

# PRIVACY IMPACT ASSESSMENT

## I BASIC INFORMATION - Existing Program – Parking ticket debt collection process

### 1. Name of Organization unit.

Department	Engineering and Public Works
Division	Parking Services Division
Branch/Section	

### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

Name, Title	Ismo Hsu, Parking Services Division Manager
Branch/Section	Engineering Department
Phone Number	250.361.1330
E-Mail	ihusu@victoria.ca

### 3. Description of the Program/System/Legislation (Initiative) being assessed.

The Parking Services Division (PSD) manages on street parking and the City's surface parking lots and parkades. Part of PSD's management responsibilities includes the issuance of parking tickets and their collection. Parking tickets the City is unable to collect are forwarded to the debt collection company, ARO Inc.

This PIA reviews the parking ticket debt collection process beginning with the City's exchange of personal information with ICBC to ARO's final collection efforts. There is no integration of the City's systems with ICBC or ARO. Staff initiated the personal information exchanges. ICBC only receives personal information it needs to verify the City's legislated authority to receive personal information for debt collection purposes. ICBC retains no personal information for its own purposes. ARO receives only that personal information it requires to perform debt collection services on the City's behalf. Only the City combines personal information it collects with personal information collected from ICBC.

### 4. Purpose/Objectives of the initiative (if statutory, provide citation).

Parking tickets are issued to help manage the limited number of available parking spaces owned by the City, to enforce City bylaws and to provide the City with revenue.

The legislated authority to issue parking tickets and collect unpaid parking tickets comes from these legislated authorities:

- City of Victoria Bylaw 09-079 "*Streets and Traffic Bylaw*", particularly Part 3 - Parking and Stopping and Schedule F - Minimum Fines for Traffic Offences other than Sections 19 to 44.

#### The applicable Motor Vehicle Act sections are

- 124(1)(g) which gives the City to power for the "...removal, detention or impounding of vehicles unlawfully occupying a portion of a highway or public place, and a scale of fees, costs and expenses for that purpose..."
- 124(1)(u) "...the enforcement of bylaws adopted under this section by fine or imprisonment, or both, and imposing fines, penalties and costs..."

124(4)(a) “to authorize an officer or employee of the municipality to make orders in respect of the matters comprised in a bylaw adopted under subsection (1) and by those orders to exercise the powers of the municipality under that bylaw, subject to the terms and conditions prescribed in the bylaw...”

**The applicable Community Charter section is:**

- Division 3 — Ticketing for Bylaw Offences

**6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

There is no previous PIA.

## **II DESCRIPTIVE INFORMATION**

**1. Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.**

**The collection, use and disclosure of personal information:**

1. Commissionaires: Only collects licence plate numbers that it discloses to Aparc Systems. **The Commissionaires are not involved with the debt collection process.**
2. Aparc Systems: Only discloses the licence plate numbers it collects from the Commissionaires to the City. All the information AParc receives from the Commissionaires hand-held devices (Motorola MC 70s) is retained on the system. This includes parking signage (i.e. 2 hr parking zone) and information on chalking tires). The City does not collect this information because TempestLive’s Ticketing module is not capable on managing this information but Aparc’s TicketManager system can. Aparc does not keep any personal information that is not also uploaded to the City. **AParc is not involved with the debt collection process.**
3. ICBC: The City discloses to ICBC the ticket number and licence plate number which ICBC collects and uses to disclose to the City the vehicle owners’ name and address (e.g. who was issued the licence plate), vehicle description (e.g. VIN, year, make, model, colour, weight) and Licensing information (i.e. licence number, registration number, effective and expiry dates). ICBC knows the City has requested the information in accordance with their Information sharing Agreement because the City provides ticket numbers. **ICBC is not involved further with the debt collection process.**
4. The City: The City uses the names and addresses ICBC provides to collect unpaid parking tickets. After three attempts to collect unpaid parking tickets, the City discloses to ARO the name and address of the vehicle owner, parking ticket number, date of ticket and other particulars of the parking ticket. The information is used to contact people and request payment and also provide them with the evidence that they incurred in traffic ticket.
5. ARO: ARO discloses the names and addresses the City provides to Trans Union and Equifax credit agencies and they provide more current telephone numbers and addresses if available.

There are privacy provisions in the agreements between ARO and the credit agencies.

**2. Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

Step 1 – The City receives ICBC information that confirms vehicle make, model etc. and identifies vehicle owner.

Step 2 – The City sends ARO the personal information to enable ARO to collect debt collection. The spread sheet contains ticker number, time and date ticket issued, name and address of vehicle owner.

Step 3 – ARO sends name and address to credit agencies to confirm most recent address. Credit agencies do not use addresses ARO provides if the addresses are more recent. ARO advised that “*demographic information is only updated if it is being reported as part of a tradeline or collection item on the consumer's credit file.*”

Step 4 - ARO mails a notice immediately after the file (the City provides) is loaded to our system. People do not receive their first phone call until the legislated required number of days passes in the Province in which they reside. The account remains open and as many as six additional notices of payment may be sent. The strategy for sending notices is based on account criteria such as: new address information and no telephone number or no contact, settlement strategy, high-balance (multiple tickets), remaining period of allowable collection activity before the debt becomes extinguished. We continue to make calls using our dialer to all available numbers until contact has been made, the number is eliminated as "not good", or until the file is closed/recalled back to the client.

Step 5 - The City receives an itemized statement that lists the ticket number and consumer name, with the date and amount paid.

Step 6 – ARO only provides the City with information on uncollected tickets when the City asks for it on an ad-hoc basis.

Step 7 - All information received from the City when the account is assigned is entered into our collection software system, (CUBS) to create a "debtor" file. Debtor records can be archived on the CUBS encrypted server, where they are securely maintained with very restricted access or, they can be purged from the CUBS system completely. This is determined by client requirement. Currently, our practice is to archive the information after 7 years. Debtor file data contains: Name, Address, City, Province, Postal, Vehicle Make, Plate #, approximate location of offence and the penalty amount.

Step 8 - Six months after a City of Victoria account has been paid in full, the consumer name is deleted from the debtor file record. This process is done on a monthly basis.

### III PERSONAL INFORMATION COLLECTION

(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

	Yes	No	n/a
Is personal information being collected?	X		

#### 1) Authorization for Collection:

A public body may collect personal information as authorized by one of the following provisions:

s. 26		Yes	No	n/a
(a)	Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?		X	
	<b>If yes, please specify the name of the Act and relevant section</b>			

s. 26		Yes	No	n/a
(b)	Is the personal information being collected for law enforcement purposes?	X		
(c)	Is the personal information directly related to, and necessary for, a program or activity of the public body?	X		
(d)	Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?		X	
	<b>If yes, please specify the prescribed purpose.</b>			
	(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection? <b>and</b>		X	
	(ii) Would a reasonable person consider that collection appropriate in the circumstances?			
(e)	Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?		X	
(f)	Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?		X	
(g)	Is the personal information being collected by observation at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public? <b>Please identify event:</b>		X	
(h)	Is personal identity information being collected by:			
	A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2, or		X	
	A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.		X	

## 2) How will the personal information be collected?

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?		X	

s. 27(1)		Yes	No	n/a
(a)(i)	Did the individual the information is about authorize another method of collection?		X	
(a)(ii)	Has indirect collection been authorized by the Information and Privacy Commissioner?		X	
(a)(iii)	Has indirect collection been authorized by another enactment?		X	
<b>If yes, please specify the name of the Act and relevant section(s)</b>				
(a.1)(i)	Is the personal information necessary for the medical treatment of an individual and it is not possible to collect the information directly from that individual?		X	
(a.1)(ii)	Is the personal information necessary for the medical treatment of an individual and it is not possible to obtain authority under (iv) for another method of collection?		X	
(b)	Is the public body collecting personal information disclosed to it by another public body under an authority within sections 33 to 36 of the FOIPP Act?	X		
<b>Specify relevant section(s) or subsections that apply.</b> Sections 33.1(1)(e.1)(i), 33.1(1)(e)(i), 33.1(1)(i)(i), 33.1(1)(i)(i.1), 33.2(i)				
(c)(i)	Is the personal information being collected for the purpose of determining suitability for an honour or award including an honorary degree, scholarship, prize or bursary?		X	
(c)(ii)	Is the personal information being collected for the purpose of a proceeding before a court or a judicial or quasi-judicial tribunal?		X	
(c)(iii)	Is the personal information being collected for the purpose of collecting a debt or fine or making a payment?	X		
(c)(iv)	Is the personal information being collected for the purpose of law enforcement?	X		
(c)(v)	Is the personal information being collected to reduce the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?		X	
(d)	Is the personal information being transferred to the public body from another public body in accordance with section 27.1?		X	
(e)	Is the personal information being collected necessary for delivering a common or integrated program or activity?		X	
(f)	Is the personal information about an employee, other than a service provider, and the collection of the information is necessary for the purposes of managing or terminating an employment relationship between a public body and the employee?		X	
(g)	Is the information personal identity information that is collected by the designated provincial identity information service that is necessary to provide services under section 69.2?		X	
<b>Additional details as required (e.g., explanation of method of collection)</b>				

**3) Notification to collect information**

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

27(2)	Yes	No	n/a
Has the individual from whom personal information is being collected, been informed of:			
(a) the purpose for collection?		X	
(b) the legal authority for collection?		X	
(c) the contact information of the person who can answer questions regarding the collection?		X	
<b>Additional details as required (e.g., method of notification)</b>			

**Notification is not required if the answer is “yes” to any of the following:**

27(3)	Yes	No	n/a
(a) Is the personal information about law enforcement or anything referred to in section 15(1) or section 15(2) of the FOIPP Act?	X		
(b) Has the Minister responsible for the FOIPP Act excused your public body from complying because it would			
(a) result in the collection of inaccurate information?			
<b>or</b>			
(b) defeat the purpose or prejudice the use for which the personal information is collected?		X	
(c) The information			
(a) is not required, under subsection 27(1), to be collected directly from the individual the information is about, <b>and</b>	X		
(b) is not collected directly from the individual the information is about			
(d) Is the information collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appears and that is open to the public.		X	
<b>Please identify event:</b>			
27 (4) Is it reasonable to expect that notifying an employee of collection under subsection 27 (1) (f) would compromise			
(a) the availability or accuracy of the information, or			X
(b) an investigation or a proceeding related to the employment of the employee?			
<b>Additional details as required</b>			

**IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)**

	Yes	No	n/a

	Yes	No	n/a
Is personal information being used?	X		

The public body **must** check one or more of the authorities listed below:

s.32		Yes	No	n/a
(a)	Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)		X	
(b)	Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?	X		
<p><b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b></p> <p>A percentage of people who receive parking tickets do not respond to City collection efforts. The City contracts with ARO to make additional collection efforts.</p>				
(c)	If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?	X		
<p><b>Specify subsection(s) being applied</b></p> <p>Sections 33.1(1)(e.1)(i), 33.1(1)(e)(i), 33.1(1)(i)(i), 33.1(1)(i)(i.1), 33.2(i)</p>				

**V DISCLOSURE OF PERSONAL INFORMATION**  
(Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?	X		

**1) Disclosure of Personal Information**

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(a)	In accordance with Part 2 (pursuant to an FOI request)		X	
(1)(a.1)	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j):  22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if			
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,		X	
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,		X	
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,		X	

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
	(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or		X	
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).		X	
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable (Note: Supporting documentation must be on file)		X	
(1)(c)	In accordance with an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada that authorizes or requires its disclosure		X	
	<b>Specify name of enactment and relevant section(s)</b>			
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) that authorizes or requires the information to be made public		X	
	<b>Specify name of enactment and relevant section(s)</b>			
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that  (i) authorizes or requires its disclosure, and  (ii) is made under an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada		X	
	<b>Specify name of enactment and relevant section(s)</b>			
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if  (i) the information is necessary for the performance of the duties of the minister, officer or employee,		X	
	<b>and</b>  (ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada			
	<b>If paragraph (1)(e)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i></b>			
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if  (i) the information is necessary for the performance of the duties of the individual in relation to the public body,		X	



s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
	<p><b>and</b></p> <p>(ii) in relation to disclosure outside Canada,</p> <p>(A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and</p> <p>(B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada</p>			
	<p><b>If paragraph (1)(e.1)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i></b></p>			
(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister		X	
(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body		X	
(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act		X	
(1)(i)	If			
	(i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by	X		
	a. an individual, or			
	b. corporation of which the individual the information is about is or was a director or officer,			
	<p><b>and</b></p> <p>(ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that</p>			
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or			
	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction			
1(i.1)	For the purposes of			
	(i) a payment to be made to or by the government of British Columbia or a public body,	X		
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or	X		
	(iii) resolving an issue regarding such a payment	X		
(1)(j)	(i) Repealed.			
(1)(k)	For the purposes of			
	(i) licensing or registration of motor vehicles or drivers, or		X	
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences		X	

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(l)	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations		X	
(1)(m)	<p>If</p> <p>(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and</p> <p>(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety</p>		X	
(1)(m.1)	For the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur		X	
(1)(n)	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted		X	
(1)(o)	In accordance with section 36 (disclosure for archival or historical purposes)		X	
(1)(p)	The disclosure			
	(i) is necessary for			
	(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or			
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body		X	
	<b>and</b>			
	(ii) in the case of disclosure outside Canada			
	(A) is limited to temporary access and storage for the minimum time necessary for that purpose, and			
	(B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred			
	<b>If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i></b>			
(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public. <b>Please identify event:</b>		X	
(1)(r)	If the information Was disclosed on a social media site by the individual the information is about,		X	

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
	Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body,  <b>and</b>			
	Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).			
	<b>Additional details as required</b>			
(1)(s)	<u>In accordance with section 35 (disclosure for research or statistical purposes).</u>		X	
(1)(t)	<u>To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information</u>		X	
(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33			
(2)(a)	To another law enforcement agency in Canada		X	
(2)(b)	To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.		X	
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.			
(4)	In addition to the authority under any other provision of this section or section 33.2, the Insurance Corporation of British Columbia may disclose personal information if,  (a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and  (b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim.		X	
(5) and (6)	For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6)			
(7)	To respond to citizens' enquiries as permitted under section 33.1(7)		X	
	<b>Additional details as required</b>			

<b>s. 33.2</b>	<b>Disclosure inside Canada only</b>	<b>Yes</b>	<b>No</b>	<b>n/a</b>
<b>(a)</b>	For the purpose for which it was obtained or compiled or for a use consistent with that purpose (see section 34)	X		
	<b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b>			
	A percentage of people who receive parking tickets do not respond to City collection efforts. The City contracts with ARO to make additional collection efforts.			
<b>(b)</b>	Repealed.			
<b>(c)</b>	To an officer or employee of the public body or to a minister, if the information is necessary for the performance of the duties of the officer, employee or minister		X	
<b>(d)</b>	To an officer or employee of (i) a public body, or (ii) an agency  or to a minister, if the information is necessary for the delivery of a common or integrated program or activity and for the performance of the duties, respecting the common or integrated program or activity, of the officer, employee or minister to whom the information is disclosed		X	
<b>(e)</b>	To an officer or employee of a public body or to a minister, if the information is necessary for the protection of the health or safety of the officer, employee or minister		X	
<b>(f)</b>	To the auditor general or any other prescribed person or body for audit purposes		X	
<b>(g)</b>	To a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem		X	
<b>(h)</b>	To a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry		X	
<b>(i)</b>	To a public body or a law enforcement agency in Canada to assist in a specific investigation			
	(i) undertaken with a view to a law enforcement proceeding, or		X	
	(ii) from which a law enforcement proceeding is likely to result		X	
<b>(j)</b>	To the archives of the government of British Columbia or the archives of a public body, for archival purposes		X	
<b>(k)</b>	Repealed.			
<b>(l)</b>	To an officer or employee of a public body or to a minister, if the information is necessary for the purposes of planning or evaluating a program or activity of a public body		X	
	<b>Additional details as required</b>			
<b>s. 33.3</b>	<b>Disclosure to Public Without Request</b>	<b>Yes</b>	<b>No</b>	<b>n/a</b>
<b>(1)</b>	Do the records fall within a category established under section 71 (1)?		X	
	<b>Additional details as required</b>			
<b>(2)</b>	Do the records fall within a category established under section 71.1 (1)?		X	

<b>s. 33.1</b>	<b>Disclosure inside OR outside Canada</b>	<b>Yes</b>	<b>No</b>	<b>n/a</b>
	<b>Additional details as required</b>			

**2) Systematic or Repetitious Disclosure/Exchanges?**

		<b>Yes</b>	<b>No</b>	<b>n/a</b>
<b>i.</b>	Do the disclosures of personal information under section 33.2 occur on a regular basis?	X		
<b>ii.</b>	Has an Information Sharing Agreement been completed for these disclosures/exchanges?  An ISA is completed with ICBC. An ISA with ARO is being completed.	X		
<b>iii.</b>	Has information related to the Information Sharing Agreement(s) been entered into the <b>Personal Information Directory</b> ?  The City does not have a PID		X	

**3) Archival or Historical Purposes (Section 36)**

		<b>Yes</b>	<b>No</b>	<b>n/a</b>
<b>(a)</b>	The disclosure would not be an unreasonable invasion of personal privacy under section 22			X
<b>(b)</b>	The disclosure is for historical research and is in accordance with section 35 (research agreements)			X
<b>(c)</b>	The information is about someone dead for 20 or more years			X
<b>(d)</b>	The information is in a record in existence for 100 or more years			X

**VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION**  
(Section 28 and section 29 of the FOIPP Act)

		<b>Yes</b>	<b>No</b>	<b>n/a</b>
<b>1.</b>	Are there procedures in place to enable an individual to request/review a copy of their own personal information?	X		
<b>2.</b>	Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?	X		
<b>3.</b>	If personal information is corrected, are there procedures in place to notify other holders of this information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:	All requests for correction of personal information are forwarded to the contact person.		
	Contact person:	Information Access and Privacy Analyst		

Phone number:	<a href="mailto:rgordon@victoria.ca">rgordon@victoria.ca</a> , 250.361.0347
<b>Additional details as required</b>	

**VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION** (Sections 30 and 30.1 of the FOIPP Act)

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?	X		
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	X		
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?		X	
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:			
	Contact person:			
	Phone number:			
<b>Additional details as required</b>				
There are recommendations for written procedures on managing the exchange of personal information that are in addition to the Information Sharing Agreements				
4.	Have user access profiles been assigned on a need-to-know basis?	X		
5.	Do controls and procedures exist for the authority to add, change or delete personal information?	X		
6.	Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?	X		
<b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b>				
<p><u>ARC Audit ability</u> - Logging systems are in place to record unauthorized and failed access attempts and logs are reviewed by the system administrator. Automatic alerts are generated and sent to the system administration team for any threats or attempts which meet certain threshold levels. Card access and video surveillance cameras are also utilized to monitor physical access.</p> <p>Tempest auditing functions are in place for parking services staff who whose Tempest's Ticketing module to process parking tickets. A separate PIA will be done on Tempest across departments that will include investigation of its audit abilities.</p>				
7.	Does the audit identify inappropriate accesses to the system?	X		

**Additional details on physical and technical security**

City of Victoria – ICBC personal information exchange:

- ICBC requires the City to upload personal information using GlobalScape’s secure SFTP program that meets the “reasonable security arrangements FIIPA requires.

City of Victoria – ARO personal information exchange:

- Personal information is exchanged via email
- The City and ARO have had discussions on improving the security of email exchange.
- The PIA recommends that improving the email security be adopted ASAP

ARO protection measures

- **Physical Measures:** Proxy Card controls by physical security region on our premises, video cameras, photo-id, visitor handling policies.
- **Technical Measures:** Role Based Access Controls, adoption of “Least Privilege” Principle, 2 factor authentication for remote access
- Users are assigned rights based on role and need to know.
- ARO does not use Cloud services

ARO – Credit agencies personal information exchange

- Information is exchanged by SFTP
- PGP encryption is used

8.		Yes	No	n/a
	Will the information be stored or accessed only in Canada?	X		
(a)	Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?			X
	<b>Please explain</b>			
(b)	Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?			X
	<b>Please explain</b>			
(c)	Will the personal information be disclosed under section 33.1(1)(i.1)?	X		
	<b>Please explain</b> ARO’s efforts to collect unpaid parking tickets falls within this disclosure reason. However, ARO does not make attempts to collect revenue from outside Canada.			

**VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)**

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?		X	
2.	<p>Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?</p> <p>The information is retained for seven years in accordance with Canada Revenue Agency requirements.</p> <p>ARO uses industry best practices when it destroys personal information.</p>		X	

***If you answered "no" to the above questions, your procedures may need to be revised. Please contact the Privacy Analyst.***





## Recommendations


1. Use a secure method to transfer personal information from the City to ARO and from ARO to the City (i.e. SFTP/ password protection/TLS as discussed between the City and ARO should be implemented).
2. Personal information in ARO "CUBS" system be deleted after seven years or, after debt collection efforts end by ARO, the personal information is sent back to the City.
3. Include a privacy schedule in contract with ARO (i.e. explains that ARO must comply with FIPPA, describes the management of personal information collects, from us and uses and/or discloses on our behalf).
4. Implement a policy whereby the City tracks all tickets sent to ARO that ARO was unable to collect on. This policy will include retrieving all personal information regarding uncollectable tickets from ARO and ARO retaining none of the personal information.
5. Delete all FTP files, emails and any other duplicated information containing personal information used for the purpose of exchanging personal information with ICBC and ARO.
6. Implement parking ticket process policies and procedures with the assistance of the Information Access and Privacy Analyst.
7. Confirm that the credit agencies don't retain addresses and phone numbers received from ARO that are more current than the information they have on file.

X SIGNATURES

PUBLIC BODY APPROVAL:

Ismael Husu, Manager Parking Services  Jan 21/2015  
Department/Division Manager Signature Date

Rob Gordon  Jan 21, 2015  
Information Access and Privacy Analyst Signature Date

 Signature 01/28/2015  
Director, Legislative and Regulatory Services Department Date