

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:	Parks, Recreation and Culture, Parks Division		
PIA Drafter:	Rob Gordon, Information Access and Privacy Analyst		
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Program Manager:	Rob Hughes, Supervisor Parks Operations		
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1. Description of the Initiative

The Parks Division is responsible for the maintenance of the City's urban forest (i.e. the trees on our boulevards and in our parks). In 2012 the City issued a RFP (#12-030) for software that could manage the City's urban forest and integrate with the City's existing Calls for Service (CFS) system. Davey Resource Group (DRG) was the winning proponent with its TreeKeeper 7 product. TreeKeeper is a sophisticated application that can manage each tree in our urban forest throughout its lifecycle.

The RFP's other requirement, integrating TreeKeeper 7 with the CFS system, is now almost complete and ready to go into production. The Calls for Service refers to calls from residents who regarding such things as the health of a tree, damage to it, need for pruning, etc. Callers' contact information is collected and included in the work order that Parks employees refer to when they do a site investigation of the tree(s). Currently, parks employees maintain separate records for the Calls for Service in TEMPEST (e.g. software developed for municipalities that performs a number of administrative functions) and management of each tree in Treekeeper 7.

The purposes of integration are:

- a. Reduce data entering (e.g. information is only added to Tempest CFS and then electronically transferred to TreeKeeper 7)
- b. A Work Request will contain the contact information of the person who called (i.e. the CFS) and the work to be done.
- c. All of the data about each tree is in one location instead of the current populated with the required information in TK7.
- d. Without the data integration Parks staff will continue to search two programs to locate the required information to respond to each Work Request
- e. With all the info in the TK7 program, there is no longer the need to print off the Tempest information. All work can be done by directly entering into TreeKeeper.

- f. The cost savings is avoiding the data entry on approximately 1000 calls a year. With each lasting on average 10 minutes, about 100 hours of staff time is about 10 minutes in length which equates to approximately 1 month of work based on a 35 hour work week.
- g. Parks staff can provide callers with immediate assistance on the status of a tree, including any previous history in which the caller requested assistance for a tree. This is a much improved customer service experience, reduces the time required for each caller allowing more callers to reach Parks staff.
- h. Integration will increase Parks staff ability to perform their work in the following ways:
 - i. The TK7 program allows us to proactively manage the publicly owned tree resource within the City.
 - ii. TK7 will be the program we use to assess, assign and complete requests for tree work.
 - iii. It will allow for cyclical pruning and tree maintenance schedules.
 - iv. It builds a complete history on each tree.
- i. The costs savings are approximately \$12,000.00 a year due to reduced data entry, less time responding to each call and elimination of the time required to print contact info from Tempest

2. Scope of this PIA

This PIA reviews the integration of TreeKeeper and CFS beginning with how the personal information in Tempest's CFS module is transferred to TreeKeeper 7. The management of the personal information in Tempest is not within the PIA's scope. Nor is the initial collection of the PIA when residents' call about their tree concerns. The scope of the PIA focuses on management of the personal information once it is entered into TreeKeeper 7 with particular focus on its storage and access from a US based Cloud service provider and access by DRG staff.

3. Related Privacy Impact Assessments

There are no related PIAs.

4. Elements of Information or Data

Names, addresses and contact info (home/cell number, email address) of residents.

Residents' play a small but significant role in managing the City's urban forest. They help by reporting on the condition and health of trees and requests to prune or remove trees. Their names, addresses and contact information are obtained to help find the location of trees, to follow up with them if additional information is required, or to relay the results of an investigation that was more than just a broken branch or other similar low priority tree report.

The majority of the information received from residents describes their concerns and may even include submitting photos showing the damage a tree has done. Approximately 35 "Requests for Service" are received each week (30 telephone calls and five emails) and approximately 25 just require obtaining name, address and contact information.

The following are other reasons to collect more than just name, address and contact information:

- Trees that fall onto private property and cause damage can require obtaining personal information about damage to cars, fences, roofs etc.
- Very rarely people want to donate trees or have trees dedicated that require collecting financial information and information about the person the tree is dedicated to.
- Bylaw complaints about damage to public trees (private tree bylaw is in Prospero exclusively).
- Requests for Parks to plant a new boulevard tree require collecting opinions as to why the tree was needed.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

Storage and access will be in the US from a Cloud service provider that the DRG uses to host TreeKeeper &. Davey Tree Service was asked to use a Canadian based Cloud service provider, but at this point in time it is not feasible from a financial perspective. The issue will be revisited.

Despite storage and access outside of Canada, the Information Access and Privacy Analyst approved the integration. The Analyst believes there are sufficient mitigating factors that favour integration proceeding including:

- The personal information is not sensitive, consisting mostly of contact information that will not be combined with other more sensitive personal information about individuals.
- The benefits of TreeKeeper 7 to collect so much necessary information about the trees in our urban forest.
- A personal information schedule is in place that contains language requiring the personal information to be managed in accordance with FIPPA (except for the storage outside Canada).
- The greater efficiencies and effectiveness available to staff to perform their work.

6. Data-linking Initiative*

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.	
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

7. Common or Integrated Program or Activity*

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.	
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.	

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

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Phone call or email received from resident	Collection	26(c)
2.	Obtaining further information from residents	Collection	26(c)
3.	Creating a “Call for Service”	Use	32(a)
4.	Assigning CFS to staff	Use	32(a)
5.	Uploading CFS info into Treekeeper 7	Use	32(a)
6.	Responding to CFS	Use	32(a)
7.	Contacting Public Works for assistance (e.g. roots into storm drains)	Use/Disclosure	32(a) 33(2)(a) and 33(2)(c)
8.	Follow-up with resident regarding outcome of CFS	Disclosure	33(2)(a)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	DRG not using the personal information in its custody in accordance with FIPPA	There is the Privacy Protection Schedule attached to the agreement between the City and DRG.	Low	Low
2.	Cloud provider not providing adequate security controls	<ul style="list-style-type: none"> • Risk to reputation • Contract requirements • Audits 	Low	Low
3.	Staff using Tablets in the field	<ul style="list-style-type: none"> • Policy to keep the tablets with them at all times • Policy • Password protection 	Low	Low
4.	Syncing information between Tempest CFS module and Treekeeper 7	<ul style="list-style-type: none"> • Not a high value target for unauthorized access attempts • Industry standard transmission measures 	low	low

10. Collection Notice

Most personal information residents provide voluntarily over the phone or via email for the purpose of assisting to maintain a healthy urban forest. Parks staff only collects what is necessary and explain why the personal information is necessary (e.g. future contact in case a tree can't be located and to tell residents what action was taken because residents want to know).

Part 3 – Security of Personal Information

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

Once actioned and the information added to Tempest, hard copy CFS forms retained in a 3 ring binder and disposed of as per the City of Victoria Policy. The binders are kept in the Supervisor of Arboriculture's office.

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

The DRG has written security requirements that includes a review of its operational and compliance control environment of its systems, server access requires a key card, password encryption if clients request (e.g. challenge – response authentication), strong governance, risk management and forensic protocols.

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

Our server initiates all communication between Tempest and Treekeeper 7. TreeKeeper cannot access Tempest.

The DRG is working on encryption for FTP communications. A recommendation has been included to follow up so that encryption is completed.

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.

There is a Privacy Protection Schedule attached to the service agreement between the City and the DRG that requires the DRG to manage the personal information in its custody in accordance with FIPPA. This schedule includes access control and edit control language.

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

An entry is made to the login log every time a user logs into TreeKeeper 7. The entry describes which user logged in and the time they logged in. This log is available for review in the administration center of TreeKeeper 7.

Anytime a user edits a tree, work record or call, the system tracks the last changed by information and time of the change. This information is reportable in the system for the site data, and can be extracted from the backend for the work record and/or call information upon request.

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?

The Privacy Schedule includes a clause regarding correction of personal information. Individuals will be advised to contact the Information Access and Privacy Analyst

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

No. People don't own the trees. They just contact Parks to provide us information that helps, or not, in their management.

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.

No

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?

N/A

Part 5 – Further Information

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

No

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

No

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



Part 6 – Information Access and Privacy Analyst’s Recommendations

1. Continue negotiations with DRG to transfer the personal information from storage and access in the US to storage and access in Canada.
2. Contact the Information Access and Privacy Analyst before changes are made regarding the collection, use, disclosure, storage, access or protection of the personal information.
3. Follow up with Davey Resource Group to ensure the FTP transmission of data becomes SFTP. Davey is now using SFTP for transmitting data (2015/05/25 date reported).

Part 7 - Program Area Signatures

 <hr/> Privacy Officer/Privacy Office Representative	 <hr/> Signature	May 28, 2015 <hr/> Date
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 <hr/> Program/Department Manager	 <hr/> Signature	May 28 th , 2015 <hr/> Date
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 <hr/> Contact Responsible for Systems Maintenance and/or Security (Signature not required unless they have been involved in this PIA.)	 <hr/> Signature	May 25, 2015 <hr/> Date
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<hr/> Head of Public Body, or designate	<hr/> Signature	<hr/> Date
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A final copy of this PIA (with all signatures) must be kept on record.