

6 December 2024

File Ref: OIAPR-1274023063-32725

By email: [REDACTED]

Tēnā koe [REDACTED]

### **Request for information 2024-292**

I refer to your request for information dated 11 November 2024, which was received by Greater Wellington Regional Council (Greater Wellington) on 11 November 2024. You have requested the following:

*“This is a Local Government Official Information and Meetings Act 1987 request regarding CCTV/security cameras on public transport in the greater Wellington region.*

*What is the timespan before existing footage that has been recorded on CCTV/security cameras, is overwritten by newer data?*

*Is this the same for all CCTV/security cameras on all different modes of public transport in the greater Wellington region?*

*If not, please provide a breakdown.*

*Also, I understand that GWRC uses more than one bus company to provide a public transport service for the greater Wellington region and these companies appear to operate this service to the public with a variety of buses.*

*From observation I'm aware that*

- a variety of manufacturers and models are used, and*
- newer and older buses are used, with older buses commonly used when they are providing a replacement service for the trains when the trains aren't able to operate due to scheduled maintenance service on the lines or due to breakdowns.*

*Please keep the above, in consideration when replying.”*

### **Greater Wellington's response follows:**

Metlink has CCTV systems installed across the public transport network for safety and security purposes. These systems may operate in the following locations:

- at rail stations (including the station, carpark, bridges and subways)
- at bus network infrastructure, such as bus shelters
- at bus hubs, layovers, interchanges, and other bus facilities including bus driver toilets
- on trains.

CCTV data captured at the above listed locations is retained for 30 days (then automatically overwritten) unless it relates to an incident or there is another lawful purpose to retain it for longer.

Metlink is responsible for capturing and storing CCTV data from trains as the trains and cameras on them are owned by Greater Wellington. Footage recorded on the Matangi electrical multiple units is saved for at least 30 days on each train. For the Wairarapa trains, due to the size of the physical hard drive on the trains, footage is stored for approximately 20 days before being overwritten.

Please refer to our CCTV policy, publicly available on our website, for further detail: <https://www.metlink.org.nz/assets/Policies-and-reports/Metlink-CCTV-Policy-February-2024-v2.pdf>. Appendix A sets out the locations of Metlink controlled CCTV.

Metlink is not responsible for the CCTV data captured on all modes of public transport, with contracted bus operators responsible for CCTV data capture and storage on the buses they own/operate. The same is true for the operator of harbour ferry services.

Greater Wellington's Partnering Contract with bus operators requires CCTV footage from buses used to deliver the services to be retained for a period of not less than 14 days. More information can be found in Schedule 4 of the Partnering contract which is publicly available on the Greater Wellington website. Refer to Schedule 4, *Vehicle quality standards*, Appendix 2, Clause 1.5: <https://www.gw.govt.nz/assets/Schedules-2-15-for-publication.pdf>.

Bus operators may choose to retain CCTV footage for longer than the minimum period specified in the Partnering Contracts, in accordance with their own CCTV policies and procedures. East by West is also responsible for how long it stores CCTV footage in alignment with its own policies and procedures (it retains CCTV footage for six weeks).

For more information on how our public transport operators treat recorded CCTV data, please refer to their privacy statements publicly available on their respective websites - which can be accessed via the Metlink website, at: <https://www.metlink.org.nz/legal/privacy-statement>.

For situations where buses are required to replace trains due to planned or unplanned disruptions, our rail operator, Transdev, is responsible for contracting bus operators to provide bus replacement services. Where bus replacement services are provided, Transdev generally is required to contract one of our existing Metlink bus operators to provide services in the first instance. Where Metlink bus operators do not have availability, other bus operators are contracted. Only Metlink bus operators are required to hold CCTV data for a minimum period as set out above.

In instances where any other bus operator is contracted, their CCTV data retention policy will apply and the provisions may vary. As Transdev contracts such operators directly, Greater Wellington does not hold any information relating to how they handle and retain CCTV data. Therefore, as it relates to operators contracted on an ad hoc basis, the requested information is refused under section 17(g)(i) of the Local Government Official Information and Meetings Act 1987, that the information requested is not held by the local authority and the person dealing with the request has no grounds for believing that the information is held by another local authority or a department or Minister of the Crown or organisation.

It is worth noting that all buses operating on the public transport network are required to meet certain standardised bus requirements, as set out in the *Requirements for urban buses in New Zealand* (the 'RUB'), which can be found on the NZ Transport Agency website, at: <https://www.nzta.govt.nz/resources/requirements-for-urban-buses/>. There are several versions of the RUB and buses need only comply with the version of the RUB applicable to the age of the bus. CCTV requirements for buses are included in this document.

If you have any concerns with the decision(s) referred to in this letter, you have the right to request an investigation and review by the Ombudsman under section 27(3) of the Local Government Official Information and Meetings Act 1987.

Please note that it is our policy to proactively release our responses to official information requests where appropriate. Our response to your request will be published shortly on Greater Wellington's website with your personal information removed.

Nāku iti noa, nā



**Samantha Gain**

Kaiwhakahaere Matua Waka-ā-atea | Group Manager Metlink