

Millimetre Wave Imager

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Version: Public Summary - Privacy Impact Assessment

Date: November 3, 2009

Executive Summary

This is a summary of the Privacy Impact Assessment completed by the Canadian Air Transport Security Authority (CATSA) in anticipation of the deployment of millimeter wave (mm Wave) screening technology at selected airports. The mm Wave screening technology offers an innovative approach and less intrusive alternative to the passenger physical search currently used at Canadian airports. Passengers undergoing secondary screening will have the choice to be screened by physical search or by mm Wave technology.

This summary reflects the findings and recommendations emanating from the assessment. The Privacy Impact Assessment (PIA) was conducted using the Government of Canada's Treasury Board guidelines for conducting PIAs, which incorporates the ten principles of the Canadian Standards Association (CSA) Model Code for assessing fair information handling practices.

The findings, recommendations, and conclusions of this PIA are consistent with those of the Preliminary Privacy Impact Assessment (PPIA) completed in January 2008.

This report concludes that CATSA is addressing all risks with risk mitigation strategies that are in line with privacy best practices including:

- making the mm Wave Imager screening process voluntary and anonymous;
- ensuring that the images are immediately and permanently deleted once the screening process is complete;
- ensuring that the mm Wave Imager cannot store, print or save the images.
- ensuring that the images reviewed during the screening process cannot be accessed by or transmitted to any other location;
- ensuring that the images are exclusively reviewed by a Screening Officer located in a remote viewing room;
- not correlating the images in any way with the name of the passenger or any other identifying information;

Privacy Principles

The findings and recommendations relating to potential privacy risks for the Millimetre Wave Imager below are presented in a framework consistent with the ten privacy principles of the CSA Model Code for assessing fair information handling practices.

Principle 1: Accountability

CATSA has assigned the accountability for privacy risks and their mitigation.

Principle 2: Identifying Purposes

CATSA has prepared communication materials to explain the mm Wave imager technology to travellers. Notice identifying the purpose of the screening process will be available at the airport security checkpoints equipped with the mm Wave Imager.

No secondary uses are contemplated.

Principle 3: Consent

Travellers selected for secondary security screening will be offered a choice between mm Wave screening and a physical search. The mm Wave screening is voluntary, and consent is obtained directly from the travellers.

Principle 4: Use of Personal Information

No information other than the transitory image generated by the mm Wave technology is collected.

Principle 5: Disclosure and Retention

The images will not be retained for any period longer than required to complete the screening of an individual, they will not be disclosed in any fashion and will be immediately and permanently deleted after the screening is completed.

Principle 6: Accuracy

The images generated by the mm Wave technology are of the individual standing in the unit. Any anomalies noted by the Image Screening Officer in the remote viewing room will be further investigated by a screening officer at the checkpoint.

Principle 7: Safeguarding Personal Information

The images are sent electronically only to the remote viewing room, so that the Image Screening Officer cannot see and identify the actual traveller. The technology uses proprietary software to preclude interception. The images are permanently deleted after screening is completed.

Standard Operating Procedures (SOPs) are in place for the Image Screening Officers who will also receive privacy related training. The Image Screening Officers will not be permitted to have electronic devices or cameras in the viewing rooms.

Principle 8: Openness

CATSA will make readily available specific information about its policies and practices relating to the management of personal information.

Principle 9: Individual Access

It will not be possible for CATSA to provide access to the images generated by the mm Wave technology as they will be immediately and permanently deleted after screening and would not be, in any case, individually identifiable and thus not retrievable by name or other identifying feature.

Principle 10: Challenging Compliance

CATSA's website offers a process by which complaints may be made. If travellers are not satisfied with the outcome of their request, they can formally file a complaint with the federal Privacy Commissioner.

Conclusion

In conducting interviews and reviewing the documentation provided for PIA purposes, it was readily apparent that CATSA has incorporated privacy as a core element of the mm Wave Imager deployment.

Going forward, CATSA will continue to assess the need for mm Wave technology against updated aviation security threat assessments as well as enhancements to technology, in order to achieve a reasonable balance between privacy and security for the travelling public.