

# Progress update on aspects of Police photographing and fingerprinting practices

## Introduction

In line with expectations set in late 2021, this report provides a further update on progress New Zealand Police (Police) has made in response to:

1. The Compliance Notice issued by the Office of the Privacy Commissioner (OPC) about Police's photographing and fingerprinting practices [14 requirements outlined in Appendix 1].
2. Recommendations made in the joint inquiry report by OPC and the Independent Police Conduct Authority (IPCA) into Police photographing of members of the public [23 recommendations outlined in Appendix 2].

## High level summary of progress from January to March 2023

- A decision-making framework has been implemented in Police's Checkpoint app on mobile devices used by frontline officers, as part of meeting OPC Compliance Notice requirement 46a(iii).
- Engagement with 20 teams across six Districts, which commenced on 17 March 2023, to raise awareness about privacy and engage in more detail on their processes for capturing, storing, sharing/using and deleting photographs. Of note, some delays have unfortunately been experienced with certain workshops, due to recent weather events.
- Requirements following initial engagement are being progressively analysed and options are being developed on changes affecting up to 30 potential policies and procedures.
- Discovery workshops on Police systems are nearing completion, analysis is underway to develop options and a timeline for system changes, and deletion of non-compliant rangatahi photographs continues.
- A training plan is being developed outlining approach, scope and timeline for general education and awareness, as well as training on policy and procedure changes, and operational practices to ensure appropriate application of relevant privacy principles.
- Procurement associated with planned assurance activity is also being scoped out.

## Key

Status	Comments
Under action	Action has been taken, and is at an early stage of review and implementation
Progressively implemented	The review and implementation process is more advanced; measures are in place and being progressively advanced, with their effectiveness being monitored
Completed	Swift remedial action has been taken, with confidence the solution is enduring; the requirement can therefore be considered closed from an audit perspective, but will continue to be monitored

## Report back on OPC Compliance Notice Requirements as at March 2023

Compliance Notice Requirement			Progress update	Status
<b>Delete casual photos of rangatahi in public</b>				
①	46a(i)	Identify and delete all photographs (and duplicates of photographs) in Police's systems that have been taken in a non-compliant manner	<ul style="list-style-type: none"> <li>Discovery work across approximately 23 Police systems is underway to identify photographs within the scope of this requirement, as per the Project milestone report below. Some challenges have been identified with extracting information from systems due to reporting limitations.</li> </ul>	Progressively Implemented
②	46a(ii)	Ensure police officers stop taking casual photographs of rangatahi in public in a noncompliant manner		Completed (22-03-18 First OPC bimonthly update re CN_2021_02)
③	46a(iii)	Develop and implement a decision-making framework based on objective and lawful criteria which a police officer must follow when deciding whether it is permissible to photograph rangatahi in public, to ensure the Agency does not retain those photographs for longer than is required to meet a lawful purpose	<ul style="list-style-type: none"> <li>The decision-making framework has been developed and was published in CheckPoint, - a Police mobility application (23 February). This provides a range of guidance to frontline officers to support decision making when photographing people. This guidance includes ensuring officers are clear on the purpose for capturing photographs, seeking consent where needed, and reminds officers to delete photographs when the lawful purpose is complete.</li> <li>Additional updates to the decision-making framework, supported by communications and training, will be undertaken following updates to practice and procedures as per the Project milestone report below.</li> </ul>	Completed (23-03-17 Second OPC quarterly update re CN_2021_02)
<b>Cease collecting biometric prints from rangatahi in custody on a voluntary basis</b>				
④	46b(i)	Identify and delete all sets of biometric prints (and duplicates of prints) in Police's systems that have been collected in a noncompliant manner	<ul style="list-style-type: none"> <li>Work continues on deleting paper records held on youth. Additional external resource may be required to support identification and deletion processes.</li> <li>See above 46(a)(i)</li> </ul>	Progressively implemented Completion due by December 2023
⑤	46b(ii)	Ensure police officers stop collecting biometric prints from rangatahi in custody in a noncompliant manner		Completed (22-03-18 First OPC bimonthly update re CN_2021_02)
<b>Cease taking photographs of rangatahi in custody on a voluntary basis</b>				
⑥	46c(i)	Identify and delete all photographs (and duplicates of photographs) in Police's systems that have been taken in a non-compliant manner		Completed (22-03-18 First OPC bimonthly update re CN_2021_02)
⑦	46c(ii)	Ensure police officers stop taking photographs of rangatahi in custody in a non-compliant manner		Completed (22-03-18 First OPC bimonthly update re CN_2021_02)
<b>Cease smartphone photography of adults in custody</b>				
⑧	46d(i)	Identify and delete photographs (and duplicates of photographs) of adults in Police custody in Police's systems that have been taken in a noncompliant manner	<ul style="list-style-type: none"> <li>See above 46(a)(i).</li> </ul>	Under action Completion due by December 2023

Compliance Notice Requirement			Progress update	Status
⑨	46d(ii)	Until Police meets its wider compliance obligations, ensure police officers stop using devices which are not connected to Police's National Intelligence Application [NIA] (including Police-issued smartphones) to take photographs of adults in police custody in a noncompliant manner	<ul style="list-style-type: none"> <li>Work in progress on: <ul style="list-style-type: none"> <li>development of new practice and procedure for photographs and fingerprints</li> <li>changes to Police mobility devices</li> </ul> </li> <li>Implementation of these will be supported by communications and training to further reinforce key messaging,</li> <li>See Project milestone report below.</li> </ul>	Under action Completion due by December 2023
Take preventive procedures				
⑩	46e	Police must develop and implement agency-wide practices and procedures to prevent ongoing Privacy Act non-compliant practices	<ul style="list-style-type: none"> <li>Engagement workshops with 20 teams across six Districts commenced on 17 March. The key purpose of the workshop is to raise privacy awareness, and engage in more detail on the processes for capturing, storing, sharing/using and deleting photographs. This will inform development of a new procedure and support changes to existing practice and procedures.</li> <li>Review of and identification of amendments to Police practice and procedures that relate to capturing, storing, sharing/using and deleting photographs or fingerprints complete.</li> <li>Work in progress on development of new practice and procedure for photographs and fingerprints, and plan to engage with 30 business owners about proposed amendments.</li> <li>See Project milestone report below for indicative timeline and scope of planned activity.</li> </ul>	Under action Completion due by December 2023
Take deletion procedures				
⑪	46f	Police must develop and implement agency-wide practices and procedures for the routine and systematic deletion of all identifying particulars, including photographs and Biometric Prints, to ensure it does not keep identifying particulars for longer than is required for a lawful purpose	<ul style="list-style-type: none"> <li>Work is continuing with Police's Information and Communications Technology Service Centre (ICTSC) and business process owners across over 23 systems, on changes required to systems to ensure compliance with relevant retention and disposal rules.</li> </ul>	Under action Completion due by December 2023
Undertake training				
⑫	46g	Police must develop and deliver agency-wide training to its staff and relevant contractors on practices and procedures highlighted by this Compliance Notice	<ul style="list-style-type: none"> <li>Communications and training will be undertaken as part of practice, procedure and system changes to further reinforce key messaging,</li> <li>See Project milestone report below for scope of work and indicative timeline</li> </ul>	Under action Completion due by December 2023
Develop and implement a system to audit compliance				
⑬	46h	Police must develop and implement a system to regularly audit its compliance with its obligation to delete all identifying particulars, including photographs and Biometric Prints, to ensure it does not keep identifying particulars for longer than is required for a lawful purpose	<ul style="list-style-type: none"> <li>System to ensure compliance with capturing, storing, sharing/using and deleting photographs and fingerprints developed with a phased approach to implementation. The system uses Police's three lines of defence assurance model.</li> <li>Procurement planning underway on Phase 1 to source external resources to lead the assurance work. Completion of Phase 1 assurance activity due by August 2023.</li> <li>See Project milestone report below for indicative timeline.</li> </ul>	Completed  Completion form being prepared.
Take all other necessary steps				
⑭	46i	Police must identify and take all other necessary steps to ensure that noncompliant practices highlighted in this Compliance Notice do not continue.	<ul style="list-style-type: none"> <li>Practices are being identified as part of a range of engagement undertaken and underway. Engagement is being used to educate about the requirements under the Privacy Act. Planning is also underway to remediate any non-compliant practices progressively,</li> <li>See Project milestone report below for indicative timeline of practice and procedure work and planned training.</li> </ul>	Under action Due as soon as reasonably practicable

**Report back on recommendations by the Independent Police Conduct Authority and Privacy Commissioner into Police’s conduct when photographing members of the public – progress as at March 2023**

Recommendation		Detail	Progress update	Status
#	<b>Taking photographs for <u>intelligence</u> purposes</b>			
1.	Police should develop a consolidated and comprehensive policy covering the use of photography to collect personal information under the Privacy Act for general <u>intelligence gathering purposes</u> .	<p>(a) setting an appropriate threshold under the Privacy Act (IPP1) for the collection of personal information: when turning their minds to their reasons for collection officers must be able to articulate a <u>reasonable possibility</u>, based on more than mere conjecture, that the individual being photographed could be relevant to a particular or likely investigation (<u>the lawful purpose</u>).</p> <p>(b) unless an exception applies, informing the individual of the purpose for taking the photograph, the consequences for the individual if the photograph is not provided and other information required under the Privacy Act (IPP 3)</p> <p>(c) setting out the applicable thresholds for exceptions to the requirement to inform the individual. In relation to the maintenance of the law exception, that requires a reasonably held belief that not complying with IPP 3 is necessary to avoid prejudice to the maintenance of the law;</p> <p>(d) the circumstances that require the consent of the individual to ensure that photographing the individual is fair and does not intrude to an unreasonable extent on their personal affairs. For example:                      (i) if an officer is engaging with an individual and informing them of the reason and purpose for the photograph, it will generally be fair to also obtain their consent, particularly if the individual is a youth; or                      (ii) if seeking the individual’s consent would be disproportionately prejudicial to the reason for taking the photograph or to the maintenance of the law, that risk of prejudice can justify proceeding without consent; and                      (iii) that, if a photograph is taken after the refusal of consent, the individual must be informed that the photograph is mandatory.</p>	<ul style="list-style-type: none"> <li>Review of and identification of amendments to over 30 Police practice and procedures that relate to capturing, storing, sharing/using and deleting photographs or fingerprints across a range of settings complete.</li> <li>Work in progress on development                             <ul style="list-style-type: none"> <li>of a new practice and procedure for photographs and fingerprints,</li> <li>on a plan to engage with 30 business owners about proposed amendments.</li> </ul> </li> <li>Communications and training will be undertaken as part of implementing a new practice and procedure and updating existing practice and procedures.</li> <li>See Project milestone report below for indicative timeline and scope of planned activity.</li> </ul>	Under action
2.	Police policy should provide clear guidelines for complying with the Privacy Act when stopping a youth in public and taking photographs for general <u>intelligence-gathering purposes</u>	<p>(a) reflecting the youth specific protections in the Oranga Tamariki Act and UNCROC;</p> <p>(b) tailoring the explanation under IPP 3 to the youth in an age-appropriate way; and</p> <p>(c) reflecting the requirements of IPP 4 when officers are deciding whether to proceed with a photograph of a youth and require officers to engage with the youth’s family, whanau or caregiver and, in the case of a child or tamariki under the age of 14, to obtain consent from them (or if they are unavailable another appropriate and independent adult), before taking a photograph of the youth.</p>		
3.	Police policy should require officers to record the circumstances and considerations that they rely on to justify the collection of personal information for purposes of intelligence gathering.			
4.	Police policy should include guidance on the limits of an officer’s power to take photographs or video recordings when that officer is lawfully on private premises.			
	<b>Taking photographs for <u>investigation</u> purposes</b>			
5.	Police should develop a consolidated and comprehensive policy covering the use of photography to collect personal information under the Privacy Act for <u>non-crime scene identification</u> . This policy should develop clear, practical guidelines for complying with the Privacy Act <u>when stopping individuals in public and taking photographs for purposes of investigations</u>	<p>(a) setting an appropriate threshold under the Privacy Act (IPP1) for the collection of personal information: when turning their minds to their reasons for collection officers must be able to articulate a <u>reasonable possibility</u>, based on more than mere conjecture, that the individual being photographed could be relevant to a specific investigation that is currently underway (the lawful purpose).</p> <p>(b) unless an exception applies, informing the individual of the purpose for taking the photograph, the consequences for the individual if the photograph is not provided and other information required under the Privacy Act (IPP 3)</p> <p>(c) setting out the applicable thresholds for exceptions to the requirement to inform the individual. In relation to the maintenance of the law exception, that requires a reasonably held belief that not complying with IPP 3 is necessary to avoid prejudice to the maintenance of the law;</p> <p>(d) the circumstances that require the consent of the individual to ensure that photographing the individual is fair and does not intrude to an unreasonable extent on their personal affairs.</p>	<ul style="list-style-type: none"> <li>See progress updates on practice and procedure work outlined against recs 1-4 above.</li> <li>More specific progress updates against recommendations to be provided as amendments are made over the next quarter.</li> <li>See Project milestone report below for indicative timeline and scope of planned activity.</li> </ul>	Under action
				Under action



Recommendation		Detail	Progress update	Status
		For example: (i) if an officer is engaging with an individual and informing them of the reason and purpose for the photograph, it will generally be fair to also obtain their consent, particularly if the individual is a youth; or (ii) if seeking the individual's consent would be disproportionately prejudicial to the reason for taking the photograph or to the maintenance of the law, that risk of prejudice can justify proceeding without consent; and (iii) that, if a photograph is taken after the refusal of consent, the individual must be informed that the photograph is mandatory.		
6.	Police policy should provide clear guidelines for complying with the Privacy Act when taking photographs of youth for investigation purposes	(a) reflecting the youth specific protections in the Oranga Tamariki Act and UNCROC;		
		(b) tailoring the explanation under IPP 3 to the youth in an age-appropriate way; and		
		(c) reflecting the requirements of IPP 4 when officers are deciding whether to proceed with a photograph of a youth and require officers to engage with the youth's family, whanau or caregiver and, in the case of a child or tamariki under the age of 14, to obtain consent from them (or if they are unavailable another appropriate and independent adult), before taking a photograph of the youth.		
7.	Police policy should require officers to record the circumstances and considerations that they rely upon to justify the collection of personal information for investigation purposes.			
8.	Police policy should confirm that Police may take photographs at a crime scene provided that the privacy of those unrelated to the incident is taken into account. This could be addressed by the redaction of images that include individuals who are not relevant to the investigation.			
Traffic checkpoints and other traffic stops				
9.	Police should prioritise review of training and policy on LTA checkpoints and stops to ensure that:	(a) policies reflect the current legal constraints, including the application of the privacy principles when taking photographs for non-LTA purposes;	<ul style="list-style-type: none"><li>See progress updates on practice and procedure work outlined against recs 1-4 above.</li><li>More specific progress updates against recommendations to be provided as amendments are made over the next quarter.</li><li>See Project milestone report below for indicative timeline and scope of planned activity.</li></ul>	Under action
		(b) checkpoints and other traffic stops are not established for the primary purpose of collecting photographs and personal information for a collateral purpose		
		(c) information gathered in the course of an LTA checkpoint or stop is not used for other purposes (e.g., general intelligence) unless lawfully collected for that other purpose, or it comes under a valid use exception under the Privacy Act		
		(d) photographs are taken for identification purposes at traffic checkpoints and other traffic stops when an infringement notice is being issued only when the driver's identity is not able to be ascertained in other way (e.g., by examination of the driving licence and accompanying photograph);		
		(e) officers receive regular training on the limits of taking photographs at LTA checkpoints and traffic stops.		
Protests and other large gatherings				
10.	Police should review the Demonstrations policy to reflect that:	(a) an appropriate threshold for photography is where the officer believes, based on some articulable facts, that there is a reasonable possibility of disorder occurring	<ul style="list-style-type: none"><li>Policy has been reviewed, updated and published.</li></ul>	Completed
		(b) recording demonstrators for no reason other than their presence in an otherwise lawful and peaceful demonstration, with the aim of identifying them for potential future demonstrations, is not necessary for a lawful Police purpose.		Completed
Issuing notices and proof of service				
11.	As part of a general review of policy and guidance relating to photographs of members of the public, Police should review and update policies and process relating to proof of service. This should make it clear that officers may photograph individuals holding a summons or 22 Recommendation infringement notice, as long as officers properly explain the purpose and use of the photograph, take it by fair and reasonable means, and limit the use of the photographs to demonstrating proof of service.		<ul style="list-style-type: none"><li>See progress updates on practice and procedure work outlined against recs 1-4 above.</li><li>More specific progress updates against recommendations to be provided as amendments are made over the next quarter.</li></ul>	Under action

Recommendation		Detail	Progress update	Status
			<ul style="list-style-type: none"><li>See Project milestone report below for indicative timeline and scope of planned activity.</li></ul>	
	Responding to monitoring by members of the public			
12.	As part of a general review of policy and guidance relating to photographs of members of the public, Police should ensure there is guidance about the lawful basis for photographing or video recording members of the public monitoring Police. This should make clear that officers should do so only if the officer has reasonable concerns that the person’s behaviour poses a threat or is obstructing them in the performance of their duty.		<ul style="list-style-type: none"><li>See progress updates on practice and procedure work outlined against recs 1-4 above.</li><li>More specific progress updates against recommendations to be provided as amendments are made over the next quarter.</li><li>See Project milestone report below for indicative timeline and scope of planned activity.</li></ul>	Under action
	Interaction with youth in Police stations			
13.	Police policy should reflect that “voluntary consent” - whether or not it is informed - does not make the otherwise unlawful or unnecessary collection of personal information lawful or compliant with the Privacy Act		<ul style="list-style-type: none"><li>See progress updates on practice and procedure work outlined against recs 1-4 above.</li><li>More specific progress updates against recommendations to be provided as amendments are made over the next quarter.</li><li>See Project milestone report below for indicative timeline and scope of planned activity.</li></ul>	Under action (note 2 parts of this recommendation were completed as per 22-03-18 First OPC bimonthly update re CN_2021_02)
14.	Police should cease the practice of taking photographs of youth on a ‘voluntary’ basis where a youth has been uplifted or detained, except where a photograph is necessary for Police’s care and protection role to ensure the safety of the youth.		<ul style="list-style-type: none"><li>Completed as part of meeting OPC Compliance Notice [46(c)(ii)].</li></ul>	Completed
15.	Police should cease the practice of taking biometric prints from youth on a ‘voluntary’ basis.		<ul style="list-style-type: none"><li>Completed as part of meeting OPC Compliance Notice [46(b)(ii)].</li></ul>	Completed
16.	Police policy should identify	(a) the limits on taking ‘voluntary’ photographs of youth (and adults) present in Police stations on a voluntary basis under IPP 1 (b) where a youth is concerned, the requirement for a parent, caregiver or other appropriate adult to be present to give informed consent for a ‘voluntary’ photograph.	<ul style="list-style-type: none"><li>See progress updates on practice and procedure work outlined against recs 1-4 above.</li><li>More specific progress updates against recommendations to be provided as amendments are made over the next quarter.</li><li>See Project milestone report below for indicative timeline and scope of planned activity.</li></ul>	Under action
17.	Police should prioritise training for officers to improve understanding of:	(a) Police’s functions under the Oranga Tamariki Act in the youth justice and care and protection contexts; (b) the youth-specific protections due to vulnerability.		
	Use			
18.	Police policy should provide clear guidelines on the purposes for which lawfully collected personal information in the form of photographs and videos may be used under the Privacy Act (IPP 10).		<ul style="list-style-type: none"><li>The decision-making framework has been developed and was published in CheckPoint - a Police mobility application. This provides a range of guidance to frontline officers to support decision making when photographing people. This</li></ul>	Progressively implemented

Recommendation		Detail	Progress update	Status
			<p>guidance includes ensuring Officers are clear on the purpose for capturing photographs. [OPC Compliance Notice (46a(i))].</p> <ul style="list-style-type: none"> <li>• See also progress updates on practice and procedure work outlined against recs 1-4 above.</li> <li>• More specific progress updates against recommendations to be provided as amendments are made over the next quarter.</li> <li>• See Project milestone report below for indicative timeline and scope of planned activity.</li> </ul>	
<b>Retention</b>				
19.	Police policy and guidelines (including any relevant disposal schedule) should be reviewed and amended to ensure the technology policy is fit for purpose to support compliance with Police's obligations under the Privacy Act (and other relevant legislation) and provide guidance for officers routinely using mobile devices for mixed personal and policing purposes including, in particular:	<p>(a) the consistent storage and uploading of images and associated data to secure locations, and minimising the retention of images on individual devices and the duplication of images across Police systems</p> <p>(b) limits on using individual devices to capture images where other Police devices or technology is specifically set up for that purpose</p> <p>(c) protocols on handling sensitive or traumatic images.</p> <p>(d) limits on the use and retention of images (and copies) in individual devices and in Police systems;</p> <p>(e) routine review and deletion of images from mobile and desktop devices</p> <p>(f) protocols for purging and replacing devices.</p>	<ul style="list-style-type: none"> <li>• Work is continuing with Police's Information and Communications Technology Service Centre (ICTSC) and business process owners across over 23 systems, on changes required to systems to ensure access controls and compliance with relevant retention and disposal rules.</li> <li>• See also progress updates on practice and procedure work outlined against recs 1-4 above.</li> <li>• More specific progress updates against recommendations to be provided as amendments are made over the next quarter.</li> <li>• See Project milestone report below for indicative timeline and scope of planned activity.</li> </ul>	Under action
20.	Police should prioritise regular training for all officers on using mobile devices to ensure legal compliance.			
<b>General</b>				
21.	Police should review systems and implement the ability to audit compliance with:	<p>(a) updated technology policy and the handling of photographs of individuals on mobile devices</p> <p>(b) the deletion of identifying particulars in accordance with statutory time limits.</p>	<ul style="list-style-type: none"> <li>• Work is continuing with Police's Information and Communications Technology Service Centre (ICTSC) and business process owners across over 23 systems, on changes required to systems to ensure access controls and compliance with relevant retention and disposal rules.</li> <li>• System to ensure compliance with capturing, storing, sharing/using and deleting photographs and fingerprints developed with a phased approach to implementation. Phase 1 assurance activity due for completion by August 2023.</li> </ul>	Under action
22.	Police should develop a strategy to improve its staff's fundamental understanding of the application of the Privacy Act to the collection and protection of personal information with a particular focus on photographs as sensitive biometric information covering	<p>(a) policies and processes</p> <p>(b) training</p> <p>(c) methods for updating knowledge and practice on an ongoing basis.</p>		
23.	In implementing the strategy, Police should establish a rolling programme of reviews and updates of key policies, and develop and deliver agency-wide training to its staff and relevant contractors on:	<p>(a) the decision-making framework and procedures to be followed to photograph individuals and youth in public</p> <p>(b) storage and deletion procedures.</p>		

Milestone report as at March 2023 for remaining OPC requirements

RAG status	On track	At risk (managed)	At risk (mitigation required)	Complete
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Work package	CN reference	Milestone	2022/2023										2023/2024						Status
			Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Onwards	
Policy and procedures	46(e), 46(f), 46(g), 46(i)	Discovery and Design - policy and procedures	Discovery																Jan 2023
		Approach to policy and procedure work			Design														March 2023
Amendment to existing procedures	46(e), 46(f), 46(g), 46(i)	New Policy							Develop and Implement										August 2023
		New Procedures							Develop and Implement										August 2023
		Plan to engage and update existing policies and procedures						Design											April 2023
		Collection of personal Information							Develop and Implement										July 2023
		Photography (Forensic imaging)							Develop and Implement										July 2023
		Part One 1- Introduction to Youth Justice							Develop and Implement										July 2023
		Youth Justice 2							Develop and Implement										July 2023
		Acceptable use of information and ICT							Develop and Implement										July 2023
		Retention and disposal of Police Records							Develop and Implement										July 2023
		Information privacy principles							Develop and Implement										July 2023
		Fingerprints							Develop and Implement										July 2023
		Police information and records management policy							Develop and Implement										July 2023
		Information Security							Develop and Implement										July 2023
		Managing security risks in policing							Develop and Implement										July 2023
		Child protection investigation policy and procedures							Develop and Implement										July 2023
		Crash scene photography							Develop and Implement										July 2023
		Family harm policy and procedures							Develop and Implement										July 2023
		Covert imagery							Develop and Implement										July 2023
		Victim relocations							Develop and Implement										July 2023
		Assaults and injuries to the person							Develop and Implement										July 2023
		Demonstrations	Develop and Implement																March 2023
		Identification of offenders							Develop and Implement										July 2023
		Sudden death							Develop and Implement										July 2023
		Identity information sharing							Develop and Implement										July 2023
		Child protection Policy (overarching)							Develop and Implement										July 2023
		Privacy breach management							Develop and Implement										July 2023
		Introduction of disclosure of information							Develop and Implement										July 2023



Work package	CN reference	Milestone	2022/2023										2023/2024						Status
			Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Onwards	
Systems Improvement (future state design)		Adult sexual assault investigation policy and procedures							Develop and Implement										July 2023
		Arrest and detention							Develop and Implement										July 2023
		Assaults and injuries to a person							Develop and Implement										July 2023
		Behaviour offences							Develop and Implement										July 2023
		Categories of surveillance with a device							Develop and Implement										July 2023
		General enquiries in homicide and serious crime investigations							Develop and Implement										July 2023
	46(d)(ii), 46(e), 46(f)	Scoping systems	Discovery																Dec 2022
		Plan to improve systems TBC Existing systems will be progressively amended based on prioritisation						Design											March 2023
		Mobility devices (iphone)		Discovery		Design			Develop				Implement						Dec 2023 TBC
		Other Systems (approx. 23)				Discovery and Design			Design and Develop				Implement						Dec 2023 TBC
Data Management (current state remedials)	46(a)(i), 46(b)(ii), 46(c)(i), 46(d)(i)	Data discovery						Discovery											April 2023
		Data deletion plan						Design and Develop			Implement								April 2023
Compliance Fix Training	46(e), 46(f), 46(g), 46(i)	Delete across police systems: • casual photographs of rangatihi; • biometric prints and photographs from rangatihi in custody on a voluntary basis; • photos of adults in custody											Implement Note photographs have been deleted and are being deleted. This activity provides assurance that information held is compliant with legal obligations. Timeframe dependent on volume and complexity of information and approach to review and deletion of remaining information requiring deletion						Dec 2023 (TBC)
		General Privacy Awareness						Develop and Implement											April 2023
		Update existing training					Iterative design, develop and implement process												Dec 2023
	46(a)(iii)	Success factors training							Design and develop			Implement							October 2023
		Checkpoint app (decision making framework)	Design and Develop			Implement													Feb 2023
		Update Checkpoint app (decision making framework) following policy and procedure changes								Develop and Implement									July 2023
Mindset/behaviour training	46(e), 46(f), 46(g), 46(i)	Privacy Awareness Videos							Develop and Design			Implement							Dec 2023
Assurance	46(h)	Develop and Implement (incl approval) Assurance System		Design and Develop		Implement													March 2023
	46(d)(ii)	Phase 1 Assurance (sample audit)						Design and Develop (procurement)			Implement								August 2023
	46(a)(i), 46(a)(ii), 46(b)(i), 6(b)(ii), 46(c)(i), 6(c)(ii), 46(d)(i), 46(d)(ii), 46(e), 46(f), 46(g)	Phase 2 Assurance																Design and Develop	June 2024
	46(h)	Phase 3 handover to BAU				Design			Develop									Develop	July 2024
	46(e), 46(f), 46(g), 46(i)	BPM Model - Coaching							Design and Develop			Implement							Dec 2023