

File No. 04-1000-20-2011-273

November 30, 2011

Rob Wipond
By Email: robwipond@shaw.ca

Dear Mr. Wipond:

Re: **Request for Access to Records under the Freedom of Information and Protection of Privacy Act (The "Act")**

I am writing regarding your request of September 2, 2011, under the *Freedom of Information and Protection of Privacy Act*, for:

A copy of the Privacy Impact Assessment for the installation, use and maintenance of Closed Circuit TV (CCTV) camera systems and their associated databases in the City of Vancouver.

All responsive records for this request are attached.

Please do not hesitate to contact me if you have any questions.

Yours truly,



Barbara Van Fraassen, BA
Manager, Corporate Information and Privacy

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Encls.

:bvf

Annex C: PRIVACY IMPACT ASSESSMENT

I BASIC INFORMATION - New or Existing Program, System or Legislation

1. Ministry/Public Body and Program Area.

Ministry	City of Vancouver
Division	Human Resources
Branch/Section	Office of Emergency Management
Program	Temporary Event Management & Public Safety ('TEMPS') System

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	Kevin Wallinger, Director of Emergency Management
Branch/Section	Office of Emergency Management
Phone Number	604 829 8370
E-Mail	kevin.wallinger@vancouver.ca

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

(Please note here if the initiative does **not** collect, use or disclose personal information). If this is a change to an existing legislation, system or program, describe the current system or program and the proposed changes.

The Temporary Event Management & Public Safety ('TEMPS') System is a mobile CCTV solution designed to assist in the management of public events and capable of providing rapidly deployed monitoring capabilities in the event of hazards, emergencies and other unforeseen eventualities. In this respect the initiative supports and enhances the capabilities of the Emergency Operations Centre at E-Comm, where the TEMPS System Control Room will be based.

The City of Vancouver already provides temporary CCTV coverage for a wide variety of event monitoring, although this has involved contracting with a variety of vendors to provide this service. Historically this approach has proved to be sub-optimal in terms of set up, operation, overall effectiveness and value-for-money.

The foundation of the TEMPS System is the establishment and equipment of a CCTV Control Room located within the E-Comm building and directly adjacent to the newly upgraded Emergency Operations Centre. By placing this facility in a seismically- resilient building, the City is ensuring that - in addition to the provision of a robust and well-equipped central monitoring station - it can also provide a vital alternate to the City's existing CCTV monitoring. (The monitoring of traffic cameras and of City-owned facilities is currently conducted in less than ideal circumstances at City Hall and, in the event of an earthquake, this monitoring - already at capacity - could be severely disrupted.)

The staffing of the TEMPS Control Room will be on an 'as needed' basis and staff will conduct real-time monitoring operations only as required by operational exigencies.

In addition this CCTV Control Room, the TEMPS System provides all the constituent elements of a fully operational mobile CCTV monitoring system, capable of swift deployment throughout the municipality. Wireless transmitters and infrastructure components allow for deployment of a wireless camera suite in areas not optimally served by the City's fibre network.

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

The prospective benefits to the City of Vancouver of implementing the TEMPS System can be enumerated as follows:

- The capacity to swiftly deploy an effective mobile CCTV presence on a City-wide basis in order to enhance public safety*
- The provision of a cost-effective, in-house solution for the monitoring of large public events*

- The capability to support the E-Comm Emergency Operations Centre in an emergency or natural disaster (such as earthquake, flooding or similar hazards) through the provision of rapidly-deployed CCTV coverage
- The provision of an alternate 'failover' site for the monitoring of City Hall facilities and Traffic Management operations in the event of a natural hazard such as an earthquake
- The ability to optimize the use of the City's fibre network to further enhance public safety

5. What are the potential impacts of this proposal? (Include privacy impacts in this description).

The fundamental purpose of the TEMPS System is to provide the City of Vancouver with the facility to monitor large public events and support emergency services during hazards and emergencies arising in Vancouver. The primary focus is public safety rather than surveillance for the purposes of crime detection.

In order to ensure this program runs in accordance with guidelines, a number of procedural safeguards will be adopted. These include:

- Real Time, event-driven monitoring – the Control Room will only be in operation as required by events and emergencies and monitoring will only be conducted during these periods
- There will be no recording or storage of images - in the event of problems being detected during a public event the operator would inform the Duty Supervisor who would make a determination as to whether any of the emergency services should be informed
- There will be clear policies, guidelines and training for all operators, whether City employees or contractors (a written policy and supporting documentation is being developed)
- All placement of cameras will be restricted to identified public areas and the siting of these cameras will ensure that no monitoring takes place in areas where members of the public have a reasonable expectation of privacy
- When utilized for the monitoring of public events, signage will be deployed advising the public of the camera deployment
- The Director, Emergency Management will be designated as 'in charge' of the TEMPS System and will conduct reviews on a regular but unscheduled basis

The City of Vancouver is aware of the concerns that have been expressed by the OIPC over the deployment of CCTV in public spaces. The City does not however believe that there are significant privacy implications to the implementation of the TEMPS System which is focused on temporary CCTV deployment without collection and/or storage of images, as opposed to 'comprehensive and continuous coverage' or 'general public surveillance'.

It should be noted that monitoring activities under this program will at all times be under the control of City staff or City-appointed contractors. All policies and operational procedures will be in strict accordance with the B.C. Freedom of Information and Protection of Privacy Act (FOIPPA) and the guidelines established by the OIPC.

Under this initiative, no personal information is being collected, used or disclosed. In event of any change to the TEMPS System as envisioned in this submission, leading to an increase in scope and the potential recording and/or storage of images, the City undertakes to provide the case for such change to the OIPC prior to any implementation

The City is also aware of the reservations held by some members of the public over the perceived incursion on their privacy by public bodies utilizing CCTV.

Notwithstanding the decision not to record or store any images as part of the TEMPS program, the City still deems it prudent to engage a broad range of stakeholders in order to provide a forum for dialog, identify specific concerns and to ensure that it is positioned to appropriately address those concerns.

Accordingly, the City is in the process of developing a Community Consultation Strategy on CCTV. This will define the parameters of the engagement process, outline the deliverables and the mechanism to be adopted, identify stakeholders and participants and set firm timelines for the process.

Amongst stakeholders who will be invited to participate will be the British Columbia Civil Liberties Association (BCCCLA), which has expressed ongoing concerns over the deployment of CCTV, and the Vancouver Public Space Network. Although the Vancouver Police Department is not a partner in the TEMPS System which forms the current submission, the City considers it appropriate to involve the VPD in this consultation process, given the possible deployment by the Vancouver Integrated Security Unit of CCTV in the City's entertainment district during the period of the 2010 Olympic and Paralympic Winter Games. To this end, senior representatives from the VPD will be invited to join in all discussions.

If possible, it is the intention to complete this process prior to the full implementation of the TEMPS System. The City is committed to a consultation process that is both broad and inclusive and solicits feedback from as wide and disparate a range of stakeholders as possible. By this process the City hopes to provide an airing of views that represent the full spectrum of opinion on CCTV and its deployment.

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

N/A

IF THERE IS NO PERSONAL INFORMATION INVOLVED, GO TO X. SIGNATURES.

7. SIGNATURES

PUBLIC BODY APPROVAL:

Kevin Wallinger, Director of Emergency Management
Program Manager (if appropriate)

Date

Paul Hancock
Manager of Information and Privacy/
FOIPP Coordinator

Date

Ministry Contact Responsible for
Systems Maintenance and Security
*[this signature only required for PIAs on new or existing
systems]*

Date

Assistant Deputy Minister or Equivalent

Date