

Briefing Note: For Information

To: Tenant Services Committee

From: Nadia Gouveia, Chief Operating Officer

Date: January 10, 2023

Re: Tenant Services Committee meeting of December 1, 2022
Fob Allocation and Access to CCTV

At the December 1, 2022 Tenant Services Committee (“TSC”) meeting, the TSC requested that Management clarify how the centralization of fob allocation and access to CCTV footage was determined, and their relation to audits performed by the Internal Audit team.

Background on Access Control Governance

At the October 2, 2018 Building Investment, Finance and Audit Committee (“BIFAC”) meeting, TCHC’s Internal Audit division presented a report regarding Employee Building Access Control (Report [BIFAC:2018-62](#)). This report outlined TCHC’s Internal Audit findings and recommendations surrounding the centralization of access control systems and provided recommendations to implement internal controls and oversight of the access control program. The BIFAC approved all recommendations in the report.

The major concerns the audit highlighted were:

- The absence of company-wide documented policies / procedures / protocols for the management of the electronic keys or physical keys;
- The decentralized nature of the building access system as each electronic access system at TCHC had different administrators at several locations across the City;
- The inability of system administrators to question, or object requested access rights for an employee as their duties were only related to the issuance and return of electronic keys;
- The lack of security background for system administrators with no or little training on the systems they were administering; and
- The outdated nature of the software supporting the electronic building access system that did not support basic internal controls and the lack of manual controls and protocols that should have been in place.

Following this audit, the Community Safety Unit undertook a review of the access control system, issues surrounding tenant and staff E-Keys which supported the audit findings.

A new process was created after the Operations Leadership Team directed CSU to take over governance of a security-related function. This was also done to ensure that information is accurately and appropriately entered into the access control system, that all E-Key requests are reviewed, that correct access levels are applied, and that corporate security and risk management/mitigation is in place, as well as to conduct audits into records that contain personal information as defined in the *Municipal Freedom of Information and Privacy Protection Act* (“MFIPPA”).

A revised process in support of the hub model, which is on hold, was created in line with industry best practices so that tenants contact their local Hub staff during regular business hours to resolve E-Key issues. Hub staff will coordinate with the Access Control and Governance team and contact the Client Care Centre after hours during emergencies, where CSU staff who work in a 24/7 capacity can make changes or alterations as requested. This new process will protect information in a central location, while still providing exceptional service to our tenants and staff. This process has been held for further discussions with internal labour partners.

Background on CCTV Access

In 2020, the CSU consulted with TCHC’s Information and Technology Services (“ITS”) and Smart Building and Energy Management (“SBEM”) departments, who maintain ownership and governance of the CCTV system, after identifying several issues surrounding access to the corporate CCTV system.

The prevalent issue surrounding the CCTV system is the number of employees corporately who could access all parts of the system, including live monitoring, footage review and archiving of footage. TCHC removed access to the footage review and footage archiving parts of the system from staff whose job functions who did not require the access including Custodial and Maintenance staff and Superintendents.

Though these levels of staff are critical to the operation of TCHC, several incidents were brought forward that staff had inappropriately utilized the system or downloaded/shared footage for non-work related purposes. The inappropriate access of CCTV footage and release or use for non-work

purposes could lead to ramifications to the involved staff members, TCHC and the Board of Directors, including civil lawsuits and fines under MFIPPA.

The Information and Privacy Commissioner of Ontario classifies CCTV footage as personal information, which must be protected as such. The IPC outlines the need to ensure the security of personal information by “limiting staff and other individuals’ access to footage on a need to know basis” (Information and Privacy Commissioner of Ontario, 2015). Though TCHC looks to resolve issues at a local level, the risk associated with widespread CCTV review and archiving access was too high and as such was removed.

All involved stakeholders collaborated on this issue including the Operations Leadership Team, CUPE 416 and 79, SBEM, CSU and ITS.

This does not apply to live viewing of the CCTV system through the March Command system. Site staff can view live cameras in order to perform their duties safely. When access to archived footage is needed, a request can be submitted to the CSU who are available 24/7. A Special Constable is able to review, document the incident, and save footage for later use corporately, or in situations involving alleged criminal offences while maintain the integrity of the law enforcement investigation or civil matter. When site staff require footage to determine if a tenant is responsible for damage to property or leaving messes, these incidents are reported to the CSU who conduct an investigation and submit a report, which can be used for tenancy management or tenant charge backs, if needed.

Ensuring the protection of tenant, staff and community stakeholder’s personal information is a key priority for TCHC and to protect the reputation of our corporation and mitigate enterprise risk.

Without the steps taken to address concerns surrounding access control and CCTV systems, there may be significant liability placed on TCHC, resulting in reputational damage and potential litigation.

Signature

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