



<b>Title</b>	<b>Body Worn Camera Pilot Assessment</b>		<b>Effective Date</b>	2025-10-09
<b>SPS Division</b>	Corporate Services Bureau		<b>End Date</b>	Until Rescinded
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*Service Directives are used by the Chief Constable to establish interim operational/administrative direction.*

## **Body Worn Camera Pilot Assessment**

### **Deputy Chief Constable Directive – Body Worn Cameras**

Version 1.0  
October 9, 2025



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### **Purpose:**

Equipping SPS officers for a six-month BWC pilot assessment will contribute to SPS objectives of:

- Enhanced and build police and public confidence in accountability and oversight
- Best evidence in oversight investigations
- Recorded interactions and increase transparency within police and public interaction
- Increased safety for the public
- Best evidence in federal and provincial statute investigations
- Cataloguing recordings to allow enhanced operational review and inform training practices

The purpose of the DCC Directive is to:

- Provide Operational Direction to Police Officers using the BWC during the assessment timeline
- Maintain flexibility as SPS learns how to utilize BWC in the community
- Inform Police Officers when and how BWC will be used
- Provide Police Officers with practices to record, upload and store BWC recordings
- Navigate and learn the process and determine resources to manage a fulsome BWC program



### Scope:

The BWC pilot assessment is a fixed-duration plan aimed to inform SPS about BWC resource management, behaviour, and procurement requirements. Within the scope of the plan are:

- A trial of 20 BWC for six months
- Assessment of resources and associated costs
- Work through the data management processes
- Test batch and live stream BWC to a remote location
- Redacting in relation to FOI and Court related disclosure
- Policy development
- Training and course material development

The procurement processes and front-line services are not being used in the assessment.



## Definitions

**Activate:** to put the BWC in a state that is recording digital evidence for retrieval and archival purposes.

**Body Worn Camera (BWC):** means a wearable video and audio recording system approved and issued by SPS and includes the camera unit and supporting software.

**Body Worn Camera Recording:** means any digital audio, video, or still image captured by a BWC, including the file's associated metadata.

**Buffering Mode:** to put the BWC in a state where it is powered on, but not activated. In this mode, the BWC continuously saves a 30-second loop of video (no audio) which is retained only if activated.

**Critical Incident:** means pursuant to the *Police Act* and the Memorandum of Understanding respecting IIO Investigations, when on-duty Officers attend:

- i. any incident where there are reasonable grounds to believe that the presence, action, or decision of an on-duty Officer:
  - a. may have been a contributing factor in the death of any person, including all in-custody deaths;
  - b. may have been a contributing factor in a life-threatening injury to any person;
  - c. may cause disfigurement (permanent change in appearance) if there were no medical intervention; or
  - d. may cause permanent loss or impairment of any function or mobility of the body, if there were no medical intervention;
- ii. any discharge of a firearm by an on-duty Officer where there are reasonable grounds to believe that any person (including a police officer) may have been injured;
- iii. any incident where there are reasonable grounds to believe that the action of an off-duty officer:
  - a. may have been a contributing factor in the death of any person;
  - b. may have been a contributing factor in a life-threatening injury to any person;
  - c. may cause disfigurement (permanent change in appearance), if there was no medical intervention;
  - d. may cause permanent loss or impairment of any function or mobility of the body, if there was no medical intervention.

**Digital Evidence:** a recording that may include audio, video, and/or associated data that is stored for future retrieval.

**DEMS:** The Digital Evidence Management (DEMS) programs currently directed in Ministerial Order M389 and outlined in the Information Management Systems (Digital Evidence Management System) Regulation (2021). PRIMECorp. conducted a formal procurement process that concluded with Axon (Nasdaq: AXON) selected as the DEMS solution provider.

**Executive Leadership Team or ELT:** means the Chief Constable and the Deputy Chief Constables.



**Employee:** means a sworn Officer or Civilian Employee appointed by the Surrey Police Board.

**FOIPPA:** means *Freedom of Information and Protection of Privacy Act*.

**Officer:** means a sworn Police Officer appointed by the Surrey Police Board.

**Place:** means the definition found in Sec 348 (3) of the Criminal Code of Canada

**PRIME-BC:** means the Police Records Information Management Environment, the provincial police records management system.

**SPS:** means Surrey Police Service.

**Stealth Mode:** to put the BWC in a state where the light indicators and sounds are disabled for Officer safety and/or operational necessity.

**Supervisor:** means a Team Leader, Manager, Sergeant, Staff Sergeant, Inspector, Superintendent, Deputy Chief Constable, Chief Constable, and any other person acting in a Supervisory capacity who is accountable for a particular area or shift on behalf of SPS.



## **General Responsibilities**

### **Officer Responsibilities:**

- Ensure the BWC is fully charged at start of shift.
- Ensure the BWC is functioning properly.
- Ensure the BWC is properly mounted on uniform using approved mounting system.
- Report loss, damage, or theft to supervisor.
- Report all malfunctions immediately to supervisor and the BWC coordinator.
- Return BWC to the charging cradle at end of the shift.
- Receive requests from Crown to provide BWC recordings, complete appropriate forms.
- Notify a supervisor should privileged information from a confidential source who wishes to remain anonymous, or a police agent, is captured by a BWC.

### **Supervisor Responsibilities:**

- Understand the factors used to determine when a recording should be stopped, be prepared to advise members to stop recording when appropriate.
- Receive reports of loss, damage, or theft of BWC from members.
- Receive reports of BWC malfunctions from members and ensure notification to the BWC coordinator.
- Receive reports by members of breaches or possible breaches to BWC storage environment and conduct a preliminary investigation into the matter and engage the departmental security officer and Director IM&T.
- Review BWC recordings of members under their supervision to provide investigative file support and/or assistance, and where there are specific questions or concerns about the member's conduct, or allegations of misconduct where the supervisor is not also a witness or respondent officer to the event, or to review police tactics for the purpose of providing training or coaching
- Receive requests from police oversight agencies to produce BWC recordings.





## Procedure

### Equipment

1. SPS Officers will use the Axon Body 4 BWC or any other SPS procured equipment.
2. SPS officers will complete required training prior to using the BWC.
3. SPS Officers will use all related hardware and software required for the purposes of managing evidence in the DEMS.
4. Only SPS procured and issued BWC's, and related equipment are to be used.
5. In addition to initial training, Officers may be required to complete refresher training at periodic intervals to ensure continued effective use of the equipment, proper calibration, and performance, and to incorporate changes, updates, or other revisions to operating procedures or equipment.

### Deployment

6. Officers participating in the BWC Pilot Test shall wear the BWC during operational times and duties. These include and are not limited uniform patrols, road safety enforcement, public order events or any time Officer's are engaged in the lawful execution of their occupation.
7. Officers involved in the assessment must select the BWC at the beginning of their work period and shall conduct the following:
  - a. Inspect the BWC to ensure it is functioning;
    - i. If the BWC is not functioning, they shall record the BWC number and report the issues to their supervisor;
  - b. Attach the BWC to their uniform in accordance with training;
  - c. Make sure the BWC is in the buffering mode.
8. At the start of a shift or if obtained during a shift, an Officer who will be carrying a BWC is required to record in their notes that they are deploying a BWC and note the BWC identification number.
9. At the conclusion of a shift, an Officer carrying a BWC is required to:
  - a. confirm the BWC is not recording;
  - b. inspect the BWC for any visible defects that may impair its operation;
  - c. ensure the BWC is properly seated in the SPS-issued docking system for charging and the secure upload of BWC recordings; and,
  - d. record the above steps in their notes.
10. Officers must not:
  - a. use a BWC to replace officer notes or reports;



- b. use a BWC in a covert capacity except in circumstances where the officer is permitted to use the BWC into stealth mode;
- c. make audio or video recordings during a situation that would reveal confidential police investigative or tactical techniques; or
- d. disclose BWC images to any person or entity unless required by their duties and authorized by law.

#### **Activation**

11. SPS Officers equipped with the BWC technology shall record all investigative and enforcement activities in compliance with this procedure and start recording prior to the beginning of all direct interactions with the public that are undertaken in whole or in part to further a valid law enforcement purpose, unless an unexpected and immediate threat to the life or safety of the officer or of a member of the public makes it impossible or dangerous to activate the body-worn camera prior to that interaction, in which case the officer is required to activate the body-worn camera at the earliest opportunity thereafter and document in their notes the reason for the delayed activation.
12. When activating their BWC, Officers should, if practicable, state the location and nature of the incident that is being recorded. The flashing red light must be visible by the public.
13. An Officer will start recording on a BWC while in the lawful execution of their duties:
  - a. before arriving at a call for service;
  - b. to assist in de-escalating a situation;
  - c. to capture evidence at a crime scene on an Officer's initial arrival;
  - d. record any other interaction where the officer believes a BWC recording will assist in the legal execution of their duty;
  - e. When an officer is lawfully authorised to enter a place either in exigent circumstances or on the authority of a search warrant, the officer shall use the BWC for recording purposes. In these circumstances, an officer shall continue to record, despite any individual's objection to being recorded.
  - f. when there is a decision to initiate contact with a member of the public, and where that contact is for the purpose of a police investigation, regardless of if the person is within camera view;
  - g. to provide best evidence when providing a person with their rights under Section 10(a) and (b) of the Canadian Charter of Rights and Freedoms;
  - h. to record best evidence of interactions and capture spontaneous utterances;
  - i. To record protective search and frisk search in the field;
  - j. record interactions with a person in custody.
14. If required for officer safety purposes, Officer's can utilize the stealth mode on their BWC in the following situations:
  - a. where the blinking light or sounds may contribute to an escalation in violent behaviour of a member of the public;
  - b. where the blinking light or sounds could give away the location of an Officer, where cover or concealment is necessary for their safety; or;



- c. any other circumstance in which the blinking light or sounds could reduce the effectiveness of police tactics, investigative techniques, or put the member or the public in danger.
  - d. When an officer uses stealth mode, the officer shall document what decision criteria were used in their notes and reports.
- 15. Automatic activation sensors will not be utilized and weighed as part of the initial BWC pilot assessment. The project team does intend to eventually activate and pilot this functionality after further testing and consultations with stakeholders.
- 16. The BWC may be left on continuously without interruption. However, an Officer should switch to buffering mode, or not recording, when the Officer:
  - a. determines the incident has concluded;
  - b. becomes aware that a recording is in violation of a prohibited action listed in these guidelines;
  - c. enters a healthcare facility when there is no anticipation of violence or aggression while waiting for service or transfer of custody, to prevent indiscriminate recording of healthcare information and treatment; or
  - d. is directed to do so by a supervisor based on the factors set out above.
- 17. Once activated, an Officer must not deactivate a BWC until the incident being recorded or purpose for recording has been concluded, unless an Officer:
  - a. becomes aware that a recording is in violation of a prohibition listed in this procedure;
  - b. has a reasonable belief that recording is likely to compromise police tactical or investigative procedures, or public safety or inhibit their ability to gather information such as:
    - i. a victim or witness is reluctant to cooperate while a BWC is recording;
    - ii. areas where electronic explosive device may be present;
    - iii. while interacting with people who have or are providing privileged information about a crime;
  - c. has a reasonable belief that the law enforcement objectives served by using a BWC do not outweigh the intrusion on an individual's privacy rights;
  - d. determines that exigent circumstances exist, where those circumstances are such that a delay in acting would result in danger to human life or safety, or action is necessary to prevent the continuation of an offence which threatens human life or safety; or
  - e. is directed to do so by a supervisor based on the factors set out above.
- 18. An Officer may stop recording when booking a prisoner in a service facility where there is reasonable belief that other recording equipment is in use, and it would not benefit the investigation and/or officer safety to have two systems recording simultaneously.
- 19. If an Officer becomes aware of an incident that should have been recorded, or they accidentally switched the BWC to buffering mode, or the BWC is found to have malfunctioned prior to the conclusion of an incident, they should articulate the details in a General Occurrence report or in their notebook within 12 hours of the end of their shift and notify a supervisor.



20. The BWC does not replace the requirement for an Officer to take notes as required in SPS Policy.

**Privacy and Advisories**

21. Use of a BWC in any circumstances can have significant privacy implications. When using a BWC, Officers must balance the law enforcement objective against possible privacy concerns.
22. Officers must not use their BWC for continuous or indiscriminate recording and are to avoid, to the extent reasonably practicable, recording uninvolved bystanders or benign interactions with the public.
23. Officers are to, at their earliest opportunity when a BWC is recording, advise members of the public they are interacting with that the BWC is recording, and they are being recorded. Officers are also to, at their earliest opportunity when a BWC is recording, advise Officers, and other first responders, in their presence that the BWC is recording, and they are being recorded.
24. The following are not prohibitions, but examples of situations or locations where heightened privacy concerns exist that Officers must balance against the law enforcement need or potential benefit of activating a BWC:
  - a. being in a dwelling house;
  - b. being in a health care facility (hospitals, clinics);
  - c. involving exposure to private health information and/or medical treatment being received;
  - d. being in a law office;
  - e. being in a location of worship;
  - f. individuals being nude or having exposed private body areas;
  - g. children or youth being present, whether the victim or the subject of a criminal investigation; or
  - h. a victim or witness being reluctant to cooperate when the BWC is activated or requesting that Officers do not record in a sensitive situation (consider the importance of obtaining their evidence by use of a BWC versus other means in those circumstances).
25. If the officer chooses to stop a recording for one of the following reasons above, the officer must record a brief statement outlining the reason recording is temporarily stopped or muted and document the reason in their notes, unless doing so would breach the confidentiality of a source.
26. Where an Officer's presence in private property is contingent on the owner occupier's consent, then the owner or occupier may withdraw consent for BWC recording and officer must comply.
27. If an Officer attends an indigenous ceremony there will be no BWC recording without express consent of the Elder or Knowledge-Keeper, or unless exigent circumstances or lawful authority exists.
28. Officer's will not record in a Law Court during normal court proceedings or while inside the court room. Officer's will only record with the BWC if Officers are responding to a critical incident and in emergent circumstances.



29. BWC images are not subject to biometric analysis including facial recognition.
30. A BWC is not to be operated under the following circumstances:
- a. administrative duties, or during conversations of a personal or non-investigative nature with other Officers;
  - b. Interactions that are unrelated to an Officer's performance of their duties;
  - c. When working in a community police role and attending a community celebration, a community hall or educational facility that does not require police attendance or element of public safety;
  - d. When conducting searches which require the arrested individual to undress.
  - e. for surveillance during lawful public assemblies.
  - f. in covert capacity.
  - g. in circumstances where a proper KGB statement is required.
31. An Officer may obstruct the lens of a BWC momentarily during sensitive situations such as a member of the public or a detained person putting clothing on.

#### **Loss or Theft of a BWC**

32. An Officer must notify their supervisor, and the supervisor must notify the BWC Coordinator, as soon as practicable, if an Officer loses or suspects the theft of their BWC. If the BWC is lost or suspected stolen in another jurisdiction, the Officer must notify the police of jurisdiction to produce a General Occurrence report of the incident.

#### **Notes and Report Writing**

33. Officers may view a BWC recording prior to completing notes and writing a report (e.g., use of force report) regarding an incident in which they were involved.
34. When completing notes of an investigation, an officer must make a notebook entry that the BWC recording was reviewed and may add addendum to notes based on that review.

#### **Reporting Recorded Suspected Misconduct**

35. Any Employee viewing a BWC recording and having reason to suspect that the recording shows inappropriate behavior, possible misconduct, or excessive use of force, is required to report the matter to their immediate supervisor and ultimately the report must be made to Inspector i/c Professional Standards Section and the Inspector is required to report the same to the Executive Leadership Team.

#### **Reports and Statements: Office of the Police Complaint Commissioner**

36. A Officer involved in or who is witness to a critical incident with sole oversight from the Office of the Police Complaint Commissioner may review a BWC recording in which the officer is depicted in or participated in at the time of its creation prior to being interviewed by the appropriate investigative unit and receiving Supervisor approval to access and review the recording, and after viewing a BWC recording the Officer may be given an opportunity to provide additional information to supplement an initial statement and may be asked additional questions as a result.



### **Independent Investigations Office of BC (IIO)**

37. If a member wearing a BWC is involved in an incident where the IIO asserts jurisdiction, the member should advise their supervisor and await further direction before taking any action.
38. In all cases where the IIO has jurisdiction, involved officers (including subject and witness officers) will not review any records of the incident without permission from the SPS IIO Liaison Officer.

### **Review of BWC Recordings for Training Purposes**

39. A BWC recording not specifically made for training purposes still may be used for training purposes provided:
  - a. the BWC recording is no longer required for an investigation or proceeding;
  - b. prior authorization has been obtained from the BWC Coordinator;
  - c. all persons in the BWC recording have been anonymized or have provided written consent that the BWC recording may be used for training purposes; and
  - d. the use is approved by the Staff Sergeant, Operational Skills Unit.

### **Release of BWC Recordings**

40. Officers shall not release a BWC recording outside SPS, unless required by law (disclosure to Crown Counsel, FOIPPA request) or prior written approval has been obtained from the Chief Constable or designate.

### **Public and Media Access Requests**

41. BWC recordings shall not be released to the Media unless authorized by the Chief Constable or designate, or to comply with a FOIPPA request.
42. Members of the public, including persons who appear or believe they may appear in a BWC recording, may request a copy of the recording in accordance with the FOIPPA.
43. SPS may release BWC footage to the public that depicts interactions with the public where a “compelling public interest” exists. This could include situations where there are significant accusations of wrongdoing or claims of improper behaviour and the recording is compelling. Only the Chief Constable can authorize the release. This release cannot be made in instances where the IIOBC has asserted jurisdiction.

### **Requests from Other Law Enforcement Agencies**

44. Requests for BWC recordings from other law enforcement agencies must be referred to the Manager, Information Privacy and Disclosure and may be disclosed by the Manager based on written documentation provided by the other agencies establishing their investigative need for access to the recording, and following consultation by the BWC Coordinator with the primary investigator of the incident associated to the recordings.
45. If another law enforcement agency requires a BWC for imminent or ongoing investigative purposes the Duty Officer or an Inspector in charge of any investigative bureau may authorize the release of the BWC recording to further the investigation.



## **Offences**

46. Except as authorized by the *Freedom of Information and Protection of Privacy Act* (FOIPPA), and where permitted under this directive, disclosure of personal information recorded using a BWC is a violation of this directive which may result in disciplinary proceedings.

## **Recording Storage and Retention**

47. Members are prohibited from deleting BWC recordings, other than to facilitate deletion in accordance with the retention periods set out below.
48. BWC recordings will be uploaded at the end of each shift to the designated secure storage location.
49. BWC recordings will be automatically deleted after thirteen (13) months, unless required as evidence or for training purposes.
50. If required for an evidentiary purpose, the BWC recording will be retained for the incident specific PRIME retention period and deleted thereafter, and if retained for a training purpose, a recording may be retained for the duration that it remains relevant as a training aid.

## **Disclosure and Vetting**

51. Only the Manager, Information Privacy and Disclosure, a supervisor in charge of disclosure for prosecution, or an Officer of the rank of Inspector or above may authorize the download of a recording for vetting, editing, redaction and disclosure.
52. Officers are prohibited from making any alterations to BWC original recordings, except for redactions to a copy of the original recording for prosecution disclosure or other authorized releases.




## Related Policies

OP 8.4 *Notebooks*

AD 9.14 *Records Administration*

OP 5.1.2 *Digital Evidence Management*

Chief Constable Signature		Approval Date	2025-10-09
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