

20 July 2017

Integrated Electronic Monitoring and Reporting System (IEMRS) - Short Form Privacy Impact Assessment (PIA)

Summary of privacy risks

	Very low/none	Low	Medium	High	Very High
Amount of personal information involved in project	High				
Sensitivity of personal information	Medium				
Risk assessment for personal information collection	Medium				
Risk assessment for personal information storage, security and disposal	High				
Risk assessment for access to and correction of personal information	Medium				
Risk assessment for accuracy of personal information	Very Low				
Risk assessment for MPI's use and disclosure of personal information	Medium				
Risk assessment for any personal unique identifiers	Very Low				

Is a full PIA required?

No	Further analysis could be useful	Desirable when resources	Desirable within next two years	yes	Yes and priority
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This Interim PIA was developed in consultation with MPI Legal, IEMRS Business Owner, IEMRS Subject Matter Expert, Government Chief Privacy Officer (GCPO) and the Office of the Privacy Commissioner (OPC). This PIA reflects the combined advice from all parties.

The privacy implications of IEMRS should be reviewed within two years. The camera (EM) regulations come into force in October 2018, and a review within two years will have sufficient information on the implementation of IEMRS to determine if any additional recommendations are required.

Summary

The Integrated Electronic Monitoring and Reporting System (IEMRS) will collect information on the location and catch of all commercial fishing in the New Zealand fishery. IEMRS will capture three streams of data:

- Complete event-based electronic catch and fishing effort reporting in a timely manner (electronic reporting – ER)¹;
- Automated geospatial position reporting (GPR) of the locations of fishing operations and related activities;
- Camera imagery of fishing and fishing-related activities, using automated cameras (electronic monitoring – EM) on fishing vessels.

IEMRS will require permit holders to install equipment on their fishing boats to provide ER, GPR and EM information to MPI. MPI will set the standards for the equipment to be installed. MPI requires permit holders to provide MPI with ER, GPR and EM data including camera imagery.

The purpose of IEMRS is to provide accurate, integrated and timely reporting and monitoring data on commercial fishing activity in order to inform decisions of fisheries managers in government and the commercial sector. Fishing vessel crews will need to be informed about the privacy implications of IEMRS and this PIA recommends several straightforward initiatives that will do this. The security of data will also need to be protected – the use of encryption and classification will achieve this goal.

The data for IEMRS will be captured on a vessel using equipment permit holders are responsible for installing. Once data is transferred to MPI the ownership is considered to have changed to MPI. All privacy requests relating to this data are expected to be made of MPI as the vessel owner has no access to the data once transferred.

The sharing of IEMRS information (where personal or commercial information is inextricably combined with fishing effort data) with other agencies and scientists (for public good research) presents challenges.

The collection of crew health and safety information on behalf of the Maritime NZ using on-board cameras may need legislative change or an Approved Information Sharing Agreement (AISA).

The IEMRS project team has consulted with OPC and the GCPO. Both said the legal authority and the law enforcement and compliance focus of IEMRS provide a clear justification for the project. Both made privacy recommendations, which have been carefully considered by MPI. OPC said IEMRS has “a clear policy purpose for collecting and using this information, and that is clearly articulated in the PIA. . . . [MPI has] also identified and mitigated the key privacy issues.”

¹ As identified by reporting requirements set out in Fisheries regulations and circulars

The IEMRS project has gone through a detailed public consultation process. The consultation document included information on legal requirements, privacy and proposed measures for information management.

Approvals

It is recommended that this PIA is approved with the following notes:

- The IEMRS Project is directed to advise permit holders of the requirement of a privacy statement to be available when CCTV is in use;
- MPI Privacy Team will provide examples of Privacy Statements that are acceptable under the Act;
- A review of this PIA is undertaken within two years' time to confirm assumptions made are correct and review the implementation of IEMRS to determine if any additional recommendations are required.

Date this short form PIA was approved: _____

Person/Role	Involvement in this PIA	Initial/Date
s 9(2)(a) Senior – Adviser Privacy	Author	s 9(2)(a) 19/7/17
s 9(2)(a) – IEMRS Principal Analyst	Contributor	s 9(2)(a) 19/7/17
s 9(2)(a) – Manager Intelligence	Contributor	s 9(2)(a) 24/7/2017
s 9(2)(a) – Solicitor Legislation	Checked legal	s 9(2)(a) 19/07/2017
s 9(2)(a) – Manager Information and Data Management	Checked Information and Data	s 9(2)(a) 21/7/2017
Debbie Ward – Chief Privacy Officer	Checked privacy and security	s 9(2)(a) 24/7/17

Background to the short form PIA for Integrated Electronic Monitoring and Reporting System (IEMRS)

Description of the project

The purpose of IEMRS is to provide accurate, integrated and timely reporting and monitoring data on commercial fishing activity in order to inform decisions of fisheries managers in government and the commercial sector (Source: Executive Summary IEMRS Discussion Paper 11 November 2016). MPI is required under the Fisheries Act to manage fisheries to provide for utilisation and ensure sustainability (Fisheries Act 1996 s 8). The information collected under IEMRS is necessary and proportionate to achieve that purpose.

IEMRS requires collection of information from commercial fishing permit holders on fishing operations including fishing effort and catch for a clear justified purpose. Under IEMRS, MPI proposes that all commercial fishing permit holders will be required to:

- complete event-based electronic catch and fishing effort reporting in a timely manner (electronic reporting – ER);
- provide automated geospatial position reporting (GPR) of the locations of commercial fishing events (this will include some land-based operations, for example, eel fishing);
- carry automated cameras (electronic monitoring – EM) on commercial fishing vessels.

MPI will require fishing permit holders to install IEMRS equipment (ER, GPR and EM) to MPI specifications. While the collected data (CCTV image) is held on the fishing vessel ownership belongs to the permit holder. On transfer of the data to MPI ownership changes to MPI as the permit holder will no longer have access to the data.

MPI needs comprehensive and accurate information on fishing activity to provide for the utilisation of fisheries resources while ensuring sustainability. MPI needs information on the total removals of target and non-target species from fisheries, and associated catch rates. MPI currently gathers this information from a variety of sources, including commercial fishers' catch-effort reporting, observers on fishing vessels, and geospatial vessel position reporting on those vessels carrying Vessel Monitoring Systems. The catch-effort reporting system is currently largely paper-based², which can cause delays of up to 13 weeks until data is available to end-users.

MPI has accumulated a substantial body of fisheries information over time. However, MPI's confidence in the fisheries information it uses would be strengthened significantly by:

- increased monitoring capacity;
- more timely catch-effort reporting;
- automated geospatial position reporting;

² Reporting of commercial fishing catch and effort is legally required, but may currently be completed using either paper-based or electronic means.

- information from other sources, such as shed sampling, surveys by research vessels or tagging studies.

There is particular value in building the information base supporting management of inshore fisheries.

Some of this information will be inextricably combined with personal and commercially sensitive information.

Overview of IEMRS components

- IEMRS comprises information collection using existing electronic data capture technologies supported by onshore data processing and analysis. New technological hardware will not be created for IEMRS.
- Key components of the IEMRS data collection system are:
 - timely, event-based electronic catch reporting (ER) by all commercial fishing permit holders;
 - on-vessel automated cameras, which monitor commercial fishing activities across fleets (EM);
 - geospatial position reporting information (GPR) on all commercial fishing activities.
- Central to the IEMRS concept is the integration of data collected from these three system components. This will occur onshore, supported by appropriate data management tools and infrastructure.

Information Flows

The data collected from the system components (ER, GPR, EM) will be integrated in an information base for the cross-checking and verification of reported information across data sources. The preliminary expectation is that the integration of the three information streams will be undertaken within MPI through linking processes similar to typical database structures (for example, using a primary key, GUID (or UUID), and content of specific linking fields).

With integrated data streams available for review, verification can proceed. Verification involves extracting data from EM imagery and position reporting and then comparing those data with fishers' electronic reports.

How Cameras work

MPI's expectation is that cameras will in many cases be activated by fishing gear. Cameras may record all fishing and transportation from fishing vessels. For example, cameras may operate for up to 12 hours to cover a longline haul, and then another two hours after the haul is complete while catch sorting occurs. The duration of camera operation will vary with fishing method and the characteristics of individual fishing operations.

Cameras will be located to cover parts of the fishing vessel using fishing gear, and where other fishing-related activities take place. Cameras may be located below deck if a fishing

vessel has a below-deck fish sorting capability. Cameras are not expected to cover those parts of a vessel unconnected to fishing or fishing-related activities. Therefore, for example, the bridge, crew quarters, messes, heads, engine room would not be covered by EM, unless any fishing or fishing-related activities occurred in those areas.

Working cameras will capture all activity within their set field of view. Some of the imagery will inextricably combine with personal and commercially sensitive information. Crew and observers working in the cameras' field of view will be filmed and their images stored. Commercial information such as the content and location of trawls will be captured.

Legal Authority to use cameras

The legal authority for the use of cameras for fisheries monitoring under IEMRS is:

The Fisheries Act 1996. The Fisheries Act provides legislative authority to make regulations to require the installation of equipment to "observe fishing or transportation".

Section 227A of the Fisheries Act enables the Chief Executive to require "in relation to any vessel, that specified equipment to observe fishing and transportation be installed and maintained on the vessel in accordance with regulations made under section 297(1)(ca)."

Section 297(1)(ca) of the Fisheries Act enables regulations to be made prescribing requirements relating to the installation and maintenance of equipment (including electronic equipment) to observe fishing or transportation, and to the payment of any associated prescribed fees and charges.

Fishing permit holders will be required to install cameras, collect imagery, encrypt and securely store imagery and then provide the imagery to MPI. The permit holder will be required to ensure workers are informed of the CCTV recording and have available a privacy statement.

Information sharing

IEMRS collected information may be of potential use to other agencies. The imagery may contain health and safety information that could be of interest to Maritime NZ, immigration information of interest to Immigration NZ and protected species information of interest to the Department of Conservation. MPI recognises the privacy complexities of the potential sharing of personal information with other agencies. In some cases personal information could be shared where the law permits. In other cases personal information would not be shared until information sharing mechanisms between agencies are agreed.

MPI would share information if matters relating to law enforcement, conservation, health and safety, or maritime safety and compliance were observed, and for research purposes. The communication of these purposes to the individuals who will be captured by the filming (crew and observers) by the fishing permit holders will satisfy the permit holder's obligations under information privacy principle three. MPI will work with permit holders to ensure that communication to the crew of the purpose of collecting information occurs. MPI is required to inform their fisheries observers and Fisheries Officers aboard vessels on which

EM is in place of the purpose of collecting information. This will meet the permit holders' and MPI's obligations as good employers.

IEMRS will collect fisheries information of use to other agencies and public good science. Examples considered here are:

- health and safety information that supports Maritime NZ's maritime health and safety role;
- geospatial information that support the Maritime NZ Civil Maritime Common Operating Picture role;
- immigration information for the MBIE immigration role;
- protected species data for the Department of Conservation;
- protected species data for agencies contracted to MPI;
- information of use to public good science and research;
- data showing non-compliance for enforcement purposes.

When MPI shares IEMRS collected imagery inextricably combined with personal and commercially sensitive information with other agencies - MPI must be able to rely on:

- (a) Legislative authority (such as an express provision in the Fisheries Act authorising or requiring the personal information to be shared);
- (b) an exemption to the Privacy Act or to the information privacy principles under the Act (such as sharing personal information under information privacy principle 11(e)(i) to avoid prejudice to the maintenance of the law);
- (c) A code of practice issued by the Privacy Commissioner (such as the code allowing some additional information sharing during national emergencies³); or
- (d) an Approved Information Sharing Arrangement.

An MoU may set out what personal information may be shared, but at least one of the above (a) to (d) is required for the information sharing to be legally authorised.

Privacy Act reform may allow MPI to rely on Information Disclosure and Reuse Instruments (IDRIs) or Schedule 5 law enforcement information sharing arrangements in the future.

MPI may want to share IEMRS collected information with other agencies as follows:

Use of IEMRS collected health and safety information with Maritime NZ.

The sharing of some IEMRS collected personal information with Maritime NZ can support the maritime health and safety role. The sharing of personal information about public health or public safety or the life or health of the individual concerned is permitted by the Privacy Act principle 11(f). This section of the Privacy Act enables disclosure of personal information if the disclosure of the information is necessary to prevent or lessen a serious

³ The Civil Defence National Emergencies (Information Sharing) Code 2013 provides agencies with broader discretion to collect, use and disclose personal information in the rare event of a major disaster that has triggered a state of national emergency.

threat to public health or public safety, or to the life or health of the individual concerned or another individual.

Health and safety related personal information cannot be shared in all situations, but it can be shared when there is a serious threat. A 'serious threat' is a threat that an agency reasonably believes to be a serious threat having regard to all of the following:

- (a) the likelihood of the threat being realised; and
- (b) the severity of the consequences if the threat is realised; and
- (c) the time at which the threat may be realised.

The Health and Safety at Work Act 2015 has mandatory health and safety requirements to report deaths, serious injuries, and serious illnesses caused by work. Reporting is also required if someone is exposed to a serious and immediate risk because of a work incident.

Sharing of IEMRS Collected Vessel Geospatial information with Maritime NZ for the Civil Maritime Common Operating Picture.

MPI's agreement to share geospatial information collected by MPI is set out in the 2004 MoU 'Between Certain Government Agencies Covering The Operation Of The National Maritime Coordination Centre'. MPI is a signatory along with Maritime New Zealand, MFAT, NZCS, NZDF and the NZ Police.

S 4 defines the New Zealand Maritime Coordination Centre function as patrol tasking to coordinate the "provision of a maritime picture, compiled from multiple sources (both open and classified), to participating agencies."

S 7 covers information sharing and says the Parties agree to share appropriate information and intelligence in order that the NMCC can:

- a. Coordinate the maritime patrol tasking for government departments and Crown entities; and
- b. Provide a maritime picture."

IEMRS collected location information (longitude and latitude) does not contain any personal information and the sharing of location information is not restricted by the Privacy Act.

Use of IEMRS collected immigration information by MBIE.

The 2012 MoU Relating to the Sharing of Official Information for Fishing Vessels, Their Crew, and Other Associated Parties between MPI, Maritime NZ and MBIE describes the parameters for sharing personal information. Under:

S 2.1 the parties agree to "assist each other's compliance investigations and approval processes" and recognise a common interest in encouraging compliance with New Zealand laws. The parties also recognise that the information that each Party collects and holds for its own purposes may be shared with other government agencies.

S 2.3 “recognises MPI collects and holds information pursuant to the Fisheries Act 1996, and any regulations made under it.”

S 2.3 goes on to say MBIE “has an interest in this information for the purpose of visa application processing and decision making for foreign fishing crew.”

S 2.5 recognises “functions under the Immigration Act, and any regulations made under it, and also labour legislation it administers”, information the Immigration Group “collects and holds in relation to the granting of temporary visas to foreign fishing crew” and “assessing compliance with the Code of Practice relating to immigration and employment matters”. MBIE “carries out a regular audit on Foreign Charter Vessels to ascertain Code of Practice compliance and holds audit information.” Schedule 3 to the MoU lists examples of the information MBIE may request from MPI. The Schedule does not currently include IEMRS EM information.

Use of IEMRS collected protected species data by the Department of Conservation

Whether MPI has legal authority to share IEMRS collected information about protected species (if inextricably combined with personal and commercially sensitive information) with the Department of Conservation depends on the Department of Conservation’s intended use of the information. For example, information privacy principle 11(h)(ii) of the Privacy Act provides that MPI can share the protected species information with the Department of Conservation if the information is to be used for statistical or research purposes and will not be published in a form that could reasonably be expected to identify the individual concerned.

If the protected species information is to be used by the Department of Conservation for other purposes, then the information sharing must be otherwise legally authorised.⁴

Use of IEMRS collected data with contracted agencies

MPI may wish to share IEMRS collected data with agencies it contracts to do research, for example on protected fish species and sea bird bycatch. This requirement should be covered off in the relevant contracts between MPI and those agencies.

The sharing of information for research purposes is, in any event, permitted under information privacy principles 10(f)(ii) and 11(h)(ii) of the Privacy Act – information may be used for research purposes if it is not published in a form where people can be identified.

Sharing IEMRS collected data for non-MPI public good science and research

The Guidelines for the Release of Information from Fisheries Databases contain directions for the MPI release of fisheries information about licensed fish receivers, catch, effort and landing returns and observer information for non-MPI public good science and research.

Most IEMRS collected fisheries data will be anonymised. This will happen when imagery information is entered into the MPI fisheries databases. It is at this process step that IEMRS

⁴ See the list on page 7 (above) with respect to the four ways (a) – (d) in which information sharing by MPI can be legally authorised.

collected imagery that is no longer required (including imagery inextricably combined with personal and commercially sensitive information) will be destroyed. MPI fisheries information can be anonymised using the standard BTIS information management processes.

Use of information for research purposes is therefore permitted under information privacy principles 10(f)(ii) and 11(h)(ii) of the Privacy Act – which allow information to be used for research purposes if it is not published in a form where people can be identified.

While information will be published in anonymised form researchers may view unedited footage that includes images of people. MPI's contracts with research providers include specific provisions for information confidentiality and data management, such that no personal information could legally be released under such contracts. Any information that was released would have to meet MPI's requirements.

Use of IEMRS collected data for law enforcement

IEMRS imagery collected for fisheries management may also collect personal information of interest to the Police and other relevant law enforcement agencies (for example about smuggling, drugs, firearms, violence). This footage could, in some circumstances, be shared with Police and other relevant agencies for law enforcement purposes using, for example, information privacy principle 11(e)(i) and (ii) of the Privacy Act.

Industry Consultation

MPI has consulted with industry and the public about this project. Submissions were invited. The consultation round ended on 23 December 2016. The consultation document *The Future of Our Fisheries: Volume III: Integrated Electronic Monitoring and Reporting System* consultation Document 2016 directly addressed privacy and information. The document said (page 29):

Privacy and Official Information Act

MPI acknowledges that the commercial sector and other stakeholders are interested in the ownership, as well as the security, privacy and confidentiality of the information collected from electronic monitoring. Important things to note in this regard are:

- MPI is the owner of ER and GPR data and EM imagery as soon as it is received [from the fishing vessel]. MPI will also own data taken from EM imagery.
- MPI will collect, store, use and release information consistent with the Official Information Act 1982 and the Privacy Act 1993. The imagery collected will be encrypted and stored to Government Protective Security Requirements standards. MPI will protect the data with a security classification from the time it is received.

When fully implemented, the EM component of IEMRS will generate an enormous amount of imagery that will be impractical and not cost effective to retain long term. An indicative amount of imagery based on the implementation of EM in Australia is

one terabyte per vessel per month. Therefore, MPI must develop an information management strategy consistent with its own obligations and the requirements of Archives New Zealand. This strategy must also be pragmatic, given the unprecedented volume of imagery MPI will be receiving and needing to house.

The document describes in detail MPI's proposed approach to the retention of imagery.

Privacy Statement

The Government Chief Privacy Officer (GCPO) recommended MPI provide information for MPI Fisheries Observers and Fisheries Officers so that they are aware that EM may be in place on the vessels they board. GCPO recommended forms that could be signed as part of the employment process GCPO also recommended that Observers be reminded of IEMRS privacy considerations regularly.

MPI is considering the amendment of employment contracts of MPI fisheries observers and Fisheries Officers to address the privacy implications of IEMRS. The information and employment contract amendments could include a description of the:

- purpose of IEMRS,
- uses of IEMRS collected personal information,
- right of staff to access and correct personal information, and
- what personal information is involved.

Commercial fishing permit holders will need to meet this requirement for their crew.

High level privacy analysis

This section contains a high level privacy analysis, with a focus on considering the project against the information privacy principles. The tables below use the following "assessment" of risk:

Very low/ none	Low	Med	High	Very High
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Nature of personal information involved

Nature of Information	Brief description of analysis	Assessment
Amount of personal information involved in project	The project estimate 14064 Tb of data a year will be collected. However the majority of this data will not include images with personal information.	High
Sensitivity of personal information	Personal information will be images of people undertaking their normal work combined with commercial catch and fishing effort data (including fish species, seabird and other protected species, and images of vessel crew working in the areas covered by the cameras) and	Medium

Nature of Information	Brief description of analysis	Assessment
	geospatial position reporting data (by vessel, location, time and date).	

Alignment with the privacy principles

High level analysis	Summary of risks of this project	Summary of mitigations	Assessment
Collection for lawful purposes, and directly from person who is aware of the collection Principles 1, 2, 3 and 4			
The right of crew and MPI staff on-board vessels (i.e. observers, fisheries compliance officers) to know their personal information is being collected.	<p>There is a risk of a breach of Principle 3. This Principle gives individuals the right to know their personal information is being collected, the purpose for which the information is being collected and the intended recipients of the information; the name and address of the agency collecting the information and the agency that will hold the information.</p> <p>There is a risk of breach of privacy principle 3 if the agency that collects personal information fails its obligations about individual access and correction rights.</p>	<p>The project will need to be clear about the uses and recipients of the filming. A privacy statement is needed for crew and observers that must detail what information will be collected and when information will be shared</p> <p>To comply with principle 3, crew will need to be informed that information is being collected by camera, the purpose of this collection, who will be receiving/holding the information, the legal authority for doing so and the rights of access and correction. This should be done in the way that is practical in the circumstances. The project will need to consider the responsibility of permit holders to do this - and MPI may assist permit holders to understand these responsibilities. Permit holders' obligations may be met by the permit holders distributing privacy information to the crew, and/or by the permit holders affixing signs that inform the crew that CCTV may be operating.</p>	Medium

High level analysis	Summary of risks of this project	Summary of mitigations	Assessment
		<p>Permit holders may choose to address their obligations as agencies under the Privacy Act (1993) using a Camera Notice posted prominently on vessels with cameras. Notices can be posted on the parts of the vessel covered by cameras. The principle 3 information will need to be available in the foreign languages commonly used by crew if this is not English. Responsibility for putting up a Notice rests with the Permit Holder. MPI will need to consider how to advise and assist Permit Holders to fulfil the permit holders' Privacy Act obligations.</p> <p>The proposed notice wording needs to say CCTV cameras are in operation for the purposes of complying with Fisheries regulations and circulars.</p> <p>As MPI is requiring the installation of CCTV cameras (and has the most privacy expertise) MPI should provide privacy advice to Permit Holders as needed.</p> <p>The Project will need to direct that all IEMRS Privacy Act Requests are handled using the MPI Privacy Act Request process.</p>	
Information storage, security and disposal Principles 5 and 9			

High level analysis	Summary of risks of this project	Summary of mitigations	Assessment
The security of data	There is a risk IEMRS data could be accessed by unauthorised people. This could compromise the integrity of the IEMRS project.	Ensure Information capture meets the Encryption Standards as set out in Section 17 (Cryptography) in the NZ Information Security Manual. (NZISM) or other identified appropriate standard.	High
As above	As above	Protect information according to the MPI Classification Guidelines. IEMRS data should be encrypted before the information is provided to MPI. Data should be classified SENSITIVE given the commercial sensitivity of content and the potential of a breach to damage MPI's reputation.	High
Retention and Disposal of records does comply with the Public Records Act	There is a need to balance the lawful retention of information on the public record with MPI's responsibility to sensibly manage the volume of information it holds. There is also the need to balance the cost of keeping data with the value that can be got from that data. Assuming data is held in a Tier 3 disk then holding 14064 Tb of data for a year would	The Project has worked with MPI Corporate Services Information Management who have liaised with the Chief Archivist as the Ministry currently has no authority to dispose of some of the records that will be created. It is expected that the Chief Archivist will agree that the MPI Retention and Disposal Schedule should be amended to ensure IEMRS routine EM imagery will be retained for at least three months. Data from the imagery (and associated information) will be entered into MPI's electronic data warehouse. Most imagery will no longer be required at this point and will be	Medium

Short form PIA for Integrated Electronic Monitoring and Reporting System (IEMRS)

High level analysis	Summary of risks of this project	Summary of mitigations	Assessment
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	<p>cost s 9(2)(b)(ii) without backup.</p>	<p>disposed of. Images and associated information of events of interest will be retained.</p> <p>The draft amended MPI Retention and Disposal Schedule that has been discussed with the Chief Archivist sets out the following rules:</p> <p>Imagery excluding any events of particular interest will be kept for not less than three months (2 months active, 1 month inactive).</p> <p>Imagery including events of particular interest that have no actual or potential legal implications (for example, bycatch events where all relevant legal requirements were met) will be kept for not less than seven years (2 years active, 5 years inactive).</p> <p>Imagery capturing potential compliance issues will be kept for not less than seven years (2 active, 5 inactive).</p> <p>Note: The current MPI Retention and Disposal Schedule (DA613) already has disposal coverage for imagery capturing identified compliance issues (excluding taskforce operations) which will be kept for not less than seven years.</p> <p>MPI Information Management will submit the amended Schedule (DA613)</p>	
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High level analysis	Summary of risks of this project	Summary of mitigations	Assessment
Personal information retention period.	Personal information is retained after it is no longer needed.	<p>for final approval to the Chief Archivist. The amended Schedule will be posted for a month by the Chief Archivist to notify an intention to dispose of public records. Following this proposal the Chief Archivist and MPI will negotiate the final form of the amendment to the current disposal authority.</p> <p>The project intends for personal information to be disposed of according to the Disposal Schedule above. Some personal information relating to events of interest will be retained for a longer period, for example for prosecutions. Information retained for prosecutions may be kept as long as is needed as the purpose for collection for that purpose (and the legal authority) is clear. This risk would be mitigated through the writing of clear business rules for the retention of personal information.</p>	Medium
Access and correction Principle 6 and 7			

Short form PIA for Integrated Electronic Monitoring and Reporting System (IEMRS)

The Privacy Act Privacy Principle 6 entitles an individual access to personal information held by the Ministry. Crew and observers have a strong case to view EM personal	The protection of privacy of persons whose images are in the footage needs to be balanced against the excessive administrative burden of	The simplest mitigation is to adopt MPI policy for managing privacy requests by staff about personal information about them held by MPI. It is MPI practice to make all personal information about an Individual available to the individual. This is normally	Medium
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High level analysis	Summary of risks of this project	Summary of mitigations	Assessment
information held by the Ministry.	obscuring their identities through editing. The cost of redaction of video footage is approximately s 9(2)(b)(ii) per hour of footage to be edited.	done by giving staff the relevant files to read. MPI could adopt the practice of enabling crew and observers to view EM footage containing their own personal information. This could be done by making copies of the footage available (with the individual's personal information) available to the individual for viewing at the nearest MPI office with the capacity to display EM footage. MPI would protect the privacy of individuals captured by EM. Faces for example could be pixelated or blacked out. MPI has done this before. MPI has a robust process for managing Privacy Act requests and OIA requests.	
Accuracy of information Principle 8			
This is not an issue with ER, GPR, EM collection of information.	none	none	Very Low

Use and disclosure Principles 10 and 11			
Sharing information with other agencies.	<p>MPI may wrongly share personal information with agencies</p> <p>People may be unaware how their information may be used.</p>	<p>Information sharing arrangements exist or will be put in place so that all agencies understand how and when they may access information.</p> <p>This risk is mitigated by the use of Camera notices by Permit holders and written information given to crew and observers by their</p>	Medium
High level analysis	Summary of risks of this project	Summary of mitigations	Assessment
Sharing information with researchers	While information will be published in an anonymised form researchers may view unedited footage that includes images of people.	<p>respective employers, as outlined above.</p> <p>Ensure researchers are aware of the confidentiality provisions that relate to all information provided to them by MPI as part of contracted services.</p>	Low
Unique identifiers Principle 12			
Not an issue.	none	none	Very Low