

Privacy Impact Assessment of the closed-circuit video monitoring system

Institution: Coast Mountain College (CMTN)

Head of the Institution: Laurie Waye, President

Executive of the activity: Michael Doyle, Vice-President, Corporate Services

Name and description of the activity: Installation of Security Cameras placed within the entrances and exterior locations of the CMTN campuses located in Terrace, Prince Rupert, Hazelton, and Smithers, British Columbia.

Legal Authority for the activity

The use of security cameras is a common security safeguard used by provincial institutions to enhance physical security of staff, students, the public, and physical or information assets. For many institutions, including CMTN, personal information is collected under the authority of various Acts and/or policy-instruments, including FOIPPA, PIPEDA as required under the Policy on Government Security, the Directive on Security Management, including the associated mandatory procedures set out in Appendices A–J, the Public Service Employment Act (PSEA), the Criminal Code of Canada, among others.

Class of Records and Personal information bank (PIB)

Class of records : *Security*

PRN 931

PIB : *Security Video Surveillance and Temporary Visitor Access Control Logs and Access Badges*

Bank Number: PSU 907

Description of the project, initiative or change

The installation of access control through electronic door locks, access badges, and video surveillance was undertaken in 2017. CMTN made improvements to ensure detection and protection against unauthorized access to facilities and to mitigate threats to staff, students and public as well as to mitigate any threats to CMTN information and assets. These improvements are intended to strengthen the security of CMTN campuses located in Terrace, Prince Rupert, Hazelton, and Smithers, British Columbia, to increase monitoring capacity, manage ingress / egress access to CMTN campuses, and support effective response and communication.

One of the enhancements to the organization's physical security program was the implementation of Avigilon security camera equipment and associated software which transmits video captured to servers located at CMTN campuses. in Terrace, Prince Rupert, Hazelton, and Smithers, British Columbia. The data captured in Terrace is stored and saved on disk drives on an Avigilon server in the data center of the Waap Sam'n (House of Spruce) building. Data captured in Prince Rupert is stored and saved on disk drives on an Avigilon server in the Communications Room of the South Block Building. Data captured in Hazelton is stored and saved on disk drives on an Avigilon server in Communications Room 127. Data captured in Smithers is stored and saved on disk drives on an Avigilon server in the second floor Communications Room.

Security cameras are essential to CMTN security staff to assess and respond to security events as they occur, as well as to investigate incidents after the fact. Security cameras allow security personnel to clearly identify the individuals and circumstances involved. Some examples may include attempts at unauthorized access or theft of physical and information assets. High quality and readily available images will enable CMTN to more effectively monitor, detect and investigate threats.

Purpose of this Privacy Impact Assessment

In order to ensure that personal information collected via security cameras are appropriately managed, this Privacy Impact Assessment (PIA) examined the aspects of the CMTN business model and data-flows as well as the policies and procedures relating to the installation of security cameras to identify and evaluate any potential risks to personal information, and to recommend possible options for mitigating any privacy risks identified. It is to be noted that no auditory components are being captured by the cameras. This PIA was therefore limited to privacy impact based solely on the visual components.

In addition, cameras and recordings are not a tool used by managers or other senior personnel to monitor any of the day to day activities of those working for them and access is not given at any time to managers or others who are not designated by the Vice President of Corporate Services. Furthermore, cameras are only located within CMTN entrances, hallways, public areas, and exterior locations. Security cameras will not be located in private or secure areas such as washroom facilities, employee and senior management offices, meeting or board rooms, and active classrooms.

Risk identification and categorization

1.1 Type of program or activity

1.1 Type of program or activity	Level of risk to privacy
<p>Program or activity that does NOT involve a decision about an identifiable individual Personal information is used strictly for statistical/research or evaluations, including mailing lists where no decisions are made that have a direct impact on an identifiable individual. The Directive on PIA applies to administrative use of personal information. The Policy on Privacy Protection requires government institutions establish an institutional Privacy Protocol for addressing non-administrative uses of personal information.</p>	1
<p>Administration of Program / Activity and Services Personal information is used to make decisions that directly affect the individual (i.e. determining eligibility for programs, including authentication for accessing programs/services, administering program payments, overpayments, or support to clients, issuing or denial of permits/licenses, processing appeals, etc.).</p>	2
<p>Compliance / Regulatory investigations and enforcement Personal information is used for purposes of detecting fraud or investigating possible abuses within programs where the consequences are administrative in nature (i.e. fines, discontinuation of access, or deportation where national security and/or criminal enforcement is not an issue).</p>	3 X
<p>Criminal investigation and enforcement / National Security Personal information is used for investigations and enforcement in a criminal context (i.e. decisions may lead to criminal charges/sanctions or deportation for reasons of national security or criminal enforcement).</p>	4 X

Details

The use of security cameras allows CMTN to enhance the security of their facilities and of individuals and assets present in such facilities. Video surveillance is conducted in real time and recordings can be used to investigate past occurrences, security incidents or emergency situations. The use of security cameras allows CMTN to monitor and quantify the number of security incidents and the quality of response and to make any adjustments to their security program as needed. Information captured digitally may also be used to support and provide investigative evidence either internally or with municipal, provincial police forces or federal law enforcement.

1.2 Type of Personal Information Involved and Context

1.2 Type of Personal Information Involved and Context	Level of risk to privacy
<p>Only personal information, with no contextual sensitivities, collected directly from the individual or provided with the consent of the individuals for disclosure under an authorized program. For example: general licensing, or renewal of travel documents or identity documents.</p>	1 X
<p>Personal information, with no contextual sensitivities after the time of collection, provided by the individual with consent to also use personal information held by another source. For example: an application process with a requirement for independent verification of certain non-sensitive factual details.</p>	2
<p>Social Insurance Number, medical, financial or other sensitive personal information and/or the context surrounding the personal information is sensitive. Personal information of minors or incompetent individuals or involving a representative acting on behalf of the individual. For example: the personal information by association indirectly reveals information on the health, financial situation, religious or lifestyle choices of the individual.</p>	3
<p>Sensitive personal information, including detailed profiles, allegations or suspicions, bodily samples and/or the context surrounding the personal information is particularly sensitive. For example: the personal information that reveals intimate details on the health, financial situation, religious or lifestyle choices of the individual and which, by association, reveals similar details about other individuals, such as relatives.</p>	4

Details

The security cameras installed by CMTN will collect, monitor and record activity within public areas of CMTN premises. No auditory components will be captured by the cameras. Although there is a decreased sense of privacy in public spaces, CMTN has posted visible signage in its locations where the cameras are present. The signage ensures that individuals are given notice and made aware that their likeness and activities are being recorded by CMTN to ensure a safer and more secure environment.

1.3 Program or activity partners and private sector involvement

1.3 Program or activity partners and private sector involvement	Level of risk to privacy
Within the institution (among one or more programs within the same institution)	1 X
With other government institutions	2 X
With other institutions or a combination of federal, provincial or territorial, and municipal governments	3 X
Private sector organizations, international organizations or foreign governments	4 X

Details

Information will be stored and used primarily within CMTN but may be shared in the event of a serious security incident or concern, with other government institutions such as the RCMP, Provincial Police or Municipal Police, in order to provide further information regarding an individual's criminal activity or to corroborate on an incident. Other private entities may be provided access to security camera footage for the purposes of fulfilling their official job duties. This may include, for example, contractors that may be hired by CMTN to work in an official capacity.

1.4 Duration of the program or activity

1.4 Duration of the program or activity	Level of risk to privacy
One-time program or activity Typically involves offering a one-time support measure in the form of a grant payment as a social support mechanism.	1
Short-term program A program or an activity that supports a short-term goal with an established "sunset" date.	2
Long-term program Existing program that has been modified or is established with no clear "sunset".	3 X

Details

There is no end date for CMTN's security program or for the use of security cameras in CMTN campuses.

1.5 Program population

1.5 Program population	Level of risk to privacy
The program affects certain employees for internal administrative purposes.	1 X
The program affects all employees for internal administrative purposes.	2
The program affects certain individuals for external administrative purposes.	3 X
The program affects all individuals for external administrative purposes.	4

Details

Recorded information of suspicious behaviour or documenting potentially illegal activities may be used for investigative purposes. In the rare event that a CMTN employee or visitor is suspected of wrong-doing, information may be used by the Vice President of Corporate Services and/or to provide evidence in a criminal investigation regarding any wrong-doing. The monitors and recordings will not be used to monitor daily activities of employees and/or visitors to CMTN offices, and will be under the direct supervision of authorized CMTN personnel. Video footage may be used by CMTN as evidence to support an internal investigation, or to provide information to law enforcement agencies to use as evidence in a criminal investigation.

1.6 Technology

Security cameras are positioned both inside and outside all four of CMTN's main campuses to capture ingress/egress traffic to CMTN buildings located in Terrace, Prince Rupert, Hazelton and Smithers, British Columbia. Cameras have been programmed to black out all instructional areas. For example, the yoga room camera when used as a classroom has been blacked out.

The recorded data is stored on a server residing on a separate Virtual Local Area Network (VLAN) of the CMTN network. Recorded data saved to servers is deleted after the device capacity is reached. Recorded data may be viewed remotely through a Virtual Desktop Interface (VDI) or Virtual Private Network (VPN) connection. For example, in the event of an incident, authorized CMTN staff can view recorded data remotely to view the potential incident. In the event of a security concern or incident (such as a break in, or an entrance door being unusually opened), the images may be viewed and used by the Vice President of Corporate Services to provide evidence in the support of internal or law enforcement agency investigations.

1.7 Data transmission

No data will be transmitted by CMTN except in the event that the data contains evidence to support an internal investigation or to provide information to law enforcement agencies to use as evidence in a criminal investigation.

1.8 Impact on individuals in the event of a breach

Given that the information captured via security cameras does not reveal any personal information (such as name, contact information, financial or medical information, etc.), and no audio recordings will be captured via the cameras, the impact to individuals in the event of a privacy breach is considered low, i.e. potential loss of privacy resulting in inconvenience to the individual.

1.9 Institutional impact in the event of a breach

In the event of an unauthorized access or disclosure of security camera footage, which includes the likeness of an individual, CMTN could potentially suffer embarrassment, negative media attention and damage to its reputation.

Recommendations

Issue	Concern	Risk level	Mitigation measure
Collection of personal information - CMTN staff, student and visitor privacy	Employees and visitors may be concerned that Information collected may be used inappropriately or that work activity is being monitored.	Low	Communication from Senior Management to ensure: <ul style="list-style-type: none"> • employees and visitors are aware that private areas are not monitored • management are not able to access images to monitor employee and visitor activities; and • that a Policy and Procedures governing the use of security cameras is in place; and • employees and visitors accessing CMTN premises are aware of monitoring through the use of signage.
Use and disclosure of information	CMTN staff, student and visitors may not be aware of how the data may be used.	Low	CMTN's Security Camera Policy regarding how data is accessed and used should be completed.