



# City of Victoria - Privacy Impact Assessment

## New Crystal Pool CCTV System

PIA-2013-001 Updated

### 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.

## Part 1 – General

Name of Department/Branch:	Crystal Pool		
PIA Drafter:	Rob Gordon		
Email:	rgordon@victoria.ca	Phone:	250.361.0347
Program Manager:	Terri Askham, Manager of Recreation Programs and Facilities		
Email:	TAskham@victoria.ca	Phone:	250.361.0362

### 1. Description of the Initiative

A PIA pertaining to the CCTV system at the Crystal Pool was completed in September 2013. A new CCTV system has now been installed. The primary reason for installing the new system is because the previous system was analog and technologically obsolete. The two other reasons were to improve image quality and add seven additional cameras (four inside, three outside) so that the areas captured are more discreet. The previous system had cameras capturing very large areas whereas the new system captures specific areas (e.g. the fitness centre)

### 2. Scope of this PIA

This PIA updates the previous PIA. Its scope is confined to just describing how the changes between the old and new systems that impact the Act's privacy provisions.

### 3. Related Privacy Impact Assessments

The original PIA completed in 2013 regarding the old analog CCTV system.

### 4. Elements of Information or Data

No change in data elements collected. The seven new cameras are located:

- Two capture the bike lock up area (old system did not provide full coverage)
- One captures the main patio area with access doors to the facility (Not covered by old system)
- One captures the garbage disposal area and chlorine room access door (Chlorine room not covered by old system)
- One captures the downstairs hallway where storage and teaching rooms are located (not covered by old system)

- Two additional cameras cover the pool and deck area (the old system only had one camera to capture the entire area)

The law enforcement reason for installing the old CCTV system is probably more of a concern now than it was in 2013 when the first PIA was installed.

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.

## **Part 2 – Protection of Personal Information**

### **5. Storage or Access outside Canada**

Storage and access is unchanged

### **6. Personal Information Flow Diagram and/or Personal Information Flow Table**

The movement of personal information from the cameras to storage and possible use and/or disclosure is unchanged.

### **7. Risk Mitigation Table**

There are no additional risks. In fact, security of the personal information in digital format has increased security capabilities of the personal information.

### **8. Collection Notice**

There is no change to the collection of the personal information. The cameras are just more current with existing technology.

## **Part 3 – Security of Personal Information**

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

The hard drive storing video footage will now be a lockable closet. The closet's purpose is now only to store the hard drive.

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

The CCTV is a closed, stand-alone system now. It is not linked to the City's network. Also, the new system allows staff to just focus on the area where an incident occurred. This prevents capture of personal information not required to investigate an incident.

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

The Crystal Pool Video Camera Use and Disclosure Policy

**12. 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.**

See above.

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

Audit functionality remains unchanged.

**Part 4 – Accuracy/Correction/Retention of Personal Information**

**14. 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?**

The video cannot be altered or changed. It is overwritten when the hard disk becomes full.

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

Remains unchanged from old system.

**16. 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.**

Remains unchanged from old system.

**17. 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?**



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Remains unchanged from old system.

### **Part 5 - Further Information**

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

Remains unchanged from old system.

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

N/A



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[Insert Initiative Title]

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

## Part 7 - Program Area Signatures

Rob Gordon  
Privacy Officer/Privacy Office  
Representative

[Signature]  
Signature

Nov 12/15  
Date

Terri Askham  
Program/Department Manager

[Signature]  
Signature

Nov. 13, 2015  
Date

N/A  
Contact Responsible for Systems  
Maintenance and/or Security  
(Signature not required unless they  
have been involved in this PIA.)

Signature

Date

Head of Public Body, or designate

Signature

Date

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