



THE CORPORATION OF THE VILLAGE OF ALERT BAY

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Alert Bay Campground Covert Surveillance Guidelines 2016

1. Video surveillance should only be deployed to address a real, pressing and substantial problem.

The campground washrooms have been repeatedly vandalized. In spring 2016, vandals used a pellet gun to disable and destroy two overtly displayed surveillance video cameras. The decision to covertly deploy a replacement camera was made in response to this act.

2. Video surveillance should be viewed as an exceptional step, only to be taken in the absence of a less privacy-invasive alternative.

The Village does not have sufficient resources for a full-time security officer at the campground. Surveillance cameras are a reasonably priced alternative that provide 24-hour monitoring.

3. The impact of the proposed video surveillance on privacy should be assessed before it is undertaken.

Two surveillance video cameras were overtly on display at the campground from spring 2015 to spring 2016. During this time, the Village did not receive any comments from the public about the presence of the cameras. The replacement (covert) camera is 25 feet further from the area of surveillance than the previous cameras and captures less movement of people. The impact of the covert camera therefore deemed less intrusive than the previous, overtly displayed cameras.

4. Public consultation should precede any decision to introduce video surveillance.

There was no initial public consultation when the overtly displayed cameras were installed. Informal discussions with Mayor and Council (elected representatives of the public) did not indicate any negative issues from covert surveillance of this particular area.

5. The video surveillance must be consistent with applicable laws.

To the best of the Village's knowledge, the covert surveillance camera is consistent with applicable laws.

6. The video surveillance system should be tailored to minimize the impact on privacy.

The camera captures a minimal area relative to the rest of the campground. The video quality is low resolution and is sufficient to obtain a general idea of who individuals are based upon clothing, stature, and body movements. Faces are reasonably discerned.

7. The public should be advised that they will be under surveillance.

The campground notice board includes a sign with 1" high letters stating: THIS AREA UNDER VIDEO SURVEILLANCE.

8. Fair information practices should be respected in collection, use, disclosure, retention and destruction of personal information.

Recording is triggered by movement within the camera's field of view. Videos are erased by order of oldest to newest as/when the recording software determines that the recording medium is at capacity. The recorded video is accessible by the Village's Chief Administrative Officer and is viewed only when necessary (ie. discovery of a criminal act within the camera's field of view, in conjunction with discovery of a criminal act at the campground, or at the request of RCMP). Video is accessed as infrequently as possible.

9. Excessive or unnecessary intrusions on privacy should be discouraged.

The camera is aimed at the campground washroom building. The camera's field of view does not include any windows or doors into the washrooms themselves.

10. System operators should be privacy-sensitive.

The Chief Administrative Officer is a member of the Privacy & Access Council of Canada, a national non-profit, non-partisan, non-governmental association in Canada that is dedicated to Privacy and Access to Information. He has served as Privacy Officer for a private financial institution with more than 3,500 customers and over \$205,000,000 in funds under management. He is also a published author on protecting one's privacy related to electronic storage of information.

11. Security of the equipment and images should be assured.

The recording device is stored behind a dead bolted wooden door. The software on the device is accessible with a username and password.

12. The use of video surveillance should be governed by an explicit policy.

This document forms the policy governing the use of the covert surveillance video system.

13. The public should have a right to know about the video surveillance system that has been adopted.

This document is available to the public.