

Smart Glasses & Wearable Recording Devices Policy

A practical starting point for small businesses

Before you put this policy into use, take a few minutes to make it your own. You don't need a dedicated HR team to do this. A business owner, manager or whoever looks after people and workplace policies can work through the checklist below.

Before you publish this policy

1. Add your policy owner

Replace **[Policy Owner / Manager]** throughout the document with the person employees should contact if they have a question or concern.

This could be an HR manager, business owner, office manager, operations manager or another person responsible for workplace policies.

2. Add your restricted areas

The policy already includes common private and sensitive areas, but add anything specific to your business.

For example, you might have a room where payroll information is regularly discussed, a secure production area, or a space where customer information is visible.

3. Check your existing policies

Think about how this policy fits with the rules you already have around:

- Privacy and confidentiality
- Acceptable use of technology
- AI
- Workplace surveillance or monitoring
- Information security
- Health and safety
- Accessibility or workplace adjustments

You don't need to repeat all of those policies here. Make sure they work together and don't contradict each other.

4. Decide what approval looks like

Decide whether employees need approval before using recording-enabled wearable devices at work, and who can give that approval.

Keep the process simple. Employees should know exactly who to ask.

5. Check the requirements that apply to your business

Privacy, recording and workplace monitoring rules can vary depending on where your business operates and the type of information you handle.

Review this policy against the requirements that apply to your business and get professional advice if you're unsure.

6. Share it with your team

Once you've customised the policy, give employees time to read it and ask questions.

Make sure new employees receive it as part of their onboarding, and consider asking everyone to acknowledge that they've read and understood it.

Smart Glasses & Wearable Recording Devices Policy

[Company Name]

Effective date: [Date]

Policy owner: [Name / Role]

Template note: This is a starting point for your business, not legal advice. Rules around privacy, recording and workplace monitoring vary depending on where you operate. Review this policy against the requirements that apply to your business before putting it into use.

1. Why we have this policy

Smart glasses and other wearable devices are becoming more capable. Some can take photos, record video and audio, scan documents or screens, and use AI to process what the wearer sees or hears.

That can be useful, but it can also create privacy and security risks.

This policy explains when recording-enabled wearables can be used at [Company Name], where they shouldn't be used, and how we protect our people, customers and business information.

Most of these expectations aren't new. They build on our existing rules around privacy, confidentiality, technology and AI. This policy simply makes it clear how those rules apply to wearable devices.

2. Who this policy applies to

This policy applies to employees and contractors working for [Company Name]. It also applies to visitors and other people using recording-enabled wearable devices while they're on our premises or participating in our meetings or activities.

It applies regardless of who owns the device.

A "wearable recording device" includes smart glasses, smart watches, body cameras, headsets or any other wearable technology that can record audio, video or images, scan information, or use AI to process what it captures.

This policy does not replace any separate rules that apply to company-issued monitoring or tracking devices.

3. The basic rule

If a device can record, people should know it's there.

Wearing smart glasses isn't automatically a problem. The issue is what the device is capable of doing and what it captures.

Before using a recording or AI feature around other people, consider:

- What am I capturing?
- Who could be captured?
- Does the information include anything private or confidential?
- Does anyone need to be told or give permission?
- Where will the information be stored?
- Do I actually need to record it?

When in doubt, ask [Policy Owner / Manager] before using the recording or AI features.

4. Using smart glasses for accessibility

Smart glasses can be a useful accessibility tool. For example, they may provide live captions, magnification, translation or hands-free assistance.

If you need to use smart glasses or another wearable device to perform your role, talk to [Policy Owner / Manager]. We'll consider accessibility needs in the same way we consider other workplace adjustments.

Being approved to wear a device does not automatically mean you can record people, conversations or confidential information.

Where recording or other features create a separate privacy or security concern, we'll work with you to find a practical way to support your needs while protecting other people and the business.

5. When you must not record

Unless [Company Name] has specifically approved it, don't use a wearable device to record, photograph, scan or capture:

- Confidential company information
- Customer or client information
- Employee or candidate information
- Financial or commercially sensitive information
- Private conversations
- Documents or screens containing sensitive information
- Meetings where confidential information is being discussed
- Anyone who has asked not to be recorded

Don't use recording-enabled wearables in areas where people would reasonably expect privacy, including:

- Bathrooms
- Change rooms
- First aid or other private areas
- Rooms being used for sensitive employee conversations
- [Add any other company-specific areas]

6. Meetings and conversations

If you're wearing a device that can record audio or video into a meeting, interview or sensitive conversation, let the people involved know before the meeting starts.

If you intend to record, follow our normal rules for recording and get any approval or consent required.

If someone asks you to stop recording or remove the device, stop immediately and speak with [Policy Owner / Manager] if you're unsure what to do.

Recording should never be treated as an automatic part of a meeting simply because the technology makes it easy.

7. AI features

Some wearable devices use AI to transcribe, summarise, translate or otherwise process what they see or hear.

Our AI policy applies to these features in the same way it applies to other AI tools.

As a general rule, don't use an AI feature to capture or process company, customer or employee information unless you're authorised to do so.

If you're not sure whether a device or AI feature is approved, check with [Policy Owner / Manager] before using it.

8. Personal devices

These rules apply whether a wearable device belongs to [Company Name] or an employee.

Using a personal device doesn't change your responsibility to protect company, customer or employee information.

If information relating to [Company Name] is captured on a personal device, don't share it through personal apps or accounts unless this has been specifically approved.

You may also be asked to delete or return business information from a personal device where appropriate.

9. Safety and incident reporting

There may be situations where taking a photo or recording something is useful for a legitimate business purpose.

For example, you may need to document a workplace hazard, equipment damage or an incident.

Where possible, use an approved company process or device for this.

If you use a personal wearable device because it's the most practical way to document an immediate safety issue, tell [Policy Owner / Manager] as soon as you can and handle the information securely.

10. If you see a concern

You don't need to be the person wearing the device to raise a concern.

If you notice someone using smart glasses or another wearable device in a way that could expose private, confidential or sensitive information, speak up or report it to [Policy Owner / Manager].

You won't be penalised for raising a concern in good faith or for asking someone to stop recording.

If you're unsure whether something is a problem, it's still okay to ask.

11. Looking after recordings and captured information

If you've been authorised to record something for work, make sure you know:

- Where the recording will be stored
- Who can access it
- How long it needs to be kept
- Whether it is being processed by an AI service
- What you need to do with it when it's no longer required

Don't keep work recordings indefinitely just because the device or app allows you to.

If you're unsure how a device stores or processes information, check with [Policy Owner / Manager] before using it.

12. What happens if the policy isn't followed?

We expect everyone to follow this policy and to raise concerns when something doesn't look right.

If someone deliberately or repeatedly ignores these rules, [Company Name] may take appropriate action under our usual workplace processes.

The response will depend on what happened and may include asking the person to stop using the device, removing access to certain technology, or disciplinary action.

Nothing in this policy is intended to prevent anyone from exercising their legal rights or raising a genuine workplace, safety or compliance concern.

13. Keeping this policy up to date

We'll review this policy [annually / every two years / as needed] and update it when the technology, our business needs or relevant requirements change.

Acknowledgment

I confirm that I have read and understood the **Smart Glasses & Wearable Recording Devices Policy** and understand what is expected of me when using recording-enabled wearable devices at work.

Name: _____

Signature: _____

Date: _____

About HR Partner

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