

Privacy Impact Assessment

Aldergrove Community League (2019) Video Surveillance System

BACKGROUND

The daycare on the premises has started keeping the front entrance doors locked at all times. This should help make sure that unwanted guests are not able to enter the building without permission.

Time, energy and costs to manage repairs, replacement and remediation to the building infrastructure and equipment have become an additional responsibility of the volunteers serving on the Aldergrove Board.

EFFORTS TO ADDRESS THE PROBLEM

The ACL has developed an AGENT STATUS relationship with the Edmonton Police Service to help them respond to active incidents at Aldergrove.

The ACL has deployed video surveillance cameras as a means to deter and prevent crime and increase security. This system is both cameras and a monitored theft alarm system in the main office of the League. We believe that this is a balanced crime deterrent approach. We think this will address the Community concerns and be the least intrusive to citizens who use the Aldergrove Community League and equipment.

The ACL has installed a door bell at the front door to determine who will have access to the hall. Onsite security is not an option for the league as the costs are too high.

Policy Statement

Aldergrove Community League (2019)

Video Surveillance System (Hikvision)

In this policy document, personal information is defined as video images captured on a video Surveillance system.

COLLECTION OF PERSONAL INFORMATION

WE have a total of 13 Night Vision cameras installed inside and outside of the building:

EXTERIOR

D3- Front right corner

D5 – Basketball Court

D6 – Front left corner

D7 – North side left corner

D8 – North side back corner

D9 – Back of building facing parkland

INTERIOR

D1- front gym hall

D2- Lobby

D4- Office

D10- Hall Stage

D11- Skate change room

D12- maintenance Room

D13- Kitchen

Hikvision Range

Covers only our leased land outlined in lease agreement with the City.

Hikvision Notification to the Public

Signage advising the public the area is under video surveillance is posted in several camera locations. In addition, the ACL newsletter and website will both include general information about the Hikvision presence and the rationale for its use.

SECURITY OF PERSONAL INFORMATION

1. Security access to the NVR images is password protected.
2. The NVR equipment is on the Office Managers Desk within a locked and alarmed office at the ACL. The locked office is within another monitored area, the building perimeter is also secured and monitored. This provides four levels of physical security for the personal information.
3. The NVR is not actively monitored at any time. Video images are captured and only reviewed after illegal activity occurs.
4. The NVR is recording all the time.
5. There is no audio captured or recorded.
6. Equipment is monitored or viewed by ACL only. There is no 3rd party contractor.
7. Backup of recorded visual images can only be done on an external hard drive and only after criteria for use of personal information are met.
8. The Childcare Director, Assistant Childcare Director and the Office Manager have access to the images.

USE OF PERSONAL INFORMATION

Video images will only be disclosed when the following criteria are met:

1. Bylaw infraction occurs – illegal dumping
2. Criminal Activity occurs – Vandalism, break and enter, other damage to equipment
3. Edmonton Police Service formally requests access to video images as part of an ongoing investigation.

ACL Board members will receive information regarding the Cameras from the Office Manager. The Office Manager will notify the Board of any issues regarding the images viewed that would require Police attention. Board members are accountable to uphold ACL NVR policies.

ACL will contact Bylaw and /or EPS for information or consultation based on review of video images of illegal activities. Each incident of disclosure will be recorded in an active log book, documenting date, general issue, follow up and impacts. This non-identifying log book information will be shared at ACL Executive Board Meetings and will be kept in a locked cabinet.

RETENTION OF PERSONAL INFORMATION

The NVR is programmed for 17 day digital information storage. After the 17 days the images are overwritten and become inaccessible. Overwriting the images eliminates the need for detailed retention schedule and addresses the secure storage and disposal requirements under the PIPA and FOIP legislation.

PROCESS FOR UNAUTHORIZED DISCLOSURE

- Immediate reporting to ACL Board
- Documentation of Privacy Breach.
- Required reporting under PIPA or FOIP legislation
- NRV password changes made immediately to prevent further disclosure.
- Individual found responsible loses access to NVR and any video images
- All incidents of Board members non-compliance with this policy will be followed up by a Board review, including recommendations to prevent further breaches.

PUBLIC REQUESTS TO ACCESS PERSONAL INFORMATION

- ACL Board member is identified as the ACL BOARD point of contact for requests.
- Requests can be made by calling 780-481-1588, and requesting a call back if needed.
- ACL will return the call and hear the request
- If information only, response will be provided
- If request is to view captured images, caller must provide a signed request in writing
- Once the written request has been received, ACL Board will determine under further direction from PIPA or FOIP that a request can be granted.
- Challenges to suspected ACL failure to comply with the policy will be managed using the same process outlined above.