

APPENDIX A: SURVEILLANCE TECHNOLOGY IMPACT REPORT

Department or Division:	Somerville Police Department
Compliance Officer (name and position):	Jeffrey DiGregorio, Captain of Administration
Submitted by:	Chief Shumeane Benford
Date:	July 23, 2026
Surveillance Technology:	Body Worn Cameras

	Please identify the purpose(s) of the proposed surveillance technology. Select ALL that apply by entering "X" in the left column.
X	Identifying and preventing threats to persons and property and preventing injury to persons or significant damage to property
X	Identifying, apprehending, and prosecuting criminal offenders
X	Gathering evidence of violations of any law in criminal, civil, and administrative proceedings
X	Providing information to emergency personnel
X	Documenting and improving performance of City employees
	Executing financial transactions between the City and any individual engaged in a financial transaction with the City
	Preventing waste, fraud, and abuse of City resources
X	Maintaining the safety and security of City employees, students, customers, and City-owned or controlled buildings and property
	Enforcing obligations to the City
	Operating vehicles for City business
	Analyzing and managing service delivery
	Communicating among City employees, with citizens, or with third parties
	Surveying and gathering feedback from constituents
	Other (Describe: Build Trust and Transparency between the police and the community If the surveillance technology is used for a purpose not listed above, does the purpose comply with the surveillance use policy? <u> X </u> Yes <u> </u> No

Complete ALL of the following items related to the proposed surveillance technology. Be as specific as possible. If an item is not applicable, enter "N/A." Do NOT leave fields blank.

1. Information describing the surveillance technology and how it works:

The use of the portable audio and video recording system provides persuasive documentary evidence for criminal investigations, internal or administrative investigations, and civil litigation. Officers shall utilize this device in accordance with the provisions the Department's Body Worn Camera ("BWC") Policy to maximize the effectiveness of the audio/video documentation to achieve operational objectives, to ensure evidence integrity, and to preserve individuals' privacy rights to the extent permitted and/or required by law. The City will only deploy this technology on terms consistent with an approved Technology-specific Surveillance Use Policy per the Public Oversight of Surveillance Technology Ordinance.

a. Authorized use – the uses that are authorized, the rules and processes required before that use, and the uses that are prohibited (10.64.b.2):

Officers wearing body worn cameras are to record all law enforcement interactions with civilians. Whenever practical, officers should immediately inform individuals that they are being audio and video recorded at the beginning of the encounter. In locations where individuals have a reasonable expectation of privacy, such as a residence, individuals may request not to be recorded. In such cases, the officer(s) have discretion not to record the event based on the purpose and circumstances of their presence or to utilize BWCs in a less intrusive manner, such as deploying audio-only recording or averting the camera away from minors, victims, or others in a vulnerable condition. Otherwise, the body worn camera shall remain activated until the event is completed in order to ensure the integrity of the recording. If an officer exercises their discretion to power off or place the body worn camera into sleep mode, the officer shall document this action via a "Use Narrative" report following the interaction. If an officer fails to activate the body worn camera or notify an individual they are being recorded, fails to record the entire contact, or interrupts the recording, the officer shall document in writing on a department approved form why a recording was not made, was interrupted, or was terminated.

BWCs may not be used to surreptitiously record people or conversations or to record (1) communications with other police personnel, (2) non-law enforcement purposes or officers' personal activities, (3) confidential information, (4) within the police station absent exigent circumstances, or (5) First Amendment protected activities absent specific indicia of unlawful activity.

Use of this technology would also fall under the City's Technology-specific Surveillance Use Policy, which articulates the rules, purposes, and policy of using video surveillance equipment.

b. Training – the training, if any, required for any individual authorized to use the surveillance technology or to access information collected by the surveillance technology, including whether there are training materials (10.64.b.9):

Officers assigned to wear Body Worn Cameras will complete a Police Department approved or provided training program before utilizing a camera in the field. Periodic training will continue to occur to ensure effective use and operation of BWCs and that the cameras are being used consistent with SPD's BWC Policy. New police personnel shall be given a copy of the City's Public Oversight of Surveillance Technology Ordinance and Surveillance Technology Use Policy for their review and trained on operating BWCs in compliance with the Surveillance Ordinance and said Policy. Officers are encouraged to inform their supervisor of any recordings that may be of value for training purposes. The Chief shall establish a regular training schedule in which body worn camera footage is reviewed and discussed with officers and Police Department public health staff such as the Community, Outreach, Help & Recovery Unit in an effort to promote and maintain law enforcement best practices.

As established in the City's Surveillance Technology Use Policy, "The Chief of Police, or their designee, shall ensure that all department personnel successfully complete training which the Chief of Police deems necessary to successfully operate and monitor Video Surveillance Equipment".

2. Information on the proposed purpose(s) for the surveillance technology (10.64.b.1):

Use of body worn cameras accomplishes several objectives. The primary objectives are as follows:

- i. To more accurately document police-public contacts, arrests, and critical incidents, and to enhance the accuracy of officer reports and testimony in court. To this end, officers will be allowed access to recordings before completing their written reports and before testifying in cases relevant to recordings collected by the Department except as otherwise noted in the City's Technology-specific Surveillance Use Policy.
- ii. To enhance the Somerville Police Department's ability to review probable cause for arrest, officer and suspect interaction, and evidence for investigative and prosecutorial purposes and to provide additional information for training purposes.
- iii. To document crime and accident scenes, or other events that include the confiscation and documentation of evidence or contraband.
- iv. To improve police accountability and aid in conducting internal investigations and making disciplinary decisions.

3. Information describing the kind of surveillance the surveillance technology is going to conduct and what surveillance data is going to be gathered (10.64.b.3):

Body worn cameras are intended to record all contacts police officers have with citizens in the performance of their official duties. The devices will capture audio and video recordings of police contacts, conversations, and other engagements with civilians. The BWCs are to be worn, activated, and the resulting data processed and accessed in accordance with the police department's BWC Policy and the approved Technology-specific Use Policy. The cameras shall be worn in an open and apparent location and not used as surreptitious recording devices. The body worn camera shall be activated prior to initiating contact with the civilian, and at the initiation of any other law enforcement or investigative encounters. Officers may use their discretion when deciding to activate the BWC in private or sensitive locations. Officers are not to activate their BWC when conducting ordinary activities or other situations that do not involve the delivery of police services or serve law enforcement purposes. A full list and definition of these activities can be found in the City's Technology-Specific Surveillance Use Policy.

Officers may not activate the cameras during public demonstrations absent specific indicia of unlawful activity. If an officer records an incident under this section, the officer must submit a Use Narrative identifying the facts and circumstances observed justifying recording the incident. This includes when the Police Department has notice of facts and circumstances giving rise to a reasonable belief that a civil disturbance will occur at a public event or demonstration.

Officers shall only use body worn cameras within the context of existing and applicable federal, state, and local laws, regulations, and Somerville Police Department Rules and Regulations and Policies and Procedures, and the approved Technology-specific Use Policy.

- a. Data access – the individuals who can access or use the collected surveillance data, and the rules and processes required before access or use of the information (10.64.b.4):

Use of this technology falls under the guidelines established in the City's Surveillance Technology Use Policy and the Police Department's BWC Policy. Police employees may only have access to BWC Surveillance Data when such access is necessary for their official duties, such as when writing incident reports or investigating potential criminal activity in public locations, or when they are the subject of an internal affairs investigation. Officer access to footage may only be granted with the approval of the Chief or designee. For a list of exemptions and rules applicable to internal access, including as it pertains to use of deadly force by an officer, please refer to the City's Technology-specific Surveillance Use Policy.

Police personnel shall use only body worn cameras issued by the Somerville Police Department. The body worn camera equipment and all data, images, video, and metadata captured, recorded, or otherwise produced by the equipment will be in the custody and control of the Somerville Police Department unless and until a request for access is made by other law enforcement entities, police oversight bodies, or the public, in which case the request will be processed and footage provided by the appropriate City agency. Included in this access would be a local police oversight authority the city establishes by ordinance or otherwise.

Body worn camera recordings are presumptively public records subject to disclosure under the Public Records Law (M.G.L. c. 66, § 10).

- b. Data protection – the safeguards that protect information from unauthorized access, including, but not limited to, encryption, access-control, and access-oversight mechanisms; (10.64.b.5)

Use of this technology falls under the guidelines established in the City's Surveillance Technology Use Ordinance and the Somerville Police Department's BWC Policy on usage. The Department's BWC Policy requires BWC data be securely downloaded at the end of each shift and establishes a data management structure overseen by a superior officer. The designated superior officer will administer day-to-day access to camera footage in consultation with the Law Department, where appropriate. BWC data shall be maintained on a secure, local or cloud-based server that is password protected, and accessible only to the Chief and the designated superior officer. No Surveillance Data shall be stored, accessed, or transmitted without proper encryption, access and password controls.

- c. Data retention – the time period, if any, for which information collected by the surveillance technology will be routinely retained, the reason that retention period is appropriate to further the purpose(s), the process by which the information is regularly deleted after that period has elapsed, and the conditions that must be met to retain information beyond that period (10.64.b.6):

All files shall be securely downloaded periodically no later than the end of each shift or work period. Each file shall contain information related to the date, body worn camera identifier, and assigned officer. Files should be securely stored in accordance with state records retention laws and retained no longer than useful for purposes of training or for use in an investigation or prosecution. The recordings will be preserved based on the content of the recording (e.g. street encounter, arrest, criminal investigation) and a retention schedule contained in the Department's BWC Policy, which was developed based on the state's records retention schedule. That schedule is as follows:

- A. Schedule I - Indefinite Retention
 - A.1. Death Investigation
 - A.2. Use of Deadly Force
 - A.3. Motor Vehicle Accident - Fatal
 - A.4. Sexual Assault/Abused Person
- B. Schedule II - 7 Year Retention
 - B.1. Use of Force
 - B.2. Arrest
 - B.3. Felony – No Arrest
 - B.4. Motor Vehicle Accident – Hit and Run/Personal Injury
 - B.5. Incidents that result in employee disciplinary matters
- C. Schedule III - 3 Year Retention
 - C.1. Misdemeanor – No Arrest
 - C.2. Motor Vehicle Accident – Property Damage
 - C.3. Investigate Person
 - C.4. Investigate Premise
 - C.5. Significant Event – Public Safety

- D. Schedule IV – 1 Year Retention
 - D.1. Traffic Stop
 - D.2. Encounter/Field Interview Observation (FIO)
 - D.3. Sick Assist
- E. Schedule V – 6 months
 - E.1. No Report - Dispatch / On Site
- F. Schedule VI – 30 Day Retention
 - F.1. Test/Training

d. Public access – if and how collected surveillance data can be accessed by members of the public, including criminal defendants (10.64.b.7):

Members of the public can make a Public Records Request in writing through the Department’s Records Clerk or the City’s Records Access Officer. This request is then forwarded to and/or reviewed by the City of Somerville Law Department, who will issue a response subject to applicable exemptions, if any, under the Public Records Law. If the video becomes evidence in a criminal prosecution, the defendant would have additional access rights pursuant to court rules and applicable law. The Public Records Law provides specific timelines for responses to public records requests and the City will comply with all legal requirements for responses to such requests.

A complete list of public access examples can be found in the City’s Technology-Specific Surveillance Use Policy.

e. Third-party data-sharing – if and how other city or non-city entities can access or use the surveillance data, including any required justification and legal standard necessary to do so, and any obligation(s) imposed on the recipient of the surveillance data (10.64.b.8):

Video evidence could be shared depending on the investigation and if other law enforcement agencies are involved or affected or if there is a public safety threat. When submitting images/video as evidence for a criminal case, the data would be shared with the District Attorney’s Office and disclosed to defendants as required by law. Images could be shared if there was a joint investigation with another Law Enforcement agency, the State Police or the FBI. Images would only be shared with authorized members of the investigating group who had permission to view the video evidence. Recordings will also be made available to police oversight bodies acting within the scope of their jurisdiction. Included in this access would be the POST Commission and any local police oversight authority established by the City pursuant to an establishing ordinance. The City will provide and/or release body worn camera footage in response to a lawful subpoena. Should the Department receive a subpoena for body worn camera recordings, the subpoena shall be directed to the City Attorney as soon as practicable.

All access to body worn camera data (images, sounds, and metadata) must be specifically authorized by the Somerville Chief of Police or their designee, and all access is to be audited to ensure that only authorized users are accessing the data for legitimate and authorized purposes. As noted immediately above, the recordings may also be made available to the public under the Commonwealth’s Public Records Law.

4. The location(s) it may be deployed and when:

Officers assigned body worn cameras will wear them in an open and apparent location at all times while on duty performing patrol or supervisory functions in the patrol division in any type of uniform. Body Cameras will be worn on the Officers outermost garment and are typically deployed in the upper torso area. Body worn cameras shall be used only in conjunction with official law enforcement purposes. Law enforcement purposes is defined under police department policy as “enforcing the law; investigating possible violations of the law; enforcement of Department policies, rules, and regulation; staff training, or researching and advising regarding matters of current and proposed federal, state and local law.” Officers are required to manually activate their cameras at the beginning of all interactions with community members and to immediately notify the community member they are recording whenever practical. Officers will be required to download any footage at the conclusion of their shift by placing the camera in the downloading docking station in the police station. The transfer of Data to the secured server occurs automatically once the camera is placed into the docking station.

5. A description of the privacy and anonymity rights affected and a mitigation plan describing how the department’s use of the equipment will be regulated to protect privacy, anonymity, and limit the risk of potential abuse:

The body worn camera shall not generally be used to record:

- i. Communications with other police personnel without the permission of the chief of police or his/her designee;
- ii. When on break or otherwise engaged in personal activities;
- iii. Encounters with undercover officers or confidential informants;
- iv. In any location where individuals have a reasonable expectation of privacy, such as a residence, restroom or locker room without a warrant or permission from the occupant(s) of the private location.

In locations where individuals have a reasonable expectation of privacy, such as a residence, they may request not to be recorded. Officers will exercise discretion whether to deactivate the recording device in such circumstances. Officer discretion is to be guided by the needs and circumstances of the law enforcement activity being undertaken and the privacy rights implicated, and may take alternative measures to deactivating the BWCs, such as placing the camera into sleep mode in “sensitive locations” include repositioning away from uninvolved persons, limiting capture of unrelated private areas, recording audio only when appropriate, or briefly pausing recording during non-investigative private discussions. Upon entering a private residence or sensitive location without a no-knock warrant or in non-exigent circumstances, the officer shall immediately notify occupants they are being audio and video recorded, with a “sensitive location” defined as public locations in which minors may be present and/or individuals may be engaging in private or personal conduct or in vulnerable positions including, but not limited to, locker rooms, places of worship, religious ceremonies, treatment areas in hospitals or clinics, law offices, and day care facilities.

6. The potential impact(s) on privacy in the city; the potential impact on the civil rights and liberties of any individuals, communities or groups, including, but not limited to, communities of color or other marginalized communities in the city, and a description of whether there is a plan to address the impact(s):

The Somerville Police has a Biased Based Policing Policy (#115). This policy emphasizes the Department's commitment to protecting the Constitutional and civil rights of all members of the community. Officers are trained annually on this policy. The SPD expresses its commitment to preserving and respecting the Constitutional rights of all the members of the community. The SPD does not endorse, train, teach, support, or condone any type of bias, stereotyping, or racial and gender profiling by its employees.

The department's BWC Policy and Technology-specific Surveillance Use Policy also includes specific protections for community members engaging in First Amendment protected activity.

7. An estimate of the fiscal costs for the surveillance technology, including initial purchase, personnel and other ongoing costs, and any current or potential sources of funding:

As of March 2026, the Somerville Police Department has been awarded a grant supporting the purchasing of equipment and technology totaling \$231,635. The upfront cost is estimated to be \$181,353.94 in the first year. The awarded grant funds would fully cover the equipment acquisition, installation, maintenance, and training costs for the first year of the program. This includes body-worn cameras with in-camera storage, charging/data upload stations, transfer stations to offload video from the body-worn cameras, and any necessary updates to the devices. The subsequent annual cost is estimated at \$95,833.70. The remaining \$50,281.06 of the grant funds will be applied to the following year and will be supplemented by City funds. There are no anticipated software costs for this program as the cameras will operate on proprietary software of the vendor and the current IT systems of the Police Department are sufficient for operation of the program. SPD also has proved estimated associated costs for additional staff in the future if needed.. The expected additional personnel cost is being estimated at a base salary of \$90,000 per a year along with \$27,000 in fringe benefits. This would also be prorated to the onboarding of the position within the fiscal year in the initial year of hire at a cost of \$7,500 per a month for base salary and \$2,250 per a month in fringe benefits.

In addition to the equipment costs, the City will fund a 2% increase to the salaries for all members of the Somerville Police Superior Officers Association (SPSOA) per their collective bargaining agreement. The salaries cost for these 2% increases is estimated at \$105,000. The City will implement a phased implementation of the program, with SPSOA members being the first to wear BWCs. The City will not deploy BWCs to patrol officers until their collective bargaining agreement includes a BWC consistent with the BWC Policy included in the current SPSOA collective bargaining agreement.

8. An explanation of how the surveillance use policy will apply to this surveillance technology and, if it is not

applicable, a technology-specific surveillance use policy:
The use of body worn cameras will be governed by the City's Technology-specific Surveillance Use Policy which will apply to this technology. Please see attached Appendix C.
a. Oversight – the mechanisms to ensure that the surveillance use policy is followed, including, but not limited to, identifying personnel assigned to ensure compliance with the policy, internal record keeping of the use of the technology or access to information collected by the surveillance technology, technical measures to monitor for misuse, any independent person or entity with oversight authority, and the sanctions for violations of the policy (10.64.b.10):
This technology is under the direction and authorization of the Chief of the Somerville Police Department. The Surveillance Technology Use Policy, all SPD policies and all applicable Massachusetts laws apply. Under the Department's BWC Policy, one superior officer will be assigned to monitor and oversee access to the BWC recordings. This superior officer will have access to and control of the recordings and will keep an access log of all individuals that request or obtain access to recordings. Use of BWCs and compliance with the Department's BWC Policy will be monitored through random audits conducted by the designated superior officer. Also, internal reviews may be conducted following a citizen complaint if the footage is deemed applicable to that complaint. Failure to adhere to policy and misuse of this technology would result in discipline up to and including termination depending on the nature, severity, and frequency of such violations. As BWCs are phased into use in the SPD, the City will continue to monitor compliance with this Policy and SPD's BWC Policy and industry best practices concerning BWCs. The City anticipates enhancing its processes and procedures concerning the use of such devices and the data they produce as the use of BWCs becomes common and widespread in the SPD. Any proposed changes to the City's practices and procedures impacting the terms and conditions of officers' employment and not within the scope of the Department's Body Worn Camera Policy will be bargained with the impacted unions as required by law, and any proposed changes that are in conflict with or beyond the scope of the Technology-Specific Use Policy will be presented to the City Council for approval of an amendment to the Technology-Specific Use Policy.