

COURTENAY AND DISTRICT FISH & GAME PROTECTIVE ASSOCIATION

VIDEO SURVEILLANCE POLICY

PURPOSE - To ensure that all applications of video surveillance in Courtenay and District Fish & Game Protective Association buildings are authorized and are compliant with the Personal Information Protection Act BC (PIPA BC) and Guidelines for Overt Video Surveillance in the Private Sector. There are video surveillance SYSTEMS located at the Shotgun Facility, the Cowboy Action Facility, the Archery Facility, the 25 and 100-yard range and in the main hall Bar. The specifics of the systems are filed separately and not within this policy due to security of information.

SUMMARY - The intent of the Courtenay and District Fish & Game Protective Association is to deter crime such as vandalism, theft and public mischief, protection of assets and property and to improve the safety of members and guests. The use of the video surveillance systems will be restricted to the purposes of law enforcement or Association discipline for unsafe practices. Video surveillance recording may be provided by the Association to the RCMP for use in an investigation and as evidence in any civil proceedings.

SCOPE AND APPLICABILITY - This policy applies to any video surveillance systems owned and operated by or for the Courtenay and District Fish & Game Protective Association.

POLICY STATEMENT - The Courtenay and District Fish & Game Protective Association recognize that video surveillance technology has a potential for impacting individual expectations of privacy and does not wish to impair personal privacy any more than warranted to provide necessary and reasonable protection of property against vandalism, theft, damage, destruction or harmful range procedures. To minimize impacts on personal privacy, the use of video surveillance technology will be reserved for legitimate law enforcement purposes or CDFGPA incidents and will be consistent with the guidelines set out by the Office of the Information and Privacy Commissioner.

GENERAL PRINCIPLES

1. The Courtenay and District Fish & Game Protective Association wishes to make use of video surveillance systems to deter unsafe practices or provide evidence of criminal activities for law enforcement.
2. Before implementing a video surveillance system or expanding an existing video surveillance system, the reason for introducing or expanding the video surveillance is to be clearly articulated in writing and approved by the Board.
3. Video surveillance systems will only be considered after other, less intrusive, security methods have been considered and have been found to be unworkable. Video surveillance systems shall be used in conjunction with other security efforts and initiatives. Systems should only be used to address real, pressing and substantial problems of enough importance to warrant overriding of personal privacy issues. Concrete evidence of the problem should be supplied prior to implementation of any video surveillance system.

PRIVACY CONSIDERATIONS

1. Video surveillance systems that record images of individuals must be protected in accordance with the FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT [RSBC 1996] CHAPTER 165
2. Video surveillance systems must be clearly visible and marked by prominent signage.

NOTIFICATION/SIGNAGE

1. Areas on Courtenay and District Fish & Game Protective Association property subject to surveillance will be identified to those in the area by way of signage.
2. Video Surveillance Signage should be clearly visible, identifying the use of video surveillance cameras in the area where they have been installed.

SECURITY OF INFORMATION

1. Recorded images are stored in secure locations, with limited access, and overwritten after a specific time.
2. Installation of video recording equipment should be restricted to areas identified as areas subject to possible criminal activities on CDFGPA property.
3. Equipment for reviewing recorded images should be installed in an area where access is strictly controlled.
4. There should be no recording of sound.

ACCESS, USE AND DISCLOSURE

1. Access to video surveillance information is limited to the following individuals:
 - a. President or Director assigned
 - b. Chair or alternate of facility where camera is located
 - c. RCMP in relation to a law enforcement matter
2. Only authorized personnel will monitor surveillance applications.
3. Any records (videotapes, still photographs, digital images, etc.) produced by surveillance systems shall be kept in a secure, locked facility and managed appropriately to protect legal obligations and evidentiary values.
4. Video surveillance monitors must be located so that the public is not able to see any video reproduction.
5. Only authorized personnel will view information and only where there is a need to do so as requested by Board or the RCMP in relation to an investigation into an alleged crime, either because an incident has been reported or is suspected to have occurred.
6. Any other requests for access to incident specific information must be justified and referred to the Board and only disclosed in accordance with the Act and documented.

RETENTION AND DESTRUCTION

1. Recorded information should be erased every thirty days where no incident of concern has been reported.
2. When recorded information reveals an incident and the Association uses this information to make a decision that directly affects an individual, the information will be retained for one (1) year after the decision is made.
3. Old storage devices must be securely disposed of by shredding, burning or magnetically erasing any or all recorded images.
4. Detailed logs should be kept of all inspections or access of video recordings by authorized personnel with name, signature and date.

TRAINING - Ongoing training should be provided to operators to make certain that they understand their obligations under all relevant legislation and CDFGPA policy.

REVIEW - Once a video surveillance system has been put in place, at a minimum of every six months, a review should be undertaken which assesses if the system is accomplishing its intended purpose and functioning. Review should also ensure that authorized personnel are complying with procedures and signing the Log Sheet.

References

BC Personal Information Protection Act (PIPA) Current to Feb 2022

Guidance Document – Using Overt Video Surveillance (Office of the Information & Privacy Commissioner for BC Oct 2017)

Guidelines for Overt Video Surveillance in the Private Sector (Office of the Information & Privacy Commissioner of Alberta (Mar 2008)

Ratified by Board of Directors February 28, 2022

Approved by the General Membership. March 14, 2022