



## General Purposes Committee

Anderson Room, City Hall  
6911 No. 3 Road

Monday, December 2, 2024  
4:00 p.m.

Pg. #      ITEM

### MINUTES

GP-3      *Motion to adopt the **minutes** of the meeting of the General Purposes Committee held on November 18, 2024.*



### LAW AND COMMUNITY SAFETY DIVISION

1. **PHASING OPTIONS FOR THE PUBLIC SAFETY CAMERA SYSTEM**  
(File Ref. No. 10-6450-07-07) (REDMS No. 7862940)

GP-13

**See Page GP-13 for full report**

*Designated Speaker: Douglas Liu*

### STAFF RECOMMENDATION

*That:*

- (1) *Option 1 to implement the RCMP proposed Phase 1 for the Public Safety Camera System as outlined in the staff report “Phasing Options for the Public Safety Camera System”, dated November 18, 2024, from the General Manager, Law and Community Safety be endorsed; and*

**General Purposes Committee Agenda – Monday, December 2, 2024**

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Pg. #      ITEM

- (2) *A capital submission for Option 1 to implement the RCMP proposed Phase 1 for the Public Safety Camera System, with an estimated value of \$2,493,794 and operating budget impact of \$181,600 be submitted for Council's consideration as part of the 2025 budget process.*

ADJOURNMENT



## General Purposes Committee

Date: Monday, November 18, 2024

Place: Anderson Room  
Richmond City Hall

Present: Mayor Malcolm D. Brodie, Chair  
Councillor Chak Au  
Councillor Carol Day  
Councillor Laura Gillanders  
Councillor Kash Heed  
Councillor Andy Hobbs  
Councillor Alexa Loo  
Councillor Bill McNulty  
Councillor Michael Wolfe

Call to Order: The Chair called the meeting to order at 4:00 p.m.

### MINUTES

It was moved and seconded

*That the minutes of the meeting of the General Purposes Committee held on November 4, 2024, be adopted as circulated.*

**CARRIED**

**General Purposes Committee**  
**Monday, November 18, 2024**

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CAO'S OFFICE

1. **INDIGENOUS RELATIONS STRATEGY – PROPOSED GUIDING PRINCIPLES AND FOCUS AREAS**

(File Ref. No. 01-0005-01) (REDMS No. 7762260)

In response to queries from Committee, staff advised that (i) according to the 2021 Census population there are approximately 1540 Indigenous people reported living in Richmond, (ii) in September, two internal training sessions were held for city staff with respect to residential schools, a lunch and learn model will be used for further training opportunities, (iii) the Guiding Principles and Focus Areas will provide guidance towards the development of a framework for the Indigenous Relations Strategy, (iv) engagement with the Musqueam Indian Band and the Tsawwassen First Nation will be prioritized in the development of the strategy, and (v) staff will work to determine which Advisory Committees align with the framework and strategy that is being developed and seek their input.

Discussion ensued with respect to (i) the value of holding multiple public consultations, (ii) acknowledging the different calls for action, and which of the calls of action can be met and when, and (iii) opportunities for Council to participate in professional development.

Correspondence from Linda Barnes, dated November 18, 2024 was distributed on table (attached to and forming part of these minutes as Schedule 1).

It was moved and seconded

- (1) *That the Indigenous Relations Strategy proposed Guiding Principles and Focus Areas outlined in the staff report titled “Indigenous Relations Strategy – Proposed Guiding Principles and Focus Areas,” dated October 28, 2024, from the Director, Intergovernmental Relations and Corporate and Strategic Planning, be endorsed; and*
- (2) *That staff be directed to develop an Indigenous Relations Strategy and engage with Indigenous communities to seek collaboration into the development of the Strategy.*

**CARRIED**

**General Purposes Committee**  
**Monday, November 18, 2024**

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**2. RESPONSE TO REFERRAL - RICHMOND CELEBRATES FIFA WORLD CUP 26**

(File Ref. No. 01-0005-01) (REDMS No. 7808316)

In response to queries from Committee staff advised that (i) with the proposed campaign there are many fixed costs that can not be reduced, even though the number of events are reduced, (ii) the FIFA licencing fees, agreements and guidelines are yet to be determined, (iii) licencing is included in the budget estimate, if it is above the projected budget that is in place, staff will bring it forward to Council for further direction, (iv) non commercial licencing fees are required for bars and restaurants screening matches, (v) staff are in discussions with various soccer clubs and will speak to the groups about providing workshops and clinics to youth, (vi) a shortage and increase in prices for high demand items such as screens, soccer equipment and supplies is anticipated, (vii) the Campaign Event Planning portfolio will be undertaken by existing staff positions, and (viii) Richmond based individuals and neighborhood groups can apply for neighborhood level funding of up to \$500 to host their own watch parties that meet City established criteria.

Correspondence from Bruce Livingston, dated November 18, 2024 was distributed on table (attached to and forming part of these minutes as Schedule 1).

It was moved and seconded

- (1) *That the “New Campaign” option to celebrate the Fédération Internationale de Football Association (FIFA) World Cup 2026 (FIFA World Cup 26) in Richmond, as detailed in the staff report titled “Richmond Celebrates FIFA World Cup 26 – Response to Referral,” dated October 28, 2024, from the Director, Intergovernmental Relations and Corporate and Strategic Planning, be endorsed for the purposes of continuing with planning and partner engagement; and*
- (2) *That one-time funding of the associated budget as outlined in the report be considered as part of the 2025 budget process.*

The question on the motion was not called as discussion ensued with respect to (i) youth engagement, (ii) availability of funds for Community Centres wanting to host events during FIFA, and (iii) possibility of allocating \$15,000 of the \$40,000 funding under the Richmond Kicks Grant program to host a 2<sup>nd</sup> Summer West Fest at West Richmond event on the second semi-finals day.

In response to a query from Committee, staff advised that adjustments can be made to the proposed events and schedules and that they will work with all the various communities and bring back to a Council at the end of 2025 a final schedule and detailed programming for each event.

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As a result of the discussion, the following **amendment motion** was introduced:

It was moved and seconded

*That the motion be amended to add:*

- (3) *That staff be directed to bring back the final schedule with all details including funding for each category by the end of 2025.*

**CARRIED**

Further discussion ensued with respect to (i) allocation of \$5000 to each Community Centre to host their own FIFA events, (ii) staff discussions with Community groups about activities and programming of FIFA events, and (iii) the City providing resources and equipment that can be used for multiple events by multiple groups.

As a result of the discussion, the following **amendment motion** was introduced:

It was moved and seconded

*That the motion be amended to add:*

- (4) *That up to \$5,000 be allocated, within the existing budget, to each Community Centre to be taken from the Kick-off Event and the Community Events and Viewing Parties aspect of the budget and for the programming to be approved by the City.*

The question on the amendment motion was not called as discussion ensued regarding granting the \$30,000 allocated for the Community Events and Viewing Parties directly to the eight Community Associations and staff working beyond that in purchasing equipment and supplies that will support all eight of the Associations.

The question on the **amendment motion** was then called and it was **CARRIED**.

The question on the main motion as amended, which reads as follows:

- (1) *That the “New Campaign” option to celebrate the Fédération Internationale de Football Association (FIFA) World Cup 2026 (FIFA World Cup 26) in Richmond, as detailed in the staff report titled “Richmond Celebrates FIFA World Cup 26 – Response to Referral,” dated October 28, 2024, from the Director, Intergovernmental Relations and Corporate and Strategic Planning, be endorsed for the purposes of continuing with planning and partner engagement;*

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**Monday, November 18, 2024**

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- (2) *That one-time funding of the associated budget as outlined in the report be considered as part of the 2025 budget process;*
- (3) *That staff be directed to bring back the final schedule with all details including funding for each category by the end of 2025; and*
- (4) *That up to \$5,000 be allocated, within the existing budget, to each Community Centre to be taken from the Kick-off Events and the Community Events and Viewing parties aspect of the budget and for the programming to be approved by the City.*

was not called, as there was agreement to deal with Parts (1) (2) (3) and (4) separately.

The question on Parts (1) (2) and (3) was then called and it was **CARRIED** with Cllr. Heed opposed.

The question on Part (4) was then called and it was **CARRIED**.

## DEPUTY CAO'S OFFICE

### 3. **ESTABLISHING A HOUSING PRIORITIES GRANT PROGRAM**

(File Ref. No. 08-4057-05) (REDMS No. 7845004)

It was moved and seconded

- (1) *That the proposed framework for a Housing Priorities Grant Program, as outlined in the report titled "Establishing a Housing Priorities Grant Program," dated October 28, 2024, from the Director, Housing Office, be approved; and*
- (2) *That staff bring forward eligible applications received through the Housing Priorities Grant Program for Council consideration.*

The question on the motion was not called as in response to queries from Committee, staff advised that (i) to be eligible for the program, conditional approval must have been granted or a development permit issued, the grant dollars will be allocated at the time of receiving final approval, and (ii) the eligible projects are projects that are adding low end market rental units or units that are tied to BC Housing's household income levels.

The question on the motion was then called and it was **CARRIED**.

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COMMUNITY SAFETY DIVISION

4. **FIRE VEHICLE REPLACEMENT RESERVE PURCHASES (2021 TO 2024) BUDGET AMENDMENT AND ANNUAL FUNDING REQUIREMENT FOR EQUIPMENT REPLACEMENT RESERVE FUND - FIRE RESCUE VEHICLES RESERVE FUND**

(File Ref. No. 09-5140-01) (REDMS No. 7670334)

Discussion ensued with respect to (i) procurement of hybrid fire engines, (ii) needs assessment, (iii) market impacts escalating costs, (iv) life cycle for frontline service emergency vehicles, (v) emergency vehicle replacement schedule based on maintenance and usage, and (vi) Vancouver Airport Fuel Facility Provision (VAFFC) usage.

In response to a query from Committee, Fire Chief Wishlove advised that purchasing the four trucks at this time will secure placement in a queue with a vendor that guarantees a price and a delivery date.

It was moved and seconded

- (1) *That a capital request for a one-time funding of \$5.0 million for Fire Vehicle Replacement Reserve Purchases be funded by Emergency Response Fuel Facility Provision (contribution from Vancouver Airport Fuel Facility Corporation), detailed in the staff report titled “Fire Vehicle Replacement Reserve Purchases (2021 to 2024) Budget Amendment and Annual Funding Requirement for Equipment Replacement Reserve Fund - Fire Rescue Vehicles Reserve Fund”, dated October 7, 2024, from the Fire Chief, be submitted through the 2025 budget process; and*
- (2) *That an additional level request to increase the annual contribution to the Vehicle and Equipment Reserve - Fire Rescue Vehicles by \$600,000 be submitted through the 2025 budget process to ensure solvency for identified future purchase needs.*

**CARRIED**

Opposed: Cllr. Wolfe



## ENGINEERING AND PUBLIC WORKS DIVISION

5. **STEVESTON VILLAGE LANE PARKING - UPDATE**  
(File Ref. No. 10-6500-01) (REDMS No. 7861108)

It was moved and seconded

*That Option 2B as outlined in the report titled “Steveston Village Lane Parking – Update” dated November 14, 2024 from the Director, Transportation be endorsed.*

The question on the motion was not called as in response to queries from Committee, staff advised that (i) four users have subscribed to the permit program to date, (ii) the overall Steveston Parking study will be brought forward to Council at the end of 2025, and (iii) the Harbour Authority offers monthly parking.

The question on the motion was then called and it was **CARRIED**.

## COUNCILLOR KASH HEED

6. **FEASIBLE OPTIONS AND POLICY FOR COMMERCIAL TRUCK PARKING IN RICHMOND**  
(File Ref. No.) (REDMS No.)

It was moved and seconded

- (1) *That staff explore further locations beyond those previously identified in reports for potential truck parking areas in Richmond, assessing their feasibility based on a realistic evaluation;*
- (2) *That staff revise and/or create policies regarding land use, transportation, and agriculture to address the current demands and challenges associated with truck parking in Richmond; and*
- (3) *That updates on items 1 and 2 be presented to the Council within a three-month timeframe.*

The question on the motion was not called as discussion ensued with respect to (i) trucks parking concerns on Agricultural Land Reserve (ALR), (ii) inconsistent enforcement, (iii) the need for dedicated truck parking for Richmond based small business truck drivers, and (iv) conducting a survey to find out where the trucks are coming from and if they are local and reporting back in the context of the referral.

The question on the motion was then called and it was **CARRIED**.

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**Monday, November 18, 2024**

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**ADJOURNMENT**

It was moved and seconded

*That the meeting adjourn (5:51 p.m.).*

**CARRIED**

Certified a true and correct copy of the Minutes of the meeting of the General Purposes Committee of the Council of the City of Richmond held on Monday, November 18, 2024.

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Mayor Malcolm D. Brodie  
Chair

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Raman Grewal  
Legislative Services Associate

**MayorandCouncillors**

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**From:** MayorandCouncillors  
**Sent:** November 18, 2024 9:57 AM  
**To:** 'Linda Barnes'  
**Subject:** RE: Support for Indigenous Strategy

**Categories:** - TO: MAYOR & EACH COUNCILLOR / FROM: CITY CLERK'S OFFICE

Good Morning,

Thank you for your email. Please be advised your email has been forwarded to the Mayor and Councillors, and appropriate staff,

Regards,  
Claudia

Claudia Jesson  
Director, City Clerk's Office  
T: 604-276-4006  
E: Cjesson@richmond.ca

-----Original Message-----

From: Linda Barnes <loulindy50@gmail.com>  
Sent: November 16, 2024 4:51 PM  
To: MayorandCouncillors <MayorandCouncillors@richmond.ca>  
Cc: Kita, Jason <JKita@richmond.ca>; Pennier, Colin <CPennier@richmond.ca>  
Subject: Support for Indigenous Strategy

City of Richmond Security Warning: This email was sent from an external source outside the City. Please do not click or open attachments unless you recognize the source of this email and the content is safe.

I offer my congratulations and support for this recommendation on the General Purposes agenda for Monday's meeting.

As an active volunteer in Steveston, having the time & resources to connect with local Indigenous nations is daunting even though we've been trying. Recognizing also the demands on Indigenous leaders' time and resources, this strategy seeks to make meaningful and long-lasting connections for our communities.

Having a city strategy such as this leads the way for community organizations to follow.

Please include volunteer organizations in a meaningful way as this strategy moves forward. Many of us, as volunteers, have been struggling to find ways to connect and include our indigenous communities often with limited success.

I look forward to hearing more and perhaps participating in some way in the future.

Cheers

## **MayorandCouncillors**

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**From:** MayorandCouncillors  
**Sent:** November 18, 2024 9:28 AM  
**To:** 'Bruce Livingston'  
**Subject:** RE: World Cup

**Categories:** - TO: MAYOR & EACH COUNCILLOR / FROM: CITY CLERK'S OFFICE

Good Morning,

Thank you for your email. Please be advised your correspondence will be forwarded to the Mayor and Councillors, and appropriate staff,

Regards,  
Claudia

### **Claudia Jesson**

Director, City Clerk's Office  
T: 604-276-4006  
E: [Cjesson@richmond.ca](mailto:Cjesson@richmond.ca)

**From:** Bruce Livingston <stevestonecotours@gmail.com>  
**Sent:** November 18, 2024 9:05 AM  
**To:** MayorandCouncillors <MayorandCouncillors@richmond.ca>  
**Subject:** World Cup

**City of Richmond Security Warning:** This email was sent from an external source outside the City. Please do not click or open attachments unless you recognize the source of this email and the content is safe.

Recent news of Richmond's plans to support the FIFA 2026 World Cup caught my attention. Generally speaking, I do not support taxpayer dollars funding parties, but I can understand youth-oriented "Soccer Day" events, or Community Centre based events. What makes no sense is a programme to give tax dollars to non-profit groups for parties, (up to \$2000), or individuals for block parties (up to \$500). When staff time to administer such programmes is included, the whole idea gets worse. At some point, this nonsense has to stop. Killing these "party grants" would be a good place to start.

Bruce Livingston  
604-377-5964



# City of Richmond

## Report to Committee

**To:** General Purposes Committee **Date:** November 18, 2024  
**From:** Anthony Capuccinello Iraci **File:** 10-6450-07-07/2024-Vol 01  
 General Manager, Law & Community Safety  
**Re:** **Phasing Options for the Public Safety Camera System**

### Staff Recommendation

That:

- Option 1 to implement the RCMP proposed Phase 1 for the Public Safety Camera System as outlined in the staff report “*Phasing Options for the Public Safety Camera System*”, dated November 18, 2024, from the General Manager, Law and Community Safety be endorsed; and
- A capital submission for Option 1 to implement the RCMP proposed Phase 1 for the Public Safety Camera System, with an estimated value of \$2,493,794 and operating budget impact of \$181,600 be submitted for Council’s consideration as part of the 2025 budget process.

Anthony Capuccinello Iraci  
 General Manager, Law & Community Safety  
 (604-247-4636)

REPORT CONCURRENCE		
<b>ROUTED TO:</b>	<b>CONCURRENCE</b>	
Transportation	<input checked="" type="checkbox"/>	
Information Technology	<input checked="" type="checkbox"/>	
Finance	<input checked="" type="checkbox"/>	
RCMP	<input checked="" type="checkbox"/>	
<b>SENIOR STAFF REPORT REVIEW</b>	<b>INITIALS:</b>	<b>APPROVED BY CAO</b>
	<i>AI</i>	<i>Seren</i>

## Staff Report

### Origin

At its Closed Council Meeting on July 22, 2024, Council adopted the following resolution and authorized its disclosure:

*The Council of the City of Richmond hereby resolves*

- (a) to endorse the Public Safety Camera System Privacy Impact Assessment attached as Appendix 1 to this resolution (the "Privacy Impact Assessment"), and*
- (b) subject to final budget approval, to implement the Public Safety Camera System Program described in the Privacy Impact Assessment.*

Additionally, at its Regular Council Meeting on January 15, 2024, Council adopted the following resolution:

*That:*

- 1. a more detailed assessment of the costs associated with implementing the Proposed Public Safety Camera System, including phasing options and funding sources, as described in the report titled "Richmond Traffic Intersection Cameras and Proposed Public Safety Camera System" dated December 6, 2023 from the City Solicitor and General Manager, Community Safety be presented for Council's consideration in the future as part of the annual budget process;*
- 2. the feasibility of obtaining a Court declaration in advance of the expenditures associated with implementing the Proposed Public Safety Camera System, as described in the report titled "Richmond Traffic Intersection Cameras and Proposed Public Safety Camera System" dated December 6, 2023 from the City Solicitor and General Manager, Community Safety be explored;*
- 3. any necessary Privacy Impact Assessment for the Proposed Public Safety Camera System be undertaken to satisfy the requirements of the Freedom of Information and Privacy Act; and*
- 4. a copy of this report titled "Richmond Traffic Intersection Cameras and Proposed Public Safety Camera System" dated December 6, 2023 from the City Solicitor and General Manager, Community Safety be provided to the Office of the Information and Privacy Commissioner for British Columbia, Minister of Public Safety and Solicitor General, and Richmond Members of Parliament and Members of the Legislative Assembly.*

This report is in furtherance of paragraph (b) of the July 22, 2024 resolution and also responds to paragraph 1 of the January 15, 2024 resolution. The remaining paragraphs of the January 15, 2024 resolution have already been addressed by staff.

This report supports Council’s Strategic Plan 2022-2026 Focus Area #3 A Safe and Prepared Community:

*Community safety and preparedness through effective planning, strategic partnerships and proactive programs.*

*3.2 Leverage strategic partnerships and community-based approaches for comprehensive safety services.*

*3.4 Ensure civic infrastructure, assets and resources are effectively maintained and continue to meet the needs of the community as it grows.*

**Analysis**

In accordance with Council’s request, staff have undertaken a detailed assessment of the costs, including the phasing options and funding sources for Council’s consideration as part of the annual budget process.

Staff have conducted further research and a needs analysis of the camera hardware, management software, and associated technology infrastructure following Council’s endorsement of the Public Safety Camera System (PSCS). Three prominent camera manufacturers and two video management vendors were contacted to inquire about the appropriate camera system for law enforcement purposes. Based on the expert opinions of the camera manufacturers and input from the RCMP’s forensic video technician, it was determined that a combination of bullet, multi-sensor, and pan-tilt-roll-zoom (PTRZ) style cameras is recommended to capture the surroundings of an intersection, including vehicles, license plates, and images of persons as set out in the City’s Privacy Impact Assessment (PIA). The recommended cameras for the PSCS are 4K ultra-high-resolution and are environmentally protected at the IP67 level or higher.

Software modeling of camera requirements was also conducted to better understand the number of cameras, installation points, and coverage for various intersection designs. On average, four cameras are modeled for simple intersections<sup>1</sup> and six cameras for complex intersections<sup>2</sup>. Therefore, the cost estimate for implementing the PSCS was revised upward due to the increased number of cameras needed at intersections, the camera models, and the additional hardware required to support fibre optic connectivity for the PSCS.

Based on the original scope outlined in the January 2024 report and the PSCS PIA, the capital cost for city-wide PSCS implementation is now estimated to be \$13,064,860, with an operating budget impact (OBI) of \$677,899, which is significantly higher than the initial preliminary cost estimate of approximately \$6.55 million.

The main drivers for the increase are the number of cameras required at an intersection and the

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<sup>1</sup> A simple signalized intersection is a junction where two or more roads meet, with traffic flow controlled by traffic signals that assign right-of-way to vehicles and pedestrians in an alternating sequence.

<sup>2</sup> A complex signalized intersection is a multi-faceted junction featuring channelized right-turn lanes, dedicated left-turn lanes, dedicated right-turn lanes, multiple through lanes, elevated above ground rapid transit tracks, pedestrian crossings, and sometimes parallel or intersecting roads, all managed by coordinated traffic signals to handle high volumes of vehicles, cyclists, and pedestrians while minimising conflicts.

higher cost per camera to achieve the image quality needed for law enforcement and prosecution. The preliminary cost estimate was based on one PTRZ camera with a multi-sensor module containing four lenses, for a total of five lenses per intersection. However, following discussions with camera manufacturers and validation through software modeling, it was determined that each intersection require at least four ultra-high-definition cameras. This is because the PSCS is not actively monitored, and the quality of the video footage is highly dependent on camera placement, resolution, and the lenses attached to the camera model. Therefore, the original preliminary estimate for one PTRZ with multi-sensor does not provide sufficient coverage unless it is actively monitored.

Based on the software modeling, a typical intersection would require four cameras. For larger or more complex intersections, it may require no less than six cameras with additional one or two multi-sensor for perimeter coverage, bringing the total lenses from four to fourteen per intersection. Additionally, the increased number of cameras resulted in higher bandwidth, additional networking equipment, servers, and data storage requirements. The number of data storage days remained unchanged at 10 days.

### Public Safety Camera System Phasing Options

Due to the high initial capital investment and the benefits of being able to assess and make potential adjustments through a phased approach, staff recommend a phased implementation plan. City staff consulted with the Richmond RCMP to determine priority locations and intersections for the initial rollout.

The Richmond RCMP proposed that priority locations include possible entry and exit routes for Richmond, areas with a high likelihood of capturing video footage of suspects and suspect vehicles, proximity to civic facilities (e.g., city hall, works yard, police detachment, community police office, community facilities), and major vehicle and transit corridors.

The phasing options do not include intersections on Sea Island, as it is under federal jurisdiction. The Vancouver Airport Authority is the principal owner of the signalized intersections on Sea Island, while the City maintains, repairs, and operates the traffic signals under contract with the Vancouver Airport Authority.

The City's PSCS PIA also describes a field testing phase prior to the implementation phase. The field testing allows the City to evaluate the effectiveness of the cameras and optimal camera placement. The field testing is expected to span six to twelve months to evaluate camera performance across the broadest possible range of weather conditions and lighting scenarios. Additionally, the testing will gather data on camera durability, enabling the City to refine maintenance and replacement schedule. The financial impact for the PSCS field testing can be funded from the existing operating budget with no tax impact and is estimated to cost between \$50,000 to \$75,000.

### Option 1 – RCMP Proposed Phase 1 for the PSCS Implementation (Recommended)

The Richmond RCMP has identified two phases for PSCS implementation. Phase 1 is comprised of ten intersections for major entry and exit routes between Richmond and Sea Island, Knight Street Bridge and the Massey Tunnel. The ten priority intersections under Phase 1 are:



1. No. 5 Road & Steveston Highway\*
2. Shell Road & Steveston Highway
3. No. 5 Road & 10700 Block
4. No. 5 Road & Horseshoe Way
5. Garden City Road & Sea Island Way\*
6. Great Canadian Way & Bridgeport Road
7. Knight Street & Westminster Highway\*
8. No. 6 Road & Westminster Highway
9. Jacombs Road & Westminster Highway\*
10. Gilbert Road & River Road

Based on the assessment of the size and geography of the Phase 1 priority intersections, it was determined that a total of 48 PSCS cameras would be required. Four of the ten intersections assessed are large intersections with complex traffic patterns (marked with \*), which require six PSCS cameras per intersection, while the remaining intersections average approximately four cameras per intersection. Maps indicating the phasing and intersection locations are provided in Attachment 2.

The cost for implementing Option 1 is \$2,493,794 in capital costs and \$181,600 in OBI. Option 1 has a higher average total cost per camera due to the fact that it includes the initial set up costs, which is comprised of the installation of information technology equipment and services to establish a brand-new segregated network dedicated to the PSCS. This segregated network is required for all options and is essential for ensuring the security, reliability, and integrity of the PSCS, as it operates independently from existing municipal networks. The cost breakdowns are provided in Attachment 1.

Option 1 is the recommended option because it offers a reduced initial financial investment in the PSCS while maintaining the critical benefits of a camera system for law enforcement. Implementing Phase 1 allows the City to focus resources on the most strategic locations, enhancing public safety where it is most needed. This phased approach provides an opportunity to assess the effectiveness of the PSCS in real-world conditions, particularly in providing evidence for prosecutions and deterring criminal activities, and it allows for the opportunity to make potential future adjustments as needed.

By collecting empirical data and assessing performance during this initial phase, the City can make informed adjustment decisions in relations to future expansions of the system. This strategy not only mitigates financial risk but also ensures that any additional investments are informed by proven results and are aligned with community safety objectives.

*Option 2 – RCMP Proposed Phase 1 and Phase 2 (combined) for the PSCS Implementation (Not recommended)*

Option 2 includes both Phase 1 and Phase 2 implementations occurring concurrently, with Phase 1 described in Option 1 and Phase 2 described below.

The Richmond RCMP proposed that Phase 2 is comprised of an additional ten intersections near civic facilities and public safety facilities. Phase 2 also provides additional entry and exit points in east Richmond near Highway 91 and Westminster Highway. The additional ten priority intersections under Phase 2 are:

1. No. 2 Road & Westminster Highway\*
2. Westminster Highway & Gilley Road
3. Old Westminster Highway & New Westminster Highway
4. No. 8 Road & Westminster Highway
5. No. 3 Road & Granville Avenue
6. No. 3 Road & Westminster Highway\*
7. No. 3 Road & Alderbridge Way\*
8. Gilbert Road & Westminster Highway
9. Gilbert Road & Granville Avenue
10. No. 2 Road & Granville Avenue\*

Based on the assessment of Phase 2 priority intersections, it was determined that an additional 48 PSCS cameras would be required. Four of the ten intersections assessed are large intersections with complex traffic patterns (marked with \*), which require six PSCS cameras per intersection, while the remaining intersections average approximately four cameras per intersection. Maps indicating the phasing and intersection locations are provided in Attachment 2.

For Option 2 (Phase 1 and Phase 2 combined), the total requirement is 96 PSCS cameras for 20 intersections. The costs for implementing Option 2 are \$3,739,097 in capital costs and \$235,416 in OBI. The cost breakdowns are provided in Attachment 1.

Option 2 provides additional camera coverage in Richmond and can be implemented based on Council's consideration and direction. Option 2 would enhance the availability of usable video footage for law enforcement and evidence for prosecution. Additionally, Option 2 may offer an increased level of crime deterrence for civic facilities. However, Option 2 would entail additional capital investments of \$1,245,303 more than Option 1 and higher ongoing annual operating costs.

Staff believe that there are potential optimizations that may be realized based on the experience of implementing the smaller-scale Option 1 (Phase 1 only). By starting with Option 1, the City can evaluate the effectiveness and efficiency of the PSCS, identify any operational challenges, and make necessary adjustments before committing to a larger investment. Therefore, Option 2 is not recommended at this time.

### Option 3 – City-wide Implementation of PSCS (Not recommended)

Option 3 involves city-wide implementation of 567 PSCS cameras at all signalized intersections with fibre optic connectivity. The financial impact for this comprehensive rollout is significant, with a capital cost of \$13,064,860 and OBI of \$677,899. While efficiency and optimization of camera coverage have been considered in this option, resulting in a lower cost per camera compared to Option 1 and Option 2, the overall implementation cost remains substantial due to the large number of ultra-high-definition cameras required and the supporting technology infrastructure needs.

Based on the substantial estimated cost and tax impact, implementing a public camera system of this scale, which is new to the City, presents considerable financial risk and does not allow any opportunity to evaluate the effectiveness and efficiency of the PSCS, identify any operational challenges, and make necessary adjustments before committing to a larger investment. Therefore, Option 3 is not recommended at this time.

### Financial Impact

Staff recommend Option 1, which is the RCMP's proposed Phase 1 for the implementation of the PSCS with \$2,493,794 in capital costs and \$181,600 in OBI. A capital submission to implement the RCMP proposed Phase 1 of the PSCS, funded by Appropriate Surplus, will be submitted for Council's consideration as part of the 2025 budget process.

### Conclusion

The importance of public safety cannot be overstated. The recommended Option 1 allows the City to phase the implementation the Public Safety Camera System (PSCS) to enhance public safety, and allow the opportunity to evaluate the effectiveness and efficiency of the PSCS, identify any operational challenges, and make necessary adjustments before committing to a larger investment. This phased approach will provide valuable insights into the operations and scalability of the PSCS, and allows for opportunities for future advancements in camera technology, which may lower costs, while mitigating financial and operational risks.

The use of the PSCS is strictly limited to law enforcement purposes and evidentiary support for prosecutions. The system will not be actively monitored in real time, and video footage retrieval will only be accessible through a production or Court order, ensuring that access is tightly controlled and legally justified. Technological safeguards will be in place, such as tightly controlled restricted access for authorized personnel only. Additionally, the PSCS will operate on its own segregated network to prevent cyberattacks and unauthorized access.

These restrictions and oversight mechanisms are designed to prevent misuse of the system and to adequately protect the privacy of individuals. By implementing robust security measures and adhering to legal requirements, the City aims to balance the benefits of enhanced public safety with the need to protect individual privacy rights. The City's Public Safety Camera System Privacy Impact Assessment, which was endorsed by Council on July 22, 2024, provides detailed information on these safeguards and is included in Attachment 3.



Anthony Capuccinello Iraci  
General Manager, Law & Community Safety



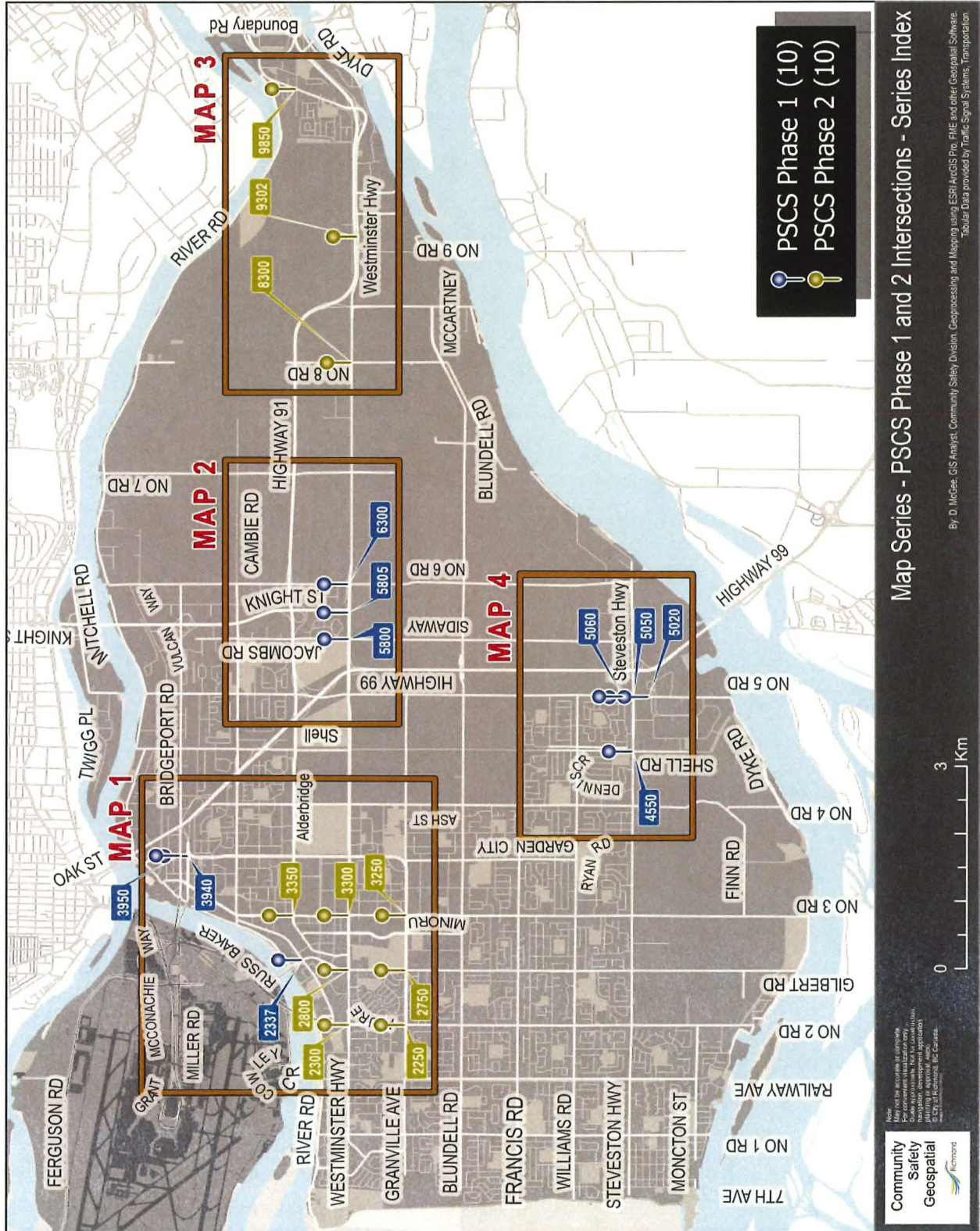
Douglas Liu  
Manager, Community Safety Policy and Programs

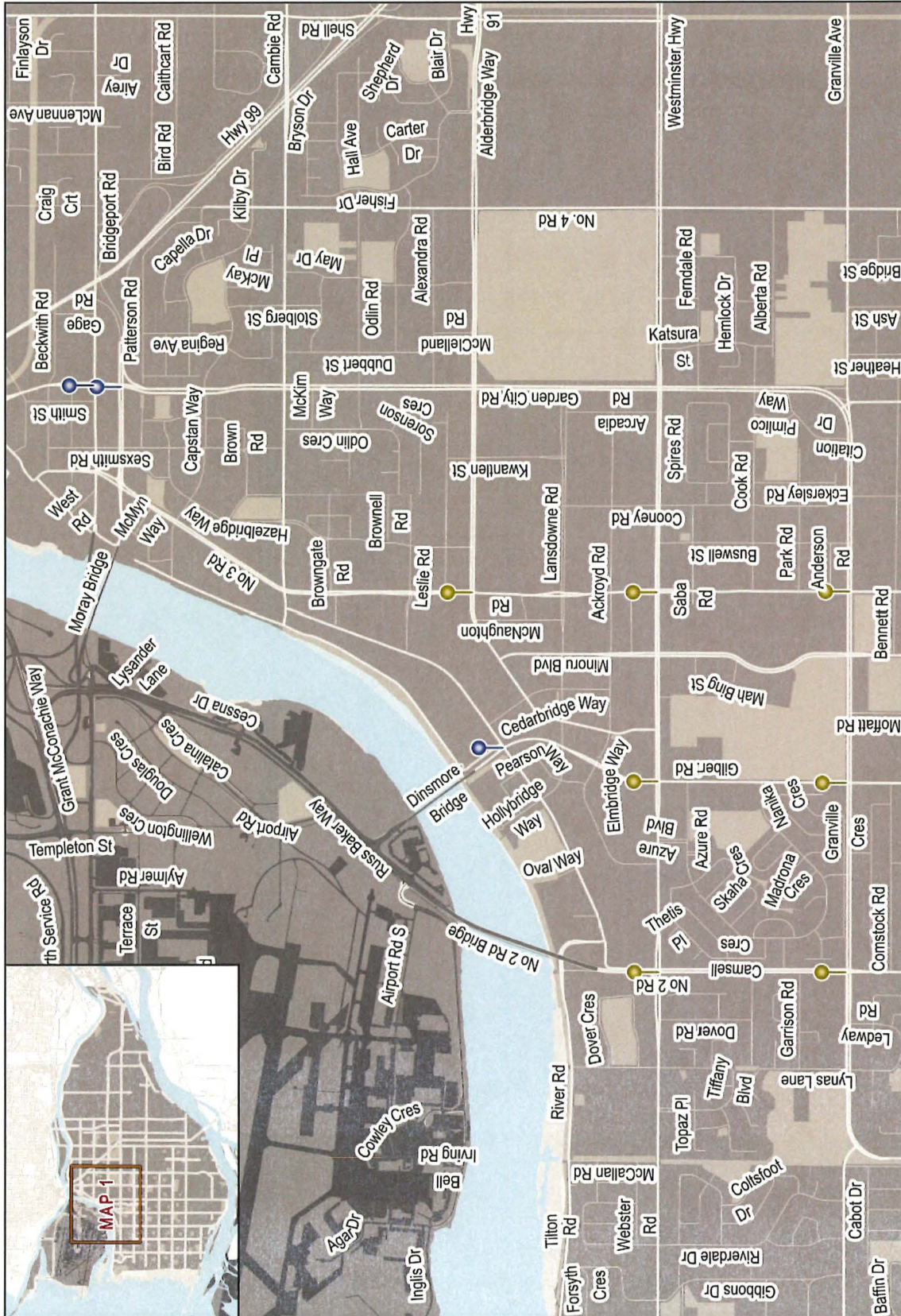
- Att. 1: Public Safety Camera System - Revised Cost Estimate, September 2024  
2: Phasing and Intersection Location Maps for the Implementation of the Public Safety Camera System  
3: City Council endorsed Public Safety Camera System Privacy Impact Assessment

**Public Safety Camera System (PSCS) - Revised Cost Estimate, September 2024**

	<b>Option 1 (Recommended)</b>	<b>Option 2</b>	<b>Option 3</b>
<b>Description</b>	<b>RCMP Proposed Phase 1</b>	<b>RCMP Proposed Phase 1 and 2</b>	<b>City-wide Implementation</b>
	<i>10 priority intersections 48 cameras</i>	<i>20 priority intersections 96 cameras</i>	<i>All fibre intersections 567 cameras</i>
PSCS Camera – Ultra High-definition All Weather	528,000	1,056,000	3,937,500
Labour – Installation of Cameras	46,000	92,000	475,000
Fibre Optic Network Isolation & Communication Cabinet	116,000	232,000	1,475,000
<b>Camera Hardware Total</b>	<b>690,000</b>	<b>1,380,000</b>	<b>5,887,500</b>
Camera Software Control/Monitor Licenses	24,898	43,709	222,387
Servers with Redundancy	440,000	660,000	1,100,000
IT Network Fibre	53,264	82,205	1,967,496
Data Storage with Redundancy (10 Days Ultra HD Storage)	620,000	700,000	1,460,000
Project Management	250,000	250,000	250,000
<b>Data Storage and Monitoring Software Total</b>	<b>1,388,162</b>	<b>1,735,914</b>	<b>4,999,883</b>
Contingency – 20%	415,632	623,183	2,177,477
<b>Grand Total</b>	<b>2,493,794</b>	<b>3,739,097</b>	<b>13,064,860</b>
		<i>1,245,303 (50%) more than Phase 1</i>	<i>9,325,763 more than Phase 1 and 2</i>
<b>Operating Budget Impact</b>	<b>Option 1 (Recommended)</b>	<b>Option 2</b>	<b>Option 3</b>
Camera Maintenance and Testing of Installed Cameras	40,187	63,706	263,422
Camera Software Assurance	4,413	8,709	44,477
Server Maintenance	32,000	48,000	80,000
Data Storage Maintenance (OBI after 3 years)	55,000	65,000	190,000
Installation for New Signalized Intersections	-	-	50,000
Replacement Due to Camera Failures (OBI after 5 years)	50,000	50,000	50,000
<b>Total Annual OBI</b>	<b>181,600</b>	<b>235,415</b>	<b>677,899</b>

**Phasing and Intersection Location Maps for the Implementation of the Public Safety Camera System**





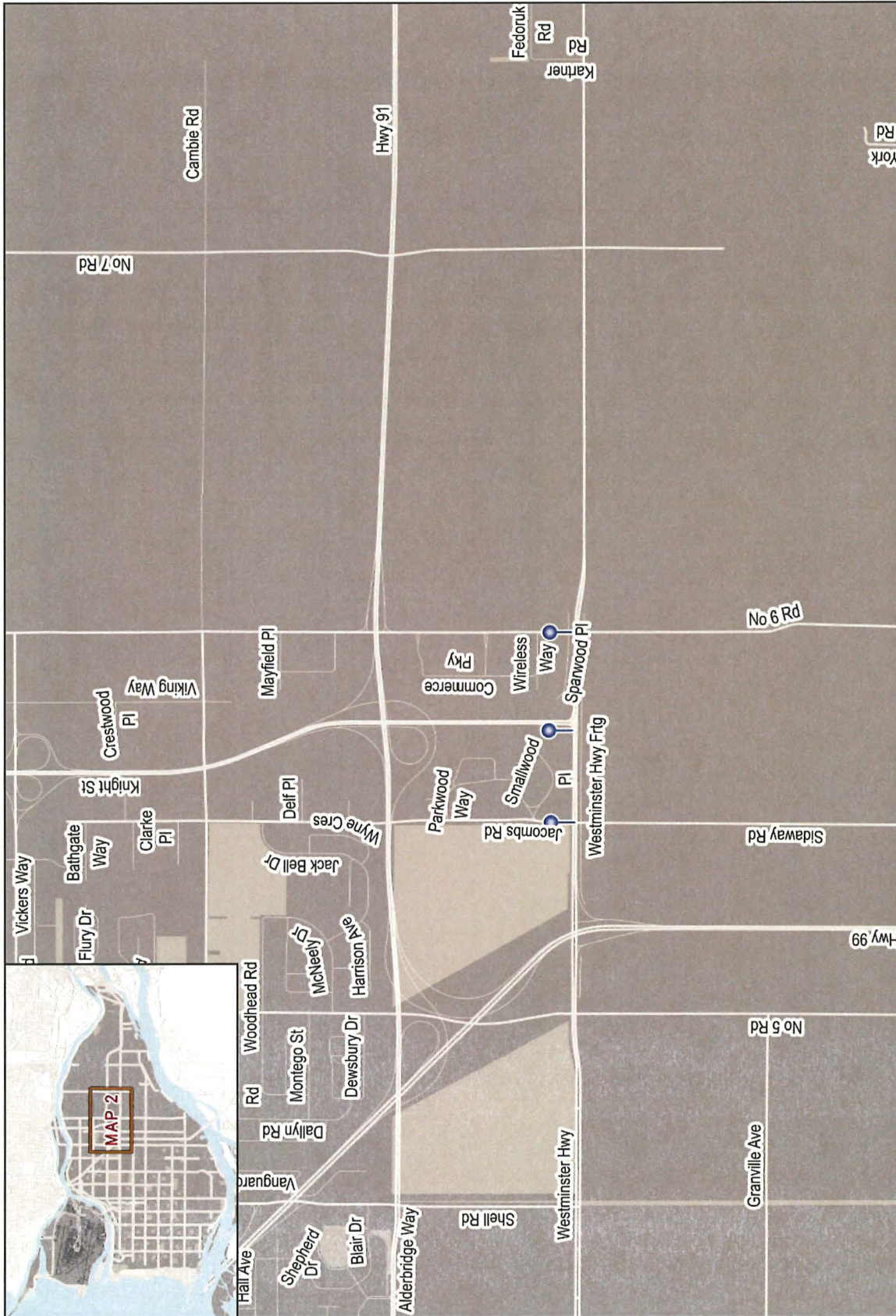
Map Series - PSCS Phase 1 and 2 Intersections - MAP 1 of 4

By: D. McGee, GIS Analyst, Community Safety Division, Geoprocessing and Mapping using ESRI ArcGIS Pro, FME and other Geospatial Software. Tabular Data provided by Traffic Signal Systems, Transportation.

Note: May not be accurate or complete. Data provided by the City of Vancouver, Navigation, Engineering Department. © City of Vancouver, BC Canada.



PSCS Phase 1 PSCS Phase 2



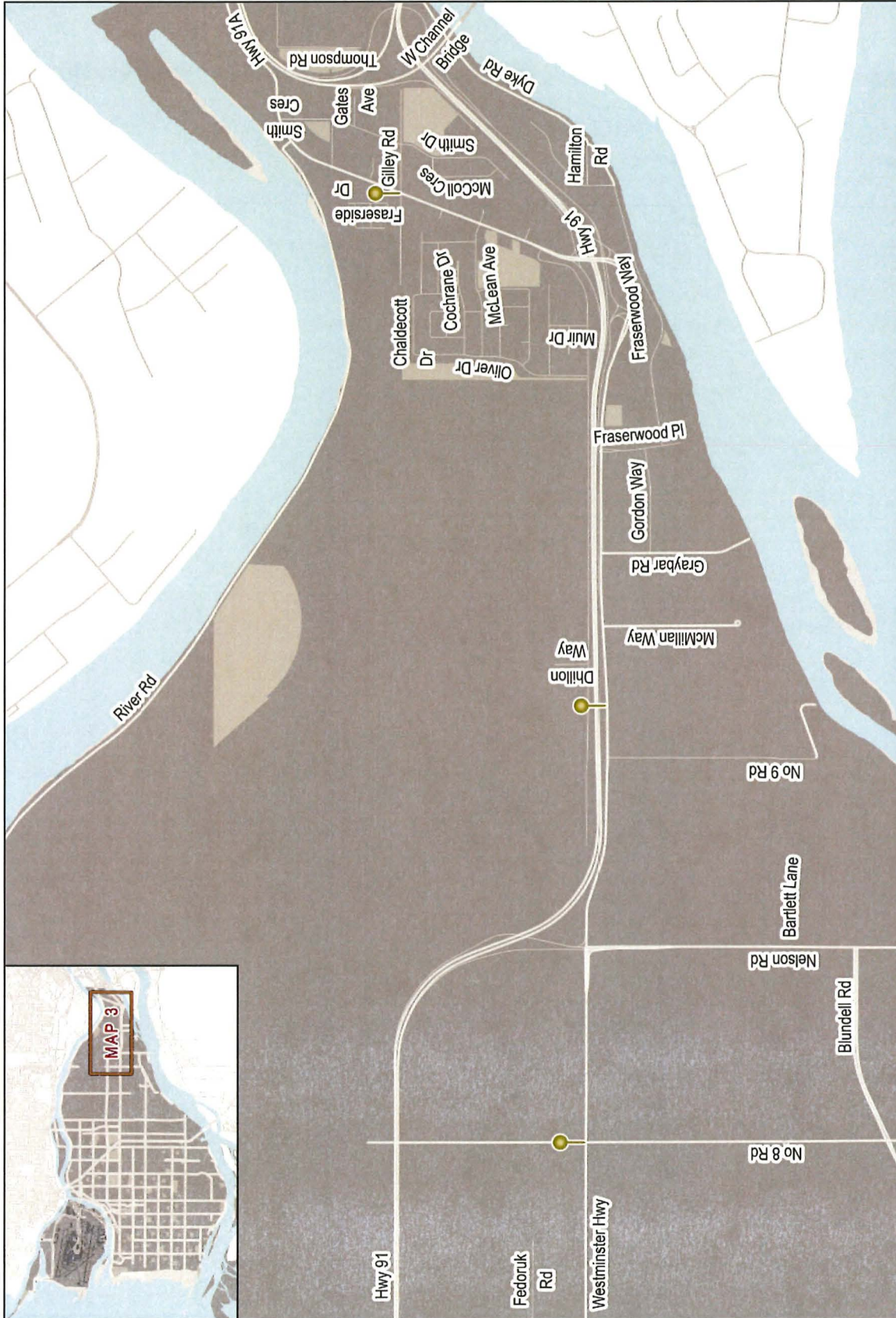
Map Series - PSCS Phase 1 and 2 Intersections - MAP 2 of 4

PSCS Phase 1 PSCS Phase 2

By: D. McGee, GIS Analyst, Community Safety Division, Geoprocessing and Mapping using ESRI ArcGIS Pro, FME and other Geospatial Software. Tabular Data provided by Traffic Signal Systems, Transportation.

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Map Series - PSCS Phase 1 and 2 Intersections - MAP 3 of 4

 PSCS Phase 1
  PSCS Phase 2

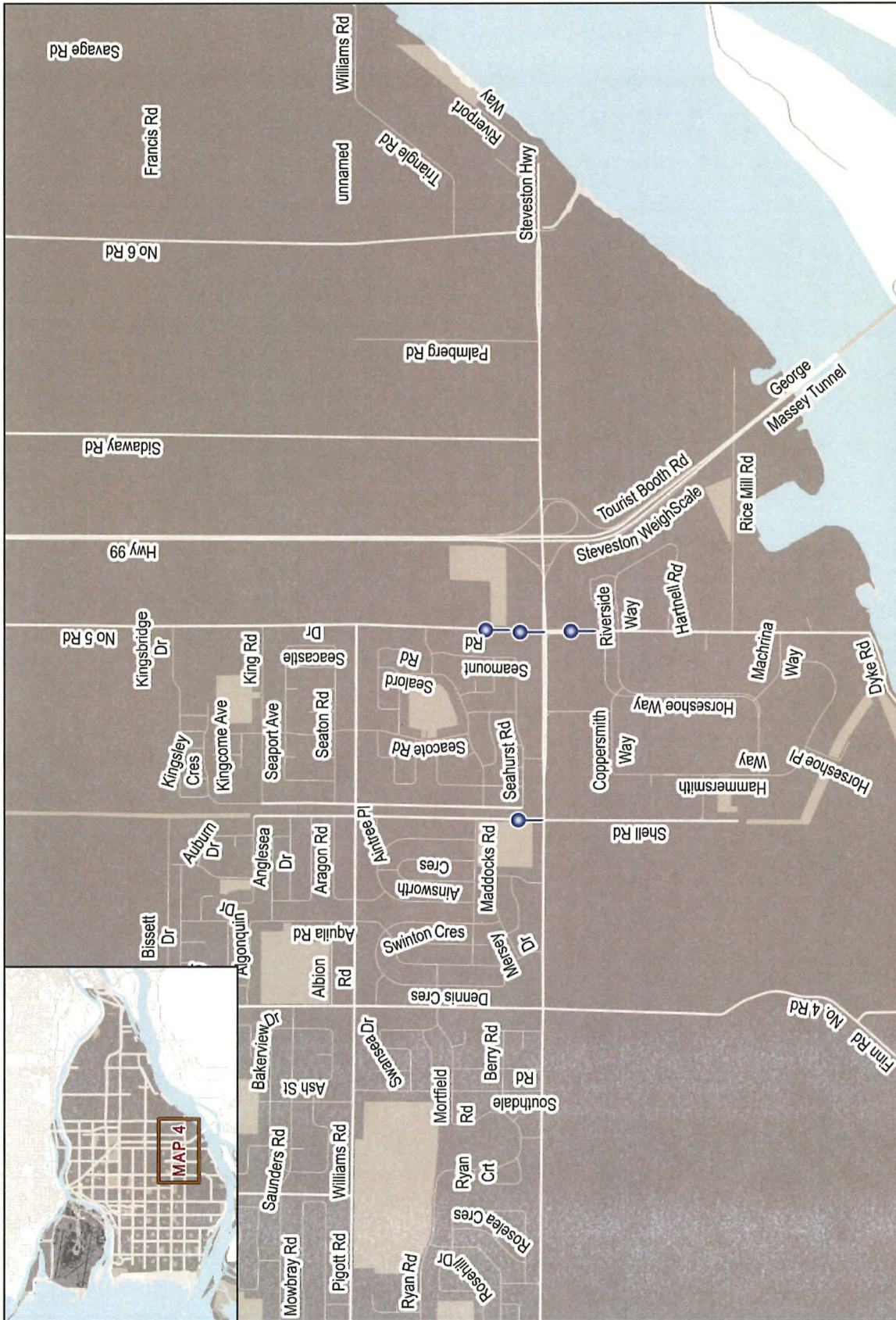
Note: May not be accurate or complete. Mapping using ESRI ArcGIS Pro, FME and other Geospatial Software. Tabular Data provided by Traffic Signal Systems, Transportation.

By: D. McGee, GIS Analyst, Community Safety Division, Geoprocessing and Mapping using ESRI ArcGIS Pro, FME and other Geospatial Software.

0 1 Km

**Community Safety Geospatial**



Map Series - PSCS Phase 1 and 2 Intersections - MAP 4 of 4

PSCS Phase 1 PSCS Phase 2

By: D. McGee, GIS Analyst, Community Safety Division, Geoprocessing and Mapping using ESRI ArcGIS Pro, FME and other Geospatial Software. Tabular Data provided by Traffic Signal Systems, Transportation.

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# Privacy Impact Assessment for Non-Ministry Public Bodies

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Use this privacy impact assessment (PIA) template if you work for a service provider to a non-ministry public body in B.C. and are starting a new initiative or significantly changing an existing initiative.

## Before you start

- If you are in a non-ministry public body, you may use this template to document a PIA. This template leads you through a complete PIA, but you are welcome to use another template or method for documenting your PIA
- An initiative is an enactment, system, project, program or activity
- Find information on the [PIA review process](#) and [question-by-question guidance](#)
- If you have any questions, email [Privacy.Helpline@gov.bc.ca](mailto:Privacy.Helpline@gov.bc.ca) or phone [250 356-1851](tel:250-356-1851)

**PART 1: GENERAL INFORMATION**

PIA file number:

<b>Initiative title:</b>	Richmond Public Safety Camera System
<b>Organization:</b>	The City of Richmond
<b>Branch or unit:</b>	Community Safety
<b>Your name and title:</b>	Douglas Liu Manager, Community Safety Policy and Programs
<b>Your work phone:</b>	604-276-4004
<b>Your email:</b>	dliu@richmond.ca
<b>Initiative Lead name and title:</b>	Cecilia Achiam General Manager, Community Safety
<b>Initiative Lead phone:</b>	604-276-4122
<b>Initiative Lead email:</b>	<a href="mailto:cachiam@richmond.ca">cachiam@richmond.ca</a>
<b>Privacy Officer:</b>	Nicole Stocking
<b>Privacy Officer phone:</b>	604-276-4156
<b>Privacy Officer email:</b>	NStocking@richmond.ca

General information about the PIA:

<b>Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the <a href="#">Office of the Information and Privacy Commissioner</a>.</b>
No
<b>Is this initiative a common or integrated program or activity? Under section <a href="#">FOIPPA 69 (5.4)</a>, you must submit this PIA to the Office of the Information and Privacy Commissioner.</b>
No
<b>Related PIAs, if any:</b>
“Closed Circuit Television (CCTV) Cameras for Signalized Intersections in Richmond”, Privacy Risk Assessment, April 23, 2018.

## 1. What is the initiative?

**Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs.**

### Public Safety Camera System

This initiative involves the installation and implementation of a public safety camera system ("PSCS") in the City of Richmond (the "City"). The objective of the PSCS is to use high resolution cameras for law enforcement purposes, specifically for the purposes of criminal investigation and prosecution only. The PSCS will be comprised of a series of new ultra-high-definition cameras installed at 176 signalized intersections in the City. The PSCS will be installed on a segregated network, distinct from the City's existing traffic intersection camera system ("TICS"), and will be protected with its own safeguards in isolation from all other City information systems. The higher resolution cameras used in the PSCS will allow greater visual detail to be captured (namely vehicle licence plates and vehicle occupants' faces, and faces of people in public spaces) than what is observable in footage captured by the TICS.

On average, it is estimated that five cameras will be installed per signalized intersection for the PSCS in Richmond. The actual number of cameras will be determined based on findings from field testing (see section below). It is anticipated that the design of each intersection will dictate the required number of cameras. For example, a simple signalized intersection may need fewer than five cameras, while a complex, multi-lane intersection with multiple dedicated turn priorities may require more than five cameras. The PSCS will be networked with City-owned fibre optic infrastructure, which is necessary to transmit high-resolution video, and the storage of video and images of the PSCS will be stored with City information technology infrastructure located in Canada. The PSCS will be a standalone system within its own segregated network and restricted to a limited number of authorized staff identified below.

The PSCS will be used strictly for law enforcement purposes, and the release of the PSCS video and images must be prescribed with a production order for criminal investigations or Court order.

In order for the RCMP to access video footage from the City's PSCS, the following process will be followed:

- the RCMP must contact the City to request video footage, and complete a "Richmond RCMP Public Safety Camera System Video Request Form" (the "Request Form");
- the RCMP must provide a court authorized Production Order, pursuant to the *Criminal Code*, along with the Request Form;
- the City's legal department will review the Request Form and Production Order and provide authorization for the release of the video footage;
- the RCMP will provide a secure storage medium for the requested footage to be exported to; and
- if the request is approved, the City will export the requested footage to the RCMP's secure platform.

The PSCS will only be accessed by a limited number of authorized staff, including:

- Supervisor, Traffic Signal Systems;
- Traffic Signal Systems Technologist;
- PSCS Analyst;

for the purposes of fulfilling authorized RCMP requests, pursuant to the procedures outlined above, and in rare and limited circumstances by senior IT or operations staff if necessary for maintenance, repair, or upgrades of the PSCS. The PSCS will not be subject to active, ongoing monitoring by either the City or the RCMP, but recordings will be in effect 24/7.

Recordings made by the PSCS will be stored for 10 days. After the 10-day period has elapsed, the video footage recorded by the PSCS will be automatically and permanently deleted. Deleted footage will be non-recoverable. The PSCS is intended to be a permanent and ongoing initiative.

### Initial Field Testing

Prior to installing the PSCS, the City plans to conduct initial field testing. The field testing will both ensure the prudent use of public funds and ensure that personal privacy will not be impacted beyond the intended scope of the PSCS.

The financial investment required for the PSCS is substantial, with the implementation costs estimated to range from \$3.29 million for partial deployment to \$6.55 million (2023 dollars) for City-wide deployment. The field testing aims to verify that the technical requirements are met, including the reliable capture of vehicle licence plates, vehicle occupants' faces, and faces of people in public spaces, but only in the intended and limited area of the intersection.

The field testing would entail the following:

1. Consulting with the Richmond RCMP on the acceptable standards for video footage required for law enforcement purposes;
2. Determining and identifying acceptable 'blind' areas;
3. Determining (make and model), configuring, and testing of PSCS cameras;
4. Determining up to ten intersections for testing, placement of the cameras at intersections, and determining the point of view coverage; and
5. Conducting field testing of the cameras under various weather conditions and various signalized intersection designs to ensure the PSCS is able to reliably capture video and images for law enforcement purposes only.

The anticipated timeframe for the field testing is expected to span six to twelve months. This period will allow for the evaluation of camera performance across the broadest possible range of weather conditions and lighting scenarios. Additionally, the testing will gather data on camera durability, enabling the City to establish a maintenance and replacement schedule.

The specific location for the field testing has yet to be determined; however, the testing process will initially involve deploying cameras at up to ten signalized intersections in Richmond. Should this initial testing on City property yield satisfactory results that meet the law enforcement objectives, the setup will then be extended to include both simple and complex signalized intersections in Richmond for further proof of concept testing. With this approach, the field testing is expected to

provide data to inform the decision on the number of cameras, and their make and model, as required for different intersection designs.

Specifically, for the field testing, the City will adopt the same deployment and implementation strategy as the PSCS, albeit on a much reduced scale. To illustrate this setup, the City plans to procure essential components specifically for PSCS field testing, including network servers, data storage solutions, ultra-high definition cameras, camera control software, networking equipment, and fiber optic equipment. Importantly, this field testing infrastructure will operate independently and segregated from any existing City information technology systems to ensure the PSCS field testing remains isolated and to maintain strict user access control, as intended.

As the primary goal of the PSCS field testing is to evaluate the cameras' performance under various lighting and weather conditions, the City will not disclose any images or video footage to the public or third parties, including law enforcement agencies. Images and videos from the field testing will be shared with selected internal City staff and members of the Richmond RCMP Detachment, however, to evaluate the PSCS's performance, ensuring the cameras meet their objective. While the PSCS field testing will not be actively monitored, recordings will be in place with a retention period of 48 hours. This 48-hour retention period is designed to provide adequate coverage for analysis, taking into account staff scheduling and availability. All video footage and images will be automatically deleted after 48 hours. Deleted footage for field testing will be non-recoverable.

## **2. What is the scope of the PIA?**

**Your initiative might be part of a larger one or might be rolled out in phases. What part of the initiative is covered by this PIA? What is out of scope of this PIA?**

This PIA addresses the field testing, and the implementation and operations of the PSCS at 176 signalized intersections in the City.

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

**Please list all the elements of information or data that you might collect, use, store, disclose or access as part of your initiative. If your initiative involves large quantities of information or datasets, you can list categories or other groupings of personal information in a table below or in an appendix.**

Continuously recorded video footage from the PSCS and field testing will capture information elements including:

- license plate numbers;
- images of vehicle occupants (drivers, passengers);
- images of pedestrians (at certain signalized intersections);
- vehicle make and model (associated with vehicle occupants); and
- geolocation data (date and time that certain vehicles, vehicle occupants and pedestrians were at certain locations).

### 3.1 Did you list personal information in question 3?

**Personal information** is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.

Type “yes” or “no” to indicate your response. **Yes**

- If yes, go to [Part 2](#)
- If no, answer [question 4](#) and submit questions 1 to 4 to your Privacy Officer. You do not need to complete the rest of the PIA template.

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

Some initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in an information incident.

**N/A**

## PART 2: COLLECTION, USE AND DISCLOSURE

This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.



### 5. Collection, use and disclosure

Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of personal information. Use columns 3 and 4 to identify the legal authority you have for the collection, use or disclosure.

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: Initial field-testing cameras record ongoing footage at up to 10 intersections in the City.	Collection	<p>Section 26(b) – the information is collected for the purposes of law enforcement.</p> <p>Section 26(c) – the information relates directly to and is necessary for a program or activity of the public body.</p> <p>Section 26(e) – the information is necessary for the purposes of planning or evaluating a program or activity of a public body.</p>	N/A
Step 2: PSCS cameras record ongoing footage at 176 signalized intersections in the City.	Collection	Section 26(b) – the information is collected for the purposes of law enforcement.	Section 3(2) of the <i>Police Act</i> requires the City to provide policing and law enforcement – the City has complied with this by entering into the Municipal Police Unit Agreement (MPUA) with the Province pursuant to s. 3(2)(b) of the <i>Police Act</i> .

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
			Further, the <i>Community Charter</i> provides that municipalities require “adequate powers and discretion to address existing and future community needs” (section 1(2)(a)).
Step 3: The City stores video footage captured by the PSCS for 10 days after it has been recorded.	Use	Section 32(a) – for the purpose for which the information was obtained or compiled, or for a use consistent with that purpose.	*Note that the use of personal information at this stage is solely for storage – no one at the City will actually view or use it*
Step 4: If a specific incident has been captured on camera, the RCMP may request footage of that incident by providing a Request Form to the City, along with an accompanying Production Order.	None	N/A	N/A
Step 5: Specified City staff, including the City Solicitor, and the City’s General Manager of Community Safety, will review the Request Form and Production Order.	None	N/A	N/A
Step 6: If a Production Order is approved per step 5 above (i.e.,	Use	Section 32(a) – for the purpose for which the information was obtained	

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
where all required information has been included), the City will review and save the relevant PSCS footage (from the specified location and window of time, as provided by the RCMP).		or compiled, or for a use consistent with that purpose (i.e., for the purposes of law enforcement).	
Step 7: The relevant video footage of the incident is disclosed to the RCMP.	Disclosure	<p>Section 33(3)(d) – a public body may disclose personal information [...] to a public body, or a law enforcement agency in Canada, to assist in a specific investigation:</p> <ul style="list-style-type: none"> <li>(i) undertaken with a view to a law enforcement proceeding, or</li> <li>(ii) from which a law enforcement proceeding is likely to result; and</li> </ul> <p>Section 33(2)(l) – to comply with a subpoena, warrant or order issued or made by a court or person in Canada with jurisdiction to compel the production of information in Canada.</p>	Production Order pursuant to section 487.014 of the <i>Criminal Code</i>

**Optional:** Insert a drawing or flow diagram here or in an appendix if you think it will help to explain how each different part is connected.

## 6. Collection Notice

If you are collecting personal information directly from an individual the information is about, FOIPPA requires that you provide a collection notice (except in limited circumstances).

Review the [sample collection notice](#) and write your collection notice below. You can also attach the notice as an appendix.

**N/A** – pursuant to section 27(3)(a) of FOIPPA, a collection notice is not required where the information collected “is about law enforcement or anything referred to in section 15 (1) or (2)”, which is the case here.

## PART 3: STORING PERSONAL INFORMATION

If you’re storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

### 7. Is any personal information stored outside of Canada?

Type “yes” or “no” to indicate your response. **No**

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

All images, video footage, and data pertaining to the PSCS will be hosted on City-owned information technology infrastructure at City Hall or at the City WorksYard.

### 9. Does your initiative involve [sensitive personal information](#)?

Type “yes” or “no” to indicate your response. **Yes** – While this is always a contextual analysis, geolocation data and licence plate numbers are highly likely to be considered sensitive information in this context.

- If yes, go to [question 10](#)
- If no, go to [Part 5](#)

### 10. Is the sensitive personal information being disclosed outside of Canada under [FOIPPA section 33\(2\)\(f\)](#)?

Type “yes” or “no” to indicate your response. **No**

- If yes, go to [Part 4](#)
- If no, go to [Part 5](#)

## PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada. You may need help from your organization’s Privacy Officer. More help is available in the [Guidance on Disclosures Outside of Canada](#).

### 11. Is the sensitive personal information stored by a service provider?

Type “yes” or “no” to indicate your response.

- If yes, fill in the table below (add more rows if necessary) and go to [question 13](#)
- If no, go to [question 12](#)

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?

### 12. Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.

### 13. Does the contract you rely on include privacy-related terms?

Type “yes” or “no” to indicate your response.

- If yes, describe the contractual measures related to your initiative.

### 15. What controls are in place to prevent unauthorized access to sensitive personal information?

### 16. Provide details about how you will track access to sensitive personal information.

**17. Describe the privacy risks for disclosure outside of Canada.**

Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.

This may include reference to the measures to protect the sensitive personal information (contractual, technical, security, administrative and/or policy measures) you outlined. Add new rows if necessary.

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure or storage of the sensitive personal information (low, medium, high)	Level of privacy risk (low, medium, high, considering the impact and likelihood)	Risk response (this may include contractual mitigations, technical controls, and/or procedural and policy barriers)	Is there any outstanding risk? If yes, please describe.

#### 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.

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

Type “yes” or “no” to indicate your response. **Yes**

- For the implementation of the PSCS in the City of Richmond, the following equipment and infrastructure components are essential:
  - *Ultra-High-Definition Cameras:* The core component of the PSCS, these cameras are capable of capturing high-resolution video footage that can detail vehicle license plates and the faces of vehicle occupants and individuals in public spaces.
  - *Networking Equipment:* To ensure the seamless transmission of video data, robust networking equipment will be required. This includes switches, routers, and possibly dedicated hardware for encryption to secure the data transmission.
  - *Fiber Optic Infrastructure:* Utilizing the City-owned fiber optic network is crucial for transmitting high-resolution video. This infrastructure supports the bandwidth requirements of ultra-high-definition video data transmission.

- *Data Storage Solutions:* Given the high volume of high-resolution video data generated by the PSCS, ample data storage capacity is essential. This would likely involve both immediate short-term storage for field testing and longer-term storage systems, including storage redundancy, for the operation of the PSCS.
- *Camera Control Software:* To manage, control, and retrieve footage from the cameras, specialized software is required.
- *Segregated Network and User Access Systems:* To prevent unauthorized access and ensure data security, the PSCS will operate in a segregated network in isolation from all other City information systems. This requires separate dedicated server hardware and software to manage user access, authentication, and authorization.
- *Maintenance and Replacement Parts and Tools:* To ensure the continuity and reliability of the PSCS, tools and equipment for regular maintenance, as well as a system for the timely replacement of faulty or outdated components, are necessary.

**18.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of [FOIPPA section 30](#)?**

Type “yes” or “no” to indicate your response. **Yes**

- The security measures for the storage and access of recordings of the PSCS includes both physical and technical aspects to ensure data integrity and privacy.
- Physical security measures include server and storage rooms that are securely locked, with access restricted to specific staff members through a key card system or physical lock. Access to these restricted areas is logged and monitored to track staff access and to prevent unauthorized access. Moreover, stringent visitor management protocols will be enforced, including mandatory sign-ins and escorting, especially when third-party contractors are needed to service the servers or related infrastructure.
- Technical security measures include a segregated network exclusively for accessing and storing video recordings from the PSCS. The use of a segregated network ensures a highly secured and isolated environment for storing and retrieving PSCS data. Access to



this segregated network is strictly limited to pre-authorized devices and workstations, with distinct user credential, with permissions controlled by the City's Information Technology (IT) department. Access to the PSCS segregated network will only be provided to specific staff members, thereby enhancing the system's security integrity. To further safeguard the segregated PSCS network, there will be no internet connectivity and a network firewall will be implemented for additional protection.

- The secure transfer of video recordings to the RCMP for law enforcement purposes necessitates that the RCMP provides their own secured storage medium.
- The City's IT policy outlines the acceptable use of computing and technology resources, holding staff accountable for their actions while utilizing the City's equipment, software, and facilities. These policies ensure that staff are fully informed of their responsibilities in safeguarding all City information and data, including that of the PSCS, to maintain its integrity and confidentiality. All data storage and backup systems will be located within Canada. The City will utilize, where feasible, encryption at different stages of data transit and storage, and will apply encryption to the data where it is determined to be an appropriate and viable addition.

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

Describe where the digital records for your initiative are stored (e.g., on your organization's LAN, on your computer desktop, etc.) and the technical security measures in place to protect those records. Technical security measures include secure passwords, encryption, firewalls, etc. Physical security measures include restricted access to filing cabinets or server locations, locked doors, security guards, etc.

If you have completed a security assessment, you may want to append it to the PIA.

**N/A** – responded yes to question 18.1.

## 20. 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.

<b>Strategy</b>	
We only allow employees in certain roles access to information	<input checked="" type="checkbox"/>
Employees that need standing or recurring access to personal information must be approved by executive lead	<input checked="" type="checkbox"/>
We use audit logs to see who accesses a file and when	<input checked="" type="checkbox"/>
<b>Describe any additional controls:</b>	<ul style="list-style-type: none"> <li>- Request Form and Production Order from RCMP, reviewed and approved by the City's legal department, required prior to disclosure to RCMP</li> <li>- Log maintained of Requests Forms submitted, and disclosure made (including to which officer, and when)</li> <li>- Implement and access the PSCS in a segregated network and storage servers. User access will include audit logging to capture logins, activities, and duration.</li> <li>- Data and video captured by the PSCS will be purged and made non-recoverable after their retention period has passed.</li> </ul>

## PART 6: ACCURACY, CORRECTION AND RETENTION

In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

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

[FOIPPA section 28](#) states that a public body must make every reasonable effort to ensure that an individual's personal information is accurate and complete.

**N/A** – video footage

**22. 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.

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

Type "yes" or "no" to indicate your response.

**N/A** – video footage

**22.2 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?**

Type "yes" or "no" to indicate your response.

**N/A** – video footage

**22.3 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?**

Type "yes" or "no" to indicate your response.

**N/A** – video footage

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

Type "yes" or "no" to indicate your response. **No**

- If yes, go to [question 24](#)

- If no, skip ahead to [Part 7](#)

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

**FOIPPA** requires that public bodies keep personal information for a minimum of one year after it is used to make a decision.

Type “yes” or “no” to indicate your response.

- If no, describe how you will ensure the information will be kept for a minimum of one year after it’s used to make a decision that directly affects an individual.

**N/A** – responded no to question 23.

**PART 7: PERSONAL INFORMATION BANKS**

A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.

**25. Will your initiative result in a personal information bank?**

Type “yes” or “no” to indicate your response. **No**

- If yes, please complete the table below.

Describe the type of information in the bank
Name of main organization involved
Any other ministries, agencies, public bodies or organizations involved
Business contact title and phone number for person responsible for managing the Personal Information Bank

## 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.

### 26. 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.

Risk Description	Risk Likelihood	Risk Consequence	Owner	Planned Steps to Address or Mitigate Risk
<p><b><u>Contractual</u></b></p> <p>The contract with Vendor to install the PSCS camera upgrades has not been negotiated and thus privacy provisions are not yet documented.</p>	Low	Low	Program Manager, CIO, Privacy Office	PSCS vendor agreements or amendments will be reviewed for the security/privacy contractual provisions required to ensure compliance with FIPPA.
<p><b><u>Notification of initial field testing</u></b></p> <p>On-site notification will be posted of initial field testing cameras.</p>	Low	High	Program Manager	<p>Although not required, the City will post notification at all sites where PSCS cameras are installed during the initial field testing.</p> <p>The City will make information available to the public regarding the purpose of the PSCS on its website.</p>
<p><b><u>Security (FIPPA Section 30)</u></b></p> <p>Information in transit</p>	Low	High	CIO	Physical security will be strengthening to include segregated network, segregated data storage, access control through a key card system, segregated workspaces, and requirements for visitors to sign-in and be escorted on City premises where the PSCS is hosted.

Risk Description	Risk Likelihood	Risk Consequence	Owner	Planned Steps to Address or Mitigate Risk
				The City's IT policy will be updated to further provide direction and define accountabilities for acceptable use of the City's computing and technology resources.
<p><b><u>Section 32 of FIPPA limits the purpose for which a public body can use personal information</u></b></p> <p>Public bodies should be prepared to demonstrate that the ways they use personal information meet the requirements of s. 32.</p> <p>Information collected through PSCS should not be used beyond the original purpose for the collection and any other purpose that is demonstrably consistent with this purpose.</p>	Low	High	Privacy Office, CIO	<p>A clear policy will be put in place prohibiting the use of the PSCS for purposes other than those stated, except as authorized by the appropriate person. This policy will be clearly communicated to all staff.</p> <p>All request forms and production orders from the RCMP will be reviewed and approved by the City's legal department prior to disclosure of PSCS video to the RCMP.</p> <p>The City's IT policy will outline the acceptable use of computing and technology resources, holding staff accountable for their actions while utilizing the City's equipment, software, and facilities.</p>
<p><b><u>Retention of Personal Information</u></b></p> <p>Personal information may not be retained for longer than necessary.</p> <p>The City will be responsible for ensuring that the personal information</p>	Low	Low	Records Mgmt., Privacy Office, CIO	<p>A policy will be established to identify PSCS data retention, amendments to retention, and the purging of PSCS data from the system. This policy should ensure that records retention and disposition schedules are in place.</p> <p>Data not used in the PSCS system be routinely and systematically destroyed or overwritten based on the</p>

Risk Description	Risk Likelihood	Risk Consequence	Owner	Planned Steps to Address or Mitigate Risk
<p>stored on the PSCS is appropriately retained and destroyed.</p>				<p>retention period. This is often accomplished with a setting in the server/storage device recorder for the PSCS system. Video data should not be destroyed earlier than prescribed by policy without a specific request to do so.</p>
<p><b><u>Governance</u></b></p> <p>Risk of absence or incomplete governance relating to government policies and procedures.</p>	<p>Low</p>	<p>High</p>	<p>Privacy Office</p>	<p>The City will develop any required policies, procedures, and training necessary to support the security and privacy governance of the PSCS systems, as recommended in the "Public Sector Video Surveillance Guidelines."</p> <p>Furthermore, audit processes will be established to ensure compliance with these policies and procedures.</p> <p>Security and privacy requirements will be communicated to relevant staff to support compliance. New employees will not have access to systems without undergoing privacy training and completing a policy review/sign-off.</p>

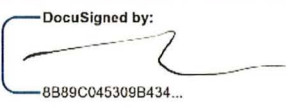
## PART 9: SIGNATURES

You have completed a PIA. Submit the PIA to your Privacy Officer for review and comment, and then have the PIA signed by those responsible for the initiative.

### Privacy Office Comments

### Privacy Office Signatures

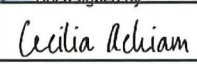
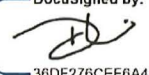


This PIA is based on a review of the material provided to the Privacy Office as of the date below.

Role	Name	Electronic signature	Date signed
Privacy Officer / Privacy Office Representative	Stocking, Nicole	 <p>DocuSigned by: 8B89C045309B434...</p>	5/22/2024

### Program Area Signatures

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 their Privacy Office and if necessary, complete a PIA update.

### Program Area Comments:

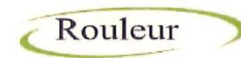
Role	Name	Electronic signature	Date signed
Initiative lead	Cecilia Achiam	 <p>DocuSigned by: 4A08F97F7DC942B...</p>	5/22/2024
Program/Department Manager	Douglas Liu	 <p>DocuSigned by: 38DE278CFE6A47D</p>	5/23/2024
Contact Responsible for Systems Maintenance and/or Security	Grant Fengstad	 <p>DocuSigned by: BCD7A0E9B78440D...</p>	5/24/2024
Only required if they have been involved in the PIA	Lloyd Bie	 <p>DocuSigned by: A93859F2CF014F7...</p>	5/28/2024



Role	Name	Electronic signature	Date signed
Head of public body, or designate	Claudia Jesson	DocuSigned by: <i>Claudia Jesson</i> 2E5043B9DB5A4CC...	5/31/2024

**SCHEDULE A**

April 23, 2018 Privacy Risk Assessment



## Privacy Risk Assessment

<b>Organization:</b>	City of Richmond
<b>Initiative or Process in Scope:</b>	Closed Circuit Television (CCTV) Cameras for Signalized Intersections in Richmond
<b>Submission Date:</b>	April 23, 2018
<b>Author:</b>	Jay Loder, Rouleur Consulting
<b>Project Contact:</b>	Ed Warzel
<b>Project Stage:</b>	Pre-implementation

### Executive Summary

Rouleur Consulting Ltd. has been engaged by the City of Richmond (the City) to perform a Privacy Risk Assessment, also known as a Privacy Impact Assessment (PIA). The purpose of the Privacy Risk Assessment is to review compliance with the City's privacy obligations for installation of public-facing Closed-Circuit Television (CCTV) cameras as established under their policies, the privacy requirements under the *Freedom of Information and Protection of Privacy Act (FIPPA)*, and guidance as provided by the Office of the Information and Privacy Commissioner of British Columbia (OIPC) to determine identifiable risks and risk mitigation processes.

This Privacy Risk Assessment is not intended as a certification tool guaranteeing compliance with the City's statutory obligations under *FIPPA*, rather, it serves to identify possible areas of non-compliance that require attention by the organization, and adoption of accepted best practices.

Some of the recommendations have implications beyond privacy which is consistent with the nature of privacy protection as it is often interwoven with information security, records management, and other business processes.

### Overview of the Privacy Risk Assessment Process

The Privacy Risk Assessment is a process that provides a review and evaluation of the risks and controls associated with privacy requirements. The Assessment can help organizations identify the most effective way to comply with their data protection obligations, meet expectations of privacy, and identify and rate privacy risks.

This report provides documentation of the risk assessment conducted regarding the equipment, software applications and services in consideration. It also provides the vendor, project team and stakeholders with better understanding as to how the data collection, storage and handling requirements of their software application and services relate to privacy requirements.

A Privacy Risk Assessment should be completed at the design stage of a new system or program, and



then revisited as program requirements and legal obligations change. Standard steps in the Assessment involve reviewing the proposal, the planning of the initiative, and the implementation. In many cases a post implementation review is conducted to ensure the initiative becomes operationalized as described.

## Background

The City of Richmond is a local government that was incorporated as a municipality on November 10, 1879 and later designated as a City on December 3, 1990. With a population of over 218,000 people, the City is a mix of residential, and commercial property, agricultural lands, industrial parks, waterways and natural areas. Because of the geographic location of Richmond, it serves as a thoroughway for neighbouring cities to provide access to various transportation options. Richmond is connected to neighbouring Metro Vancouver cities by a series of bridges and a tunnel. There are two major freeways feeding into Richmond, a rapid transit line, and two railway lines. Richmond also has two international seaports. In addition, Vancouver International Airport is located in Richmond on Sea Island.

Currently there are 175 signalized intersections in Richmond, among which 60 intersections are equipped with non-recording traffic detection cameras. The existing traffic cameras function primarily to detect vehicles, manage traffic flow and respond to real-time traffic incidents. Each camera equipped intersection has four cameras to monitor traffic flow in each direction of the intersection. Existing traffic detection cameras have the capability of capturing live video feeds, but to date the recording function has not been equipped within existing hardware and software. In early 2018, Richmond City Council approved funding for a new initiative to install additional CCTV cameras, with recording capabilities, at 175 signalized intersections in Richmond. These cameras will enhance public safety by serving as an important investigatory tool for RCMP. This Privacy Risk Assessment analyses the privacy impacts for these additional cameras.

Responsibility for Privacy at the City of Richmond rests with the Head of the Public Body. Responsibility for day to day privacy compliance including PIA's at Richmond rests with the Privacy Officer designated in the City Clerk's office. The City Clerk's office also receives and processes requests for information under the *Freedom of Information and Protection of Privacy Act (FIPPA)*.

## Objective

Rouleur Consulting Ltd. has been engaged by Richmond to perform a Privacy Risk Assessment. The purpose of this Privacy Risk Assessment is to review compliance with the privacy requirements under the *FIPPA*, and relevant Richmond policies to identify related risks and prescribe recommendations on compliance and risk mitigation. Recognized privacy protection best practices provided by Federal and Provincial government bodies were also considered in this assessment.

## Introduction

This assessment report presents findings and recommendations arising from Rouleur's review at Richmond. We reviewed policies and procedures at the City that were relevant from the perspective of compliance with *FIPPA*. The review was conducted through Winter 2018. A draft final report was reviewed by the Privacy Officer and select senior staff in April 2018. This final report was prepared April 23, 2018.

Benefits of deploying CCTV cameras at traffic intersections have been described by the City as:

- Ability to retroactively observe specific traffic issues such as collisions, damaged equipment, safety concerns, and general signal operation.
- Assistance in law enforcement investigation and insurance matters or claims pertaining to motor vehicles and pedestrians.
- Data collection on traffic analysis for the improvement of traffic services.
- Providing real-time information for traffic management in disaster and emergency responses.
- Identify and proactively address safety concerns and hazards.

## Scope

In early 2018, Richmond City Council approved funding for a new initiative to install additional CCTV cameras, with recording capabilities at 175 signalized intersections in Richmond. The intention of the cameras is to improve public safety by serving as an important investigative tool for the RCMP. This Assessment analyzes the privacy impacts for these additional cameras. The focus of the review was limited to CCTV cameras at traffic lights and intersections in the City of Richmond. Further Privacy Risk Assessments relating to CCTV cameras may be required in the future if they are not located at traffic intersections or installed for the same intended use.

CCTV camera capture a wide array of personal information including:

- Personal vehicle identifiers such as licence plates, stickers or other unique identifiers.
- Images of individuals in vehicles, on bikes or as pedestrians at the intersections.
- Any other personally identifiable information captured in the view of the cameras.

Therefore, installation and use of the CCTV cameras involves multiple areas of governance and privacy compliance that will be covered in this review, including:

- Operational and staff requirements
- Responsibilities of Richmond
- Access and role-based permissions to CCTV camera data

- Disclosure of CCTV camera data
- Retention of CCTV camera data
- Public notification and transparency
- Privacy breach mitigation
- Policy, procedure and auditing requirements

For the past several years, with the advent of low-cost and excellent-quality digital CCTV systems, police have been exploring local CCTV assets in investigating criminal activity, identifying suspects and apprehending criminals. Quality images of perpetrators and/or their vehicles has, when available, been reported to cut police investigational time and reduce policing costs. Cities with cameras have claimed success in reducing crime and increasing perceptions of public safety through deterrence and the quick apprehension and removal of dangerous individuals from the community.

Threats of violence and terrorism remain an existent threat not only in international locations but also domestically in Canadian cities. Cities with CCTV systems have claimed success in reducing crime and increasing perceptions of public safety through deterrence and the quick apprehension and removal of dangerous individuals from the community. Richmond feels it is prudent to be proactive in addressing potential threats to the City's community safety needs.

In the City of Richmond, the main purpose of installing CCTV cameras at traffic intersections is to enhance public safety in the City. CCTV cameras are proposed to be present at all 175 signalized intersections in Richmond. CCTV images are intended to be transmitted by wireless radios apart from locations where fiber optic cables exist. The system is not a real time surveillance system except in the case of emergency or disaster.

## Related Privacy Impact Assessments (PIAs)

There are also related PIA or Privacy Risk Assessments completed by neighbouring communities which have been evaluated to compare to the CCTV cameras proposed in this review. The three comparative PIAs are:

- City of Surrey CCTV Television Traffic Management Program "CCTV Network System" (2012)
- City of Victoria, Johnson Street Bridge Webcam (2015)
- City of Vancouver Temporary Event Management & Public Safety (TEMPS) CCTV Program (2011)

The Province of British Columbia is currently conducting a PIA relating to a government proposal to expand its current intersection camera program.

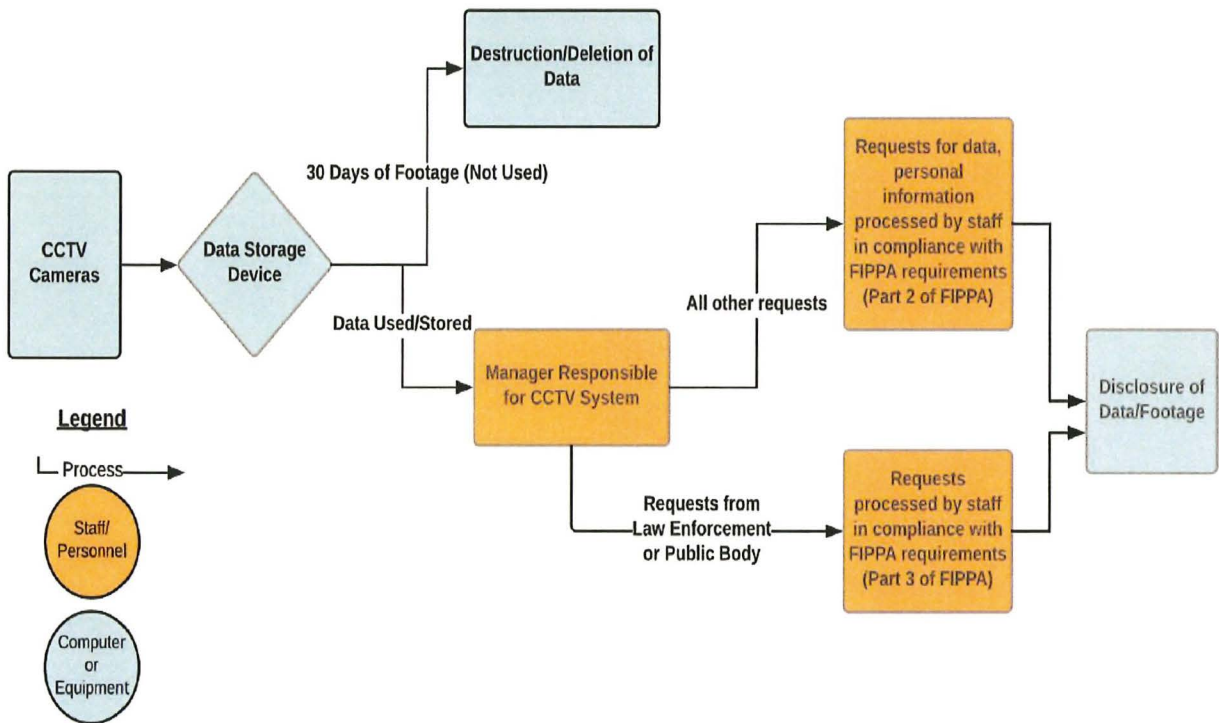
Further programs built or modifications to the CCTV cameras after Richmond installs them will require additional or addenda risk assessments to address privacy issues specific to the new programs or modifications.

## Documentation Review

We reviewed several documents of relevance, chief among them Richmond’s Information Technology Security Policy, Privacy Policy and the *FIPPA* legislation. As well, the document “*Public Sector Surveillance Guidelines*” published by the OIPC (which sets out that Office’s privacy management guidance and expectations for surveillance by Public Bodies in British Columbia) was considered. A full listing of the documents reviewed may be found in the appendix to this report.

## Data Flow

Images are captured by the cameras and stored and after 30 days the records are deleted. If the City is in receipt of a request for images, the manager responsible for the CCTV system will review the application and process the request in keeping with the City’s procedures for information requests.



## Data and Personal Information Classification Matrix

The following table documents the data collected:

	Data	Data Classification	Purpose	Data Steward
1.	Employee contact information - includes user ID, organizational ID and basic user contact information (e.g. phone number or email address).	Contact Information (Exempt from FIPPA)	Employee contact information is information used to identify and differentiate users of the system. This information is used to confirm access permissions.  Most employee contact information is considered either non-personal information, or "Business Contact Information" under FIPPA.	Manager responsible for setting permissions to access system
2.	Personal information captured in video footage (e.g. likeness/face, licence plate, habits/routines of users of intersection.)	Personal Information, Section 22 of FIPPA	Personal information would not be used for any purpose other than the scope of the CCTV cameras program. For personal information to be released or disclosed, it would need to be subject to an existing disclosure process (law enforcement etc) or go through a formal FOI request to the City Clerk's Office.	City Clerk's Office and Manager of Department responsible for CCTV traffic cameras

## Findings and Recommendations

The nature of our review was not to identify every potential privacy risk; rather, it was to identify those issues and risks specific to the CCTV cameras program in scope. The specific risk findings and recommendations arise from our review of documentation and the meetings and discussions with staff. Although many topics were covered in those discussions, this section makes mention only of those topics that may give rise to measurable privacy risks or issues for the organization.

Our detailed findings for the proposed CCTV camera installation cover the following:

### Operational and Staff Requirements

Cameras have resolutions that are high enough to capture the details of traffic flow for the proposed use of the data (example: the ability to zoom in to read licence plates on vehicles.) Additionally, cameras should be resilient to all types of weather, wind and general exposure to outside elements and



positioned high enough that there is very little way of tampering with the cameras. See Appendix 2 for more information on equipment and technology of CCTV camera systems.

The CCTV cameras should be positioned to view the centre of intersections, showing all approaches to the intersection. If possible, cameras should not be focused or capturing anything outside of day-to-day intersection operations. (Example: cameras should not face or see directly into office buildings or residential homes). While cameras may have the ability to move around and view areas outside of the intersection, they will not be used to meet the needs of nearby matters, such as fires or emergencies.

*FIPPA* requires that Richmond meet a high standard of compliance to the protection of personal information. Cameras collect multiple types of personal information, thereby risk management and due diligence becomes the responsibility of Richmond staff and camera operators.

Staff using the CCTV cameras should have a Terms of Use or similar policy that defines the system, including:

- The staff position responsible for the management of the system;
- Location of all areas monitored by cameras and notification signs that also disclose date/times of operation recordings;
- Staff location(s) where the video feed from the cameras may be monitored, saved and sent to other staff;
- Restrictions on camera position or field of view, if any;
- Restrictions on recording of information, if any;
- Proposed installation date, inspection and warranty dates, if any;
- Documentation requirements, including staff access logs and document destruction schedules, if applicable;
- Requirements and process for viewing recorded video information;
- The positions of the employee(s) with responsibility for the day-to-day operations of the systems;
- A description of how the public will be notified of the existence and use of the system;
- Operating procedures that minimize the system's potential impact on privacy, maximize transparency, and identify appropriate uses of the system; and,
- Other information specified in any procedures adopted pursuant to this policy.

## Responsibilities of Richmond Employees

### City Staff:

- Ensure all CCTV camera installations meet requirements of the program, policies and procedures and initiate new risk assessments for new installations or modifications to the CCTV systems.
- Review and approve installation and staff permissions who will have access to the system.
- Document the location of CCTV traffic cameras on a map, the capabilities of the equipment, life-span, warranties and schedule inspections/audits to ensure proper operations.
- Monitor performance of the CCTV traffic camera system and staff to ensure policy and *FIPPA* compliance.
- Ensure proper training is provided to all staff operating the CCTV camera system.
- Manage the storage and tracking of camera data, including the access logs of when data was copied, accessed or deleted.

- When requested by the Clerk's Office for an information request or law enforcement matter, ensure data is safely stored and delivered in a timely manner (Clerk's office will set deadlines).
- Draft, update and review policy and procedures in alignment with Richmond's review process, including training manuals and modules for new employees.
- Investigate, report and mitigate any privacy breaches with the City Clerk's office, as applicable.
- Review privacy breaches and plan mitigation and prevention processes, thereby preventing reoccurring breaches or risks.

#### **Clerk's Office Staff:**

- Review and approve all access requests for CCTV traffic camera data.
- Be responsible for the disclosure of CCTV camera data that include personal information or exempted information from disclosure in compliance with *FIPPA*.
- Provide privacy breach investigation support, mitigation and preventative risk management planning.
- Provide targeted privacy training ensuring employees are aware of *FIPPA* regulations when dealing with personal information contained in the video data.
- Ensure that any elected officials or senior leadership staff members who request access to information contained in the CCTV systems is on a need-to-know basis for completing their job duties. No access shall be given to employees who do not require the information outside of their responsibilities.

#### **Contractors:**

- Ensure contractors have provisions in service agreements or contracts to comply with all areas of *FIPPA*, specifically including: personal information, third party information, storage inside of Canada, retention and life-cycle process of sensitive data and secure destruction of data.

## **Access and Role-Based Permissions to CCTV Camera Data**

Access to the CCTV traffic camera system should be in compliance with *FIPPA* and therefore granted on a need-to-know basis for those individuals who require the access to perform their work duties. Specific roles that may be given access to the data could be defined in policy to include:

- RCMP and other law enforcement personnel staff (through proper access to information processes in compliance with *FIPPA*).
- Emergency Operations (EOC) staff (in the event of an emergency).
- City Clerk's office (FOI, Privacy staff and support staff as needed).
- Traffic operations and roads staff, who operate, maintain and repair the system.

## **Disclosure of CCTV Camera Data**

Individuals from the public or business organizations must submit a *FIPPA* request to access, in which all information exempted from disclosure would be redacted by City staff. Disclosure of CCTV camera data may be subject to fees as set out in *FIPPA* and the Richmond Fees and Service Bylaw.

Section 26(b) of *FIPPA* authorizes collection of personal information for the purposes of law enforcement. Schedule 1 of *FIPPA* defines "law enforcement" as: policing, including criminal intelligence

systems; investigations that lead, or could lead, to a penalty or sanction being imposed; or proceedings that lead, or could lead, to a penalty or sanction being imposed.

When a request for CCTV camera data has been received in writing that is part of a law enforcement investigation or authorized by another statute of BC, the data (redacted or un-redacted) can be released in the following circumstances:

- Law enforcement agencies for the purpose of an investigation (must contact City Clerk's office to initiate request process).
- Risk management in the course of injury or other investigations of damage/loss.
- Emergency services in connection with the investigation or accident.

When the CCTV camera data is disclosed it must be properly documented by the City Clerk's (Privacy and FOI) department. Responses to FOI requests will follow the City's existing FOI response process.

## Retention of CCTV camera data

Recorded video images should be stored in secure location and should comply with the Richmond's records management policies and bylaws. The data becomes the custody and control of Richmond, unless the data is forwarded to other entities for law enforcement or loss investigation purposes (ex: The Fire Commissioners Office of BC will obtain the custody and control of the video data if it is submitted to them or required for a fire investigation which involved loss/damages).

Recorded video data should be set on a retention schedule, and not permanently stored (ex. 30 days). If footage is used for an investigation or law enforcement matter, it should be retained as long as required in accordance with Richmond's records management and retention policies.

Under *FIPPA* requirements, all recorded data and information should be stored and only accessed inside Canada.

## Public Notification and Transparency

Richmond should exercise a high degree of care when using CCTV systems to ensure the protection of privacy rights. Because personal information may be collected in the camera footage, the public should be notified of the presence of cameras at intersections, as well as provided information online regarding the privacy notice. Privacy notice requirements in *FIPPA* regulations require that signage be placed in a conspicuous place that includes the following information:

- Notify the area/intersection/block is under video surveillance upon entry;
- What authority the City of Richmond has to collect the data (Section 26 of *FIPPA*);
- The manager responsible for the collection of the data; and
- The address or contact information of the manager or senior person responsible for the collection of the data.

It is recommended that an individual's personal contact information not be used in the notice, rather, that the role be posted, for example "please contact the City Clerk's office", or the manager responsible

for administering the program. Notification signage should be periodically audited to ensure notification is at all required sites.

See Appendix 4 for examples of CCTV camera notification signage.

Additionally, employees of Richmond who could be impacted by the installation of a CCTV camera should be given clear information, including:

- Intended use of the cameras;
- Objectives of the system including clarification that there is no relationship to employee performance monitoring;
- Areas and location covered by CCTV cameras;
- Contact information of manager who can provide additional information;
- Security over video records;
- Rights and process to access video footage of themselves; and
- Information regarding the storage and retention of the footage.

It is further recommended that the City make information publicly available to citizens on the purpose and benefits of the CCTV program, as they do with other services under the "Public Safety" tab on their City website.

## Privacy Breach Mitigation

The manager responsible for the operation of the CCTV cameras should be required to report immediately any unauthorized collection, use or disclosure of personal information to the City Clerk's office.

The manager responsible for the operation of the CCTV cameras should monitor the use of the cameras to ensure policies related to the system are being followed and the risk of breaches occurring is mitigated. In partnership with the City Clerk's office, staff should perform privacy breach investigations as they occur, then draft conclusions of it to cover the facts, identifying causation or risks associated with the breach, create processes to prevent such breaches in the future and update CCTV camera policies as required.

## Policy, Procedure and Auditing Requirements

As mentioned in the findings above, a CCTV camera policy, including procedures should be drafted by Richmond. The policy should include all the elements listed above. The policy should be updated on an as-needed basis and will become a requirement for all staff who have access to the CCTV camera system to read and acknowledge (sign) they have read and understood it.

As a point of reference for this review, the City of Surrey has published their CCTV camera footage policy "Policy and Procedures for the CCTV Traffic Camera Management System" online (see appendix).

The City of Vancouver's policy "CCTV Systems Corporate Policy" can be found here:

<http://policy.vancouver.ca/AE00302.pdf>

Risk mitigation recommendations based on the findings above appear in the table below. Recommendations that propose new or revised policy or procedures for Richmond will of course need to be approved via their existing approval processes.

## Privacy Risk Register

Risk Description	Risk Likelihood	Risk Consequence	Owner	Recommendation to Address or Mitigate Risk
<p><b><u>Contractual</u></b></p> <p>The contract with Vendor to install the CCTV camera upgrades has not been negotiated and thus privacy provisions are not yet documented.</p>	Low	Low	Program Manager, CIO, Privacy Office	Recommendation - Agreements or amendments should be reviewed for security/privacy contractual provisions required in contract to ensure compliance with FIPPA.
<p><b><u>Collection of Personal Information (PI) - Section 26 FIPPA</u></b></p> <p>Public Bodies must only collect personal information (PI) as permitted in S.26. A public body must be prepared to demonstrate to the OIPC with specific evidence that S.26 authorizes the proposed or collection of PI by a surveillance system.<sup>1</sup></p>	High	High	Privacy Office	<p>Recommendation – the City should determine if the stated goals of the CCTV project can be achieved by less invasive privacy measures. If it is determined that the project can go forward, the following will be recommended:</p> <ul style="list-style-type: none"> <li>- The City conduct research to determine if the deployment of CCTV at intersections will achieve the stated benefits of the project.</li> <li>- The City determines if there are less privacy sensitive ways to deploy CCTV throughout the City.<sup>2</sup></li> </ul> <p>Further recommendations:</p> <ul style="list-style-type: none"> <li>- Position the CCTV cameras in such a way as to reduce the collection of individual images that are not the intended subjects (i.e. pedestrians).</li> <li>- Determine if the stated goal</li> </ul>

<sup>1</sup> OIPC - *Public-Sector Video Surveillance Guidelines (2014)* p.2

<sup>2</sup> OIPC - *Public-Sector Video Surveillance Guidelines (2014)* p.5

				can be accomplished with cameras being operational only at certain times of the day rather than 24 hours. <sup>3</sup>
<b>Risk Description</b>	<b>Risk Likelihood</b>	<b>Risk Consequence</b>	<b>Owner</b>	<b>Recommendation to Address or Mitigate Risk</b>
<p><b><u>Collection of PI - Section 27 FIPPA- notification</u></b></p> <p>Section 27(2) of FIPPA requires that individuals be notified of collection of personal information.</p>	Low	High	Program Manager	<p>It is recommended that to comply with S.26, the City should have notification at all sites where the cameras are installed (see Appendix 4 for examples). Further the City should create a process to periodically review notifications at all sites to ensure notifications are in place; for example this process could be linked to the periodic servicing of cameras, etc.</p> <p>The City should also make information available to the public regarding the purpose of the CCTV program on their website under the “Public Safety” tab.</p>
<p><b><u>Collection of PI - Section 26 – Law Enforcement Purpose</u></b></p> <p>The BC OIPC has determined in a number of Orders that an investigation must be underway at the time the PI is collected for s.26(b) to apply. A public body is not authorized to collect personal information about citizens, in the absence of an</p>	Low	High	Privacy Office	<p>The City has existing procedures for disclosure of personal information for law enforcement purposes.</p> <p>It is recommended the disclosure procedures for law enforcement purposes be reviewed to ensure they are in compliance with FIPPA requirements.</p>

<sup>3</sup> OIPC – *Using Overt Video Surveillance Guidance Document (2017) p. 2*

<p>investigation; on the chance it may be useful in a future investigation. Similarly, for collection to be lawfully authorized, the proceeding must be ongoing at the time of collection.<sup>4</sup></p>				
Risk Description	Risk Likelihood	Risk Consequence	Owner	Recommendation to Address or Mitigate Risk
<p><b><u>Security</u></b> <b>(FIPPA Section 30)</b></p> <p>Information in transit</p>	<p>Low</p> <p>Low</p>	<p>High</p> <p>Low</p>	<p>CIO</p> <p>CIO</p>	<p>Physical security controls are in place and include, card access, segregated workspaces and requirements for visitors to sign in and be escorted through the building.</p> <p>Richmond's IT Policy provides direction and defines accountabilities for acceptable use of Richmond's computing and technological facilities.</p> <p>A decision has not been made regarding the network connection used between Richmond's CCTV network and where the data storage location will be, nor which employees will have access.</p>
<p><b><u>Protection of Personal Information</u></b></p> <p>Risk of</p>	<p>Low</p>	<p>Low</p>	<p>CIO, Privacy Office</p>	<p>If a third-party service provider is used for the network of the CCTV systems, they may not meet the requirements of S.30.1. This risk may be addressed through an additional risk assessment and</p>

<sup>4</sup>OIPC - *Public-Sector Video Surveillance Guidelines (2014)* p.4

<p>noncompliance FIPPA S.30.1 (Storage/Access outside of Canada).</p>				<p>contractual provisions.  Storage and access must stay within Canada, as well as backup systems. Where possible, encryption should be used for the data in transit and at rest.</p>
<p><b><u>Protection of Personal Information</u></b>  Risk of noncompliance FIPPA S.30.1 (Storage/Access outside of Canada).  Risk that USA Freedom Act permits bodies under the Foreign Intelligence Surveillance Act (FISA) to issue a sealed order for access to an individual's data.</p>	<p>Low</p>	<p>Low</p>	<p>Privacy Office</p>	<p>When a foreign government requests access to video surveillance, section 30.1 "Obligation to report foreign demand for disclosure" must be followed.  Recommendation :  Create guidance that all requests of this nature must be referred to the Privacy Office.</p>
<p><b>Risk Description</b></p>	<p><b>Risk Likelihood</b></p>	<p><b>Risk Consequence</b></p>	<p><b>Owner</b></p>	<p><b>Recommendation to Address or Mitigate Risk</b></p>
<p><b><u>Section 32 of FIPPA limits the purpose for which a public body can use personal information</u></b>  Public bodies should be prepared to demonstrate that the ways they use personal information meet the requirements of s. 32. Information</p>	<p>Low</p>	<p>High</p>	<p>Privacy Office</p>	<p>It is recommended that a clear policy prohibiting the use of CCTV (except as authorized by the appropriate person) for purposes other than those stated be in place, and clearly communicated to all staff.</p>



<p>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.</p>				
<p><b><u>Accuracy, Correction, Retention of Personal Information</u></b></p> <p>Personal information may be retained for longer than necessary.</p> <p>Richmond will be responsible for ensuring that the personal information stored on their CCTV systems is appropriately retained and destroyed.</p> <p>Need to determine if any information is stored on cameras, if so what retention, destruction rules are in place.</p>	<p>Low</p>	<p>Low</p>	<p>Records Mgmt. Privacy Office</p>	<p>It is recommended that where required, data retention, accuracy and correction policies should be in place or created.</p> <p>Records retention and disposition schedules will ensure that personal information is kept for at least one year if used and directly affecting an individual.</p> <p>Data that is not used in the CCTV system should be routinely destroyed or overwritten every thirty (30) days. This is often accomplished with a setting in the server/storage device recorder for CCTV systems.</p> <p>Video data should not be destroyed any earlier than prescribed by policy without a specific request to do so.</p>
<p><b>Risk Description</b></p>	<p><b>Risk Likelihood</b></p>	<p><b>Risk Consequence</b></p>	<p><b>Owner</b></p>	<p><b>Recommendation to Address or Mitigate Risk</b></p>
<p><b><u>Governance</u></b></p>	<p>Low</p>	<p>High</p>	<p>Privacy</p>	<p>It is recommended that the City develop any required policies,</p>

<p>Risk of absence or incomplete governance relating to government policies and procedures.</p>			<p>Office</p> <p>procedures and training required to support security and privacy governance of the CCTV systems as recommended in the "Public Sector Video Surveillance Guidelines."<sup>5</sup> Further, it is recommended that audit processes be in place to ensure compliance with policies and procedures.</p> <p>Security and privacy requirements should be communicated to relevant staff to support compliance. New employees should not have access to systems without privacy training and policy review/sign off.</p>
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## Summary

*"Installing surveillance equipment may seem like a logical decision for your organization, but collection and use of personal information through video surveillance may violate BC privacy law and could lead to other costly liabilities".<sup>6</sup>*

While several municipalities in British Columbia have deployed CCTV processes similar to those contemplated by the City of Richmond, the Office of the Information and Privacy Commissioner has indicated several times that they have concerns about this method of collection and use of personal information. It is recommended that the City determine the benefits of deploying CCTV and explore if alternative methods are available to achieve the desired benefits.<sup>7</sup>

Further, the City has a reputational risk should the Office of the Privacy Commissioner investigate, audit or make public statements in the media regarding the City's CCTV initiative specifically, or the City's approach to privacy generally. These risks can be mitigated by the City addressing the risks as listed in this report's Risk Register, being transparent about the deployment of CCTV and the benefits to the community. Finally, as has been the City's intention, it is essential that the City consult with the OIPC prior to implementing CCTV to allow their office to provide feedback on the proposed initiative.

As mentioned, further PIA's or Risk Assessments may be required as new related services or modifications are considered, and through post implementation to ensure the programs delivered match those proposed.

<sup>5</sup>OIPC - *Public-Sector Video Surveillance Guidelines (2014)*

<sup>6</sup>OIPC – *Using Overt Video Surveillance Guidance Document (2017) p. 1*

<sup>7</sup>City of Richmond – *Report to Committee – Closed Circuit Television (CCTV) (Oc. 3, 2017) p.4 "Benefits of Recording Capability for Traffic Cameras"*

## Appendix 1:

### ***Freedom of Information and Protection of Privacy Act (FIPPA)***

The purpose of *FIPPA* is to provide a right of access to information under the control of institutions in accordance with the principles that, information should be available to the public, necessary exemptions from the right of access should be limited and specific, and decisions on the disclosure of government information should be reviewed independently of government; and to protect the privacy of individuals with respect to personal information about themselves held by institutions and to provide individuals with a right of access to that information - <https://www.oipc.bc.ca/about/legislation/> .

The provisions of Part 3 of *FIPPA* apply to **personal information** – that is, recorded information about an identifiable individual – in the custody or under the control of a public body. "**Personal information**" means recorded information about an identifiable individual other than contact information. "**Contact information**" means information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual. <https://www.oipc.bc.ca/about/legislation/>

## Appendix 2:

### **Equipment and Software Security/Privacy Certifications**

As no specific software programs or equipment and camera specifics have been identified in this review it is recommended that Richmond ensure that the purchased products meet industry standards and privacy requirements.

A security compliance framework is best designed by the Richmond IT Department for integration into current systems and specifications, incorporating full-cycle test and audit phases, security analytics, risk management best practices, and security benchmark analysis to achieve certificates and attestations of the software and equipment.

## Appendix 3:

### Documents Reviewed

1. **City of Richmond Staff Report - "Closed Circuit Television (CCTV) for Signalized Intersections in Richmond" Report, October 2017.**  
[https://www.richmond.ca/shared/assets/21 CCTV CNCL 12111749033.pdf](https://www.richmond.ca/shared/assets/21_CCTV_CNCL_12111749033.pdf)
2. **City of Surrey - Policy and Procedures for CCTV Traffic Camera System Traffic Management Centre (2014)**
3. **City of Surrey - CCTV Traffic Management Program "CCTV Network System" (2012)**
4. **City of Surrey - Public Safety Uses of the Traffic Camera Network (2016)**<http://www.surrey.ca/files/PublicSafetyUsesoftheTrafficCameraNetwork.pdf>
5. **City of Victoria - Johnson Street Bridge Webcam (2015)**  
<http://www.victoria.ca/assets/Library/PIA%202011-001%20Updated%20JSB%20Webcam.pdf>
6. **City of Vancouver - Temporary Event Management & Public Safety (TEMPS) CCTV Program (2011)**<http://robwipond.com/wp-content/uploads/2012/05/City-of-Vancouver-CCTV-PIA.pdf>
7. **City of Vancouver - CCTV Systems Corporate Policy**  
<http://policy.vancouver.ca/AE00302.pdf>
8. **City of Vancouver - Procedure for Public Realm CCTV Systems**  
<http://policy.vancouver.ca/AE00302P1.pdf>
9. **City of Vancouver - CCTV Setup and Monitoring Policy**  
<http://webftp.vancouver.ca/covfoi/Phase%201%20-%202011%20Stanley%20Cup%20Record%20Release%20-%20Proactive%20Disclosure/Emergency%20Management/EM-1%20Binder/EM-1%20Tab1-005%20CCTV%20Policies.pdf>
10. **Office of the Information and Privacy Commissioner's Office- Public-Sector Video Surveillance Guidelines (2014)**  
<https://www.oipc.bc.ca/guidance-documents/1601>
11. **Office of the Information and Privacy Commissioner's Office – Guide to Using Overt Video Surveillance, October 2017**
12. **Office of the Information and Privacy Commissioner's Office – Audit and Compliance Report P16-01 - Over-collected and Over-exposed: Video Surveillance and Privacy Compliance in a Medical Clinic**
13. **Office of the Information and Privacy Commissioner - Use of Video Surveillance by Local Government** <https://www.oipc.bc.ca/public-comments/2128>

## Appendix 4:

### Sample Notification


“The City of Richmond's CCTV camera system is authorized to collect personal information under the authority of section 26 of the *Freedom of Information and Protection of Privacy Act*. Personal Information is collected for the purpose of, traffic management and planning, law enforcement and public safety. For questions regarding the collection of personal information, please contact the [title of manager], [department name] at [phone number] or {address of city hall}”.

### Signage Examples






**NOTICE**


You have entered an area that may be monitored by Closed Circuit Video cameras. This program is a community initiative to reduce crime within the City of Belleville.



Legal Authority for collection of information is Section 29(1)(g) of the Ontario Municipal Freedom of Information and Protection of Privacy Act. If you have any questions or concerns about this program please contact the Belleville Police Service at 613-966-0882



**Partners with the Community**



PERSONAL INFORMATION (PHOTOGRAPH) IS COLLECTED UNDER THE AUTHORITY OF THE CITY OF TORONTO ACT 2006 AND THE CITY OF TORONTO MUNICIPAL CODE CHAPTER 545 AND WILL BE USED ONLY IN THE EVENT OF A CRIMINAL OFFENCE INVESTIGATION. QUESTIONS REGARDING THE COLLECTION OF THIS INFORMATION CAN BE DIRECTED TO:

DIRECTOR, INVESTIGATION SERVICES  
MUNICIPAL LICENSING & STANDARDS  
12E, CITY HALL, 100 QUEEN ST W, TORONTO, ONT M5H 2N2  
1-877-TO TAXIS (1-877-888-2947)