1. Definitions

“Applicant” means the General Manager of the responsible department or his or her delegate;

“CCTV Application” means the form that must be completed and approved prior to installing cameras, also known as a CCTV privacy impact assessment, (PIA);

“CCTV Application Amendment” means the form that details changes to an approved CCTV Application that must be completed and approved prior to implementation of the changes;

“CCTV system” refers to any mechanical, electronic or digital system or device that: (i) enables continuous or periodic CCTV or video recording, observing or monitoring of individuals, assets and/or property; and (ii) is intended to be mounted or affixed to a structure, fixture or vehicle. For greater certainty, “CCTV system” includes devices such as enterphone systems, handheld license plate recognition systems and drones, but does not include cell phones with video capability, hand-held video recorders or video conferencing systems;

“FIPPA” means the Freedom of Information and Protection of Privacy Act (British Columbia);

“Head” means the City Manager, or the Director, Access to Information and Privacy, as designated under the Freedom of Information and Protection of Privacy By-law and Delegation by the Head of the City of Vancouver; and

“Traffic CCTV System” means any CCTV system set up to monitor road or traffic conditions or to collect information or data for traffic-related purposes.
2. **Scope**

This procedure is subject to the CCTV Systems Policy. This procedure applies to all Traffic CCTV Systems.

3. **Responsibilities**

Responsibility for ensuring compliance with policies and procedures related to Traffic CCTV Systems is assigned to the General Manager, Engineering, or their designate.

4. **Process**

To implement or expand a Traffic CCTV System, the applicant must:

- complete a CCTV Application or CCTV Amendment Application, for a Traffic CCTV System in the form set by the Head;
- obtain preliminary approval of the Traffic CCTV System Application from the General Manager, Engineering;
- submit the Traffic CCTV System Application with the preliminary approval from the General Manager, Engineering, to the Director, Access to Information and Privacy (ATIP);
- request final approval of the Application from the Head.

Until the FIPPA Head gives final approval, the Applicant must not take any steps to purchase or implement the Traffic CCTV System or Traffic CCTV System expansion.

5. **Uses of Traffic CCTV Systems**

Where a use for a Traffic CCTV System has previously been approved in accordance with the CCTV Systems Policy and this procedure, a new CCTV Application, or CCTV Application Amendment, is not required to change the location of the Traffic CCTV System if the following conditions are met:

(a) The use of the Traffic CCTV System remains the same as previously approved with the only change being a change of location of the Traffic CCTV System;

(b) The Manager of Traffic & Data Management, or in that person’s absence the Senior Traffic Management Engineer (CEII), approves in writing the new location for the use of the Traffic CCTV System;

(c) The purpose of the Traffic CCTV System is for collecting data for traffic counts or the monitoring of traffic patterns; and
(d) The CCTV Traffic System does not collect personal information and does not require a privacy impact assessment to be completed.

6. Security of Information

Information collected using a Traffic CCTV System must be kept secure as follows:

(a) Only the City employees or service providers authorized in the CCTV Application, or CCTV Amendment Application, may access or operate the Traffic CCTV System. Access to the Traffic CCTV System recordings are restricted to Traffic and Data Management Staff.

(b) The pan-tilt-zoom functions of the Traffic CCTV System must be restricted to only City staff trained in the operation of the system, the CCTV System Policy and this Procedure. Any access to the Traffic CCTV System through a general system login will be restricted to pre-set camera views that do not contain personal information.

(c) Areas where the video feed from a Traffic CCTV System is monitored must, as far as possible, restrict access to approved Traffic and Data Management staff.

(d) Security arrangements must be in place to prevent unauthorized monitoring, interception or interference with transmissions from the Traffic CCTV System.

(e) Any still images of traffic taken from a Traffic CCTV System feed and posted to the City website must not contain personal information.

(f) City employees and service providers responsible for the installation or operation of a Traffic CCTV System must review and comply with the CCTV Systems Policy, this procedure and FIPPA.

(g) Any agreement between the City and a service provider involving work on a Traffic CCTV System must state that any and all records created, dealt with or arising from, the delivery of a video monitoring program remain at all times under the City’s control and subject to privacy legislation, including FIPPA, and other applicable statutes.

(h) Where recorded information from a Traffic CCTV System may contain personal information, the following shall apply:

(i) information stored on tapes or other removable storage devices must be dated, labeled and stored securely in a locked container located in a controlled access area.
Information stored on a computer or server must be protected in accordance with the City’s policies; and

(ii) copies of recorded information from a Traffic CCTV system that may contain personal information should be retained in accordance with section 14 of the CCTV Systems Policy.

7. **Public Notification**

The public must be notified of the existence, and possible operation, of a Traffic CCTV System in the event of the system being setup so it may collect personal information. Clearly written signs must be prominently displayed at the perimeter of the video monitoring areas, bearing the wording:

“For the Purpose of Collecting Information on Traffic Conditions in the Immediate Proximity THIS AREA MAY BE UNDER VIDEO SURVEILLANCE

Questions? Contact the City’s Access to Information and Privacy Office at 3-1-1 (or 604-873-7000) or 453 West 12th Avenue, Vancouver, BC V5Y 1V4”

**REFERENCES**

- Freedom of Information and Protection of Privacy Act
- Freedom of Information and Protection of Privacy By-Law No. 11451
- Records Management By-law No. 9067

**RELATED POLICIES AND PROCEDURES**

- ADMIN-009 Corporate Records and Information Management Policy
- ADMIN-029 Privacy Policy
- ADMIN-016 CCTV Systems Policy
- ADMIN-016P1 Procedure for Public Realm CCTV Systems
- ADMIN-016P2 Procedure for CCTV Monitoring of City Premises
## APPROVAL HISTORY

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<th>Date:</th>
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<tr>
<td>City Manager’s Office</td>
<td>City Clerk, Head, Freedom of Information and Protection of Privacy</td>
<td>March 26, 2015</td>
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<tr>
<td>APPROVED BY:</td>
<td>Director, Legal Services, Head, Freedom of Information and Protection of Privacy</td>
<td>April 6, 2015</td>
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<tr>
<td>APPROVED BY:</td>
<td>Deputy City Manager, Head, Freedom of Information and Protection of Privacy</td>
<td>April 6, 2015</td>
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<td>REVIEWED AND AMENDED</td>
<td>APPROVED BY:</td>
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<td>City Manager</td>
<td>September 22, 2021</td>
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* Changes to the Freedom of Information and Protection of Privacy By-law in 2017 reduced the City’s “Heads” from three to the City Manager.

Next review date 9/22/2023