

Surveillance Cameras

Labour Market Information Centre
City Centre Area Office

Privacy Impact Assessment

FINAL REPORT

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In consultation with:
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Chapter 1: Description of the Surveillance Camera Activity

Alberta Employment and Immigration (AE&I), Delivery Services provides services to clients in the Labour Market Information Centre (LMIC) at the City Centre Area Office located in the Lawford building at 10242 -105 Street, Edmonton, Alberta. This leased building has a waiting room for clients on the main and the 3rd floor. Individuals using this space are waiting for appointments with the Career Employment Counselors or the Support and Financial Services Coordinator. Clients also come into the LMIC to access reference material, computers, photocopiers and fax machines.

Four surveillance cameras are used as a deterrent to theft, conflicts and inappropriate behaviors.

The surveillance cameras record images of individuals accessing the LMIC on the main floor. The surveillance cameras are motion sensitive and are only activated when there is movement in the area and do not have audio capacity.

The images are captured on a television monitor and recording equipment located in a locked electrical room on the 2nd floor. The equipment is not currently manned by anyone and is only accessed if a situation warrants it. The video tape recording of images is re-recorded on after a 24 hour loop is finished.

This Privacy Impact Assessment (PIA) focuses on the use of the surveillance cameras.

1.1 Responsible Public Body

AE&I is the Ministry responsible for the LMIC at the City Centre Area Office located in the Lawford building.

1.2 Responsible Business Area

The surveillance cameras are the responsibility of the Area Business Manager, Delivery Services, LMIC, AE&I.

1.3 Contact Person

The following individual can answer questions about the personal information collected, used and disclosed by the use of surveillance cameras.

Area Business Manager
City Centre Area
Delivery Services, Labour Market Information Centre
Alberta Employment and Immigration
#702, 10242 – 105 Street
Edmonton AB, T5J 3L5
Tel. 780-415-4999

1.4 Overview

The surveillance cameras were installed to be a deterrent to theft, conflicts and inappropriate behaviors by individuals entering and using the LMIC services at the City Centre Area Office on the main floor of the Lawford building in Edmonton.

1.4.1 Background

In support of this service delivery the use of the surveillance cameras provides an indirect presence in the unsupervised areas of the LMIC to be a deterrent to theft, conflicts and inappropriate behaviors.

1.4.2 Current Situation

The surveillance cameras were installed to record a full view of those in the area located on the main floor of the LMIC. This location is in the leased space within the Lawford Building. The 573 square meter area has chairs for seating, 30 computers for client use, and a large selection of books in the library, photocopiers, fax machines and access to using phones for long distance services as well as 8 local phones. Approximately 1400 individuals per month will use this space, and at any given time there may be up to 120 individuals waiting or using the facilities throughout the day.

On a daily basis there have been expensive books taken, up to a \$100.00 value.

This area has two public access doors leading into the LMIC, three staff access doors, with an additional two client access doors into the interview areas.

Four signs are prominently displayed; one on each door at the entrance to the LMIC from the street and one on each door at the entrance to the LMIC from the lobby through the main building entrance. The following is displayed:

Warning, These premises are Video Surveilled. If you have any questions please contact 780-415-4999 (refer to *Appendix 1*).

1.4.3 Surveillance Camera Project Overview

The departmental security policy requires the completion of a PIA along with the development of a process for managing the information collected by surveillance cameras.

As part of the process, policies are developed for the operation and use of the system following the Government of Alberta's Guide to Using Surveillance Cameras in Public Areas (the "Guide"). These policies record the decisions made about access, use, disclosure, retention and destruction of the records from surveillance cameras. This is an internal document aimed at addressing all the details regarding the operations for the surveillance camera (refer to *Appendix 2*).

The Guide also recommends that both a PIA, and the business case prepared by the business unit, be submitted to the Office of the Information and Privacy Commissioner (OIPC) for acceptance.

The surveillance cameras are motion sensitive and are only activated when there is movement in the area, there is no audio capacity. The monitoring equipment records activity on video tape on a 24 hour loop. The video tape is re-recorded on after the 24 hour loop is finished.

The surveillance cameras are installed on the main floor of the LMIC. The monitoring equipment is in a locked electrical room on the 2nd floor and accessed only if warranted. The Area Business Manager and the Building Operator have access and keys to this room.

The completion of a PIA and business case (refer to *Appendix 3*), demonstrates AE&I's commitment to use best practices in addressing privacy issues around the use of surveillance cameras as identified by the OIPC.

1.5 Benefits of Surveillance Cameras

1.5.1 Benefits to Clients

A surveillance camera is an effective technique aimed at deterring theft, conflicts and inappropriate behaviors.

The LMIC has many areas that do not have a staff member present to monitor activity. The use of the surveillance cameras allows an indirect presence in the space.

1.5.2 Benefits to Alberta Employment and Immigration

Surveillance cameras may provide a safer work environment for staff by deterring inappropriate behaviours in the waiting area and to reduce potential conflicts between clients.

The surveillance cameras may also deter criminal activity. On a daily basis the LMIC is losing expensive books up to \$100.00 in value.

Chapter 2: Personal Information Collected, Used and Disclosed by Surveillance Cameras

2.1 Personal Information Involved

When the surveillance cameras are operating, they capture images of the individuals entering the LMIC, sitting in the waiting room as they wait for appointments and clients using reference material and equipment; public computers, phones, fax machines. The images are relayed to a television monitor and are recorded onto a video tape. The monitor is not currently manned by anyone and only accessed if a situation warrants it.

The information captured by the surveillance cameras constitutes information about an identifiable individual.

2.2 Personal Information Flow

Images captured on the surveillance cameras are relayed to a television monitor and recording equipment in a locked electrical room on the 2nd floor.

Only images are recorded onto a video tape as the surveillance camera does not have audio capacity.

2.3 Information Users

If a public safety issue or incident in the LMIC took place the recording would be provided to the appropriate individuals to investigate. There are also four Commissionaires in the building who can also be called to respond to an observed incident.

Emergency procedures have been prepared including the appropriate response to an incident observed (refer to *Appendix 2*). These procedures were prepared by addressing the areas identified in the Guide to Using Surveillance Cameras in Public Areas.

Chapter 3: Protection of Personal Information Analysis

3.1 Collection of Personal Information

Section 33 of the *Freedom of Information and Protection of Privacy (FOIP) Act* requires that public bodies have authority to collect personal information. In this case, section 33(b) of the Act may apply if an incident occurs and personal information from the image is documented for the purposes of law enforcement.

33 *No personal information may be collected by or for a public body unless*
(b) *that information is collected for the purposes of law enforcement.*

The surveillance cameras are used to record activity on the main floor of the Labour Market Information Centre (LMIC), City Centre Area Office in the Lawford building in Edmonton. The surveillance cameras capture images of individuals entering the LMIC on the main floor, using the services provided and exiting the area.

The surveillance cameras are motion sensitive and are only activated when there is movement in the area, there is no audio capacity. The monitoring equipment records activity on video tape on a 24 hour loop. The video tape is re-recorded on after the 24 hour loop is finished. The recording is not accessed unless a security incident warrants it.

Signs are prominently displayed; one at each side of the entrance to the LMIC from the street and one at the entrance to the LMIC from the lobby through the main building entrance.

The authorized employee of the business unit reviews the tape if requested to and will document the facts and circumstances of an incident for the purposes of law enforcement.

3.2 Manner of Collection of Personal Information

If the employee of the business unit witnesses a threat to public safety, vandalism and/or theft, they will document a description of any individuals and activity and report it on an Incident and Accident Investigation Report. They will then send this report to the Business Manager who will decide if a viewing of the tape is required. This process would be an indirect collection of information authorized under section 34(1) (g) *the information is collected for the purpose of law enforcement.*

3.3 Accuracy and Retention

The surveillance cameras are motion sensitive and only activated when there is movement in the area. The images portrayed by the surveillance camera are recorded and retained on the recording equipment until the 24 hour loop is finished. The video tape is re-recorded on after 24 hours.

Information documented by an employee may be submitted to authorities and will be disclosed following procedures for investigating an incident.

3.4 Right to Request Correction of Personal Information

Since the recorded image of an individual is only retained for a minimal amount of time, a request for correction is not anticipated.

3.5 Protection of Personal Information

The television monitor and recording equipment is located in the electrical room on the 2nd floor and is not monitored by any individual. This room is locked at all times and can be accessed only by the Area Business Manager and the Building Operator.

Images captured on the surveillance cameras are relayed to the television monitor and recording equipment. The surveillance camera does not have audio capacity.

3.6 Use of Personal Information

The use of the surveillance cameras is to act as a deterrent to reduce theft and the likelihood of conflict between clients. The LMIC has many areas that do not have a staff member present to monitor activity. The use of the surveillance cameras allows for an indirect presence in the space to be a deterrent.

3.7 Disclosure of Personal Information

In the event of a threat to public safety or the detection of criminal activity the employee would notify their supervisor, building security, and authorities (e.g. Police). Information may be documented for law enforcement purposes.

3.8 Disclosure for Research or Statistical Purposes

The images are retained on recording equipment until the 24 hour loop is finished then the video tape is re-recorded on. There is no information to use for research or statistical purposes.

Chapter 4: Potential Privacy Impacts

4.1 Mitigation of Potential Privacy Impacts

Publications are available to assist business areas when the use of surveillance cameras is being considered. The Government of Alberta's "[Guide to Using Surveillance Cameras in Public Areas](#)" is available on the Service Alberta website @ <http://foip.gov.ab.ca/resources/publications/SurveillanceGuide.cfm>.

The Alberta Employment and Immigration, Information and Privacy Office Advice Sheet on "Surveillance Cameras and Privacy Compliance" is available to departmental employees on the intranet site @ <http://ahreintranet.gov.ab.ca/department/cs/foip/resources/faq/index.asp>

AE&I staff in the building requested the use of the surveillance cameras.

Currently there are 4 Commissionaires at the site to provide security for the building but are unable to actively monitor all areas. It is believed that the surveillance cameras act as a deterrent for any potential incidents.

Signs are prominently displayed; one on each door at the entrance to the LMIC from the street and one on each door at the entrance to the LMIC from the lobby through the main building entrance. The sign identifies who to contact to answer questions regarding the surveillance camera.

For those individuals who choose not to enter the area and be recorded, they are able to obtain the services from the LMIC by being seen on the 3rd floor.

4.2 Conclusion

The surveillance cameras were installed as a deterrent to theft and potential issues in the Labour Market Information Centre of the City Centre Area Office in the Lawford Building located at 10242-105 Street Edmonton, Alberta. The goal is to reduce and eliminate conflicts, incidents and theft for an area that is not readily visible to staff or Commissionaires.

The surveillance cameras are thus being utilized to record activity in the LMIC area. Images captured on video tape are only maintained until the 24 hour loop is finished.

Program staff has developed processes and procedures for the implementation of the surveillance cameras to ensure that all staff is aware of the implications of having the surveillance cameras and their responsibilities. An annual review will be conducted of the decision for the implementation of the surveillance cameras to confirm that using this technology is still useful for the Program area.

Appendix 1: Copy of the Video Surveillance Sign

Appendix 2: Policies and Procedures

Appendix 3: Business Case