



LPS-4-RT-003

Body-Worn Camera Policy

Policy Section 2: RT	Risk Management, Technology, Privacy, and Data Governance
Effective Date	April 16, 2026
Last Updated	April 2026
Approved By	London Police Service Board
Board Governance Policy Linkages	
Legislation	<ul style="list-style-type: none">• <i>Community Safety and Policing Act, 2019 (CSPA)</i>• <i>Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)</i>• <i>Canadian Charter of Rights and Freedoms</i>• <i>Criminal Code of Canada</i>• <i>Ontario Human Rights Code</i>

1. Purpose

1. The purpose of this Organizational Policy is to establish the London Police Service Board’s (the “Board”) expectations for the use and deployment of, and internal Standard Operating Procedures and directives around Body-Worn Cameras (BWC) and Digital Evidence Management Systems (DEMS) by the London Police Service (the “Service”).
2. This Policy operates within and is intended to be read in conjunction with Board Policy *LPS-4-RT-002-Artificial Intelligence Technology Use*, which establishes the overarching framework for technology governance.
3. The Board affirms that Body-Worn Cameras, when governed by clear principles, lawful practices, and robust oversight, can enhance accountability in policing, evidence integrity, and public trust.
4. The Board authorizes the use of BWCs by members of the Service in accordance with this Policy, recognizing that BWCs and the related DEMS are tools that may support transparency, accountability, bias-free policing, evidence collection, and public confidence in policing when governed and used appropriately.
5. The Policy establishes governance-level expectations for the Chief of Police (the “Chief”) in implementing and overseeing the BWC program, and any related systems used to store, manage, access, and retain recordings.
6. This includes expectations that the BWC Program:
 - a) Respects privacy, human rights, and constitutional protections.



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- b) Enhances public trust and confidence in policing through increased transparency and accountability.
 - c) Supports effective evidence collection and the fair and timely resolution of complaints.
 - d) Provides for secure, lawful, and responsible data management.
7. The Board acknowledges that the use of BWCs engages privacy, human rights, and constitutional considerations and therefore requires clear expectations, safeguards, and oversight. This Policy provides a governance framework to support responsible, respectful use.
8. This is a Board Organizational Policy that sets expectations around the provision of policing and does not provide operational instructions or interfere with the Chief's operational decision-making authority. Detailed procedures, directives, and training requirements around the use of BWCs are the responsibility of the Chief.

2. Definitions

For the purpose of this Policy:

1. **Body-Worn Camera ("BWC")**: a mobile, wearable video and audio recording device authorized for use by members of the police service during designated interactions with the public and other policing activities.
2. **Digital Evidence Management Systems ("DEMS")**: a secure, encrypted system used to store, manage, access, and dispose of digital recordings and associated metadata in accordance with the law.
3. **Member**: any sworn officer or civilian employee of the police service equipped with or authorized to use a BWC.
4. **Risk Level**: As defined in the Board's *Artificial Intelligence Technology Use Policy LPS-4-RT-002*.

3. Legislative Authority and Context

The Board is responsible for the provision of adequate and effective policing in the City of London under the *Community Safety and Policing Act, 2019*. This Policy is established in the context of the following legislative frameworks and oversight guidance:

1. **Community Safety and Policing Act, 2019 (CSPA)**: Authorizes the London Police Service Board to set policies for the effective management of the London Police Service.
2. **Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)**: Governs access, use, retention and disposal of recordings as personal information.
3. **Ontario Human Rights Code**: Prohibits discrimination in service delivery.
4. **The Canadian Charter of Rights and Freedoms**: Protects privacy and due process rights.



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4. Scope

1. The Chief is responsible for the administration of the Service and shall comply with this Policy when authorizing or using BWCs and Digital Evidence Management Systems.
2. Any of the Chief's directives and procedures, as they relate to:
 - a) All members of the police service who are authorized to wear or operate a BWC.
 - b) All recordings captured by BWCs in the course of policing duties.
 - c) All storage, access, use, disclosure, retention, and destruction of BWC recordings.
3. Body-Worn Cameras are one component of the Service's broader technology environment and are also subject to the Board's overarching expectations around technology governance under Board Policy *LPS-4-RT-002-Artificial Intelligence Technology Use*.

5. Roles and Responsibilities

1. The Board is responsible for:
 - a) Approving this Policy and any amendments.
 - b) Setting governance expectations and principles for the use of BWCs.
 - c) Receiving and reviewing reports related to the use, risks, impacts, and effectiveness of BWCs.
 - d) Receiving an annual *Technology Compliance and Risk Report* required under the Board's *Artificial Intelligence Technology Use Policy LPS-4-RT-002*, including content respecting BWCs and related systems.
2. The Chief of Police is responsible for:
 - a) Implementing this Policy.
 - b) Developing and maintaining internal procedures, directives, and training governing BWC use.
 - c) Ensuring sworn members and civilian police professionals comply with internal procedures as they relate to the use of BWCs.
 - d) Ensuring compliance with legal, ethical, and policy requirements in the use of BWC.
 - e) Providing reports to the Board as required under this Policy.

6. Guiding Principles

The use and deployment of BWCs, and related systems supporting the BWC program, shall adhere to the following guiding principles:

1. **Legality and Human Rights:** BWCs and related systems shall be used only in a manner that complies with the applicable laws, including the *Canadian Charter of Rights and Freedoms*, human rights legislation, privacy laws, and policing legislation.



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2. **Fairness:** Use must not result in the increase or perpetuation of bias in policing and should diminish such biases that exist.
3. **Justifiability:** The use of BWCs must be shown to further the purpose of law enforcement in a manner that outweighs identified risks.
4. **Organizational Accountability:** Use must be auditable, transparent, and governed by clear policies and procedures.
5. **Transparency:** The Service shall be as transparent as reasonably possible about the use of BWCs, their purpose, and their impact, subject to lawful limits related to operational security, ongoing investigations, or legal privilege. Where BWCs are used in a way that materially affects an individual or a case, such use should be appropriately and lawfully disclosed.
6. **Privacy:** Use must, to the greatest degree practicable, preserve the privacy of the individuals whose information it collects in line with 'privacy by design' principles.
7. **Meaningful Engagement:** The adoption or material expansion of BWC must be preceded by meaningful public engagement commensurate with the risks posed by the technology contemplated.

6. Policy Directives

6.1 Internal Procedures and Directives

1. The Chief shall develop and maintain clear Standard Operating Procedures and internal directives around the use of BWC within the London Police Service, which at a minimum address:
 - a) Authorization to wear and operate BWCs.
 - b) Circumstances in which BWCs are to be activated and exceptions to required activation.
 - c) Circumstances in which BWCs can and cannot be deactivated.
 - d) Circumstances where recording may be restricted, interrupted, or delayed, with related documentation requirements.
 - e) Requirements for advising individuals that a BWC is recording at the earliest reasonable opportunity, subject to safety considerations.
 - f) Prohibition on the use of BWCs for general or continuous surveillance of the public.
 - g) Supervisory review mechanisms to support compliance.
 - h) Relevant training requirements.
 - i) Documentation and record-keeping.
 - j) Secure handling, retention, and disposal of recordings.



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- k) Consideration of targeted engagement with key stakeholder groups, as identified by the Service and informed by peer police services, for the purpose of supporting informed, transparent and community-responsive procedures.
 - l) The use of relevant legal references, guidance, and resources, including those issued by the Ministry of the Attorney General, police legal advisory committees, and recognized governance frameworks for BWC programs in Ontario.
 - m) Requirements for reporting material privacy, legal, operational, or reputational issues arising from the BWC program.
 - n) Annual audit processes to assess compliance with BWC policies, privacy impact assessments, legal requirements, use of force reporting, and Service procedures.
2. The Chief shall ensure alignment with relevant regulatory guidance, including that of the Information and Privacy Commissioner of Ontario.
 3. The Chief shall ensure that procedures governing the use of BWCs are reviewed and updated as necessary to reflect changes in law, oversight guidance, technology, operational experience, audit findings, or issues raised through complaints or ongoing stakeholder engagement.

6.2 Authorization and Deployment

1. The deployment of BWCs shall be consistent with this Policy and limited to members who are authorized and trained under approved Service procedures.

6.3 Activation and Use

1. The Chief shall ensure that internal Standard Operating Procedures and directives:
 - a) Require members to activate BWCs in accordance with defined policing interactions.
 - b) Require documentation and supervisory review where recording does not occur as expected.
 - c) Prohibit the use of BWCs for general surveillance.

6.4 Privacy and Data Governance

1. BWC recordings and any related systems used to store, manage, access, and retain such recordings shall be governed in a manner that is secure, lawful, and consistent with privacy, human rights, and the Board's objectives for public accountability and transparency.
2. The Chief shall ensure that:
 - a) BWC recordings and metadata are stored securely on Canadian servers or equivalent lawful infrastructure.
 - b) Retention schedules comply with applicable legislation.



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- c) A Privacy Impact Assessment is conducted if any significant changes are made to the BWC program.
- d) Access is restricted to authorized roles and subject to audit logging.

6.5 Restrictions on Secondary Uses

- 1. BWC recordings shall not be used in conjunction with facial recognition, biometric databases, analytics, or profiling tools without appropriate legal and privacy review.
- 2. Recordings shall not be used for non-policing or commercial purposes.

6.6 Training and Supervision

- 1. Members shall receive training prior to BWC issuance and ongoing refresher training addressing legal obligations, privacy, and human rights considerations.

7. Public Disclosure, Reporting, and Accountability

7.1 Transparency and Disclosure

- 1. The Board and Service shall ensure that information regarding the BWC program, including its purpose, use, and applicable policies, is made publicly available.
- 2. The Service shall maintain processes to facilitate lawful access to BWC recordings by individuals, in accordance with applicable legislation.

7.2 Monitoring, Auditing and Compliance

- 3. The Service shall conduct an annual audit of body-worn camera use, recordings, and associated data to assess compliance with policy, legal requirements, and Service procedures.
- 4. The Service shall report to the Board on key trends, issues, and any material instances of non-compliance identified through the audit, as part of the annual *Technology Compliance and Risk Report* to the Board.

7.3 Reporting and Board Oversight

- 1. The Chief shall inform the Board promptly of incidents involving BWC footage that may affect public trust or require Board awareness.
- 2. The annual *Technology Compliance and Risk Report* to the Board, as required under the Board's Policy *LPS-4-RT-002-Artificial Intelligence Technology Use*, shall include information regarding BWC usage to inform the Board in its oversight role, such as:
 - a) Changes to BWC procedures.
 - b) Summary of audit findings in terms of key trends, issues, and any material instances of non-compliance.



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- c) Compliance statistics (activation rates, non-recorded incidents and reasons).
 - d) Use of footage for training.
 - e) Access and disclosure, including an overview of public requests, releases, and refusals.
 - f) Use of recordings in legal proceedings.
 - g) Complaints involving BWC use.
 - h) Trends in use of force and other metrics tied to BWC outcomes.
 - i) Ongoing budgetary and resource considerations and implications.
 - j) Any unintended impacts, legal issues, or technology risks.
5. Consistent with the provisions of the CSPA respecting Closed matters, reporting shall align with legislative expectations while balancing transparency with operational integrity.