

3 September 2021

R. Mark Evans, OBE
Deputy Chief Executive: Insights and Deployment
NZ Police
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WELLINGTON 6140

Emailed to: Robert.Evans@police.govt.nz

Tēnā koe Mark,

Automatic Number Plate Recognition (ANPR) technology to improve frontline safety

Thank you for your letter regarding Police's proposed use of Automatic Number Plate Recognition (ANPR) technology to help improve the safety of frontline officers. I also appreciate your congratulations regarding my selection as the preferred candidate for the role of UK Information Commissioner.

I appreciate you taking the time to provide me with an update on the work Police have been undertaking to improve the support and protection given to frontline staff since the tragic loss of Constable Matthew Hunt.

I understand Police propose to use ANPR as part of a wider programme of work focused on the use of existing technology to provide "real-time risk information" to frontline staff. My Office has been advised that the long-term objective of this particular proposal is to install ANPR cameras in patrol cars. The ANPR technology would then be used to scan for vehicles of interest and alert staff to high-risk situations, so that Police can make more informed decisions at traffic stops.

My Office would welcome consultation on this proposal, and a briefing on Police's wider programme of work to make risk-based information available to frontline staff. We would also value the opportunity to review and provide feedback on Police's policy on the use of ANPR.

The use of ANPR by Police is likely to be a matter of some public interest. It is important that any privacy risks, real and perceived, associated with the proposed use of ANPR are managed appropriately. For a proposal of this sort, and before the technology is piloted, I would expect to see a mature Privacy Impact Assessment that identifies potential privacy impacts and any necessary mitigations. The safeguards identified should include the development of robust operational procedures, training, and auditing requirements, so as to ensure personal

information related to ANPR use by Police is protected from unauthorised access, use and disclosure. My expectation is that these safeguards also extend to any third-party providers associated with the proposal.

It is critical that the ANPR proposal is not developed in isolation from the environment in which it will be used. Recent interactions between our organisations suggest that considerable work is necessary to strengthen Police's privacy culture, practice and management systems. I am particularly concerned by the apparent low level of privacy knowledge and understanding at the frontline. It is my expectation that Police will be working to strengthen its privacy culture and privacy management systems in parallel with the development of this proposal and I would certainly expect to see progress in these matters before the ANPR initiative was extended beyond the proposed pilot.

I look forward to hearing more from your staff on this proposal and my Office is ready to meet with your team to discuss it further. In the meantime, it would be useful if your staff could please provide my Office with an indication of timeframes for implementation of the pilot, so we can allocate resources accordingly.

We look forward to working with Police on its approach to the use of ANPR, so that we can help ensure the appropriate safeguards are in place to protect privacy.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'John Edwards', written in a cursive style.

John Edwards
Privacy Commissioner