

File No. 04-1000-20-2016-296

September 21, 2016

s.22(1)

Dear s.22(1)

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

I am responding to your request of August 17, 2016 for:

A recent copy of the Privacy Impact Assessment and Privacy Policy for the City of Vancouver's Traffic Surveillance Cameras (Traffic Monitoring).

All responsive records are attached. Through the completion of the initial stage of the Privacy Impact Assessment (PIA), it was determined that no personal information was being deliberately collected by the traffic camera system. Therefore, the PIA has been completed up to the signature stage and requires nothing further.

Please see the following links regarding privacy relating to CCTV systems and Traffic CCTV systems:

http://former.vancouver.ca/policy_pdf/AE00302.pdf
http://former.vancouver.ca/policy_pdf/AE00302P3.pdf

Under section 52 of the Act you may ask the Information & Privacy Commissioner to review any matter related to the City's response to your request, within 30 business days from the date of this letter. You can request a review by writing to: Office of the Information & Privacy Commissioner, Email: info@oipc.bc.ca, Tel: 250-387-5629 and providing: 1) the request number (#04-1000-20-2016-296); 2) a copy of this letter; 3) a copy of your original request; and 4) the reason you're requesting a review.

Please do not hesitate to contact the Freedom of Information Office at foi@vancouver.ca if you have any questions.

Yours truly,

A handwritten signature in black ink, appearing to read 'B. Van Fraassen', with a long horizontal flourish extending to the right.

Barbara J. Van Fraassen, BA
Director, Access to Information
City Clerk's Department, City of Vancouver
Email: Barbara.vanfraassen@vancouver.ca
Telephone: 604.873.7999

Encl.

:ag

Traffic CCTV System Application

Site Name: Traffic and Data Management

Site Location: Crossroads, 6th Floor, Traffic Management Centre

Applicant Name: Winston Chou

Contact Information: 87913, winston.chou@vancouver.ca

Justification for Video System Installation	
Criteria	Comments
Describe the personal information that will be captured by the system	<p>The intent of the Traffic CCTV System is to provide staff with the ability to remotely monitor traffic conditions, trends, movements, safety concerns, and volumes. Staff are able to view separate parts of the City's transportation network without having to travel to the location saving time and allows the ability to monitor a variety of streets in real time with existing staff resources.</p> <p>Traffic CCTV is not intended to capture personal information and so video images are intentionally left low to ensure that personal information is not captured under normal operating functions.</p> <p>Under normal operating conditions Traffic CCTV is not intended to capture personal information. However, there may be situations that will require staff to zoom in on a particular view, in this case, information such as license plates and individual's face may be identified.</p>

Justification for Video System Installation	
Criteria	Comments

<p>Is system directly related to and necessary for a City program or activity?</p>	<p>Yes, the system is directly related to the operations of the Traffic & Data Management Branch. The Branch's responsibility is to manage the City's street network, design and operate traffic signals, address traffic safety concerns, track trends and collect traffic volume data.</p> <p>The Traffic CCTV System provides staff with visual information and situational awareness relating to traffic conditions and public safety in case of events such as: traffic collisions, power outage affecting traffic signals, construction, and special events.</p>
---	--

Justification for Video System Installation	
Criteria	Comments

<p>Have less intrusive means been considered that will meet the requirements of the program or activity?</p>	<p>Non-intrusive means have been considered and are being used. Where possible staff will conduct field observations to observe traffic conditions. However, given the limited staff and the size of the City’s road network the Traffic CCTV system is required to provide better monitoring coverage of the network and provides better feedback and information to staff when monitoring traffic conditions over time.</p> <p>Traffic cameras are mounted approximately 20 ft above street level on traffic signal poles or trolley poles. Current camera views do not allow personal information to be identified. Camera pan/tilt/zoom features have been locked out. Any situation requiring pan/tilt/zoom requires an authorized user to perform the operation. In addition, Traffic Control Room blinds will be drawn and camera control activity will be logged.</p> <p>Under normal operating conditions Traffic CCTV is not intended to capture personal information. However, there may be situations that will require staff to zoom in on a particular view, in this case, information such as license plates and individual’s face may be identified.</p>
---	--

When all of the ‘Justification’ questions have been answered complete the checklist for ‘Rationale’ & ‘Terms of Use’ section.

Rationale for Video System Installation

<p>What problem is the system expected to address?</p>	<p>Without the Traffic CCTV System, staff would not have the ability to monitor traffic conditions remotely or as quickly. Staff would also not have situational awareness during events that impact traffic conditions. The Traffic CCTV system may also be required during Emergency Operations Centre (EOC) activations to monitor traffic impacts as a result of an emergency.</p> <p>The purpose of the traffic camera system is to provide City staff with visual information relating to traffic conditions and public safety in case of events such as: traffic collisions, power outage affecting traffic signals, construction, and special events.</p> <p>Given the limited staff and the size of the City’s road network the Traffic CCTV system is required to provide better monitoring coverage of the network and better feedback to staff when monitoring traffic conditions over time.</p> <p>Staff are able to view separate parts of the City’s transportation network without having to travel to the location saving time and allows the ability to monitor a variety of streets in real time with existing staff resources.</p>
<p>How will the system address this problem?</p>	<p>Traffic CCTV system provides real-time view of traffic conditions from one location addressing the need for multiple field staff which the Traffic & Data Management Branch does not have the resources to support.</p> <p>The remote capability of the Traffic CCTV system also allows staff who are outside the office to view traffic conditions and respond to incidences as necessary.</p>
<p>Why will less intrusive means not be effective?</p>	<p>As previously noted, field observations conducted by staff would not be sufficient under the current staffing levels.</p>

<p>How will the benefits outweigh any privacy invasion resulting from use of the system?</p>	<p>As previously noted, the system is not intended to capture personal information.</p> <p>However, there may be situations that will require staff to zoom in on a particular view, in this case, information such as license plates and individual's face may be identified.</p> <p>The system provides staff the ability to have real time situational awareness in the field. In the case of monitoring events, incidents, and traffic flow this allows staff to monitor multiple locations without the need to be on site.</p>
---	---

Terms of Use for Video System Installation	
Criteria	Comments
<p>Position responsible for video system and name of incumbent</p>	<p>Winston Chou, CE2</p>
<p>Location of cameras</p>	<p>Currently, there are 52 intersections that have traffic cameras installed. Please see attached map and list of camera locations</p>
<p>Areas monitored by cameras</p>	<p>Please see attached map and list of camera locations.</p>
<p>Location where video feed will be viewed</p>	<p>Video will be viewed by City staff primarily at the Traffic Control Room, Crossroads, Engineering; and during activations of the Emergency Operations Centre, Office of Emergency Management. If necessary, staff will view the traffic cameras at off-site locations via laptop or handheld mobile device through a secure connection.</p>

<p>Restrictions on camera position or field of view (e.g. tilt, pan, zoom)</p>	<p>Traffic camera pan/tilt/zoom functions have been locked out for normal, day-to-day use. Preset camera angles/views are in place which do not capture personal information.</p> <p>Only authorized users will be permitted to adjust pan/tilt/zoom functions beyond preset views. This is necessary in some cases if staff are required to view traffic conditions that are not shown in the preset camera angles/views.</p> <p>Authorized users are:</p> <ul style="list-style-type: none"> • Diane Hiltz • Erica Sullivan • Graeme Kraft • Greg Nowak • Jason Lam • Khat Vesal • Sherwood Plant • Steve Brown • Winston Chou
<p>Hours of operation</p>	<p>24/7</p>
<p>Proposed installation date</p>	<p>Traffic Camera System has been in place in CrossRoads building since 2009. Prior to CrossRoads, the Traffic CCTV system was in the 2nd Floor City Hall, Traffic Control Room, since the mid 1990's.</p>
<p>Proposed end date, if any</p>	<p>n/a</p>
<p>Is the system actively monitored?</p>	<p>No <input type="checkbox"/> Yes <input checked="" type="checkbox"/></p> <p>It is actively monitored but only during regular office hours from 0700-19:00 or during special events that require traffic monitoring and Emergency Operation Centre Activations.</p>
<p>Video Recording</p>	
<p>Is the video recorded?</p>	<p>Recording videos required only when there is a request to record video and will be destroyed in accordance with the CCTV Policy. Recording video is not required on an ongoing basis. Video recording can be requested by various departments in the City, but all requests are to be approved by either of the following Traffic and Data Management staff; Winston Chou, CE2 or Banafsheh Rahmani, CE1.</p>

<p>Describe any restrictions on recording (dates, times, circumstances).</p>	<p>Recorded video is not intended to capture personal information. However, there may be situations that will require staff to zoom in on a particular view, in this case, information such as license plates and individual's face may be identified.</p>
<p>Describe the circumstances and conditions under which recordings would be viewed.</p>	<p>Recorded video will be viewed when there is a need to extract traffic counts, view traffic conditions and trends to aid in traffic engineering analysis and road design.</p>
<p>Describe the location and security of recorded data.</p>	<p>The recorded video is located on a City of Vancouver network drive. Access to video files is restricted to authorized staff only,</p> <p>H:\TRANSPORTATION\Data Management\Miovision Video files are automatically deleted after 65 days.</p>
<p>Specify the applicable VanRIMS classification, and the retention and disposition schedule.</p>	<p>Files are not placed in VanRims.</p>
<p>Describe how the records will be destroyed.</p>	<p>Video files will be deleted.</p>
<p>Describe the content of the system logs</p>	<p>As per COV CCTV Systems Information Policy AE-003-02 For each CCTV system that collects or may collect personal information, the log is 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.</p>

APPROVALS:

_____)	_____
General Manager, Engineering)	Date
_____)	_____
Director, Access to Information)	Date
_____)	_____
Freedom of Information Head (City Clerk))	Date
_____)	_____
Freedom of Information Head (Director of Legal Services))	Date
_____)	_____
Freedom of Information Head (City Manager))	Date

Appendix A - Camera Locations

Application Guide

This Application covers video systems that will be installed for the purpose of gathering traffic-related information under the direction of the Engineering Department.

The “Approved” section on the left is to be filled out by those approving the application, not the applicant.

Policy and the Procedure

The City’s CCTV Systems Policy and Traffic CCTV Systems Procedure govern the application.

Give Details

Specific information is required for each item. For example, the application should disclose how the system is directly related to and necessary for a City program or activity.

Similarly, the less intrusive means should be specified and the reason(s) they aren’t appropriate described.

Terms of Use

Position - the responsible position (job title) is required as well as the name of the person currently in the job.

System Location/Restrictions on Coverage, etc. - may be shown on an attached map rather than by narrative.

Recorded Video - procedures should be set out in detail. The process for erasing recorded video at the end of the retention period must be fully documented (process to be followed, responsible position, logging, etc).

System Logs - should be detailed, and should be maintained in VanDocs and made available to Access to Information Office (in addition to operational needs).

Audits - the applicant and responsible staff should understand that the representations and descriptions in the Application will be tested by random audits from time to time.