



November 5, 2020

Mr. Jim Hart
Chair
Toronto Police Services Board
40 College Street
Toronto, ON M5G 2J3

Dear Mr. Hart:

RE: Toronto Police Services Board Body-Worn Camera Public Consultation

I am writing to provide the Toronto Police Services Board (the Board) with the submission of the Information and Privacy Commissioner of Ontario (the IPC) regarding the governance framework for the Toronto Police Service (the Service) Body-Worn Camera (BWC) Program. My comments focus on the Board's draft BWC Policy and the Service's draft BWC Procedure as posted on the Board's [website](#) on October 20, 2020 (hereafter the Policy and the Procedure). It is my understanding that the Board will be considering these two governance documents at its November 24, 2020 public meeting.

As you are aware, the IPC wrote to the Board and the Service with respect to an earlier version of the Service's procedure (the July 27, 2020 version). My [letter](#) to the Board dated August 17, 2020, set out thirteen recommendations to help the Board and the Service put in place a BWC governance framework that respects the public's need for transparency and accountability in policing, and the equally compelling need to respect individuals' reasonable expectation of privacy. These thirteen recommendations were also relayed directly to the Service in our letter of August 14, 2020.

Since August, the Board, the Service, and the IPC have engaged in extensive dialogue over Toronto's BWC governance framework. While this work is still ongoing, significant progress has been made regarding the shared commitment to build transparency, accountability, and privacy into the Toronto BWC Program. In this context, I am pleased that the Board and the Service have committed to continuing to work with my office to improve necessary elements of the governance framework in the weeks and months ahead.

The IPC's Overarching Position on BWCs

As I explained in my letter of August 17, 2020 to the Board, the IPC recognizes the potential value of implementing police BWC systems. Civilian deaths in Canada and the United States continue to provide painful reminders of the importance of creating accurate recordings of police-civilian encounters. There is a growing public expectation to receive truthful and timely information about those encounters and to hold law enforcement accountable for their actions and decisions.



In addition to transparency and accountability, individuals also value their sense of privacy and expect it to be protected from unwarranted state surveillance whether they are in private or public places. Accordingly, it is critical that a BWC governance framework respect both the public's need for enhanced transparency and accountability in policing, and the equally compelling need to respect individuals' reasonable expectation of privacy.

With the appropriate governance framework in place, BWC systems can be implemented in a manner that advances both these goals and helps earn public trust, recognizing that even a well-designed BWC Program can only provide a partial solution to the broader challenges facing policing today.

As you know, the thirteen recommendations I made on August 17, 2020 focused on establishing necessary transparency and accountability mechanisms, while at the same time, putting in place essential privacy controls and safeguards.

In the pages that follow, I will summarize each of those thirteen recommendations, the actions taken by the Board and the Service in response, and the IPC's evaluation of their current status. Where applicable, I will also provide additional recommendations.

MEETING THE PUBLIC'S EXPECTATION WITH RESPECT TO TRANSPARENCY & ACCOUNTABILITY

Recommendation #1 - *The Board and the TPS should commit to making BWC policies and procedures readily available to the public and publicly commit to working with the IPC to address our recommendations (regarding an appropriate BWC governance framework) by the end of 2020.*

Response to Recommendation #1: On October 20, 2020, the Board published the Policy and the Procedure on the Board's website. Section 15 of the Policy requires that "a current copy of the Service's BWC procedure" be "posted on the Service's public website."

At its August 18, 2020 meeting, the Board agreed not to proceed with Service-wide deployment until the necessary governance framework is in place. In addition, the Board and the Service committed to working with the IPC on developing the BWC governance framework, which they have actively done and continue to do. In view of our progress to date, I am confident that the governance framework will be completed by the end of 2020 or shortly after January 1, 2021.

Status of Recommendation #1: I consider recommendation #1 as having been addressed.

Recommendation #2 – *To help ensure that a full picture of the initial stages of police-civilian encounters is captured, the BWC's pre-event recording capacity should be leveraged to capture a longer period (for example, 60 rather than 30 seconds), and include both audio and video recording.*

Response to Recommendation #2: The Service's position is that given requirements in the Procedure that officers generally record the totality of all investigative or enforcement interactions or incidents, 30 seconds of pre-event video recording should be sufficient to

ensure that a full picture of the initial stages of all or virtually all such incidents are recorded.

As indicated in recent discussions with the Board and the Service, it is not yet clear that this approach to pre-event recording will be sufficient, particularly in circumstances where a police-civilian interaction starts as an informal one, *outside* of a call for service, but then quickly transitions into an investigative incident. In those circumstances, a 30-second pre-event recording capacity may not be sufficient to show what happened during the critical moments leading up to the officer's decision to treat the encounter as requiring an investigative stance.

In an effort to address our concerns, the Board has included provisions in its Policy with respect to annual audit requirements. Notably, section 33(c) requires that the audit review a sampling of BWC recordings of police – civilian interactions that arose independently of a call for service to assess whether those recordings began prior to the beginnings of those interactions and, if not, why not. In addition, the Service is exploring the possibility of instituting a longer pre-event recording of both video and audio in relation to, for example, incidents where an officer draws a weapon.

Status of Recommendation #2: It is apparent that both the Board and the Service are mindful of the importance of using BWCs to capture a full picture of the initial stages of police-civilian interactions that involve or result in an investigative incident. In addition, the Board and the Service have agreed to continue to engage the IPC on this issue.

ADDITIONAL RECOMMENDATIONS: At this time, I ask that the Service agree to update the IPC on possible changes to the BWC's pre-event recording capacity within the first quarter of 2021. In addition, I ask that the Board and the Service agree to commit to meet with the IPC regarding the lessons learned from its first annual BWC audit.

Recommendation #3 – *BWC recordings should be mandatory for the full duration of any calls for service and all other investigative-type encounters that involve a member of the public, subject to only a very limited number of exceptions. In particular, any mandated exceptions to the duty to record should be kept to a minimum, and any such exceptions should be clearly defined.*

Recommendation #4 – *Officer discretion to deactivate a BWC's recording functions and a supervisor's authority to order such deactivation should also be significantly limited and clearly defined.*

Recommendation #5 – *Officer discretion to block or reduce a BWC's recording capacity should also be significantly limited and clearly defined.*

Response to Recommendations #3, #4 and #5: Subject to two additional recommendations discussed below, the Policy and the Procedure have evolved to the point where they provide the Service and its officers with sufficiently clear and detailed instructions regarding the activation and deactivation of their BWCs. These instructions, found in sections 5 – 8 and

10 of the Policy and sections 4-6 of the Procedure¹, will help ensure that the totality of police-civilian investigative interactions will be recorded, subject to carefully and narrowly defined exceptions. Exceptions include limitations on recording in healthcare facilities, during spiritual ceremonies of Indigenous People, and in private places. In addition, there is provision for a vital but limited discretion for officers to momentarily obstruct the lens of their BWCs to protect the dignity of witnesses, victims or suspects in vulnerable situations (such as when an individual is in a state of undress).

As highlighted in the CCLA's October 9, 2020 [submission](#) to the Board, the use of BWCs at protests requires special consideration given the fundamental rights at issue and the potential chilling effect of overbroad surveillance. I agree with the CCLA that when police attend protests, their BWCs should not be turned on until after an officer determines that a specific situation calls for an investigative or enforcement action that will lead to, or is likely to lead to, direct interaction with one or more members of the public, including through the possible use of force. Such controls are consistent with the requirements in section 6 of the Policy that BWCs not be used for general surveillance or to record activity that is not a direct interaction between a police officer and a member of the public.

Status of Recommendations #3, #4 and #5: Substantial progress has been made with respect to these recommendations.

ADDITIONAL RECOMMENDATION: At this time, I recommend that the Board and the Service amend the Policy and Procedure to provide appropriate controls with respect to the use of BWCs at protests.

Recommendation #6 – *Officer and supervisor decisions to deactivate a BWC should be accompanied by stricter record keeping requirements.*

Response to Recommendation #6: Section 11 of the Policy requires that the Service establish rules governing de-activation-related record keeping requirements. Section 7 of the Procedure requires officers to record a brief audible statement indicating the reason for the intentional deactivation or limitation of the recording functionality of their BWCs, except where doing so would not be possible or would disclose confidential information. Section 8 of the Procedure addresses the record keeping requirements for accidental or unintentional interruptions to recording by requiring a subsequent deactivation notation in an officer's BWC and memorandum book. Section 20 of the Procedure addresses record keeping requirements with respect to the role of supervisors.

¹ As discussed in an October 30, 2020 telephone call between IPC and Board staff, there is an error in the section numbering of the Procedure. The text that forms the substance of section 6 is missing its enumeration as "section 6" and subsequent sections of the Procedure all require adjustment such that, for example, section 6, 7, 8, etc. become sections 7, 8, 9, etc. In this way key references to sections 5, 6, and 7 as found in what are now sections 6, 7, 20 and 29 will refer to the applicable rules about recording/not recording, consent and deactivation. I have asked my staff to follow up with the Board and the Service with respect to other technical recommendations in the days ahead. In the meantime, note that in the body of today's submission, we have chosen to make reference to the provision numbers as found in the Policy and draft Procedure as published on October 20, 2020.

Status of Recommendation #6: Substantial progress has been made with respect to this recommendation. The only outstanding issue relates to section 7 of the Procedure as it does not set any record keeping requirements where one of its exceptions applies (i.e. once the circumstances justifying the section 7 exceptions have come to an end).

ADDITIONAL RECOMMENDATION: I recommend that the Procedure be amended to instruct officers to make a deactivation notation in both the officer's BWC and memorandum book at the earliest opportunity, once the circumstances warranting a section 7 exception have come to an end.

Recommendation #7A – *As part of a comprehensive governance framework, accountability and transparency require the timely disclosure of all relevant BWC recordings to the bodies responsible for independent oversight of police (e.g. the Ontario Independent Police Review Director (the OIPRD) and the Special Investigations Unit (the SIU))*

Response to Recommendation #7A: Section 19(c) of the Policy requires that the Procedure establish conditions to ensure that access to BWC recordings is provided in a timely manner to bodies responsible for independent oversight of police (e.g. the OIPRD and the SIU). Accordingly, page 4 and sections 14, 19, 27, and 30 of the Procedure require that relevant BWC recordings must be secured and provided to the SIU in compliance with SIU requirements. We understand that this means that all relevant BWC recordings will have to be made available to the SIU in a timely manner. Page 4 and sections 13 and 28 further provide for comparable requirements with respect to the OIPRD.

Status of Recommendation #7A: I consider recommendation #7A as having been largely addressed.

ADDITIONAL RECOMMENDATION: Given the importance of independent oversight and the evidentiary value of BWC recordings, I recommend that the sections of the Board's Policy dealing with annual auditing (section 33) and annual reporting (section 35) be amended to verify, and report on, the extent to which BWC recordings are being made available to the applicable independent oversight bodies in a complete and timely fashion.

Recommendation #7B – *As part of a comprehensive governance framework, accountability and transparency further require the proactive public interest-based disclosure of BWC footage to the public in special circumstances to address compelling concerns about human rights and police use of force.*

Response to Recommendation 7B: Section 26 of the Policy requires the establishment of a public interest disclosure process whereby the Chief of Police may release BWC recordings to the public. The Policy requires that in considering releasing a BWC recording, the Chief must consider all relevant factors, including what is consistent with the law and the public interest and what is reasonable in the circumstances of the case. If the Chief decides to make such a public interest disclosure, sections 27 and 28 of the Policy require that the Service employ image blurring and voice distortion techniques so as not to reveal the identity of members of the public, but otherwise release a full and unedited copy of the

recording. Finally, on releasing a BWC recording to the public, the Chief must provide the public with a justification for the public interest release decision.

The Procedure also provides that the Chief may authorize the release of BWC recordings to the public where a compelling public interest exists, for example where there are allegations of discreditable conduct, improper conduct, misconduct or excessive or improper use of force by an officer.

Status of Recommendation #7B: I consider recommendation #7B as having been addressed.

ADDITIONAL RECOMMENDATION: However, given the importance of transparent and accountable decision-making, particularly with respect to the police use of force, I further recommend that the Procedure require that, if the Board or a member of the public requests the Chief to disclose a use of force-related BWC recording in the public interest and the Chief refuses to do so, the Chief provide the public with a justification for not releasing the recording.

PROTECTING INDIVIDUALS' REASONABLE EXPECTATION OF PRIVACY

Recommendation #8 – *The BWC governance framework must recognize and protect the public's reasonable expectation of privacy.*

Response to Recommendation #8: Both the Policy and the Procedure now explicitly state that individuals have a reasonable expectation of privacy, including in public spaces, and provide a number of important privacy and security protections, including the following:

- Section 16 of the Policy requires that BWC recordings, any meta-data produced by the body-worn cameras, and the technology supporting the Service's BWCs must be:
 - Stored on a secure Canadian storage server in accordance with all applicable provincial and federal legislation and security best practices, so as to prevent any editing, tampering and unauthorized access to recordings and meta-data,
 - Encrypted within the camera, during transit to the storage server, and while in storage, and
 - Destroyed at the end of their retention period in a secure manner which prevents recovery and unauthorized access to the recordings and metadata

Page 3 of the Procedure further indicates that:

“The Body Worn Camera and the Cloud Storage Solution are both Information Technology Assets and therefore subject to the *IT Acceptable Use Agreement* and *IT Governance* that establish organization wide controls to ensure secure storage, transfer, and disposal of all recordings created by the BWC system, including records containing audio, video files and meta-data. These controls govern any wrongful access, attempts to defeat security measures, and

inappropriate or personal use of this infrastructure, and shall be implemented by the Information Security Officer.”

- Section 18 of the Policy requires that the Procedure address the actions the Service will take with respect to actual or potential privacy breaches with respect to BWC recordings and meta-data storage services, including with respect to breach mitigation and breach notification.

Page 3 of the Procedure further provides that:

“Officers shall identify any indication or suspicion of a breach to their supervisor who will in turn conduct a preliminary investigation and engage the Information Security Officer according to the Service Procedure 17-02 Information Breaches. [...] In cases where there is a breach or possible breach of the Cloud Storage Solution, [...] the Supplier will, consistent with contractual obligations, promptly notify TPS in writing, and provide information relating to the breach or possible breach.”

- Section 17 of the Policy requires that the Procedure define minimum retention periods for BWC recordings and any associated meta-data and the conditions for the extension of those periods. Section 16(c) requires the secure destruction of this information at the end of each applicable retention period.

Page 3 of the Procedure further dictates that:

“Service BWC records shall be retained for a minimum of two (2) years plus one (1) day (which ensures the records are retained for the duration of the general limitation period established by the Limitations Act, 2002, S.O. 2002, c.24, Sched. B) and then securely destroyed, absent a circumstance that triggers a longer retention period.” (The Board and Service indicate that the circumstances that trigger a longer retention period are defined in terms of record classifications and that the retention periods for those classification are described in City of Toronto By-Law No. 689-2000.)

- Sections 32 – 35 of the Policy require the Service to conduct privacy impact assessments (PIA) and annual audits, notify the Board of changes to the Procedure, and provide the Board with annual reports. In addition, section 36 of the Policy requires the Board to conduct periodic reviews of the Policy. It is our understanding that such reviews will include an assessment as to whether Toronto’s BWC Program is accomplishing its purposes.

Finally, as you know, on October 30, 2020, I wrote to you and asked that the Board require that the Service involve the IPC in reviewing the Service’s PIAs when significant changes are made to Toronto’s BWC Program, for example, in relation to any updates to the services provided by AXON Canada. In addition, I requested that you require the Service to notify the IPC in the event of significant BWC-related privacy breaches. I understand that you have agreed to do both in accordance with the terms I conveyed to you on October 30, 2020.

Status of Recommendation #8: In my view, the Board and the Service have made significant improvements to the Policy and Procedure that incorporate limits and controls to better protect the public's reasonable expectation of privacy.

ADDITIONAL RECOMMENDATIONS: However, given the importance of the privacy rights at issue, I further recommend that the Board and the Service review City of Toronto By-Law No. 689-2000 to ensure that:

- Triggering events justifying retention of BWC recordings beyond the two year plus one day period are generally limited to circumstances where a recording is determined to be relevant to an ongoing investigation or a criminal or civil proceeding, and
- Unless indefinite retention is absolutely necessary, each applicable retention period comes with a clear rule dictating that, at the end of a reasonable period, secure destruction will be accomplished at the earliest opportunity.

Secondly, I recommend that the annual auditing and reporting requirements at sections 33 and 35 of the Policy be amended as follows:

- To ensure that calls for service related BWC recordings are handled in a manner consistent with the activation, deactivation, obstruction, access, retention and destruction requirements referenced in paragraphs (a) through (g) of section 33 of the Policy, I recommend that section 33 be amended to require that the Service conduct an annual audit of a sample of incidents during the reporting year that were initiated by a call for service.
- Section 35 of the Policy should be amended to require that the Chief's annual report to the Board include information about the number of potential privacy breaches that were investigated during the calendar year, the number determined to constitute a breach together with a summary description, the number of times the IPC was notified of the breach, and the number of individuals notified.

Thirdly, pursuant to my letter of August 17, 2020, I recommend that the Board ensure that the selected vendor and equipment are capable of supporting the Service's ability to comply with its statutory privacy and security requirements. In this context, it is critical that the Board satisfy itself that it has sufficient contractual terms in place with AXON Canada to support the Board's and the Service's compliance with all applicable privacy and security obligations.

Recommendation #9 – *Explicit limits and controls with respect to the use and disclosure of BWC recordings should be put in place, including detailed role-based access controls and explicit limitations on the use and disclosure of BWC recordings for secondary purposes.*

Response to Recommendation #9: Section 19 of the Policy provides that Service Members (i.e. Toronto police officers and other employees of the Service) may only access BWC recordings if their duties and functions justify and necessitate such access. Section 20 provides that Service Members who obtain access to BWC recordings under section 19

may not further disclose those recordings to any other parties without lawful authority. Section 21 requires that the Procedure establish the documentation required to obtain access to a BWC recording. At a minimum, that documentation must include the identity of the requestor, the reason for the request for access, and the authority under which the demand for access is being made. Section 22 obliges the Service to establish related audit trail requirements. Section 23 requires that the Service establish additional access controls and other safeguards in order to protect the privacy of suspects and witnesses who are minors in accordance with the requirements of the *Youth Criminal Justice Act*.

With respect to access by, and use and disclosure by anyone within the Service, the Procedure section on “Use and Disclosure (*Internal*) BWC Recordings” states that “(a)ccess to or viewing of BWC records will only be allowed to members of the Toronto Police Service with a specific role in relation to the records justifying and necessitating such access”. It then provides nine examples of circumstances where Service Members will be permitted to access, use and disclose BWC recordings.

With respect to access by and disclosure to anyone external to the Service, the Procedure section on “Use and Disclosure (*External*) BWC Recordings” states that “access to or viewing or production of BWC records for people who are not members of the Service will be provided only as permitted or required by law.” It then provides nine examples of circumstances where external access and disclosure of BWC recordings will be permitted.

Finally, the Procedure provides that:

“All actions in the BWC system are logged and auditable by Information Security. Audit logs are retained indefinitely.” (at page 3)

“Service Members who obtained access to a recording may not provide access to the recording or otherwise disclose it to other Service Members or any external body or individual without lawful authority. All such access is recorded within the meta-data of the system and can be tracked.” (at page 8)

With respect to restrictions on the use of BWC recordings for secondary purposes, the Service has assured the IPC that BWC recordings will not be “mined”, for example, to feed intelligence, nor will the Service’s BWC systems be used as a form of mass surveillance. The Service also takes the position that, as a practical matter, any such capacities would require the use of artificial intelligence or machine learning techniques that the Service has agreed not to use or deploy at this time. Moreover, section 30 of the Policy prohibits any such mass surveillance tactics, techniques or practices.

Status of Recommendation #9: It is my view that the Board and the Service have made significant progress with respect to the establishment of necessary access, use, and disclosure controls.

ADDITIONAL RECOMMENDATIONS: However, in view of the challenges associated with reconciling law enforcement duties with the need to mitigate the risks using and disclosing BWC recordings for foreseen or unforeseen secondary purposes, I further recommend that:

- the annual auditing (section 33) and reporting requirements (section 35) in the Policy be amended to ensure that the Service audit and report on the use and

disclosure of BWC recordings to assess whether all sampled uses and disclosures were justified and necessary; and,

- that the Board and the Service commit to consulting with the IPC and any other appropriate agencies to help the Service identify the necessary *Youth Criminal Justice Act*-related safeguards.

Recommendation #10 – *Enhanced notices should be provided to the public informing them of the existence and use of BWCs worn by officers.*

Response to Recommendation #10: Section 9 of the Policy requires police officers to inform members of the public that they are being recorded at the earliest opportunity during an interaction.

The Procedure (at page 4) further requires that, at the earliest opportunity, officers advise people they are interacting with, that the officer's BWC is recording and that the individual is being recorded. In addition, officers are required to wear their BWCs in plain view, mounted on their uniforms in the approved location using the approved mounting system. The cameras come with a sticker containing both pictographic and text notifications that the camera is a recording device. Furthermore, subject to an overriding concern about officer safety that justifies an officer's decision to employ a "Stealth Mode", when the BWC is recording, a red light on the camera repeatedly flashes on and off, the camera emits an audible sound every two minutes, and it emits an extended audible sound on deactivation.

Finally, additional notice is provided to the public through information published on the Service's website.

Status of Recommendation #10: I consider recommendation #10 as having been addressed.

Recommendation #11 – *Meaningful opportunity should be afforded to members of the public to provide or refuse consent to BWC recordings in private places.*

Response to Recommendation #11: Section 10(a) of the Policy requires that the procedure set out conditions under which, prior to entering a private residence or other private place, officers must inform occupants that they are being recorded in both video and audio and inquire whether these individuals request that the body-worn camera be deactivated. As indicated on page 2 of the Procedure, when officers enter a private residence or a private place on the basis of the owner or occupant's consent, officers are required to:

- Provide the owner/occupant with a reasonable opportunity to refuse or consent to being recorded and, where consent to recording is refused,
- Stop recording in that place.

Status of Recommendation #11: I consider recommendation #11 as having been addressed.

Recommendation #12 – *Use of personal information in BWC recordings used for officer training should be restricted when other less privacy-invasive alternatives are available.*

Response to Recommendation #12: Section 29 of the Policy states that the Service may only use BWC recordings for training purposes after the identities of all members of the public captured on the recordings are concealed through measures such as blurring and voice distortion.

As reflected on pages 3, 4, and 8 and in sections 18 and 28, the Procedure provides that:

- Supervisors and Unit Commanders shall identify BWC recordings that may be appropriate for training.
- BWC recordings identified by Supervisors or Unit Commanders as potentially relevant for training must be referred to the Unit Commander of the Toronto Police College who will review them to determine their potential utility for training.
- The use of BWC recordings requires the approval of the Toronto Police College.
- Anonymizing measures shall be completed by the lead trainer prior to the use of any BWC footage in training so as to ensure that the identities of all members of the public captured in the recordings are concealed through measures such as image blurring and voice distortion.

Status of Recommendation #12: In my view, the Policy and the Procedure provide for a process capable of ensuring that BWC recordings that feature members of the public will not be used for training purposes unless and until the recordings have been anonymized to preserve the privacy and dignity of the individuals involved. I consider Recommendation #12 as having been addressed.

Recommendation #13 – *The TPS should commit (and the Board should so direct the TPS) to adhere to a moratorium on the use of any facial recognition-related technologies in conjunction with BWCs – other than in the context of “mug shot” matching – until after the release of the privacy guidance being prepared by federal, provincial, and territorial privacy authorities and consultation with the IPC.*

Response to Recommendation #13: Section 30 of the Board Policy provides that:

“Recordings from BWC may not be used in combination with FRT, video analytics software, voice recognition software, or to generate a searchable database of images of individuals who have interacted with Service Members, with the exception of comparing images that are directly related to an investigation to a “mug shot” database in a manner approved by the Board.”

Status of Recommendation #13: It is our understanding that the Service and the Chief have agreed to adhere to the above moratorium. Based on the assumption that the moratorium will continue to be respected, I consider recommendation #13 as having been addressed and look forward to following up with the Board and the Service once the federal-provincial, and territorial Commissioners have issued their FRT-related guidance.

Finally, in my letter of August 17, 2020, I advised the Board that the IPC would not object to the Board approving a contract and moving ahead with the purchase of appropriate equipment, provided that officers are trained on the final governance framework well before BWCs are widely deployed in Toronto.

Section 12 of the Policy requires that officers be trained prior to being issued a BWC and receive subsequent ongoing training. These requirements are supported throughout the Procedure (see, for example, sections 4, 16, 26, and 28). It is my understanding that training is being provided to each group of officers being equipped with BWCs before they begin to use BWCs while on duty and that this training is based on the latest version of the Procedure.

Conclusion

The Board and the Service have demonstrated a commitment to build a BWC governance framework capable of providing for transparency, accountability and privacy. As mentioned at the outset, I look forward to further discussions with the Board and the Service in the months ahead in order to complete the BWC governance framework prior to full deployment of Toronto's BWC Program. I also encourage the Board and the Service to continue to engage key human rights experts such as the Ontario Human Rights Commission.

I remain confident that our ongoing collaboration will help establish an effective and robust BWC governance framework that will serve not only the needs of Toronto, but also provide a robust model for other police services in Ontario planning to implement similar BWC programs.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patricia Kosseim', with a decorative flourish underneath the name.

Patricia Kosseim
Commissioner