

TORONTO TRANSIT COMMISSION REPORT NO.

MEETING DATE: March 24, 2010

SUBJECT: TTC CORPORATE POLICY (NEW) - TTC VIDEO RECORDING POLICY

ACTION ITEM

RECOMMENDATION

It is recommended that the Commission adopt the policy entitled "Video Recording Policy" as attached as Appendix A to this Report.

FUNDING

There is no funding impact.

BACKGROUND

On March 3, 2008, the Ontario Privacy Commissioner, Dr. Ann Cavoukian, released her report entitled "Privacy and Video Surveillance in Mass Transit Systems: A Special Investigation Report" (the "Privacy Commissioner's Report"). The Privacy Commissioner's Report studied the general use of video surveillance cameras in mass transit systems and concluded that based on the unique and multifaceted nature of mass transit systems, a full range of safety and security options available, including the use of video surveillance, is required. The Privacy Commissioner also concluded that the use of Video Surveillance by the TTC is in compliance with MFIPPA.

The Report also focused on ensuring that the TTC has appropriate safeguards in place to protect misuse of information collected by the TTC's Video Surveillance Systems.

The Report contains a number of recommendations which were adopted by the Commission at its meeting on March 16, 2008. The TTC Video Recording Policy was created by the TTC, in consultation with the Office of the Information and Privacy Commissioner in 2007 and was further updated in 2008 based on the Privacy Commissioners recommendations.

The policy has been further amended based on recent changes, as agreed to by the Ontario Privacy Commissioner, relating to the retention periods for video recordings collected from Wheel Trans vehicles.

DISCUSSION

The TTC Video Recording Policy addresses the TTC's collection, use and disclosure of personal information obtained from the TTC video recording systems located within the public portions of the transit system. Currently, video recording systems are located within subway stations, buses, streetcars and Wheel-Trans vehicles. Video recording systems will also be part of the new Toronto Rocket subway cars.

The Video Recording Policy requires an annual audit of the Video Recording Systems and the TTC is currently preparing for an external audit of the system to be completed by the end of March 2010.

In order to ensure greater public awareness of the TTC video recording systems, a copy of the policy, upon Commission approval, will be provided on the TTC website.

JUSTIFICATION

In order to ensure that the TTC use of video cameras throughout its systems provides an appropriate balance between an individual's right to privacy and the Commission's objective of ensuring the safety and security of its customers, employees and assets, it is recommended that the Video Recording Policy as set out in Appendix A be adopted.

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45-5-5

Attachments – Appendix A – TTC Video Recording Policy

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1.0 RESPONSIBILITY

General Secretary

2.0 PURPOSE

The Toronto Transit Commission recognizes the need to balance an individual's right to privacy and the need to ensure the safety and security of TTC employees, customers and property. While video recording cameras are installed for safety and security reasons, the TTC's video recording systems must also be designed to minimize privacy intrusion. Proper video surveillance, where deemed necessary, is one of the most effective means of helping to keep the TTC transit system, facilities and properties operating in a safe, secure, and privacy protective manner.

This TTC policy has been developed to govern video surveillance at TTC owned, leased and occupied properties in accordance with the privacy provisions of the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA).

This policy applies to all types of camera recording devices at TTC owned, leased and occupied properties that are used for security purposes.

This policy does not apply to covert video surveillance undertaken by the TTC for law enforcement purposes or to video surveillance in non-public places.

3.0 ROLES AND RESPONSIBILITIES

3.1 Responsibilities of the General Secretary

The General Secretary may delegate various responsibilities under this policy to Department Heads. The key duties of the General Secretary include:

- Ensuring policy compliance;
- Co-ordinating annual audits of the TTC's video surveillance system to ensure compliance with this policy;
- Reviewing the policy every two years and forwarding recommendations for update, if any, to the Commission for approval;
- co-ordinating the development of video recording system related privacy training standards;
- Establishing and maintaining a CCTV Steering Committee; and

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- Receiving status updates from the Chief Special Constable, Deputy General Manager Bus and Deputy General Manager - Rail every six months, regarding staff adherence to the responsibilities within the policy.

3.2 Responsibilities of the Chief Special Constable

The Chief Special Constable shall be responsible for the following:

- Conducting a Video Security Threat Assessment to determine the requirements for a video recording system for TTC owned, leased or occupied properties (excluding vehicles) as more particularly set out in the Surveillance Video Security Threat Assessment To Determine the Requirements for a Video Surveillance System Form.
- Providing assistance for Video Security Threat Assessments to the Deputy General Manager - Bus and Deputy General Manager - Rail, as required, to determine the requirements for a video recording system for TTC vehicles.
- Preparing recommendations for review and obtaining installation approval of video recording systems for TTC owned, leased or occupied properties (excluding vehicles).
- Approving the installation of video cameras in accordance with this policy at specified TTC owned, leased or occupied properties (excluding vehicles).
- Advising on the placement of video recording signs for TTC properties (excluding vehicles).
- Delegating day-to-day operations of video systems for TTC properties (excluding vehicles) to Designated Departmental Management staff (DDM).
- In consultation with the Assistant General Secretary, developing privacy training for TTC and contract staff that have responsibilities under this policy.
- Immediately reporting all alleged privacy breaches of this policy to the General Secretary.

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3.3 Responsibilities of the Deputy General Manager - Bus

The Deputy General Manager - Bus shall be responsible for the following:

- Conducting a Video Security Threat Assessment, in consultation with the Chief Special Constable to determine the requirements for a video recording system on TTC buses (which shall include Wheel-Trans vehicles), as more particularly set out in the Surveillance Video Security Threat Assessment To Determine the Requirements for a Video Surveillance System Form.
- Preparing recommendations for reviewing and obtaining installation approval of video recording systems for TTC buses.
- Approving the installation of video cameras, in accordance with this policy, on specified TTC buses.
- Advising on the placement of video recording signs for TTC buses;
- Delegating day-to-day operations of video systems for TTC buses to DDM.
- Ensuring that video surveillance equipment on TTC buses are maintained in a state of good repair.
- In consultation with the Assistant General Secretary, developing privacy training for TTC and contract staff that have responsibilities under this policy.
- Immediately reporting all alleged privacy breaches of this policy to the General Secretary.

3.4 Responsibilities of the Deputy General Manager - Rail

The Deputy General Manager - Rail shall be responsible for the following:

- Conducting a Video Security Threat Assessment, in consultation with the Chief Special Constable, to determine the requirements for a video recording system for TTC streetcars, light rail vehicles and subway vehicles as more particularly set out in the Surveillance Video Security Threat Assessment To Determine the Requirements for a Video Surveillance System Form.
- Preparing recommendations for reviewing and obtaining installation approval of video recording systems for TTC streetcars, light rail vehicles and subway vehicles.
- Approving installation of video cameras, in accordance with this policy, on specified TTC streetcars, light rail vehicles and subway

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- vehicles.
- Advising on the placement of video recording signs for TTC streetcars, light rail vehicles and subway vehicles.
- Delegating day-to-day operations of video systems for TTC streetcars, light rail vehicles and subway vehicles to DDM.
- Ensuring that video surveillance equipment on TTC streetcars, light rail vehicles and subway vehicles are maintained in a state of good repair.
- In consultation with the Assistant General Secretary, developing privacy training for TTC and contract staff that have responsibilities under this policy.
- Immediately reporting all alleged privacy breaches of this policy to the General Secretary.

3.5 Responsibilities of Designated Departmental Management staff (DDM)

The DDMs are responsible for the video operations for a particular location, including vehicles. The responsibilities of a DDM include the following:

- Overseeing day-to-day operations and maintenance of video recording cameras at a specific site location.
- Providing supervision to approved Users.
- Complying and ensuring User's compliance with all aspects of this policy.
- Ensuring recording devices are stored in a safe and secure location.
- Ensuring logbooks, recording all activities related to video devices and records, are kept and maintained by Users.
- In consultation with the Assistant General Secretary, providing training to Users regarding obligations and compliance with the MFIPPA and this policy.

3.6 Responsibilities of Users

Users are TTC staff or contracted individuals entrusted by a DDM to operate and/or maintain the video recording system for a particular location. The duties and responsibilities of the User include:

- Complying and adhering to all aspects of this policy;
- Ensuring all aspects of the video recording system is functioning

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properly;

- Documenting all information regarding the use, maintenance, and storage of records in the applicable logbook, including all instances of access to, and use of, recorded material to enable a proper audit trail;
- Ensuring that no personal information is disclosed without the approval of the DDM;
- Ensuring that no copies of data/images in any format (hardcopy, electronic, etc.) is taken from the video recording system without approval from the DDM; and
- Forwarding all requests for access to video records to the DDM. The DDM will consult with the Co-ordinator, Freedom of Information/Records Management, as required, and/or forward requests/complaints to the Co-ordinator, Freedom of Information/Records Management for processing.

3.7 Responsibilities of the Assistant General Secretary

The Assistant General Secretary shall be responsible for the following:

- Providing advice and recommendations to staff to assist in MFIPPA.
- Processing access requests for video recording records, as required.
- Responding to privacy complaints related to video installations.
- Investigating video recording security / privacy breaches.
- In consultation with the DDM staff, providing training on a regular basis to Users regarding obligations and compliance with the MFIPPA and this policy (Refer to the Privacy Protocol: Guidelines for Managing a Privacy Breach Form).

3.9 Responsibilities of the CCTV Steering Committee

The TTC has established a CCTV Steering Committee, which Committee includes representatives of Special Constable Services, Legal & Claims, Bus Transportation, Rail Transportation, Rail - Signals/Electrical/Communications and Safety. The duties of the CCTV Steering Committee include:

- Making recommendations regarding the installation of video surveillance equipment at specific site locations;
- ensuring appropriate public consultation has occurred prior to expanding the TTC's use or locations of video recording systems as set out under the Video Recording Systems Locations;

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- researching and evaluating new privacy-enhancing technologies and if appropriate, recommending the purchase of new privacy-enhancing technologies;
- Making recommendations to the General Secretary regarding updates to this policy.

3.10 Responsibilities of Employees and Contractors

All TTC employees and contractors must adhere to this Video Recording Policy and must not disclose, access or use information contained in the TTC video recording system, its components, files, or database for personal reasons nor disclose, dispose, destroy, erase or alter any record without proper authorization from the DDM and without following the terms and conditions contained in this Policy.

4.0 GUIDELINES TO FOLLOW PRIOR TO THE IMPLEMENTATION OF A VIDEO SURVEILLANCE SYSTEM

4.1 Installation of Video Recording System:

Before deciding to install a video recording system, the following factors must be considered:

- The use of video recording cameras should be justified on the basis of verifiable, specific reports of incidents of crime or significant safety concerns.
- A video recording system should only be considered after other measures of deterrence or detection have been considered and rejected as unworkable.
- An assessment must be conducted on the effects that the proposed video recording system may have on personal privacy, and the ways in which any adverse effects can be mitigated.
- The proposed design and operation of the video recording systems should minimize privacy intrusion.

Refer to the Surveillance Video Security Threat Assessment To Determine the Requirements for a Video Surveillance System Form to assist in reviewing these factors.

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4.2 Designing, Installing and Using Video Recording Equipment

When designing a video recording system and installing equipment, the following must be considered:

- Given the open and public nature of the TTC's facilities and vehicles and the need to provide for the safety and security of employees and patrons who may be present at all hours of the day, the TTC's video recording systems may operate at any time in a 24 hour period.
- The video equipment shall be installed to only record those spaces that have been identified as requiring video recording.
- Users' ability to adjust cameras shall be restricted so that Users cannot adjust or manipulate cameras to overlook spaces that are not intended to be covered by the video recording program.
- Equipment shall never record the inside of areas where the public have a higher expectation of privacy (e.g. change rooms and washrooms).
- Where possible, video recording should be restricted to periods when there is a demonstrably higher likelihood of crime being committed and detected in the area under surveillance.
- Reception/recording equipment must be located in a strictly controlled access area. Only DDM staff, or those properly authorized in writing by the DDM, shall have access to the controlled access area and the reception/recording equipment.
- Every reasonable attempt should be made by video Users to ensure video equipment is not in a position that enables the public and/or unauthorized staff to view images.
- Video recording systems and related equipment shall be installed at the locations as more particularly set out in Schedule "A" to this Policy, which Schedule shall be amended from time to time.

4.3 Notice of Use of Video Recording System

In order to provide notice to individuals that a video recording is in use:

- The TTC shall post signs, visible to members of the public, at all entrances and/or prominently displayed on the perimeter of the location being video recorded; and
- The notification requirements of this sign must inform individuals of the legal authority for the collection of personal information; the

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principal purpose(s) for which the personal information is intended to be used; and the title, business address, and telephone number of someone who can answer questions about the collection.

4.4 Personnel Authorized to Operate Video Equipment

Only employees and contractors designated by the Chief Special Constable, Bus - Deputy General Manager, Rail - Deputy General Manager or the DDM, as applicable (Users), shall be permitted to operate and/or maintain video recording systems. All Users shall acknowledge in writing that they have received training with respect to their confidentiality obligations and that they understand those obligations. Breach of this Policy by any employee of the TTC may result in discipline of the employee, up to and including dismissal. Any breach of this Policy by any contractor under contract to the TTC may result in the contract being terminated.

5.0 VIDEO EQUIPMENT / RECORDS

5.1 Types of Recording Devices

The TTC may use either Digital Video Recorders (DVR) or time lapse Video Cassette Recorders (VCR's) in its video systems. The following retention periods shall apply:

- 5.1.1 Information collected by a video recording system from a TTC bus (excluding Wheel-Trans vehicles) or streetcar will be retained, unless otherwise requested, for a period of 15 hours of vehicle operational time.
- 5.1.2 Information collected by a video recording system from a subway vehicle or subway station will, unless otherwise requested, be retained for a period of 72 hours.
- 5.1.3 Information collected by a video recording system from a TTC Wheel Trans vehicle will be retained, unless otherwise requested, for a period of 7 days.

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5.2 Record Identification Logbook

All records (storage devices) shall be clearly identified (labelled) as to the date and location of origin including being labelled with a unique, sequential number or other verifiable symbol. In facilities with a DVR that stores information directly on a hard-drive, the computer time and date stamp shall be understood to be this identification. In facilities with a VCR or other recording mechanism using a removable / portable storage device, the User shall affix a label to each storage device identifying this information.

Each User or facility, as applicable, shall maintain a logbook to record all activities related to video devices and records. The activities include all information regarding the use, maintenance, and storage of records and all instances of access to, and use of, recorded material. All logbook entries will detail authorized staff, date, time and activity. This logbook must remain in a safe and secure location with the video recording equipment. Only the Chief Special Constable, Deputy General Manager - Bus, Deputy General Manager - Rail, or the DDM, as applicable, are authorized to remove a logbook from the secure location.

5.3 Remote Access

The TTC may use remote access to monitor, retrieve, operate, maintain or audit all or part of its video surveillance system. TTC further reserves the right to provide remote access to law enforcement agencies for law enforcement purposes. Any remote access provide to law enforcement agencies shall contain a provision allowing the TTC to conduct annual audits relating to the collection, use and disclosure of information obtained through the TTC's video recording system(s) and any such audits shall be performed in accordance with this Policy.

Logbooks shall be maintained at each remote access site location to record all activities related to video devices and records. The activities include all information regarding the use, maintenance, and storage of records and all instances of access to, and use of, recorded material. All logbook entries will detail authorized staff, date, time and activity. This logbook must remain in a safe and secure location at the remote access site location.

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6.0 AUDIT OF VIDEO RECORDING SYSTEMS

6.1 Annual Audit

The TTC shall undertake, on an annual basis, an audit of its video recording systems. The audit evaluation shall be thorough, comprehensive and shall test all program areas of the TTC video recording systems to ensure compliance with this Policy and procedures. The audit shall be conducted based on the *Generally Accepted Privacy Principles (GAPP) – A Global Privacy Framework*.

6.2 Initial Audit

The initial audit of the TTC video recording systems will be conducted by an external third-party and shall include an assessment of the extent to which the TTC has complied with recommendations as provided by the Ontario Privacy Commissioner (as set out Privacy Investigative Report MC07-68, dated March 3, 2008).

7.0 ACCESSS TO VIDEO RECORDS

7.1 Access

Access to the video recording records, e.g. logbook entries, DVD/CD, video tapes, etc shall be restricted to authorized personnel only to in order to comply with their roles and responsibilities as outlined in this Policy.

7.2 Storage

All tapes or other storage devices that are not in use must be stored securely in a locked receptacle located in an access-controlled area.

7.3 Formal Access Request Process

With exception of requests by law enforcement agencies, all requests for video records should be directed to the Co-ordinator, Freedom of Information/Records Management for processing. A person requesting access to a record should make a request in writing either in the form of a letter or by submitting a Access/Correction Request Form to the Co-ordinator, Freedom of Information/Records Management. The individual

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requesting the record must:

- Provide sufficient detail (the approximate time and date, the location - if known - of the incident, etc.) to enable an experienced employee of the TTC, upon a reasonable effort, to identify the record; and,
- At the time of making the request, pay the prescribed fees as provided for under the MFIPPA.

7.4 Access – Law Enforcement

If access to a video recording record is required for the purpose of a law enforcement investigation, the requesting Officer (or in emergency situations, the User that authorized the release) must complete the TTC's Law Enforcement Officer Request Form or the Special Constable Services Request Form and forward this form to the DDM or designate. The DDM, or designate, will provide the recording for the specified date and time of the incident as requested by the Law Enforcement Officer.

The DDM, or designate, will record the following information in the site location's video logbook:

- The date and time of the original, recorded incident including the designated name/number of the applicable camera and VCR/DVR.
- The name of the User at the time of the incident.
- The time and date the copy of the original record was sealed.

- The time and date the sealed record was provided to the requesting Officer.

7.5 Viewing Images

When recorded images from the cameras must be viewed for law enforcement or investigative reasons, this must only be completed by an individual(s) authorized by the DDM in a private, controlled area that is not accessible to other TTC employee's and/or visitors.

7.5 Custody, Control, Retention and Disposal of Video Records/Recordings

The TTC retains custody and control of all original video records not provided to law enforcement. Video records are subject to the access and privacy

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requirements of the MFIPPA, which includes but is not limited to the prohibition of all TTC employees and contractors from access, or use of information from the video recording system, its components, files, or database for personal reasons.

Information collected from the video recording system will be retained for a minimum of one (1) year where it has been used by the TTC or a law enforcement agency as part of a criminal, safety, or security investigation or for evidentiary purposes.

The TTC will take all reasonable efforts to ensure the security of records in its control / custody and ensure their safe and secure disposal. Old storage devices must be disposed of in accordance with an applicable technology asset disposal process ensuring personal information is erased prior to disposal, and cannot be retrieved or reconstructed. Disposal methods may include shredding, burning, or erasing depending on the type of storage device.

With the exception of records retained for criminal, safety, or security investigations or evidentiary purposes, the TTC shall delete video records as follows:

- 7.5.1 For records collected from a video recording system on a bus or streetcar - after 15 hours of operational time for buses and streetcars.
- 7.5.2 For records collected from a video recording system within a subway system - one time per day for all recordings that have been retained for at least 72 hours.
- 7.5.3 For records collected from a video recording system on subway vehicle - after 72 hours.
- 7.5.4 For records collected from a video recording system on a Wheel-Trans vehicle - after 7 days.

7.6 Unauthorized Access and/or Disclosure (Privacy Breach)

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A TTC employee or contractor who becomes aware of any unauthorized disclosure of video record in contravention of this Policy and/or a potential privacy breach shall immediately notify the General Secretary.

Upon confirmation of the existence of a privacy breach, the General Secretary shall notify the Information and Privacy Officer of Ontario (IPC) and work constructively with the IPC staff to mitigate the extent of the privacy breach and to review the adequacy of privacy protection with the existing policy.

The DDM shall inform the General Secretary of events that have led up to the privacy breach (Refer to Privacy Protocol: Guidelines for Managing a Privacy Breach Form). The employee or contractor shall work with the DDM to take all reasonable actions to recover the record and limit the record's disclosure.

The General Secretary, in consultation with the DDM, and where required, will notify affected parties whose personal information was inappropriately disclosed. The General Secretary, in consultation with the DDM shall investigate the cause of the disclosure with the goal of eliminating potential future occurrences.

A breach of this Policy by an employee of the TTC may result in discipline, up to and including dismissal. A breach of this Policy by service providers (contractors) to the TTC may result in a poor performance review and/or termination of their contract.

7.7 Inquiries From the Public Related to the Video Recording Policy

An employee receiving an inquiry from the public regarding the Video Recording Policy shall direct the inquiry to the Co-ordinator, Freedom of Information/Records Management at 416-393-4000.

7.8 Review of Video Recording Policy

This Policy shall be reviewed every two years by the CCTV Steering Committee and General Secretary who will forward recommendations for update, if any, to the Commission for approval.

8.0 REFERENCE SOURCES

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- Access/Correction Request Form
- Law Enforcement Officer Request Form
- Municipal Freedom of Information and Protection of Privacy Act
- Notice of Collection
- Ontario Information Privacy Commissioner Privacy Investigative Report MC07-68, dated March 3, 2008
- Privacy Protocol: Guidelines for Managing a Privacy Breach
- Special Constable Services Request Form
- Surveillance Video Security Threat Assessment To Determine the Requirements for a Video Surveillance System Form

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