

APPENDIX A: SURVEILLANCE TECHNOLOGY IMPACT REPORT

Department or Division:	Somerville Police Department
Compliance Officer (name and position):	Chief Shumeane Benford
Submitted by:	Chief Shumeane Benford
Date:	March 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.	
	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
	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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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 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.

- 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):

Whenever possible, officers should 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, they may decline to be recorded unless the recording is being made pursuant to an arrest or search of the residence or the individual or exigent circumstances exists. In such cases, the officer(s) shall not activate the recorder or shall deactivate the recorder as the case may be before entering the private location. Otherwise, the body worn camera shall remain activated until the event is completed in order to ensure the integrity of the recording unless the contact moves into an area restricted by the Department's BWC policy.

Use of this technology would also fall under the City's Surveillance Technology 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):

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. Body worn cameras allow for accurate documentation of police-public contacts, arrests, and critical incidents. They also serve to enhance the accuracy of officer reports and testimony in court.
- ii. Audio and video recordings also enhance this agency'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. The body worn camera may also be useful in documenting crime and accident scenes, or other events that include the confiscation and documentation of evidence or contraband.

iv. Body worn cameras will be used to build trust and transparency with the community.

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):

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. The cameras shall be worn in an open and apparent location and not as surreptitious recording devices used in specialized operations. Officers shall activate the body worn camera to record all contacts with citizens in the performance of official duties and in accordance with department policy.

The body worn camera shall be activated prior to initiating contact with the citizen, and at the initiation of any other law enforcement or investigative encounters. Officers may use their discretion when deciding to activate the BWC during incidental public contact during the ordinary course of the day but must notify individuals with which they are engaged that they are recording the encounter. Officers are not required, or expected, to activate their BWC when conducting ordinary activities or other situations that do not involve the delivery of police services. Officers may, at their own discretion, activate their cameras when in the community during instances if they feel it useful or necessary.

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 Surveillance Data when such access is necessary for their official duties. 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 is the sole property of the Somerville Police Department. 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 establishes a data management structure overseen by a superior officer and civilian support staff will be utilized to administer day-to-day access to camera footage. Officer access to footage may only be granted with the approval of the Chief or designee. Public access will be granted through the Law Department’s Public Records Request process. 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 and 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.

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.

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 in accordance with Massachusetts Rules of Evidence. 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. All access to body worn camera data (images, sounds, and metadata) must be specifically authorized by the Somerville Chief of Police or his/her 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 worn cameras shall be used only in conjunction with official law enforcement activities. Officers are required to activate their cameras at the beginning of all interactions with community members and to notify the

community member they are recording. Community members may decline to be recorded in locations in which they have a reasonable expectation of privacy (e.g. the home).

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 decline to be recorded unless the recording is being made pursuant to an arrest or search of the residence or the individuals.

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.

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 program must undergo a vendor requisition process to determine additional considerations. It is likely that additional personnel will be needed to manage the program following implementation.

In addition, under the terms of the current collective bargaining agreements with both the patrol and superior officers, patrol officers with 8 years or more of service will receive a 2% increase in pay when the cameras are deployed, and all superior officers will receive a 2% increase in pay when cameras are

deployed.

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 City's Surveillance Technology Use Ordinance and the SPD BWC policy. The Department's current BWC Policy is contained in the collective bargaining agreement between the City and the patrol and superior officers unions and any changes to that policy will be subject to the bargaining process.

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. Failure to adhere to policy and misuse of this technology would result in discipline up to and including termination depending on the violations.