



City of Victoria - Privacy Impact Assessment

Temp Bus Terminal Camera

PIA-2016-016

Part 1 – General

Name of Department/Branch:	Transportation section of Planning		
PIA Drafter:	Rob Gordon		
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Program Manager:			
Email:		Phone:	

1. Description of the Initiative

The off-street, private sector, bus terminal at 700 Douglas Street (the corner of Douglas and Belleville streets) ended operations in July 2016 because its lease was not renewed. The site's owner is going to build residences on the property. A new bus terminal location was required, but no suitable, long-term, off-street site was located.

With no replacement bus terminal available for July, a temporary terminal has been created across the street at 713 Douglas Street in front of the Crystal Gardens. This site provides many of the requirements for a bus terminal including sufficient curb side parking, closeness to the main tourist area and hotels, commercial space for ticket sales, waiting room area, parcel drop off etc.

On the other hand, an on-street bus terminal can negatively impact its surroundings in ways that an off-street location doesn't. This may be especially true of the temporary bus terminal because it is located within commercial and residential zones. Examples of negative impacts that City staff have identified include:

- parking availability
- vehicle traffic disruptions
- pedestrian flow impeded (e.g. during loading/unloading of people and luggage)
- access obstructions to businesses neighbouring the terminals leased commercial space

In recognition that the new bus terminal may have unacceptable negative consequences to its surroundings, it was decided that the location would be temporary until its presence could be thoroughly evaluated. One component of this evaluation is video to record activity at the site, especially the unloading and loading of passengers and luggage – using video to capture screen shots. The evaluation period using the camera is 18 months ending approximately December 2017.

2. Scope of this PIA

This PIA reviews the single, fixed, camera that captures the area in front of the Wilson's Transportation ticket office, waiting area, package sorting etc. and the reserved sidewalk area that can accommodate three 45 foot buses. The camera is located on the traffic signal pole directly

above the intersection, Douglas at Humboldt. This camera was installed back in 2007 as part of the Transit Signal Priority Project. It is being used because it can capture the area being evaluated and it was also the least expensive option.

3. Related Privacy Impact Assessments

There is no related PIA.

4. Elements of Information or Data

Generally, screen prints are captured a few times a day (1-2 in the morning and similarly in the afternoon). Camera screen prints are taken at relevant times of the day. It captures images that are clear enough to identify individuals. The video taken is live streaming that is not recorded.

Screen prints are taken Monday to Friday during peak business periods.

The use of a camera to take screen prints is very cost effective compared to hiring someone. The information captures the entire area objectively whereas hiring someone introduces subjectivity, which may not capture the data required or may not capture all the data required during unusually busy periods with lots of activity over an area that extends beyond the front entrance of the ticket office and location of the bus being unloaded/loaded.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

Storage and access of screen prints are on the City's protected network.

The main feed of the camera's video is the Sign Shop in the Public Works yard on Garbally Street. No record of the video is created because it is not recorded. Staff in the Transportation section of the Engineering Department remotely access the feed from their workstation computer. One staff member takes the daily screen prints and saves them to a network folder available to engineering staff.

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 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.	

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);	yes
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.	Video screen prints are taken	Collection	26(e)
2.	Screen prints are analyzed to evaluate the temporary bus terminal's impacts on its surroundings	Use	32(a)
3.	Screen prints are provided to management for decision making	Disclosure	33.2(a)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	The screen prints capture unnecessary images of people	The camera is focused on the area immediately around the ticket office and sidewalk parking area	med	low
2.	Access to screen prints by staff who don't need access	Permissions are being applied to the folder where the screen prints are stored	med	low
3.	Retention of screen prints long after the reason for their collection is completed		med	low
4.	Use for reasons other than evaluation of temp bus terminal		low	low

10. Collection Notice

No notice is required as the personal information is not being collected directly from people and only video is not being taken, only screen prints that capture an extremely small portion of activity during business hours of the bus terminal

Part 3 – Security of Personal Information

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

The Transportation section of the Engineering Department is not accessible to the public.

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

Computers are password protected with manual and automatic screen lock.

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

No

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.

Permissions are added to folders that contain personal information

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

There is no written documentation.

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 screen prints cannot be altered.

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

No

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.

N/A

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.



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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

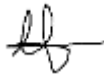

- Adopt the privacy measures described in the December 1, 2016 email from the Information Access and Privacy Analyst describing the use of the camera and the privacy mitigation requirements.
- If any changes take place regarding the use of the camera, please advise the Information Access and Privacy Analyst to review the changes for compliance with FoIPPA.



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Part 7 - Program Area Signatures

Nick Armstrong has signed on behalf of Department. No IT signature was required.

Program/Department Manager	Signature	Date
N/A	 X	1/23/2017
Contact Responsible for Systems Maintenance and/or Security (Signature not required unless they have been involved in this PIA.)	Nick Armstrong Transportation Technologist Signed by: Nick Armstrong	
Rob Gordon		January 9, 2017
Privacy Analyst	Signature	Date

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