



Privacy Impact Assessment for Non-Ministry Public Bodies

Video Surveillance at the Township of Esquimalt Facilities

PIA#[assigned by your privacy office(r)]

Why do I need to do a PIA?

Section 69(5.3) of the Freedom of Information and Protection of Privacy Act (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Public bodies should contact the privacy office(r) for their public body to determine internal policies for review and sign-off of the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

If you have any questions about this PIA template or FOIPPA generally, you may contact the Office of the Chief Information Officer (OCIO) at the Privacy and Access Helpline (250 356-1851). Please see our [PIA Guidelines](#) for question-specific guidance on completing a PIA.

What if my initiative does not include personal information?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to their privacy office(r) even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

Part 1 – General

Name of Department/Branch:	Corporation of the Township of Esquimalt		
PIA Drafter:	Artur Bittencourt		
Email:	artur.bittencourt@esquimalt.ca	Phone:	250-414-7134
Program Manager:	Rachel Dumas		
Email:	rachel.dumas@esquimalt.ca	Phone:	250-414-7135

In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

The system being assessed is the Video Surveillance System (the System) at the Township of Esquimalt (the Township) facilities. Proper video surveillance is one of the most effective means of helping to keep the Township’s facilities and properties operating in a way that protects public safety, security, and privacy. The Township is aiming to implement the System to Township’s owned and leased properties for public safety and security purposes.



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The System will not be used for:

- i) video surveillance by the Victoria Police;*
- ii) video surveillance for employment or labour relations purposes; or*
- iii) video surveillance of roads in order to assess their condition, for reduction of liability purposes.*

2. Scope of this PIA

This assessment only includes video surveillance at Township owned and leased properties in accordance with the privacy provisions of FOIPPA.

3. Related Privacy Impact Assessments

There is no previous related PIA.

4. Elements of Information or Data

The System will capture individuals' images only, with no audio, and the following will be criteria will be implemented:

- The System would be installed to only monitor those areas that have been identified as requiring video surveillance.*
- The ability to adjust or manipulate video recording cameras is restricted so that the cameras do not record areas that are not intended to be covered by the System, such as through windows in adjacent buildings or onto adjacent properties.*
- The System would never monitor or record the inside of areas where the public and staff have a higher expectation of privacy (e.g. change rooms and washrooms).*
- The System would be restricted to locations where there is a demonstrably higher likelihood of significant public safety or security concerns in the area under surveillance.*
- Viewing and recording equipment will be in a restricted access area where only authorized staff have access.*

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office(r). They will guide you through the completion of your PIA.



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Part 2 – Protection of Personal Information

In the following questions, delete the descriptive text and replace it with your own.

5. Storage or Access outside Canada

Video images captured by the system are stored in Canada, locally on each camera, up to 30 days. The cameras store the images encrypted at rest. The data can only be accessed with the encryption keys located in the cloud controller. No personal data is stored in the cloud. The cloud controller can only be accessed via multi-factor authentication, by the IT Manager or staff designated by CAO. A service provider that is repairing the System can only access the data if authorized by the IT Manager.

6. Data-linking Initiative*

In FOIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.	
1. Personal information from one database is linked or combined with personal information from another database;	no
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	no
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	no
If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.	



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7. Common or Integrated Program or Activity*

<p>In FOIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.</p>	
1. This initiative involves a program or activity that provides a service (or services);	no
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	no
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

** Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). Contact your public body’s privacy office(r) to determine how to proceed with this notification and consultation.*

For future reference, public bodies are required to notify the OIPC of a “data-linking initiative” or a “common or integrated program or activity” in the early stages of developing the initiative, program or activity. Contact your public body’s privacy office(r) to determine how to proceed with this notification.



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8. Personal Information Flow Diagram and/or Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<i>Video cameras record images on various Township facility locations</i>	<i>Collection</i>	<i>26(c)</i>
2.	<i>All requests for access to Records are to be directed to the Corporate Officer, Municipal Hall, at 1229 Esquimalt Road, Esquimalt, BC V9A 3P1 for response. Such requests must be in writing either in the form of a letter, an email or on the prescribed form available on the Township's website and must set out the specific date and time of the incident and Record requested.</i>	<i>Disclosure</i>	<i>33.1(7)</i>
3.	<i>In the event that the Corporate Officer provides access to any Record, the following information, as relevant, will be recorded by the IT Manger in the logbook:</i> <i>i) the date and time of the original, recorded incident including the designated name/number of the applicable camera and DVR;</i> <i>ii) the time and date the copy of the original Record was prepared and sealed;</i> <i>iii) the time and date the sealed copy of the Record was provided to the applicant;</i> <i>iv) the case file number of the Law Enforcement Officer's investigation, if applicable;</i> <i>v) a description of the circumstances and legal authority justifying the disclosure;</i> <i>vi) the amount of the Record involved; and</i> <i>vii) the means used to provide access to the Record.</i>	<i>Disclosure & Use</i>	<i>33.2(c) and 32(a)</i>



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9. Risk Mitigation Table

Please identify any privacy risks associated with the initiative and the mitigation strategies that will be implemented. Please provide details of all such strategies. Also, please identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

Examples can be removed and additional lines added as needed.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<i>Employees could access video recordings and use or disclose it for personal purposes</i>	<i>Oath of Employment; Management Policy M-OER-07 'Code of Conduct'; Township's Video Surveillance Policy terms</i>	<i>Low</i>	<i>High</i>
2.	<i>Request may not actually be from client (i.e. their email address may be compromised)</i>	<i>Implementation of identification verification procedures</i>	<i>Low</i>	<i>High</i>
3.	<i>Client's images information is compromised when transferred to the service provider</i>	<i>Transmission is encrypted and over a secure line</i>	<i>Low</i>	<i>High</i>
4.	<i>Inherent risks granting access (via download link) to a client via email</i>	<i>Video Recording link will be provided by secure, encrypted download link</i>	<i>Low</i>	<i>Medium</i>

10. Collection Notice

In order to provide notice to the public and staff that a Video Surveillance System is in use at a particular location:

- The Township shall post signs, substantially as set out on sign below, at all entrances and/or prominently displayed in proximity to the area under video surveillance.*
- The notification will also be posted on the Township's website for the public's information.*
- The notification will inform individuals of the legal authority for the collection of personal information, the principal purposes for which the personal information is intended to be used, and*



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the Corporate Officer's contact information in the event of any questions about the collection of personal information.



ATTENTION

**This area may be monitored by
Video Surveillance Cameras**

The personal information obtained from the Video Surveillance Cameras at this site is collected under the authority of the Community Charter and will only be used for the purposes of promoting public safety and security and reducing property damage at this site.

Any questions about the collection of personal information may be directed to the Corporate Officer, Township of Esquimalt, 1229 Esquimalt Road, Esquimalt, BC V9A 3P1, or by telephone at 250-414-7135. More information is available at www.esquimalt.ca.



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Part 3 – Security of Personal Information

If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.

11. Please describe the physical security measures related to the initiative (if applicable).

Physical access to data centre in IT Department will be restricted by key cards to authorized staff only; cameras installed will be resistant to vandalism and tampering.

12. Please describe the technical security measures related to the initiative (if applicable).

Firewalls, encryption at rest, multi-factor authentication will be implemented.

13. Does your branch/department rely on any security policies?

All staff sign an Acceptable Computer and Mobile Phone Use Agreement. For further details contact Artur Bittencourt, IT Manager, 250-414-7134

14. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

Access to the System and Records produced by it will be restricted to relevant authorized staff only, in accordance with the Video Surveillance Policy as approved by the CAO.

15. Please describe how you track who has access to the personal information.

The IT Manager shall ensure that a logbook is prepared and retained in a safe and secure location to record all access activities related to the System and Records. The activities to be recorded shall include the authorized staff involved, the date, time and details of the activity, and all information regarding the use, maintenance, storage and all instances of access to Records and the System.



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Part 4 – Accuracy/Correction/Retention of Personal Information

- 16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?**

Not applicable to video recordings.

- 17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.**

Yes, any significant breaches or threats to public safety or security or property damage including vandalism will be reported to bylaw enforcement or police as appropriate.

- 18. If you answered "yes" to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.**

There will be limited disclosure and only the excerpt of the Recording depicting the specific event requiring follow up action will be provided to bylaw enforcement or police..

- 19. If you answered "yes" to question 17, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?**

Yes, the Record will be maintained in accordance with the Township's Council Policy ADMIN-42 'Records Management – Esquimalt Records Classification/Retention manual.'



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Part 5 – Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

No, information will only be disclosed by request as per Township’s Video Surveillance Policy and in accordance with a request for access to records under FOIPPA.

Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact your privacy office(r).

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No.

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).

22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.

No.

Please ensure Parts 6 and 7 are attached to your submitted PIA.



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Part 6 – Privacy Office(r) Comments

This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update and submit it to Privacy Office(r).

Privacy Officer/Privacy Office
Representative

Signature

Date



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Part 7 – Program Area Signatures

Artur Bittencourt,
IT Manager
Contact Responsible for Systems
Maintenance and/or Security
(Signature not required unless they
have been involved in this PIA.)

Signature

Date

Rachel Dumas,
Manager of Corporate Services/
Corporate Officer
Head, Freedom of Information and
Protection of Privacy

Signature

Date

A final copy of this PIA (with all signatures) must be kept on record.

If you have any questions, please contact your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.