
	Hudson Police Department Policy and Standard Operating Procedures Body Worn Cameras and In-Car Video	Policy and Procedure 3.34
Authorized by: Chief Richard P. DiPersio	Issue Date: 4/4/23	
Effective Date: 4/4/23	Revision Number - Date: (1) 5/24/23	
Issuing Authority:  Richard P. DiPersio Chief of Police	Mass. Accreditation Standards Ref.: 41.3.8	

I. GENERAL CONSIDERATIONS AND GUIDLINES

The Hudson Police Department is committed to creating transparency, ensuring accountability, and enhancing public trust by effectively using body worn cameras (BWC) and In-Car Video (ICV). The purpose of this policy is to establish guidelines for the proper use, management, storage, and retrieval of video and audio data recorded by Body Worn Cameras (BWCs) and In-Car Video (ICV). They are an effective law enforcement tool that reinforce the public's perception of police professionalism and preserve factual representations of officer-civilian interactions. BWCs and ICVs may be useful in documenting crime and accident scenes or other events that include the confiscation and documentation of incidental evidence or contraband.

The equipment will enhance the Department's ability to document and review statements and events during the course of an incident, preserve video and audio information and evidence for investigative and prosecutorial purposes. BWC and ICV recordings, however, provide limited perspective of encounters and incidents and must be considered with all other available evidence, such as witnesses' statements, officer interviews, forensic analysis and documentary evidence. Additionally, studies have shown that BWCs and ICVs are a contributing factor in reducing complaints against police officers, increasing police accountability, and enhancing public trust.

In many cases, accurate and reliable recordings can help defend officers and the department against false accusations and unjustified litigation. The use of mobile/body video cameras can also give patrol officers added protection against false accusations of police misconduct during traffic stops, as an effective law enforcement tool that reinforces the public's perception of police professionalism and transparency, and preserves factual representations of officer-citizen interactions. This policy does not govern the use of surreptitious recording devices used in specialized operations.

The BWC is intended to record anything the officer could have potentially heard and/or observed using his/her senses. This does not mean that the BWC officer is required or expected to have seen and/or heard everything captured in the footage. Likewise, there may be information the BWC officer obtains through his/her senses that is not captured by the BWC. As such, each incident should be based on the totality of the circumstances when reviewing the video/audio for retraining or disciplinary purposes.

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

Officers make decisions based on the totality of the human senses. Officers recollection of specific details may be different than what is captured in digital evidence since body worn cameras only capture audio and video. The use of the body worn camera provides a record that may be different than an officer's recollection which can be affected by stress and other factors.

Video images cannot always show the full story nor do video images capture an entire scene. Persons reviewing recordings must also be cautious before conclusions are reached about what the recordings show. Video evidence has limitations and may depict events differently than the officer, and may not depict any or all of the events as seen or heard by the officer. Video has a limited field of view and may not capture events normally seen by the human eye. The "frame rate" of video may limit the camera's ability to capture movements normally seen by the human eye. Videos are a two dimensional medium and may not capture depth, distance or positional orientation as well as the human eye. Video evidence is intended to assist an officer.

II. POLICY

It is the policy of the Department to respect the legitimate privacy interests of all persons in Hudson, while ensuring professionalism in its workforce. Officers shall only use BWCs and ICVs within the context of existing and applicable federal, state, and local laws, regulations, and Department rules and policies. The Department prohibits recording civilians based solely upon the civilian's political or religious beliefs or upon the exercise of the civilian's constitutional rights, including but not limited to freedom of speech, religious expression, and lawful petition and assembly. BWC/ICV footage shall not be reviewed to identify the presence of individual participants at such events who are not engaged in unlawful conduct. [41.3.8(a)]

III. PROCEDURES

1. Training Requirements

1.1. Prior to its use, all officers shall be trained in the proper use of the BWCs and ICV. Additional training may be required at periodic intervals to ensure proper use and operations, calibrations, and to incorporate changes, updates, or other revisions in policy and equipment. All training shall become part of the individual officer's permanent training record. Training shall include the following:

- 1.1.1. Review of department policy;
- 1.1.2. Proper use and maintenance of the equipment;
- 1.1.3. Placement of the BWC; and

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

- 1.1.4. Procedures for properly securing and uploading audio/video evidence from BWC and ICV (when implemented).

2. Camera Activation and Use [41.3.8]

- 2.1. Officers who are assigned a BWC are required to wear the BWC while engaged in field activities, unless exempt as follows:

- 2.1.1 When the Chief of Police or his/her designee determines that circumstances make it inappropriate to mandate wearing a body worn camera; or

- 2.1.2. While assigned to Administrative duties for the department as determined by the Chief of Police.

- 2.2. Officers will only use BWCs and ICV on duty and during engagement in a police function. [41.3.8(a)]

- 2.3. Recordings shall be specific to an incident. Officers shall not indiscriminately record entire duties or patrols. [41.3.8(a)]

- 2.4. Officers may activate BWCs and ICV in many situations, however this policy is not intended to describe every possible circumstance. Every officer equipped with a BWC system is required to record contact with civilians regardless of the number of officers on the scene of the incident. Officers shall activate, or make reasonable efforts to activate, or activate when safety permits, the video and audio components of BWCs and ICVs to record, at a minimum, the following circumstances:

- All police/citizen encounters which include all 911 emergency calls;
- Vehicle Stops, motorist assists, and crash investigations;
- Arrests and transports;
- Calls for service;
- Criminal complaints;
- Physical or verbal confrontations and incidents involving use of force;
- Encounters which escalate or become adversarial;
- Searches of vehicles or persons;
- Search and arrest warrant service;
- Emergency response driving and pursuits (a BWC recording need not be used if ICV is recording);

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

- Prisoner transports (the rear ICV will be utilized when transporting a prisoner in the rear seat (when implemented));
- Mass demonstrations, crowd control, special events;
- Transport of individuals other than prisoners will be recorded, unless the passenger is a department member or government official;
- K9 searches
- Searches for lost/missing persons/criminal suspects
- Any other incident the officer deems appropriate while acting in the performance of their duties;
- When ordered to by a supervisor
- **Exception:** Officers are not required to record normal casual conversations/encounters with citizens that do not correspond with the above noted circumstances.

- 2.5. Officers shall activate the BWCs and ICVs, and start recording upon arrival on scene of a call for service or when engaged in any law enforcement related encounter or activity, or upon activation of lights and siren. Officers will have to manually activate BWC/ICV, unless activated by automatic triggers such as the “Holster Activation Sensor” technology. [41.3.8(a)]
- 2.6. Officers may use their discretion when deciding to activate the BWC/ICV during incidental public contact during the ordinary course of a duty day. Officers are not required, or expected, to activate their BWC/ICV when conducting police engagement activities or other situations that do not involve the delivery of police services. Officers may, at their own discretion, activate their cameras during these instances if they feel it useful or necessary. Officers may also activate their cameras outside of the mandatory requirements at their discretion but shall make a reasonable effort to inform individuals they are being recorded and must abide by exceptions and prohibitions. [41.3.8(a)]
- 2.7. Once activated, the BWC and ICV shall remain activated until the event is completed in order to ensure the integrity of the recording, unless otherwise provided in this policy. If the officer de-activates the BWC/ICV, the officer should record the reason with a message on the BWC while activated and subsequently document same in their written report. (see section 8 BWC/ICV Deactivation) [41.3.8(a)]

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

2.8. If an officer fails to activate the BWC the officer shall document in the incident report (or supplemental report on the reporting officer's incident report) that a recording failure occurred. The officer shall submit BWC/ICV Special Notification Form to the BWC Administrator. The BWC Administrator will sign and forward the form to the Chief of Police.

2.9. School Resource Officers:

2.9.1. The determination of when the BWC will be activated during school activities will be developed through a standard operating procedure that is agreed upon by the Superintendent of Schools and the Chief of Police.

3. Recording within a Residence

3.1. Upon entering a private residence without a warrant or in non-exigent circumstances, the officer shall notify occupants they are being audio and video recorded. This notification and the response should be made while the BWC is recording. When determining whether or not to record, the officer shall be guided by the safety of all person(s) present, and weigh the discretionary factors referenced in Section 4.2 with the fact that a home is a uniquely private location. If the officer turns off the recording the officer should record the reason with a message on the BWC while activated and subsequently document the same in their report.

3.2. If an officer uses his/her discretion to turn off the BWC, the officer shall document in the incident report (or supplemental report on the reporting officer's incident report) that he/she decided to stop recording by the end of the shift or as soon as practical. The officer shall submit a BWC/ICV Special Notification Form to the BWC Administrator to document that he/she decided to stop recording by the end of the shift or as soon as practical. The BWC Administrator shall submit the officer's Form to Chief of Police.

4. Recording in Areas Where There May be a Reasonable Expectation of Privacy

4.1. Officers should be mindful of locations where recording may be considered insensitive or inappropriate, or prohibited by privacy considerations. Such locations may include locker rooms, places of worship, religious ceremonies, certain locations in hospitals or clinics, law offices, and day care facilities. At such locations, at the officer's discretion

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

and based on the circumstances, the officer may turn off the BWC. The officer should record the reason with a message on the BWC while activated and subsequently document same in their written report.

[41.3.8(a)].

- 4.2. BWC/ICV Discretionary Recording Considerations include, but are not limited to: the sensitive or private nature of the activities or circumstances observed; the presence of individuals who are not the subject of the officer-civilian interaction; the presence of people who appear to be minors; any request by a civilian to stop recording; and the extent to which absence of BWC/ICV recording will affect the investigation.
- 4.3. If an officer uses his/her discretion to turn off the BWC/ICV, the officer shall document this action in the incident report (or supplemental report on the reporting officer's incident report). The officer shall submit a BWC/ICV Special Notification Form to the BWC Administrator to document that he/she decided to stop recording by the end of the shift or as soon as practical. The BWC Administrator shall submit the officer's Form to the Chief of Police.

5. Notice of Recording

- 5.1. BWC officers are not required to notify citizens in areas where a citizen does not maintain a reasonable expectation of privacy, but may do so at the beginning or during the BWC officer's interaction with the citizen. BWC officers may take into account tactical considerations as to if, or when, to notify a citizen of the recording. When notification is practical, BWC officers may notify civilians that they are being recorded, with language such as "I am advising you that I am recording our interaction with my body worn camera." All BWC's will be conspicuously placed in the center of the BWC officer's chest area, on the outermost garment, to allow the camera to be immediately noticeable to those interacting with the BWC officer. Officers shall not record civilians surreptitiously.

6. Consent to Record

- 6.1. Officers do not have to obtain consent to record. If a civilian request the officer stop recording, the officer(s) has no obligation to stop recording if the officer is recording an occurrence identified in Section 2. When evaluating whether to stop recording, officers should weigh the BWC/ICV Discretionary Recording Considerations identified in Section 4. Officers should record the request to turn the BWC/ICV off and the officer's response to that request, if possible.

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

Note: Individuals may be recorded when there is no expectation of privacy. This includes when they are in a public place or in public view. Consent to record another person is not needed in public, such as a traffic stop, at a business, outside of a home, or even inside of a home where a person does not have an expectation of privacy, such as a guest. In the event someone who is in public requests not to be recorded, they should be informed that while they are in public, consent is not needed.

- 6.2. If an officer deactivates a BWC/ICV in response to a civilian request, the officer shall also indicate the request in an incident report (or supplemental report on the reporting officer's incident report). If an officer deactivates a BWC/ICV in response to a civilian request, the officer shall fill out a BWC/ICV Special Notification Form and submit it to the BWC Administrator indicating that a civilian requested the officer turn the BWC off by the end of the shift or as soon as practical. The BWC Administrator shall submit the officer's Form to the Chief of Police.

7. Recording of Victims / Witnesses

- 7.1. If an officer's BWC/ICV would capture a visual or audio recording of a victim or witness who is giving his/her first account of a crime, the officer may record the encounter but should weigh the BWC/ICV Discretionary Recording Considerations specified in Section 4 in determining whether to activate or discontinue recording. If the officer decides to activate and/or continue recording, the officer shall make the notification specified in Section 5. If the victim is in any way unsure of the need for the recording or is uncomfortable with the thought of being recorded, the officer shall inform the civilian that the civilian may request to have the BWC/ICV turned off. If the camera is already activated, the officer should record the request to turn the BWC/ICV off and the officer's response, if possible.
- 7.2. Intentionally obstructing video recording while allowing audio only to record on a BWC/ICV system is strictly prohibited. Due to the possibility of violating legitimate privacy expectation, inadvertently recording protected conversations, or intentionally violating M.G.L. c. 272, § 99, Interception of Wire and Oral Communications, all camera pre/post event buffers shall be configured so they do not record audio.

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

8. BWC/ICV Deactivation

- 8.1. To the extent possible, prior to deactivating a BWC/ICV, the officer shall state the reason for doing so. Generally, once a BWC/ICV is activated, the officer will continue recording uninterrupted until or unless the event has concluded or the officer has been ordered to deactivate the BWC/ICV by a supervisor. A supervisor may order officers to turn off their BWC/ICV when they deem it necessary and/or appropriate, for legitimate law enforcement purposes.

9. Camera Deployment

- 9.1. Officer Responsibility - BWC equipment is the responsibility of every officer issued the equipment. Officers must use the equipment with reasonable care to ensure proper functioning. Officers shall inform their Patrol Supervisor as soon as possible of equipment malfunctions or loss of a BWC so that the Patrol Supervisor can procure a replacement unit.

- 9.2. Police officers shall use only BWC/ICVs issued by this Department. The BWC/ICV equipment and all data, images, video recordings, audio recordings, and metadata captured, recorded, or otherwise produced by the equipment is the sole property of the Hudson Police Department and shall not be released without the authorization of the Chief of Police or his/her designee.

9.2.1. At the beginning of each shift, the officer will:

- Assign a BWC from the charging station; and
- Ensure that the issued equipment has a fully charged battery and is functioning properly; and
- Notify a Patrol Supervisor whenever there is a malfunction or damage to the BWC; and
- Affix his/her BWC properly upon his/her uniform in a manner consistent with training and policy (conspicuously placed in the front center of the officer's outermost garment at mid chest level); and
- Position and adjust the BWC to record events; and
- Position and adjust the BWC microphone to ensure that it is unobstructed

9.2.2. During each shift, the officer shall:

- Activate the BWC and record as outlined in this policy;

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

- Document the existence of a BWC recording in all of the appropriate documents, (i.e. Incident Report, Citation, FIO, Administrative Reports);
- Ensure the appropriate incident number and category is assigned to recordings for retention;
- Notify investigative or specialized unit personnel, including an evidence technician, of the existence of BWC and ICV recording;
- Officers shall not change, alter or make repairs of any kind to the BWC device. All repairs will be conducted with approval of the Chief of Police.
- If during a tour of duty an officer becomes aware that the BWC's battery has become depleted, the officer shall without delay notify the OIC.

9.2.3. Document in the incident report (or supplemental report on the reporting officer's incident report) the circumstances and reasons if he/she fails to activate the BWC/ICV, fails to record the entire contact, interrupts the recording, or the BWC/ICV malfunctions. The officer shall submit a BWC/ICV Special Notification Form to the BWC Administrator to document the circumstances and reasons. The BWC Administrator shall submit the officer's form to the Chief of Police.

9.2.4. Docking/Uploading Recordings – BWC best practices:

- Prior to the officer securing at the end of the tour of duty, the officer will place the BWC in the docking station. The docking station will charge the battery in the BWC and transfer video data to the storage system.
- The officer will ensure that all uploaded videos are properly tagged/classified in the evidence management system for retention.
- Officers shall notify the on-duty supervisor of any issues with the BWC system

9.2.5. In-Car Video – Officer Responsibilities:

In general, officers assigned to a department vehicle equipped with ICV will follow the same procedures as defined for the BWC. The officer shall:

- Ensure the ICV is in good working order

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

- Ensure camera lens is free of debris, unobstructed, and facing intended direction
- Immediately notify the supervisor of any malfunctions or damage
- Activate and record per this policy
- Properly tag/classify recordings for retention
- Document the existence of an ICV recording in all written narratives
- Upload recordings to the evidence management system

10. Request to Redact

- 10.1. Officers wearing BWCs should be aware that their BWCs may unintentionally capture private/security information such as door codes, phone codes, and computer codes. If the officer knows that his/her BWC/ICV captured sensitive information or material, the officer shall inform the BWC Administrator and request redaction of the video prior to distribution to any outside parties. The officer shall document in the BWC/ICV Special Notification Form to the BWC Administrator the nature of the information captured and the request for redaction. The BWC Administrator shall submit the form to the Chief of Police. The Chief of Police will authorize redaction when he/she determines it is necessary.

11. Recording Restrictions

- 11.1. Improper Recording - Officers shall not use BWC/ICVs to record in violation of this Policy or any rule of the Hudson Police Department, including:
- 11.1.1. During breaks, lunch periods, or time periods when an officer is not responding to a call, or when not in service;
 - 11.1.2. Any personal conversation of or between other department employees without the recorded employee's knowledge;
 - 11.1.3. Non-work-related personal activity, especially in places where a reasonable expectation of privacy exists, such as locker rooms, dressing rooms, or restrooms;
 - 11.1.4. Investigative briefings;
 - 11.1.5. Encounters with undercover officers or confidential informants;

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

- 11.1.6. Departmental meetings, workgroups, in-service training, or assignments of an operational or administrative nature. Using BWC/ICV for training purposes is not a violation of this restriction;
 - 11.1.7. A telephonic conversation, except in accordance with the provisions of State and Federal Law while in the performance of official duties.
 - 11.1.8. Strip searches
- 11.2. If an officer inadvertently records as listed above, the officer shall follow the request to redact/delete procedures described in Section 10.

12. Improper Use of BWC/ICV Footage

- 12.1. Officers shall use BWC/ICV data, images, video recordings, audio recordings, or metadata only for legitimate law enforcement reasons. They shall not use data, images, video recordings, audio recordings, or metadata for personal reasons, or non-law enforcement reasons.
- 12.2. Department personnel shall not use BWC/ICV data, images, video recordings, audio recordings, or metadata to ridicule or embarrass any employee or person depicted on the recording.
- 12.3. Department personnel shall not disseminate BWC/ICV data, images, video recordings, audio recordings, or metadata unless the Chief of Police or his/her designee approve the dissemination and the Department personnel disseminates the BWC/ICV data, images, video recordings, audio recordings, or metadata in the course of his/her official duties. An officer may disseminate images and/or video recordings that are related to an ongoing search for a suspect to other officers BWC's with the approval of the OIC. [41.3.8(b)]
- 12.4. Department personnel shall not copy, record, or otherwise reproduce any BWC/ICV recording/footage using a recording device (including using an iPhone, iPad, or other electronic or other device). [41.3.8(b)]
- 12.5. Officers shall not allow citizens to review recordings.
- 12.6. Officers shall not modify, edit, alter, erase or otherwise modify in any manner BWC/ICV recordings, except as authorized by law or department policy.

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

- 12.7. Officers shall not publish or display BWC/ICV recordings to the Internet or social media sites, in accordance with the departments social media policy.
- 12.8. All BWC/ICV recordings/footage is the sole property of the Town of Hudson Police Department.

13. Supervisor Responsibilities

- 13.1. All Duty Supervisors assigned to oversee officers utilizing Department-issued BWC/ICVs shall:
 - 13.1.1. Ensure officers are utilizing their BWC consistent with this directive.
 - 13.1.2. Contact the BWC Administrator whenever any officer is unable to use the BWC or upload digitally recorded data due to technical problems.
 - 13.1.3. Request replacement BWC equipment from the BWC Administrator when an officer indicates the equipment is lost or malfunctioning via the Special Notification Form. Once procured by BWC Administrator, ensure new equipment is received by requesting officer.
 - 13.1.4. During roll call, ensure each BWC is working properly and any malfunctions or damage to BWC is documented. The supervisor will remove any malfunctioning and/or damaged BWC from service and issue a spare BWC if available.
 - 13.1.5. Ensure each BWC device is returned to the docking station at the end of each officer's shift, is functioning properly, and is in the uploading stage by verifying indicator lights.

14. BWC Administrator Responsibilities:

- 14.1. The BWC Administrator shall be responsible for the ordering, issuance, retrieval, storage, cleansing, and duplication of all recorded media.
- 14.2. The BWC Administrator shall ensure that adequate recording media is on hand and available for issuance.

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

- 14.3. The BWC Administrator shall be responsible for collecting and storing all completed media.
- 14.4. Recorded media may only be erased pursuant to a court order; or in accordance with established retention guidelines.
- 14.5. The BWC Administrator will be responsible for the long-term storage of media deemed to be of evidentiary value, consistent with the department's evidence storage protocols and retention schedule.
- 14.6. Conduct a weekly review from randomly selected footage using the BWC Performance Software. This review will determine if the officer activated and used his/her BWC in accordance with this policy and the video was uploaded and cataloged correctly. [41.3.8(4-M)]
- 14.7. Ensure that distribution of media to the public shall be conducted by the Chief or his designee.

15. Internal Access / Review

- 15.1. Officer Access to Their Own Footage (Not Related to Officer Involved Death, Officer Involved Shooting, or Other Use of Deadly Force): Officers may review their own BWC/ICV recording when they are:
 - 15.1.1. Involved in an incident, for the purposes of completing an investigation and preparing official reports. To help ensure accuracy and consistency, officers should review the BWC/ICV recording prior to preparing reports; and
 - 15.1.2. Preparing for court. Officers should advise the prosecuting attorney that they reviewed the BWC/ICV recording; and
 - 15.1.3. Providing a statement pursuant to an internal investigation or other critical incidents. At the officer's request, the officer's attorney and/or Union Representative may be present when the officer views the video.
 - 15.1.4. Officers shall not state "refer to video" as a substitute for a detailed and thorough report. BWC Officers should continue to prepare detailed and thorough reports in the same manner as prior to the implementation of the BWC's.

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

15.2. Officer Access to Footage Following an Officer Involved Death, Officer Involved Shooting, or Other Use of Deadly Force [41.3.8(b)]

- 15.2.1. Following an officer involved death, officer involved shooting or other use of deadly force, officers and supervisors at the scene shall not view any video.
- 15.2.2. The on-scene incident commander shall be permitted to view BWC/ICV video and relay necessary information only if exigent circumstances exist and it is necessary to view the video to (1) identify suspect information or (2) gather pertinent information that is necessary to protect life or safety prior to investigators arrival on scene.
- 15.2.3. At a time determined by the Chief of Police and the supervisor in charge of the investigation, officers who: (1) were involved in the incident, (2) discharged their weapon, and/or (3) witnessed the incident may view their own video before giving a statement. At the officer's request, the officer's attorney and/or union representative may be present when the officer views the video. [41.3.8(b)]
- 15.2.4. BWC/ICV video footage is a tool that may aid officers in providing an accurate and complete account of the incident. BWC/ICV footage should not replace an officer's memories of the incident and the officer should base his/her statement on his/her memories, not solely on the video. Officers shall not state "refer to video" as a substitute for a detailed and thorough report. BWC Officers should continue to prepare detailed and thorough reports in the same manner as prior to the implementation of the BWC's.

16. Officer Access to Footage:

- 16.1. Officers who need to review video or audio footage from another officer shall make a request via the BWC/ICV Special Notification Form to the BWC Administrator describing why they need to review the footage.
- 16.2. The Office of the Chief of Police shall approve or deny the request. With approval, the BWC Administrator will provide access to the video and audio footage to the requesting officer. If providing another officer's video or

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

audio, the BWC Administrator shall notify the officer whose BWC/ICV footage is requested that the BWC/ICV footage is being shared.

17. Supervisor Access to Footage

- 17.1 Any supervisor may request, through the BWC Administrator, to review BWC/ICV footage consistent with Section 12.
- 17.2 Supervisors may review BWC/ICV data, images, video recordings, audio recordings, or metadata, consistent with this Policy, to assist them in completing use of force reviews and internal investigations pursuant to a complaint.

18. Audit/Review of Footage:

- 18.1. A monthly audit and review of all access shall be conducted to determine if there was any unauthorized access to officer video and why such access was performed. The results of the audit and review will be made available in the BWC Administrator's Office.
- 18.2. The BWC Administrator has the responsibility of assisting the Chief in maintaining professionalism through audit and review. Its purpose is to identify deficiencies in adhering to policies, procedures, rules, regulations, and directives implemented by the Department or by the Town of Hudson. The BWC Administrator or his designee shall perform a weekly audit and review from randomly selected footage using the BWC Performance Software. This review will help determine if officers have activated and used his/her BWC in accordance with this policy and the video was uploaded and cataloged correctly.
[41.3.8(4-M)]

- 19. The "Live Stream" function is a resource to aid in obtaining "real time" information to assist in critical incident or search and rescue management. Only Command and/or Supervisory Staff, authorized by the Chief or his designee, may access the "Live Stream" function of the BodyWorn/AvailWeb system during critical or search and rescue incidents which pose a serious risk to life, serious risk of bodily harm, or imminent danger to any persons. This may include checking on the welfare of an officer not answering their radio, and maintaining command over tactical deployments and high-risk scenarios. If "Live Stream" is activated those personnel shall complete a report to the Chief documenting why the function was activated and the duration of the incident. Additionally, the officer(s) must be notified that the "Live Stream" function was activated.

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

- 19.1. A quarterly audit of the “Live Stream” activation will be conducted to ensure that this feature is not being used for unauthorized discipline or randomly abused. The results of the audit and review will be made available in the BWC Administrator’s Office.

20. Public Information Requests

- 20.1. The BWC Administrator shall respond to public information requests submitted under M.G.L. Ch. 66, sec. 10 in accordance with all applicable state laws and regulations.
- 20.2. Officers are not permitted to provide video to any external partners and shall direct any requests to the BWC Administrator.

21. The BWC Administrator will make reasonable attempts to inform officers when their videos and/or BWC/ICV information are released, unless prohibited by legal or investigative restrictions.

22. Retention

- 22.1. Camera Storage: BWC/ICV recordings and data are kept in a cloud-based storage platform managed by the BWC Administrator.
- 22.2. Video Footage Retention: The Department will retain BWC/ICV footage based on categorization, but may retain the footage longer on a case-by-case basis as determined by the Chief of Police or his/her designee. The footage retention schedule for cloud-based footage access is as follows: **[41.3.8(c)]**
 - 22.2.1. Schedule I- Indefinite Retention
 - Death Investigation
 - Lethal Force
 - Sexual Assault / Abused Person
 - Motor Vehicle Crash resulting in death
 - 22.2.2. Schedule II- 7 Year Retention
 - Use of Force
 - Arrest
 - Any felony

Hudson Police Department Policies and Procedures

3.34 Body Worn Cameras and In-Car Video

22.2.3. Schedule III- 3 Year Retention

- Misdemeanor Crimes
- Investigate Person
- Investigate Property
- Summons
- Motor Vehicle Crash with injury

22.2.4. Schedule IV- 180 Day Retention

- Significant Event - Public Safety
- Traffic Stop
- Encounter/FIO
- Sick assist/Medical
- No Report - Dispatch / On Site
- Motor Vehicle Crash – No injury
- Mental Health Evaluations
- Test/Training