



March 22, 2018

Video Monitoring System Privacy Impact Assessment

Site Name: Vancouver Community College

Site Location: 250 West Pender Vancouver BC V6B 1S9

Program Representative: Director Safety / Security and Risk Management Surinder Aulakh

Contact Information: 604.871.7000

Justification for Video System Installation	
Criteria	Comments
Describe the personal information that will be captured by the system	<p>Vancouver Community College (VCC) Downtown Campus is a 10-story college with approximately 366,000 square feet of space, constructed in 1947 with additions in 1960 (Dunsmuir Building) and 1982 (Tower Building). The College's main entrance is located at 250 West Pender Street, on the south side of West Pender Street between Hamilton Street and Cambie Street in addition there are 3 below-ground levels.</p> <p>The personal information captured by the video surveillance system at the Vancouver Community College's Downtown location includes identifiable images of individuals entering, exiting and within various interior areas throughout the facility. The collection of the personal information collected by the Vancouver Community College's CCTV is limited to that which is necessary for the purposes of security and safety with all information is collected by fair and lawful means.</p> <p>There is video surveillance located on the interior and exterior perimeters as well as in the secure parking areas for the purposes of preventing unauthorized after-hours entry, theft, or threat to personal safety and damage to property. The system will capture images of individuals including at;</p> <ol style="list-style-type: none">1. Campus Interiors2. Campus Exteriors3. Parking Areas4. Administration Towers (floors 1 thru 9)



The Vancouver Community College campus is in Vancouver's downtown district bordering the City's Downtown Eastside to the north. The Downtown Eastside has struggled with many complex challenges including drug use, crime, homelessness, mental illness, housing issues, unemployment, and loss of businesses in the community. This combined with the proximity to mass transit with ease of access to the public, puts the site at particular risk from unauthorized entries and opportunistic crimes. A regular gathering spot for protests and demonstrations, Victory Square lawn hosts gatherings from time to time and is mere steps from the Pender Street entrance of the VCC Downtown Campus.

Urban buildings can be targets for many security breaches. The building has many people in an environment where movement is not restricted by elevators or stairways. The sheer size of this site may also slow down the response from security staff. The CCTV Cameras at VCC Downtown Campus assist security personnel with the ability to view live feeds from multiple entrances at the College.

The washrooms of the campus are frequently used by transient individuals, while the exterior landscape provides some concealment for homeless persons. There is also daily evidence left behind, in the form of needles and alcohol swabs, of intravenous drug users that are also using the concealment of the bushes.

There are **s. 15(1)(l)** cameras utilized for the interior of the campus and an additional **s. 15(1)(l)** cameras used on the exterior of the campus to monitor the access areas. There are no cameras in areas where people have a heightened expectation of privacy, such as change rooms, washrooms, or into windows

*For complete Vancouver Community College Vulnerability Assessment Detail
See - **LGRMG VCC Vulnerability Assessment September 2017 v2.pdf***

Justification for Video System Installation

Criteria	Comments
Is system directly related to and necessary for a security program or activity, such as maintaining the safety or security of individuals, assets or property or to maintain public safety?	<p>Yes. The system is necessary for VCC Downtown Campus security program to maintain the safety and security of students, employees, information, and assets within the College.</p> <p>The main purposes for which the personal information is collected by the Security CCTV System is;</p> <ul style="list-style-type: none">• Facility Management – General safety, security and site access management• Incident Management – Observation of activity and incidents as they happen, providing the ability to coordinate effective, safe response in a manner sufficient for the type of incident.• Deterrence – The cameras and corresponding signage are employed in an overt manner and provide a visible deterrent• Incident Investigation and Evidence – The system records and retains images before, during and after an incident for investigative purposes and for evidentiary value• Appropriate Security Detection – To ensure an appropriate response to incidents on the campus• This facility has a high volume of student traffic during operational periods. The CCTV assists with security’s ability to identify any suspicious persons or trespassers and initiate procedures to mitigate any associated risk.• Maintaining the safety or security of individuals, assets or property and to maintain public safety

Justification for Video System Installation

Criteria	Comments
<p>Have less intrusive security measures been considered that will meet the requirements of the program or activity?</p>	<p>Yes. The initial security measures were determined to be insufficient to fulfill the requirements of the safety and security program at the VCC Downtown Campus.</p> <p><i>See - LGRMG VCC Vulnerability Assessment September 2017 v2.pdf</i></p> <p>VCC Downtown Campus has documented and verifiable evidence of daily incidents which include; unauthorized access, threatening communication, trespass, vandalism, person removals, hazard identification, needle sweeps, etc.</p> <p>There are areas of the VCC Downtown Campus that require CCTV monitoring to observe and prevent unauthorized entry after hours and detection of incidents taking place. The camera system is used as part of an integrated protection system for safety and security which includes;</p> <ol style="list-style-type: none"> 1) Random perimeter patrols by dedicated site Security Personnel 2) Electronic Access Controls (Proximity Readers) 3) Credentialing (Photo ID on Proximity Reader Cards) 4) CCTV Surveillance (For security / safety purposes) 5) Key Controls 6) Conspicuous display of various security signage throughout the facility

Rationale for Video System Installation

Criteria	Comments
<p>What problem is the system expected to address?</p>	<p>Less intrusive measures have been ineffective in stopping individual's intent attempting to steal or vandalize property or victimizing students and staff. Security personnel cannot be everywhere at all times so the CCTV System is required to supplement the other countermeasures at the site.</p> <p>Utilizing the CCTV system, is part of an integrated strategy, and can assist Security Personnel to <u>detect</u> and <u>respond</u> to potential areas of concern on the Campus.</p>
<p>How will the system address this problem?</p>	<p>The system will address these problems by the following means;</p> <ul style="list-style-type: none"> ▪ In addition to the other security measures used at the VCC Downtown Campus, the system will provide security personnel with general surveillance of the site to ensure safety and security ▪ The system provides views of the access and egress points of the VCC Downtown Campus staff entrances to ensure access control ▪ The system will provide views of uncontrolled access areas of the VCC Downtown Campus site ▪ The system provides an investigative capability should an event take place, with the ability to view and retrieve stored images for authorities ▪ The system cameras and associated signage can provide some deterrence to mitigate incidents and undesirable activity <p>VCC Downtown Campus has posted clearly written signs prominently displayed at the perimeter of surveillance, so the public has sufficient warning that video or audio surveillance is or may be in operation before entering any area under surveillance. The notification states: the purpose for the collection, the legal authority for the collection, and the title, business address and business telephone number of an employee of Vancouver Community College who can answer any queries. The signage notifies individuals when they are collecting personal information and implies knowledge and consent from the individual before entering the facility.</p>
<p>Why will less intrusive security measures not be effective?</p>	<p>VCC Downtown Campus has documented and verifiable evidence of daily incidents which include; unauthorized access, threatening communication, person removals, hazard identification, needle sweeps, etc. The CCTV</p>

	<p>system at VCC Downtown Campus is necessary for a security breach to be detected quickly, then the likelihood of the responders' being capable of mitigating the event, is even greater.</p>
<p>How will the benefits outweigh any privacy invasion resulting from use of the system?</p>	<p>The benefits of CCTV fall into 2 categories:</p> <p>1) Protection of VCC assets (People, Property, Information)</p> <p>(Assets include: people, property, information, and reputation)</p> <ul style="list-style-type: none"> a) The CCTV provides protection for VCC Downtown Staff and Security personnel by creating customer and / or visitor accountability for behavior due to being under surveillance. The psychology of surveillance can cause individuals to modify their unacceptable behavior, which directly reduces the number of incidents of physical and/or verbal abuse. b) Provides an ability to view the sites access and egress points to better ensure staff and students safety and security <p>2) Assists in the mitigation of risk</p> <ul style="list-style-type: none"> a) It will assist VCC Downtown Campus in the identification of risks that they may be exposed to, and in-turn mitigate those risks b) Monitoring of the CCTV cameras enables staff to dispatch the appropriate resources which may include: Mobile Security, Police, maintenance staff etc. The more efficient the response ultimately, less damage to property and less risk to employees / students. c) It can assist Occupational Health and Safety investigators collect information to maximize recommendations that will mitigate future risks. d) It can assist Police investigators to identify how a crime happened and identify who was involved, which can result in prosecution. <p>Collection, use and/or disclosure of personal information will be undertaken in the least privacy invasive manner possible. Minimizing the number of data elements collected, limiting access to the data and short retention periods reduces the privacy invasive impact of the CCTV at VCC Downtown Campus.</p> <p>See Page 13 - Disclosure Limitations</p>

Terms of Use for Video System Installation

Criteria	Comments
Position responsible for video system and name of incumbent	<p>The individuals who are accountable for the organization’s compliance with the CCTV collection of personal information are;</p> <p>Surinder Aulakh – VCC Security Director (Privacy Officer)</p>
Location of cameras	<p>There are s. 15(1)(l) cameras utilized for the interior of the campus and an additional s. 15(1)(l) cameras used on the exterior of the campus to monitor the access areas. The control system and main computer console reside in the first-floor Security Office, which is restricted access, while the computer server is located in the locked room within the restricted access IT Room s. 15(1)(l)</p> <p><i>See - Appendix “A” VCC Downtown Campus Camera Inventory</i></p>
Areas monitored by cameras	<p>The Security Camera system at VCC Downtown Campus is a wired and fiber optic cable ethernet system used for the surveillance of perimeter property, people accesses, and vehicle entrances</p> <p>Please refer to Appendix “A” CCTV Security Surveillance at VCC Downtown Campus Site for the location of each camera, including the camera’s name, location and brief description of view-angle.</p>
Location where video feed will be viewed	<p>Viewing computer monitors are also installed in three locations</p> <ol style="list-style-type: none"> 1) s. 15(1)(l) 2) s. 15(1)(l) 3) VCC Main Floor Security Office <p>Footage from the security cameras is continuously streamed to a Network Video Recording (NVR) and is stored for thirty days. Viewing of the stored security video monitoring footage is limited only to select Management Staff (listed above) and individuals deemed by VCC Campus Privacy Officer as” Authorized Users”.</p> <p>Authorized Users of the system will be trained and fully aware of the rules respecting privacy as outlined by the Office of the Information Privacy Commissioner of British Columbia.</p>

<p>Restrictions on camera position or field of view (e.g. tilt, pan, zoom)</p>	<ul style="list-style-type: none"> ▪ Vancouver Community College, in agreements with labor unions, limits the placement of cameras to certain locations on the VCC Campus interior ▪ s. 15(1)(l) ▪ Security Personnel intermittently view cameras throughout the day however the cameras are not continuously monitored. ▪ Security Office monitor displaying camera views is in a restricted access area and cannot be viewed by the general public <p>See - Appendix "A" VCC Downtown Campus Camera Inventory</p>
<p>Hours of operation of Vancouver Community College</p>	<p>The Vancouver Community College's contracted security personnel at times monitors the video images on a computer monitor displaying multiple real time images at the Security Station. Footage from the security cameras is continuously streamed to a Network Video Recorder and is stored for thirty days. Viewing access to the stored security video monitoring footage is limited only to select "Authorized Users".</p> <p>The building's normal operating hours are 0700 - 2300 hrs. (Monday - Friday) and 0800 – 1600 hrs. (Saturday's). Security Personnel remain on site 24 / 7 / 365 days a year</p> <p>The collection of personal information is limited to that which is necessary for the purposes identified by Vancouver Community College. Information is collected by fair and lawful means.</p> <p>Personal information captured that is requested to be kept for investigation or evidentiary value, shall be retained only as long as necessary for the fulfillment of those purposes.</p> <p>VCC Downtown Campus makes readily available to individuals, specific information about its policies and practices relating to the management of personal information captured by the CCTV System.</p>

<p>Safeguards in place at Vancouver Community College</p>	<p>Vancouver Community College downtown campus protects personal information collected by CCTV by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure and disposal of personal information.</p> <ol style="list-style-type: none"> 1) Administrative Safeguards – Vancouver Community College administrative safeguards include policies, privacy training, Authorized User consent forms, Law Enforcement release forms, Manager Release Forms, Surveillance Logs 2) Technical Safeguards – Vancouver Community College Downtown Campus technical safeguards include passwords and user ID, two factor authentications, and firewalls 3) Physical Safeguards - Vancouver Community College Downtown Campus physical safeguards include; some electronic access controls, key locks, door astragals, video cameras, recent LED lighting upgrade, and security officers 4) Auditing – Vancouver Community College Downtown Campus auditing includes audit logs, records of user activity, proactive and focused third party audit capacity <p>Security of Information</p> <p>Information collected using a CCTV Monitoring System must be kept secure as follows:</p> <ol style="list-style-type: none"> a) Only VCC Authorized Users or VCC service providers authorized by the VCC Privacy Officer may operate the Security CCTV System. b) Areas where the video feed from the CCTV System is monitored is not accessible to the public or unauthorized employees c) Security arrangements are in place to prevent unauthorized monitoring, interception or interference with transmissions from the Security CCTV Monitoring System. d) Information stored on media or other removable storage devices must be dated, labeled and stored securely in a locked container located in a controlled access area (security office). Information stored on a computer or server must be protected in accordance with VCC policies. e) Any agreement between the VCC and a security service provider involving work on a CCTV Monitoring System must state that any and all records created, dealt with or arising from, the delivery of a video monitoring program remain at all times under the VCC control and subject to privacy legislation of British Columbia Personal Information Protection Act <i>PIPA</i>) and other applicable statutes. f) VCC employees and service providers responsible for the installation or operation of a CCTV System must review and comply with 1) VCC Policies 2) British Columbia Personal Information Protection Act (<i>PIPA</i>) and 3) sign the “Authorized User Agreement” to confirm their agreement
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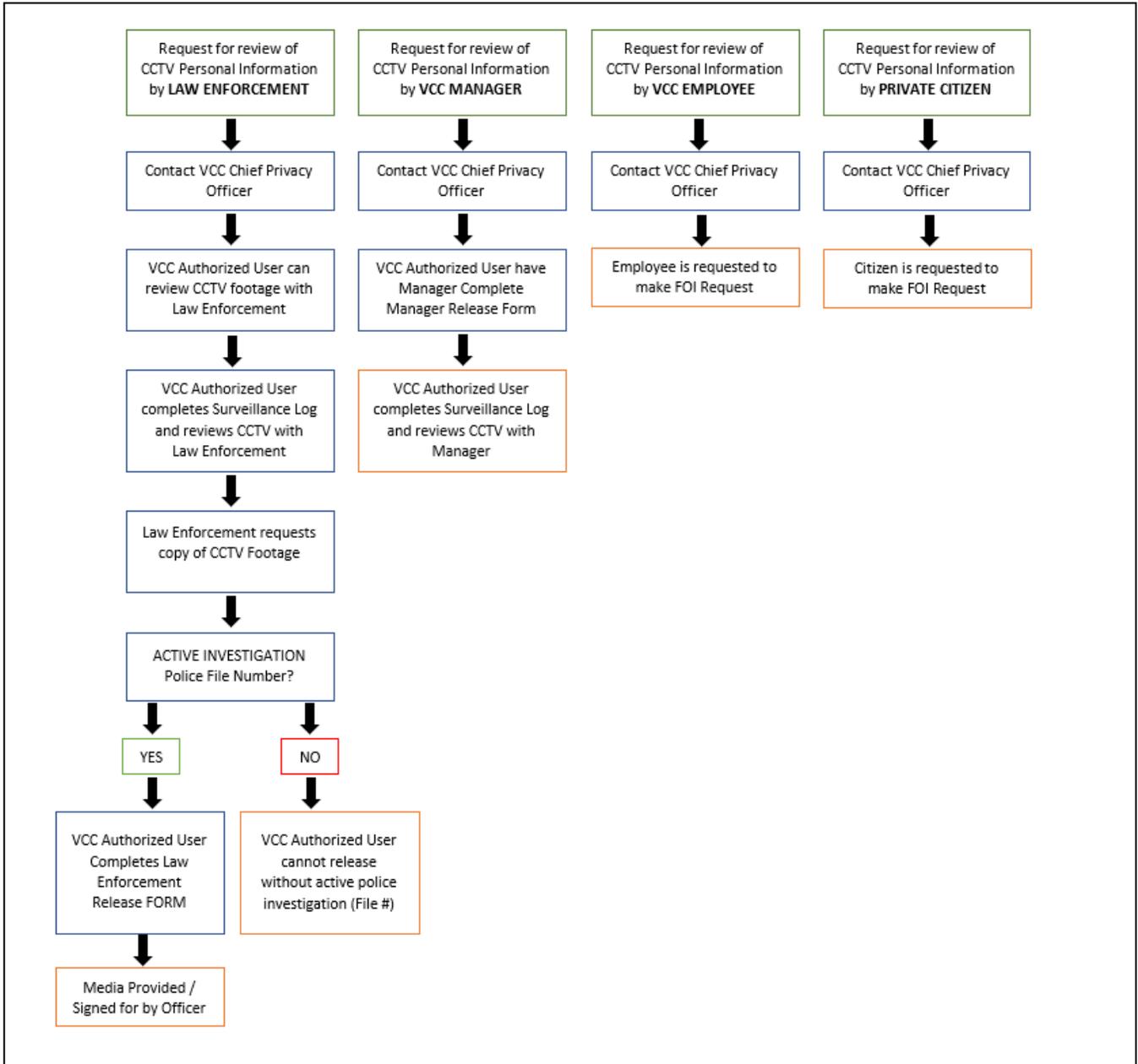
<p>Is the system actively monitored?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>The Security CCTV system is occasionally actively monitored by Security Personnel and at various times by the VCC Privacy Officer and VCC CEO. There are times when the Security Personnel leave the Security Office to attend to other responsibilities. The Security CCTV system would not be monitored at these times.</p>
<p>Video Recordings</p>	
<p>Is the video recorded?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Footage from the security cameras is continuously streamed to a Network Video Recorder (NVR) and is stored for thirty days. Viewing of the stored security video monitoring footage is limited only to select "Authorized Users, and occasionally the VCC Downtown Campus Privacy Officer, and the VCC Downtown Campus CEO</p>
<p>Describe any restrictions on recording (dates, times, circumstances).</p>	<p>Recorded images will only be used or disclosed as per the following requirements:</p> <ul style="list-style-type: none"> • For the purposes of maintaining the safety or security of individuals, assets and Vancouver Community College property, • As otherwise authorized by law.
<p>Describe the circumstances and conditions under which recordings would be viewed.</p>	<p>The recordings will be reviewed by "Authorized Users" for incident investigation requirements or specific requests (i.e. Police Investigations).</p> <p>Public requests for personal information will be directed to VCC Privacy Officer Surinder Aulakh and follow the Freedom of Information request processes.</p> <p>See page 13 - Disclosure Limitations</p>

<p>Describe the location and security of recorded data.</p>	<p>The video monitoring system’s hard-disk drive and system server will be located inside locked room [REDACTED] restricted to authorized personnel only. The location is within restricted “Employee Access Only” area. Room [REDACTED] is protected with a key lock and has an audible notifier to alert staff when persons enters the room. Information stored on the system will be dated, labeled and stored securely in the system server where access to it (the system-server or hard-disk drive) is via secure password, known only to the individual Authorized Users.</p> <p>Authorization = Strong Password for log in to network</p> <p>Authentication = Permission based on Authorized User role</p> <p>Personal information is protected by security safeguards appropriate to the sensitivity of the information.</p> <p>[REDACTED] and the [REDACTED] Offices are locked and located within a Authorized Persons Only areas. Computers located in these Offices are protected by two factor authentications.</p>
<p>Specify the applicable classification, and the retention and disposition schedule.</p>	<p>Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.</p>
<p>Describe how the records will be destroyed.</p>	<p>Video footage will be stored within the video monitoring system’s hard-disk drive Network Video Recording system for a period of thirty (30) days before the system overwrites over old footage. Any personal information recorded on external media and no longer required for evidentiary value shall be destroyed / purged within thirty days.</p>
<p>Describe the content of the system logs</p>	<p>For each CCTV system that collects or may collect personal information, the log will be kept to record all instances of personal information being viewed in a CCTV video recording, the start and end locations viewed in the recording, the date and time of viewing, and identities of those present while viewing.</p>



VCC Downtown Compliance Documentation	
DOCUMENTATION	<p>Personal information is not to be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Any disclosure of video surveillance recordings outside VCC Downtown Campus should be limited to that authorized by the applicable British Columbia privacy law Personal Information Protection Act (PIPA) and will be documented. Access to personal information will be limited to those employees whose job responsibilities require that they access the personal information (Authorized Users).</p> <p>VCC Downtown Campus protects the confidentiality of personal information, and the privacy of the individual who are the subject of that information. VCC Downtown Campus uses all the documentation listed below to ensure compliance with privacy legislation and is committed to protecting the information from theft, loss and unauthorized access to, use of, disclosure, copying or disposal of the information.</p>
Compliant Signage	<ul style="list-style-type: none"> ▪ Informs individuals that video surveillance is taking place on Vancouver Community College Downtown Campus for Safety and Security
VCC Authorized Users Forms	<ul style="list-style-type: none"> ▪ All “authorized users” are fully aware of the purposes of the system, fully trained in rules protecting privacy, and will comply with PIPA
VCC Law Enforcement Release Forms	<ul style="list-style-type: none"> ▪ Information recorded by a CCTV System may only be used or disclosed for the purpose for which it was collected or as otherwise authorized by law
VCC Manager Release Forms	<ul style="list-style-type: none"> ▪ Information collected through video or audio surveillance should not be used beyond the original purpose for the collection and any other purpose that is demonstrably consistent with this purpose.
VCC Authorized User Surveillance Logs	<ul style="list-style-type: none"> ▪ Logs should be kept of all instances of access to, and use of, recorded material
VCC CCTV Element Specifications	<ul style="list-style-type: none"> ▪ Support materials for changes to PIA and support for PIA Amendment documentation
VCC Recorder Element Specifications	<ul style="list-style-type: none"> ▪ Ensures VCC has all information for security maintenance life cycle management

Disclosure Limitations



This privacy impact assessment is a tool to identify risks and mitigation strategies associated with the use of personal information. It is an essential tool for ensuring compliance with the privacy requirements and is a building block of a good privacy management program at Vancouver Community College Downtown Campus.

It is essential to protect the confidentiality of personal information, and the privacy of the individual who is the subject of that information. This includes protecting the information from theft, loss and unauthorized access to, use of, disclosure, copying or disposal of the information.

DOCUMENT VERSION, REVIEW, and APPROVAL HISTORY

VERSION	AUTHOR	NATURE OF CHANGES	DATE
VCC PIA March 2018	M. McCafferty	Initial Compliance PIA	March 22, 2018

DESCRIPTION

1) DESCRIPTION OF THE INITIATIVE

The Privacy Impact Assessment is being undertaken to ensure Vancouver Community College is protecting the personal information, and the privacy of individuals who are being captured on the Security Cameras at Vancouver Community College site.

2) SCOPE OF THIS PIA

The Privacy Impact Assessment will cover the cameras installed and used for security purposes at the Vancouver Community College Downtown Campus.

3) ELEMENTS OF INFORMATION

The information collected by the security cameras at the site includes identifiable images of employee’s students, contractors, delivery personnel and visitors to the Vancouver Community College Downtown Campus.

4) DESCRIPTION OF INFORMATION FLOW

Access to personal information will be limited to those employees whose job responsibilities require that they access the personal information.



LIONS GATE
RISK MANAGEMENT GROUP

CONFIDENTIAL

PREPARED BY:

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March 22, 2018

Vancouver Community College Campus

250 West Pender Street Vancouver, BC

CAMERA INVENTORY

APPENDIX "A"

VCC Level 1

s. 15(1)(l)



VCC Level 2

s. 15(1)(l)



VCC Level 3

s. 15(1)(l)



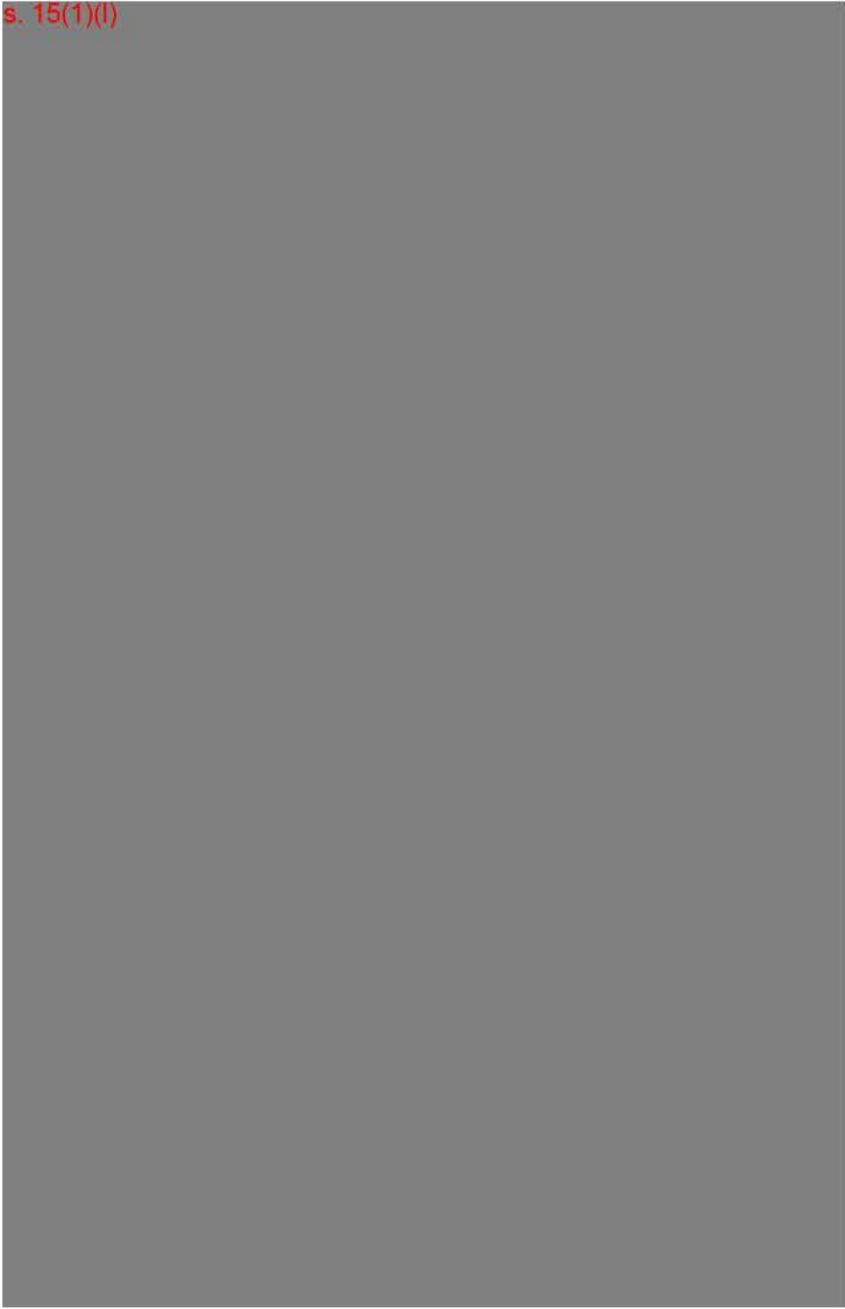
VCC Level 4 & 5

s. 15(1)(l)



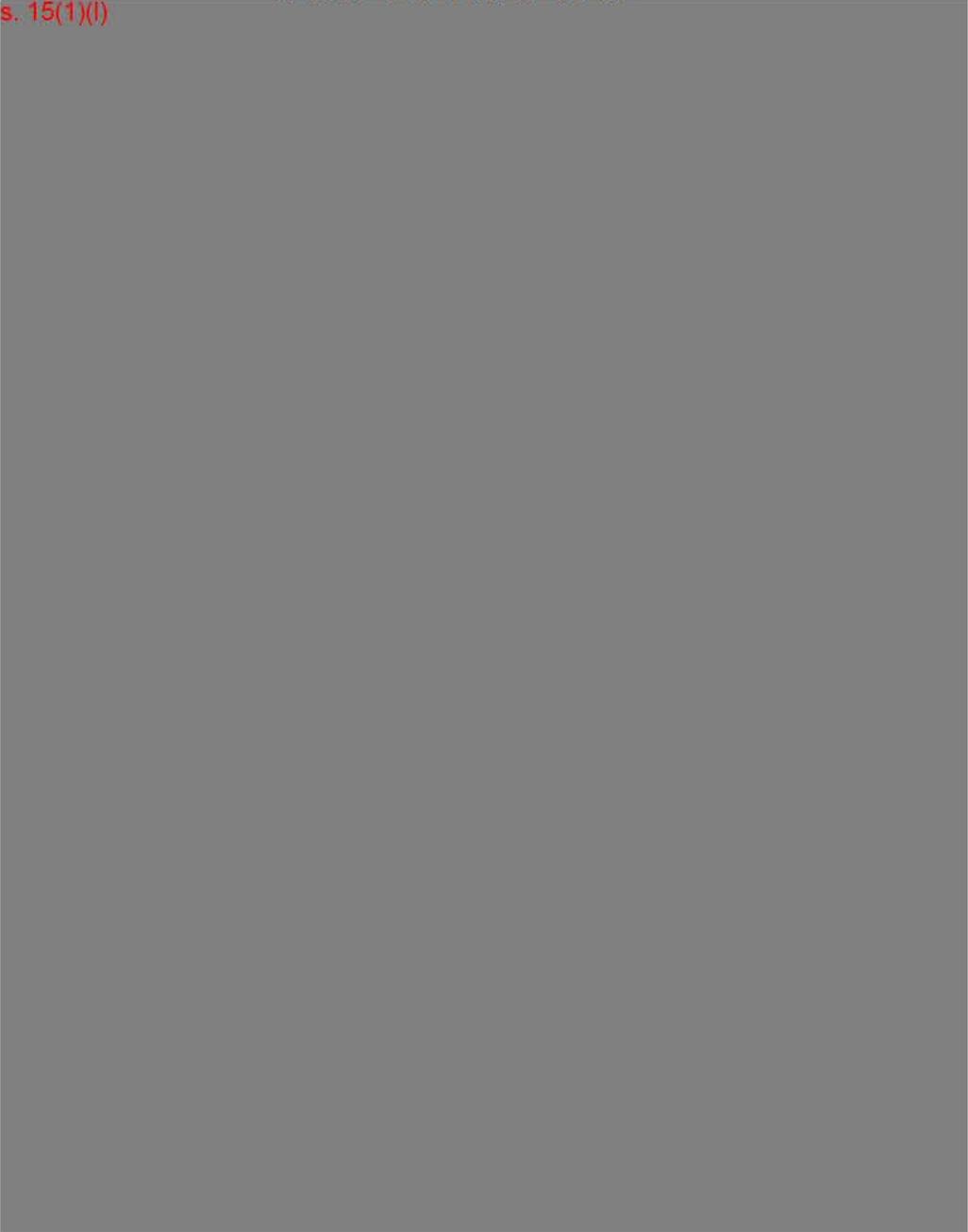
VCC Level 6 & 7

s. 15(1)(l)



VCC Level 8 & 9

s. 15(1)(l)



VLC Exterior

s. 15(1)(l)



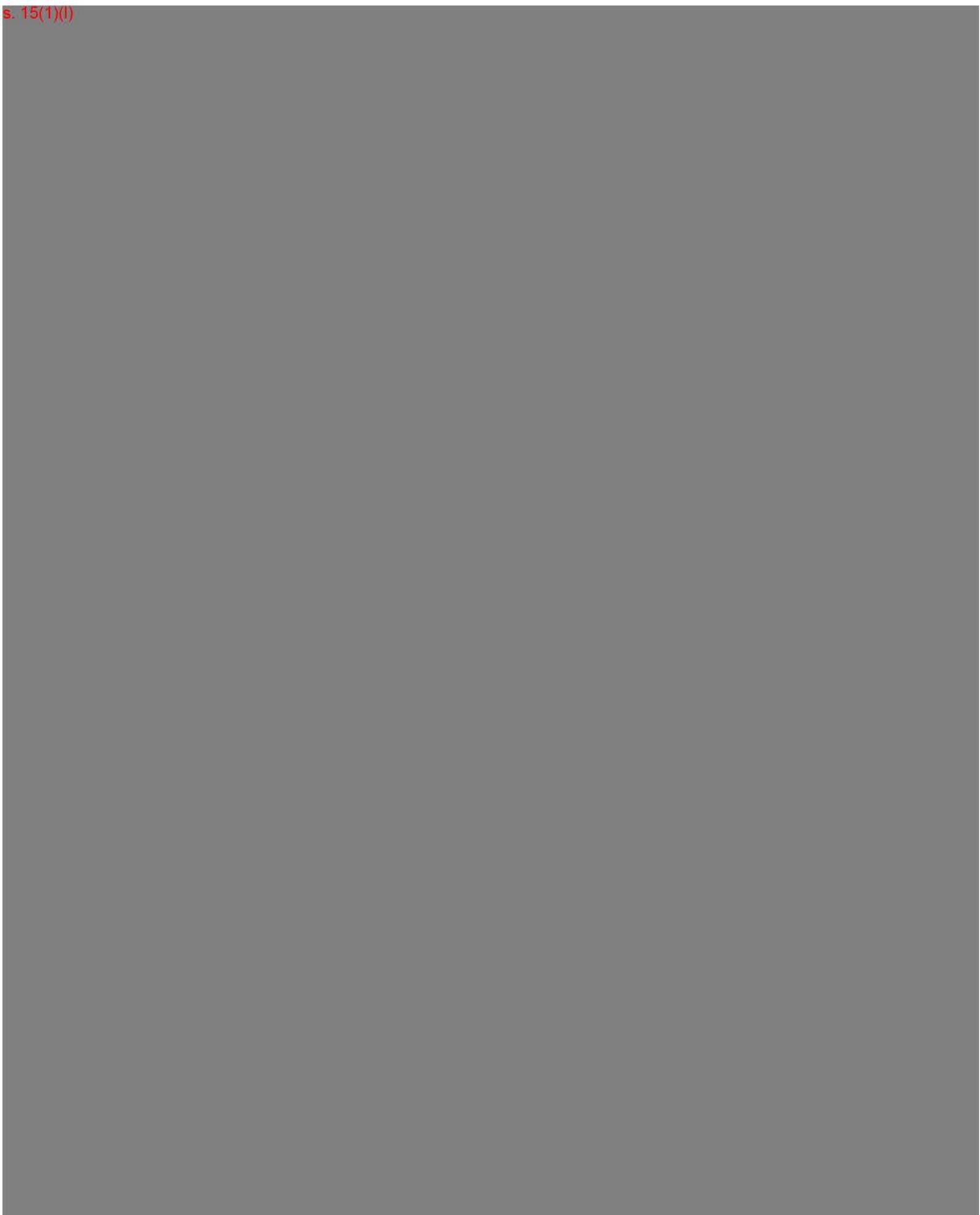
Totals by Element Type

s. 15(1)(l)

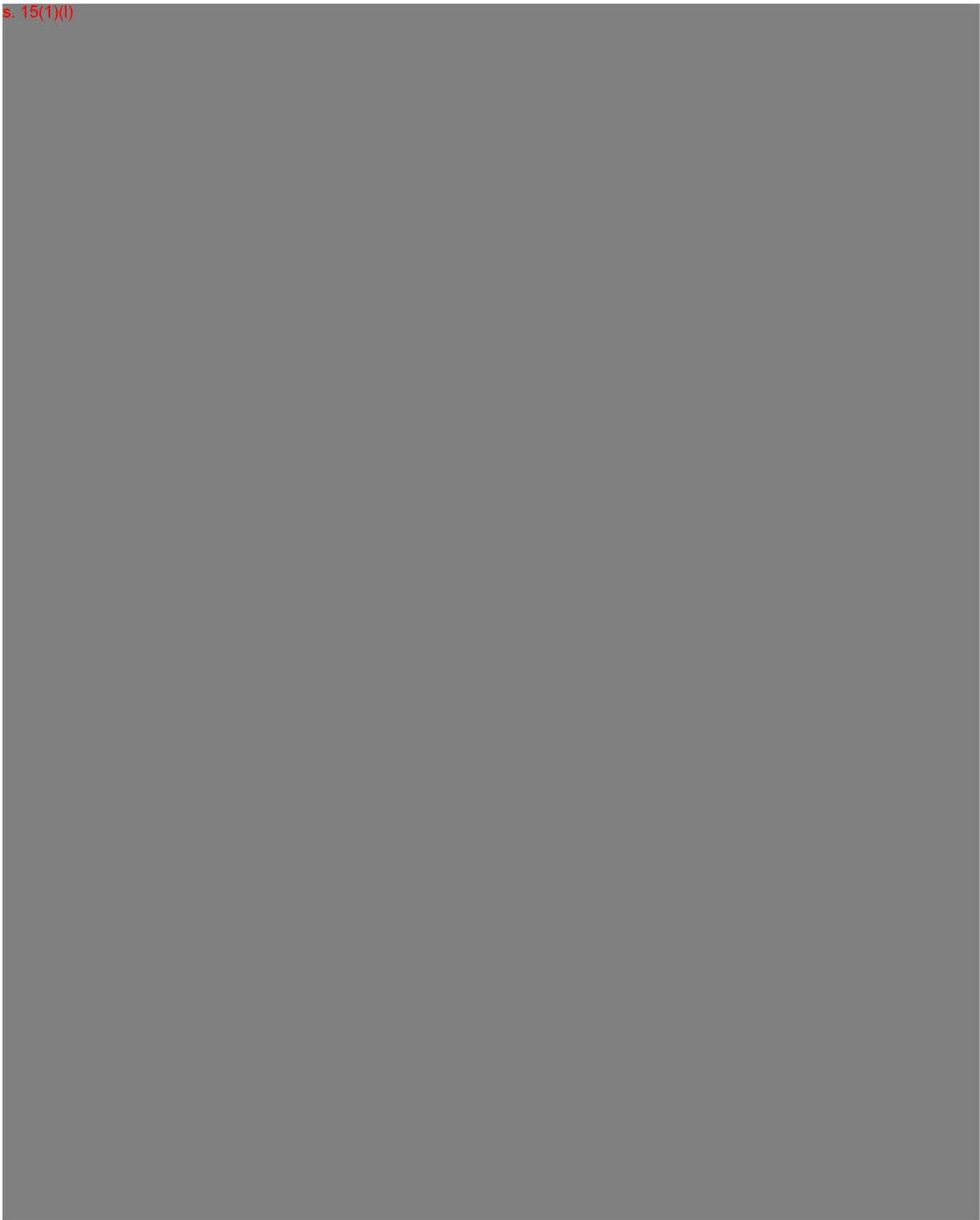


Totals by Element Detail

s. 15(1)(l)



s. 15(1)(l)



s. 15(1)(l)

