastructure to provide a reliable and consistent, automatically generated dataset to a wider range of stakeholders.

STAKEHOLDER	ROLE IN THE TRIAL
Trial initiator	<ul style="list-style-type: none"> • set up the objectives of the trial • manage the trial • evaluate the trial and make a recommendation for a long-term solution based on the outcome
Camera footage providers	<ul style="list-style-type: none"> • provide camera footage to the data analysis provider for processing • display signage advising the public of the existence and use (both primary and secondary purposes) of the cameras
Data analysis provider	<ul style="list-style-type: none"> • be the point of aggregation for the camera footage data • provide a 'software as a service' model to the trial initiator for automated analytics of modal shapes and directions • distribute an output of the data containing time of day, day of week, date, direction of travel, and total count in a spreadsheet (or other agreed format) within 24 hours of processing the camera footage data • provide a secure location for the camera footage data while on VIP Security premises • prevent any malicious use of the camera footage data while on VIP Security premises • dispose of the camera footage data within 7 days of processing • Comply with the CCC – VIP Security Data Access and Privacy Agreement 2002 • comply with the Privacy Act 1993
Report generator	<ul style="list-style-type: none"> • transfer the files received from the data analysis provider into a CCC approved document management system • make available user-friendly reports of the data that meet the wide range of stakeholders' needs • provide enhanced reports for camera footage providers • create a dashboard to operational stakeholders • make the trial data available quarterly (or as agreed) to the general public

1.2 Personal information that the project will involve

The camera footage data is analysed by software that counts modal shapes and identifies direction paths. This software does not use facial recognition nor do people (data analysts) monitor the footage. Therefore, no personal information will be collected, used, or disclosed.

Type of personal Information	Source of Information	Purpose of information for the project
None		

2. Privacy assessment

2.1 Areas that are risky for privacy

Some types of projects are commonly known to create privacy risks. If the project involves one or more of these risk areas, it's likely that a PIA will be valuable.

Does the project involve any of the following?	Yes (tick)	No (tick)	If yes, explain your response
Information management generally			
A substantial change to an existing policy, process or system that involves personal information <i>Example: New legislation or policy that makes it compulsory to collect or disclose information</i>		✓	
Any practice or activity that is listed on a risk register kept by your organisation <i>Example: Practices or activities listed on your office's privacy risk register or health and safety register</i>	✓		Risk is considered in project planning and captured on the project brief which is cascaded up through organisation risk registers accordingly.
Collection			
A new collection of personal information <i>Example: Collecting information about individuals' location</i>		✓	
A new way of collecting personal information <i>Example: Collecting information online rather than on paper forms</i>		✓	
Storage, security and retention			
A change in the way personal information is stored or secured <i>Example: Storing information in the cloud</i>		✓	

Does the project involve any of the following?	Yes (tick)	No (tick)	If yes, explain your response
<p>A change to how sensitive information is managed</p> <p>Example: Moving health or financial records to a new database</p>		✓	
Does the project involve any of the following?	Yes (tick)	No (tick)	If yes, explain your response
<p>Transferring personal information offshore or using a third-party contractor</p> <p>Example: Outsourcing the payroll function or storing information in the cloud</p>		✓	
<p>A decision to keep personal information for longer than you have previously</p> <p>Example: Changing IT backups to be kept for 10 years when you previously only stored them for 7</p>		✓	
Use or disclosure			
<p>A new use or disclosure of personal information that is already held</p> <p>Example: Sharing information with other parties in a new way</p>		✓	
<p>Sharing or matching personal information held by different organisations or currently held in different datasets</p> <p>Example: Combining information with other information held on public registers, or sharing information to enable organisations to provide services jointly</p>		✓	
Individuals' access to their information			
<p>A change in policy that results in people having less access to information that you hold about them</p> <p>Example: Archiving documents after 6 months into a facility from which they can't be easily retrieved</p>		✓	
Identifying individuals			
<p>Establishing a new way of identifying individuals</p> <p>Example: A unique identifier, a biometric, or an online identity system</p>		✓	

Does the project involve any of the following?	Yes (tick)	No (tick)	If yes, explain your response
New intrusions on individuals' property, person or activities			
Introducing a new system for searching individuals' property, persons or premises <i>Example: A phone company adopts a new policy of searching data in old phones that are handed in</i>		✓	
Surveillance, tracking or monitoring of movements, behaviour or communications <i>Example: Installing a new CCTV system</i>	✓		Use of existing CCTV camera footage that is being captured for security and crime prevention. The camera footage being analysed for the multi-modal counting trial is 10min intervals taken each hour from 8am to 8pm each day. This camera footage data is analysed by software that counts modal shapes and identifies direction paths. This software does not use facial recognition nor do people (data analysts) monitor the footage. This data is held, analysed, and subsequently deleted at a 3 rd party security vendor's secure room which operates in accordance with the CCC – VIP Privacy and Confidentiality Agreement 2002 as well as the Privacy Act 1993. Therefore, no personal information will be collected, used, or disclosed.
Changes to your premises that will involve private spaces where clients or customers may disclose their personal information <i>Example: Changing the location of the reception desk, where people may discuss personal details</i>		✓	
New regulatory requirements that could lead to compliance action against individuals on the basis of information about them <i>Example: Adding a new medical condition to the requirements of a pilot's license</i>		✓	
List anything else that may impact on privacy, such as bodily searches, or intrusions into physical space		✓	

2.2 Initial risk assessment

Aspect of the Project	Rating (L, M or H)	Describe any medium and high risks and how to mitigate them
<p>Level of information handling</p> <p>L – Minimal personal information will be handled</p> <p>M – A moderate amount of personal information (or information that could become personal information) will be handled</p> <p>H – A significant amount of personal information (or information that could become personal information) will be handled</p>	L	
<p>Sensitivity of the information (e.g. health, financial, race)</p> <p>L – The information will not be sensitive</p> <p>M – The information may be considered to be sensitive</p> <p>H – The information will be highly sensitive</p>	L	
<p>Significance of the changes</p> <p>L – Only minor change to existing functions/activities</p> <p>M – Substantial change to existing functions/activities; or a new initiative</p> <p>H – Major overhaul of existing functions/activities; or a new initiative that's significantly different</p>	L	
<p>Interaction with others</p> <p>L – No interaction with other agencies</p> <p>M – Interaction with one or two other agencies</p> <p>H – Extensive cross-agency (that is, government) interaction or cross-sectional (non-government and government) interaction</p>	L	
<p>Public impact</p> <p>L – Minimal impact on the organisation and clients</p> <p>M – Some impact on clients is likely due to changes to the handling of personal information; or the changes may raise public concern</p> <p>H – High impact on clients and the wider public, and concerns over aspects of project; or negative media is likely</p>	L	

3. Summary of privacy impact

The privacy impact for this project has been assessed as:	Tick
Low – There is little or no personal information involved; or the use of personal information is uncontroversial; or the risk of harm eventuating is negligible; or the change is minor and something that the individuals concerned would expect; or risks are fully mitigated	✓
Medium – Some personal information is involved, but any risks can be mitigated satisfactorily	
High – Sensitive personal information is involved, and several medium to high risks have been identified	
Reduced risk – The project will lessen existing privacy risks	
Inadequate information – More information and analysis is needed to fully assess the privacy impact of the project.	

3.1 Reasons for the privacy impact rating

The privacy impact for the Smart Christchurch Multi-modal Counting Trial has been assessed as **low** because no personal information will be collected, used, or disclosed during the trial:

- The camera footage data is analysed by software that counts modal shapes and identifies direction paths. This software does not use facial recognition nor do people (data analysts) monitor the footage.
- The camera footage data is aggregated, stored, analysed, and subsequently deleted at a 3rd party security vendor's premises which operates in accordance with the Christchurch City Council (CCC) – VIP Privacy and Confidentiality Agreement 2002 as well as the Privacy Act 1993.
- The output provided to CCC for the trial is aggregated pedestrian totals in a spreadsheet with generic information such as location, time of day, date, and total count.
- The cameras being used for this project are existing cameras owned privately by a business or by a public agency such as CCC or Christchurch Transport Operations Centre (CTOC). Most of these cameras are being used for crime and safety prevention as well as for traffic monitoring.
- The analysis for this trial is automated, non-personal, and is similar to the traffic monitoring already taking place on the CTOC cameras.
- There is a data collection, retention, and deletion agreement which minimises malicious or accidental misuse of camera footage data.
- Signage will be installed in camera zones in compliance with the Privacy Act.
- The public have been aware of CCTV cameras and their use for many years. Value-added post-analysis conducted automatically by reputable purpose-built software to produce aggregated shape totals is unlikely to elicit a negative response from the public.

4. Recommendation

A full privacy impact assessment is **not required**.

5. Sign off

Teresa McCallum

Smart Cities Programme Manager

Signature

Date