

# PRIVACY IMPACT ASSESSMENT

## *Solid Waste Location-Based Data Collection* *PIA # 2023-02*

### **Why do I need to do a PIA?**

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a Privacy Impact Assessment (PIA). A PIA must be conducted on a new initiative for which no PIA has previously been completed and before implementing a significant change to an existing initiative.

A PIA is a step-by-step review process to make sure your new initiative which is an enactment, system, project, program or activity meets or will meet the requirements under Part 3 of the Freedom of Information and Protection of Privacy and; Identify and assess privacy risks and identify a risk response(s) that is proportionate to the level of risk.

If you have any questions, email [privacy@metrovancouver.org](mailto:privacy@metrovancouver.org) or phone 604-432-6921.

### **What if my initiative does not include personal information?**

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to their privacy office(r) even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed and that there is no inadvertent collection, storage and disclosure of personal information.

## **PART 1: GENERAL INFORMATION**

|   |   |
|---|---|
| <b>Department / Division:</b>             | Solid Waste Services                                    |
| <b>Initiative Lead name and title:</b>    | Maria Edwards, Project Engineer                         |
| <b>Initiative Lead phone:</b>             | 778-452-4637  |
| <b>Initiative Lead email:</b>             | maria.edwards@metrovancouver.org                        |
| <b>Department Manager name and title:</b> | Paul Henderson, General Manager of Solid Waste Services |
| <b>Department Manager phone:</b>          | 604-432-6442  |

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|----------------------------------|--|
| <b>Department Manager email:</b> | paul.henderson@metrovancover.org   |
| <b>Privacy Officer:</b>          | Brooke Holtz   |
| <b>Privacy Officer phone:</b>    | 604-432-6291   |
| <b>Privacy Officer email:</b>    | <a href="mailto:privacy@metrovancover.org">privacy@metrovancover.org</a> |

**1. What is the initiative?**

*Metro Vancouver is responsible for planning waste reduction and recycling and the operation of a series of solid waste facilities in the region. Planning for less waste, improving reuse and recycling systems, and managing the remaining waste reflects the public’s expectations of high environmental stewardship and affordable and accessible waste management. Tracking the generation and disposal locations of waste in the region will assist in planning the regional solid waste system.*

*The initiative in question for this privacy impact assessment is an electronic location-based tracking device used to collect data on waste generation locations and final disposal locations.*

*Metro Vancouver staff or contractors would place a location-based tracking device into a publicly accessible waste container. Upon placement, the user would note the location of the waste container, the type of waste the container is designed for, and the name of the company displayed on the waste container. Once the waste is collected from the container, the location-based tracking device would provide Metro Vancouver with the location of the receiving facility and potentially the route information from the collection location to the receiving facility.*

*The location-based tracking device chosen for this initiative is the [REDACTED] [REDACTED] or equivalent. It uses three AAA alkaline batteries, which are commercially available at a relatively low cost and can be managed safely in the waste system. The [REDACTED] utilizes cellular signal, GPS, and Wi-Fi to detect and report its location. The settings on the [REDACTED] can be customized to report its location on a set interval via a heartbeat when stationary and its location in more frequent intervals when the accelerometer senses the*

device is in motion. Since the [REDACTED] is a location-based tracking device, it can only collect and report data on its location and no other information.

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

The scope of this PIA covers the use of location-based tracking devices for determining the locations of facilities receiving waste generated within the region. For the purposes of analysis, it is estimated that 200 location-based trackers would be deployed annually as part of a program to understand the flow of municipal solid waste around the region.

## **3. Are there any related Privacy Impact Assessments?**

There are no related PIA's.

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

The location-based tracking devices utilize a combination of technologies, including Bluetooth, satellites, Wi-Fi sniffers, a receiver and algorithms to track the location of an item anywhere in the world in real-time. In this instance, the devices will be used to track the location and movement of waste. The location-based tracking devices can assist in facility planning, understanding the accuracy of waste system data, and identifying receiving facilities.

The method outlined here allows location-based tracking devices to be placed into waste containers before collection. The device can then be tracked from point of collection to final disposal destination by electronically providing the longitude and latitude coordinates to a database.

Information involved in the initiative:

- Location of where the waste was generated;
- Type of waste within the container;
- The name of the company displayed on the waste container;
- Potential truck route data from collection location to receiving facility;
- Location of receiving facility.

**4.1 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.

- Yes**, go to [Part 2](#)
- No**, answer [Question 5](#) and submit questions 1 to 5 to your Privacy Officer. You do not need to complete the rest of the PIA template.

**5. How will you reduce the risk of unintentionally collecting personal information?**

*Inadvertent collection of personal information is not a risk for this initiative because the devices used can only provide location data. The devices do not have the ability to record information about an identifiable individual.*

## PART 9: SIGNATURES

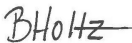
You have completed a PIA. Submit the PIA to your Privacy Officer for review and comment, and then have the PIA signed by those responsible for the initiative.

### Privacy Office Comments

- The trackers used in this initiative are only to be used in waste containers.
- The trackers can not be used to track employees or individual's movements.
- Using trackers for any other purpose will need to have a PIA completed.
- Inform the privacy team if a different tracking device is being used so they can update this PIA.

### 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 | Brooke Holtz |  | January 19, 2023 |

### 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       | Maria Edwards,<br>Project Engineer                            |  | January 19, 2023 |
| Department<br>Manager | Paul Henderson,<br>General Manager of<br>Solid Waste Services |  | January 19, 2023 |