

PIPA Compliance Requirements for Video Surveillance in a BC Community Hall (Non-Profit)

LVCC operates as a private sector organization under British Columbia's **Personal Information Protection Act (PIPA)**. Video surveillance is permitted but must follow strict privacy rules. The key reference is the **Office of the Information and Privacy Commissioner for BC (OIPC) Guidelines for Overt Video Surveillance in the Private Sector**.

Core PIPA Requirements

1. **Legitimate Purpose & Necessity** Cameras may only be used for a reasonable security or safety purpose (e.g., protection of people, property, or assets). The organization must be able to demonstrate that less invasive alternatives were considered and found insufficient.
2. **Minimization** Cameras must capture the minimum personal information necessary. Areas with a reasonable expectation of privacy (washrooms, changing areas, private offices) must not be monitored.
3. **Transparency & Notification (Signage)** Clear, visible signs must be posted before individuals enter monitored areas. People must have a reasonable opportunity to avoid the area if they object.
4. **Accountability** The Board must designate a responsible person (e.g., President or Secretary). A written **Video Surveillance Policy** must be developed that covers purpose, access controls, retention periods, and security.
5. **Access & Correction Rights** Individuals have the right to request access to footage containing their personal information (subject to limited exemptions for security or legal investigations).
6. **Retention & Security** Footage should generally be retained for a short period — **recommended 7 to 30 days maximum** — unless required for a specific incident or legal hold. Storage must be secure with strictly limited access.
7. **No Covert Surveillance** All cameras in the hall must be overt (clearly visible) and individuals must be notified of their presence.

Recommendation: LVCC should complete a simple **Privacy Impact Assessment (PIA)** for the camera system.*

Recommended Signage Text

Exterior / Main Entrance Sign (larger, clearly visible from outside) **VIDEO SURVEILLANCE IN OPERATION**

This facility uses video cameras for the safety and security of persons and property. Images may be recorded and reviewed for security incidents.

For inquiries or access to personal information, contact:

Lardeau Valley Community Club Secretary – Kris Healy

Email: lvcc.manager.bc@gmail.com

Interior / High-Traffic Area Signs (smaller, placed near cameras or hallways) **Video Surveillance In Use**

This area is monitored by security cameras for safety and security purposes. Contact the Board Secretary for questions or access requests.

Approved for use by the Board of Directors Date: May 10, 2026

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What is a Privacy Impact Assessment (PIA)?

A **Privacy Impact Assessment** is a structured process used to identify, assess, and reduce privacy risks associated with a project or system that collects, uses, or stores personal information — in this case, the security camera system in the hall.

It is a best-practice tool recommended by the **Office of the Information and Privacy Commissioner for BC (OIPC)** for any organization using video surveillance.

Why is a PIA Recommended for LVCC?

- It demonstrates **accountability** under PIPA (one of the core requirements).
- It helps protect the Society from complaints, investigations, or fines.
- It forces the Board to clearly document:
 - Why cameras are needed
 - What risks exist
 - How those risks are being mitigated
- It creates a defensible record if a member or the OIPC ever asks questions about the cameras.

Even a **simple** PIA is very useful for a small non-profit like LVCC.

What Does a Simple PIA Look Like?

Here's a practical, short version suitable for the Board:

LVCC Camera System – Privacy Impact Assessment (PIA) Date: May 10, 2026

1. Description of the Project Installation and use of overt security cameras inside and outside the Lardeau Valley Community Centre.

2. Purpose (Legitimate Need) To enhance the safety and security of people, property, and assets at the hall.

3. Type of Personal Information Collected Video images of individuals entering or present in public/common areas of the facility.

4. Privacy Risks Identified

- Individuals may not be aware they are being recorded.
- Potential for misuse of footage.
- Unauthorized access to stored recordings.
- Longer-than-necessary retention of footage.

5. Mitigation Measures

- Clear signage posted at all entrances and monitored areas (see Attachment 260510B).
- Access to footage limited to designated Board members (President and Secretary).

- Footage retained for maximum 14–30 days unless required for an incident.
- Written policy governing use and access to be adopted.
- No audio recording.
- Cameras positioned to avoid private areas (washrooms, etc.).

6. Conclusion & Recommendation The privacy risks are low and can be effectively managed with the measures above. The Board approves proceeding with the camera system under these controls.

Approved by the Board of Directors Date: May 10, 2026