
Video Surveillance: Discussion Notes

Maintaining physical and psychological safety is important for thriving communities. Measures that housing co-ops can take to improve the safety and security of members, staff, and others, include:

- accommodating members' accessibility needs,
- maintaining appropriate lighting,
- installing video surveillance devices, and
- regular review of the co-op's structures and pathways for obstacles and uneven surfaces.

Some of these tasks are straightforward, but surveillance systems are complicated and need careful consideration.

Motivations

Video surveillance may offer benefits, including assisting with policy enforcement and deterring crime. However, video surveillance comes with costs – costs that are financial, administrative (maintenance and monitoring), and psychological (loss of privacy). Have a clear understanding of how a surveillance system would serve the co-op and its members.

Like many others, your co-op may decide it does not need a video monitoring system. That's great! There are other measures that you can employ as part of your overall approach to safety and security. See the Centre's **Safety and Security Audit Checklist** for suggestions.

If your co-op wishes to proceed with a video monitoring system, that is also great! This guide is intended to help you have a conversation at your co-op to prepare. What needs to be considered to draft a video surveillance policy? What steps should you take?

We hope that you can tailor our template **Video Surveillance Policy** to better meet your needs. You will also want to consider how video surveillance aligns with your co-op's vision and values.

Use of cameras for a reasonable purpose

Your co-op may be considering installing cameras to ensure enforcement of a policy. For example, the co-op may want to install cameras in the garbage room to ensure members are complying with disposal rules set out in garbage room policy. Current privacy legislation allows for video surveillance systems to be installed if organizations demonstrate use for a reasonable purpose. The co-op's policy should clearly set expectations, including what uses are prohibited. The relevant policy should also state a video surveillance system is being installed to enforce the policy.

It is important to understand that there are limitations on the use of surveillance and recordings.



Preliminary research

Consulting with members is a good place to start! Consider the following questions:

- Is there general agreement that a video surveillance system would be helpful?
- Is there a list of recommended locations within your co-op for monitoring?
- What level of surveillance have members, your privacy officer, staff, or consultants recommended?
- Are there any particular concerns about policy enforcement?

When installing any new security equipment at your co-op, it is important to get professional advice. This would include legal advice as well as technical suggestions. You will want to ensure that your co-op installs a system that meets co-op needs and that it adopts a framework that complies with current privacy legislation.

Ask yourself these questions when preparing to contact a security surveillance company or consultant:

1. **What need** does the co-op want to meet by installing video surveillance equipment?
2. **Where** does the co-op want to install the cameras?
3. What **features** does the co-op want in the camera equipment?

Consider these features:

- a. Video-only recording, or video-plus-audio recording?
 - b. Continuous recording, or only recording triggered by motion?
 - c. Does live monitoring of the system also allow the person monitoring to communicate through the camera system (through audio).
 - d. Infrared/night vision or extra lighting to improve the signal in dark conditions?
 - e. Telephoto (zooming) or panning capabilities? Or restrictions on these features to better balance privacy and security?
4. **Who will have access** to the camera(s) and recording system? Will recordings be held on a secure, encrypted platform? Is the video accessible remotely (e.g., by computer or cell phone)?
 5. What **budget** do you have in mind? (Both for purchase and any ongoing or maintenance costs?)

Once the co-op has a general idea of what its surveillance needs are then it can request quotes, ideally from at least three companies who install video surveillance systems. When requesting quotes, it is helpful to ask whether the company also offers maintenance or additional security services. Some large security companies also offer 24/7 monitoring.



Privacy (see Policy, sections 2, 4 and 8)

When co-ops collect personal information, privacy and data-handling issues arise. Your co-op will want to review its **Privacy Policy** as it relates to the impacts of video recording. It is possible to include provisions on video surveillance within a Privacy Policy that looks at privacy more broadly, but we recommend having a separate Video Surveillance Policy.

The co-op will potentially collect the personal information of members, other residents (including children), visitors, staff (where relevant) and contractors. In conjunction with installing video surveillance, your co-op will need to consider how to monitor, access, store, and dispose of surveillance footage. Your policy should be clear on each of these aspects.

Under the *Personal Information Protection Act*, anyone whose image is captured under the co-op's surveillance video has the right to access their own personal images. When providing images, the co-op must ensure it does not inadvertently infringe on another person's privacy by releasing their images without written consent. Your co-op should regularly provide privacy **training** to individuals who work closely with the co-op's video surveillance equipment.

The **positioning of cameras** is also a necessary consideration. Some areas are not appropriate for surveillance. Bathrooms and changing areas are the most obvious examples, but other areas also require care. The co-op should limit how intrusive its systems are. Typically, co-ops should limit the field of vision of cameras, so they are not constantly monitoring the movements of co-op members and their guests. This may mean restricting capturing surveillance footage to common areas only.


Notices (see Policy, section 3)

It is important to install signage where cameras are present to notify the public about areas under surveillance and to give persons an option not to enter.

The notice can have a picture of a camera (for accessibility) and the words "Under video surveillance". The notice should include the co-op's Privacy or Personal Information Protection (PIP) Officer as a point of contact for anyone with questions around the co-op's surveillance system. Procedures around dealing with questions and complaints will follow what is stated in the co-op's privacy policy.

Access to recordings (see Policy, sections 5 and 6)

The co-op will limit surveillance access to a limited group of individuals for a limited range of purposes. Legitimate purposes may include complying with a request to access personal information, assist in emergencies, provide information regarding suspected criminal activity, respond to requests by police or legal authorities, allow for routine system maintenance and potentially, assist policy



enforcement. Some co-ops may engage members on who the designated personnel should be (for example, it may be the PIP Officer).

The co-op should keep a log of who is accessing the surveillance footage when they are accessing it, and the reason for it. The co-op should also have a safety procedure for the secure storage of this logbook.

Unauthorized access to recordings or video system

Consider the consequences when an incident of unauthorized access to surveillance footage is found. Keep in mind that these consequences can be based on the severity of the breach.

After conducting an investigation, some options may include:

- No further action
- Providing a warning
- Removing authority to access the co-op's video surveillance system
- Considering membership termination

Disposition of video recordings (see Policy, Section 7)

The co-op will want to develop a procedure for the disposal of video footage. The co-op's video surveillance system may automatically delete recordings after a certain period of time or after a certain amount of storage has been filled. According to the Office of Information and Privacy Commissioner, it is recommended that recordings are held for a maximum of 7 days.

There may be additional situations where footage is retained but will eventually need to be discarded. The co-op will want to consider what these exceptions are and related protocol for deletion.


When specific recordings are destroyed (e.g., footage used to assist an investigation), the destruction should be noted in a logbook.

Security Surveillance by Residents

So far, this guide has focused on the actions of the co-op, and systems that co-ops might install.

Individual members and residents may also have devices that capture video (e.g., doorbell cameras, dashboard vehicle cameras, outdoor security cameras, indoor security cameras etc.). These privately installed surveillance equipment can prompt privacy concerns, so it is important for the co-op to anticipate these concerns. Potentially your surveillance and/or privacy policy addresses them, too.

Current privacy legislation is directed at an organization's video surveillance equipment. In 2025, legislation does not extend to those surveillance systems held by private individuals. Even though



personal recording is not fully covered by the law and it is not the focus of CHF BC's model Video Surveillance Policy, it is definitely worth discussing. Your co-op is a community and members may wish to maintain a certain level of privacy. Residents should be aware about how their decisions to install private surveillance equipment can or will impact their neighbours and co-op guests.

Your co-op should consider providing some guidelines and recommendations like those it takes on itself. One example would be identifying areas where recording is taking place. Another example would be recommending that residents restrict the field of vision of their cameras to avoid capturing someone's entry way, common pathways (e.g., stairwells, corridors), and shared areas (e.g., playground, common room, main roads). As always, areas where people have heightened expectations of privacy, like washrooms or living areas in their own homes, should be off limits to recording by others. The co-op may even wish to extend its policy work to speak of consequences of violating the most critical guidelines.

Co-ops should recognize they may be limited in how they can resolve disputes between members and apply any enforcement action related to member-owned surveillance systems. It may also be worth checking in with your co-op's lawyer.

Notes and Additional Resources

Surveillance is an expanding and evolving area. Your co-op will want to review its policies regularly to make sure your community continues to comply with the law and best practices.

You may find it useful to look at resources from some of the following organizations:

- Office of the Information & Privacy Commissioner of BC
<https://www.oipc.bc.ca/>
- British Columbia Civil Liberties Association
<https://bccla.org/>
- Canadian Security Association (CANASA)
<https://www.canasa.org/>
- Office of the Privacy Commissioner of Canada
<https://www.priv.gc.ca/en/>

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