



# Privacy Impact Assessment

## Victoria Fire Department Prevention Tablets

PIA# 2016-001

### Part 1 – General

Name of Department/Branch:	Victoria Fire Department		
PIA Drafters:	Rob Gordon, Douglas Carey, Katherine Wilson		
Email:	rgordon@victoria.ca	Phone:	250 361-0347
Program Manager:	Dan Atkinson, Victoria Fire Department		
Email:	datkinson@victoria.ca	Phone:	250 920-3369
PIA Drafter:	Katherine Wilson		
Email:	kwilson@victoria.ca	Phone:	250.361.0392

#### 1. Description of the Initiative

The Victoria Fire Department (VFD) uses Panasonic ToughPad tablets to access inspection, property and contact information in the field. The Prevention tablets use third party software FDM Mobile Inspections to read and update information related to property inspections for multiple occupancy, public assembly, commercial and industrial properties.

The devices are assigned to a specific user; devices are not shared. Each device has email configured and a PIN or password to unlock the device. These devices double as a daily-desktop computer as well as a mobile device for entering inspection returns in the field.

#### 2. Scope of this PIA

This PIA reviews VFDs Prevention tablets for compliance with FIPPA's privacy provisions.

#### 3. Related Privacy Impact Assessments

##### VFD Mobile Phone PIA

<https://worksites.victoria.ca/sites/Teams/TeamTemplate/FireSupport/Team%20Documents/Mobile%20Phones/PIA%202015-008%20VFD%20Mobile%20Phones%20FINAL.docx>

##### VFD Mobile Data Terminal PIA

<https://worksites.victoria.ca/sites/Teams/TeamTemplate/FireSupport/Team%20Documents/MDT%20Fire%20Mobile%20Units/PIA%202015%20VFD%20MDT.docx?web=1>

#### 4. Elements of Information or Data

- Property Contact information:** the contact names and numbers for properties are displayed and editable on the tablets through the FDM Mobile Inspections application.
- Fire Investigation Photographs:** While photographs should not be taken with these devices or stored locally, they can be accessed through the devices on the City of Victoria shared



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drives. During fire investigations, Prevention staff will use their digital SLR camera, not the tablets to take photographs.

### Part 2 – Protection of Personal Information

#### 5. Storage or Access outside Canada

FDM servers are hosted locally within the City of Victoria datacentre. There is no access from outside Canada nor is information passed to any agency outside of Canada. City of Victoria IT takes daily database backups.

**Back-up locations of personal information:** Backup servers are hosted within the City of Victoria infrastructure, in Victoria, Canada.

#### 6. Data-linking Initiative\*

<b>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.</b>	
1. Personal information from one database is linked or combined with personal information from another database;	No
2. The linkage purpose 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

**7. Common or Integrated Program or Activity\***

<p><b>In FOIPPA, “common or integrated program or activity” is strictly defined. 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.</b></p>	
1. This initiative involves a program or activity that provides a service (or services);	<b>Yes</b>
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;	<b>No</b>
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	<b>No</b>

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

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	If new build, contact information is collected and input to FDM when the building permit is obtained and the final occupancy inspection is performed. This information is put into FDM	Collection	26(c)
2.	Contact information related to a multiple occupancy, public assembly, commercial and industrial properties is collected during scheduled inspection	Collection	26(c)
3.	The information is used to assist investigators on call outs	use	32(b)
4.	The information is used to assist investigators on call outs	disclosure	33.2(a), 33.2(c)
5.	The Inspector will input the updated or new contact information into FDM using the tablet	use	32(b)
6.	The information is disclosed to the Office of the Fire Commissioner as part of each incident report	disclosure	33.1(1)(c)

### 9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Inspection vehicle doors are not locked and the tablet is stolen.	Devices has username and password requirement.	Low	Low

### 10. Collection Notice

A collection notice is not required. Personal information is collected indirectly under section 27(1)(b) and 27(3)(c).

## Part 3 – Security of Personal Information

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

The Prevention tablet is to stay with the Prevention Officer when not secured in its desktop cradle at VFD. If stored in the Prevention vehicle, the vehicle will be locked.

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

A username and password is required for each user to access the data stored in FDM application. Furthermore, a City of Victoria network ID and password are required to access the tablet.

**Security features for system maintenance, patch updates, synchronization:** SSAE 16

#### Transmission security:

- All data stored on the device is encrypted with SSL. All connectivity to City of Victoria servers must begin with a login, which creates a session. All API access is limited to sessions.
- All connectivity to City of Victoria servers must begin with a login, which creates a session.
- DHCP connection to Mobile Inspections FDM application
- Firewalls, DDoS protection, SSAE 16

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

**Governance:** VFD Prevention tablet users have been instructed to use the Digital SLR camera to take photographs or videos first, then their mobile phone second, as the mobile phone has much better photo/video quality. Their tablet will be the last resort for taking photographs.

Only approved staff are permitted to access data within FDM. These permissions are maintained by VFD and changes are made by IT as required. VFD has process and permissions in place to control access to personal information stored in FDM.



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- 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.**

Personal information can be added or deleted in FDM Mobile Inspections using the Prevention tablet. A username and password are required to both log in to the device and to access Mobile Inspections in FDM.

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

Only approved staff are permitted to access data within FDM. These permissions are maintained by VFD and changes are made by IT as required. VFD has process and permissions in place to control access to personal information stored in FDM.

### **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?**

An individual's contact information is updated or corrected when VFD is requested to do so. Contact information is often updated following incident response, or provided during company, or fire inspections. Personnel may also manually enter the information into the FDM database when they complete Incident Reports or enter inspection returns. This information can be updated in FDM database using their Prevention tablets in the field or at their desk connected through the City of Victoria network.

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

No

### **Part 5 – Further Information**

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

The information forms part of incident reports that are forwarded to the Office of the Fire Commissioner.

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

No.



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20. Will a personal information bank (PIB) result from this initiative?

No.

## **Part 6 – Privacy Office(r) Comments**

1. Please advise the Privacy Officer whenever there are changes with the use of the tablets that may affect the collection, use and/or or disclosure of personal information.



