



Royal Roads University

Privacy Impact Assessment

Langford Campus, Phase I Construction
PIA# 2022-12

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PART 1: GENERAL INFORMATION

PIA Drafter	C. Levesque, AVP Ops & Resilience [in consultation with Durwest Construction Management Ltd.]
Business unit:	Ops & Resilience
Your name and title:	
Your work phone:	X2503
Your email:	Carolyn.levesque@royalroads.ca
Initiative	West Shore Initiative – Phase I Development
Initiative Lead name and title:	As above
Initiative Lead phone:	As above
Initiative Lead email:	



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GENERAL INFORMATION ABOUT THE PIA:

Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.
This initiative is a data-linking program under FOIPPA No
Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.
This initiative is a common or integrated program or activity No
Related PIAs, if any: N/A

1. What is the initiative?

BC Government approval to proceed with the first phase of development on the new Langford post-secondary campus in Langford was confirmed on August 3, 2022.

As lead on the construction project for the build of the first building on the campus, RRU is working with the contracted project/construction manager (Durwest Construction Management) to have a time-lapse camera installed on the construction site to record construction progress. The recording will be of the quality required to use for archival and historical purposes and may be reviewed in the event of any security issue that may arise on site during construction.

Sub-contractors engaged during the construction process as well as any other teams / crews and Royal Roads University staff on site during the project will be aware of the camera's presence through posted notices.



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2. What is the scope of the PIA?

This PIA is related only to the duration of the construction of the first building on the new Langford campus, expected to open in September 2024.

3. What are the data or information elements involved in your initiative?

Digital images of the construction process which will include workers and Royal Roads University staff on site.

3.1 Did you list personal information in question 3?

Yes

4. How will you reduce the risk of unintentionally collecting personal information?

Unintentional collection of personal information is not anticipated. Cameras will be configured to capture activity within a secured construction site that is posted with signs advising that video surveillance is in effect.

PART 2: COLLECTION, USE AND DISCLOSURE

5. Collection, use and disclosure



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Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FOIPPA authority	Other legal authority
Step 1: Capture video images of the site which may include images of construction workers and Royal Roads University staff employed on the site.	Collection	s.26(c) s.26 (d) (i) (ii)	
Step 2: Extract suitable images for archival / historical purposes. Every effort will be made to ensure that video images which identify a worker / worker are not included in these image captures, or that faces are blurred.	Use	s.32(a)	
Step 3: In the event that the system requires repair, approved technicians will be provided access to the system which may include access to the video images stored within.	Disclosure	s.33 (2) (t)(i) (ii)	
Step 4: In the event of criminal activity on the site, provide video images to law enforcement to aid in the investigation.	Disclosure	s.33 (3) (d)(i) (ii)	

6. Collection Notice

You are entering an area where Closed Circuit Television is in operation. Images are being recorded for the purposes of crime prevention, personal safety and are being retained for archival and historical purposes. For more information regarding the collection and use of your



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personal information please contact Royal Road's University's Privacy Officer via regular email privacyofficer@royalroads.ca

Crews on site, Royal Roads University staff on site and the general public will be advised of the presence of a video camera through relevant signage on the construction site fence.

PART 3: STORING PERSONAL INFORMATION

7. Is any personal information stored outside of Canada?

No

8. Does your initiative involve sensitive personal information?

No

9. Where are you storing the personal information involved in your initiative?

Section 15(1)(I), Section 21

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

Not applicable.



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Outcome of Part 4

The outcome of Part 4 will be a **risk-based decision made by the head of the public body on whether to proceed with the initiative**, with consideration of the risks and risk responses, including consideration of the outstanding risks in question 17. **The public body may document the decision in an appropriate format as determined by the head of the public body or by using this PIA template.**

PART 5: SECURITY OF PERSONAL INFORMATION

In Part 5 you will share information about the privacy aspect of securing personal information. People, organizations or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical and technical environments.

15. Does your initiative involve digital tools, databases or information systems?

Yes.

15.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

No.



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16. What technical and physical security do you have in place to protect personal information?

Section 15(1)(l), Section 21

17. Controlling and tracking access

Please check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.

Strategy	
We only allow employees in certain roles access to information	✓
Employees that need standing or recurring access to personal information must be approved by executive lead	✓
We use audit logs to see who accesses a file and when	✓
If the Customer notices a Video Systems failure, then the Customer should notify Six Technologies Victoria Inc. as soon as practicably possible. Upon	✓



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Strategy		
notification or detection of a Video Systems failure, Six Technologies Victoria Inc. will dispatch a Service Technician as soon as possible.		
In the event that workers or site staff required access to the area of Video Monitoring during standard monitoring periods, then the Customer or its authorised personnel are required to notify Six Technologies Victoria Inc., its relevant partners, and/or its Video Monitoring Station either by phone or email.		✓
Describe any additional controls:		

PART 6: ACCURACY, CORRECTION AND RETENTION

18. How will you make sure that the personal information is accurate and complete?

Not applicable.

19. Requests for correction

FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

19.1 Do you have a process in place to correct personal information?

Not for this initiative.



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19.2 Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?

Yes.

19.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?

Yes.

20. Does your initiative use personal information to make decisions that directly affect an individual?

No

21. Do you have an information schedule in place related to personal information used to make a decision?

Yes

Royal Roads has a detailed records and retention schedule that may be viewed [HERE](#). A review of the appropriate section in this schedule confirms that personal information used to make a decision directly affecting an individual (is / is not) retained for a minimum of one year. (edit as required.)



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PART 7: AGREEMENTS AND INFORMATION BANKS

22. Does your initiative involve an [information sharing agreement](#)?

No

23. Will your initiative result in a personal information bank?

No

PART 8: ADDITIONAL RISKS

Part 8 asks that you reflect on the risks to personal information in your initiative and list any risks that have not already been addressed by the questions in the template.

24. **Risk response**

Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.

Possible risk	Response
Risk 1: Theft of the video storage	Section 15(1)(l), Section 21
Risk 2: Technical fault resulting in loss of the video data	Section 15(1)(l), Section 21



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PART 9: SIGNATURES

Privacy Office Comments

The primary purpose of this video surveillance system is to record, for historical purposes, the activities related to the construction of the West Shore Campus. Given that this will be an active construction site it is inevitable that video images of those working on the site will be captured as part of the process. This PIA documents the intent of the initiative and the safeguards in place to protect the personal information captured as part of the initiative.

Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.

Signing below constitutes a recommendation of this PIA to the RRU VP CFO.		
Signature:		Date: <u>1/3/2023</u>
Name:	Don Devenney	

Program Area Comments:

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with the Privacy Office and if necessary, complete a PIA update.



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Program Area Signatures

Role	Name / Signature	Date signed
Initiative lead	Signature: Name: Per below	Date: <u><DATE></u>
AVP, Operations & Resilience	Signature: Name: Carolyn Levesque Carolyn Levesque	Date: <u>1/23/2003</u>
Head of public body, or designate Only required if personal information is involved	Signature: Name: <ENTER FULL NAME>	Date: <u><DATE></u>