

## Madalyn Letellier

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**From:** Derrick Rice [REDACTED]  
**Sent:** Friday, April 24, 2026 10:27 AM  
**To:** RSJ; Mayor; Public Comments; All City Council  
**Subject:** Minimum Policy Requirements for Police use of Body-Worn Cameras  
**Attachments:** BWC-Minimum-Policy-Requirements.pdf

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TO: City of Somerville City Council (as public comment)  
CC: City of Somerville Mayor's office, Department of RSJ, and Police Department

Please see the attached letter of public comment, titled "Minimum Policy Requirements for Police use of Body-Worn Cameras Which Are Widely Recommended By Prior Expert Guidance", authored by 4 residents and co-signed by 22 community leaders, organizations, and advocates.

This pertains to all current City Council business regarding police adoption of Body Worn Cameras. In particular, City Council item #26-0484, "Requesting approval of the Surveillance Technology Impact Report for Body Worn Cameras.", currently in committee (Legislative Matters).

Thank you,  
- Derrick Rice (he/him)  
Somerville Ward 3 resident

# Minimum Policy Requirements for Police use of Body-Worn Cameras Which Are Widely Recommended By Prior Expert Guidance

April 24, 2026

From: A collection of community organizers and civil rights advocates  
To: City of Somerville City Council  
CC: City of Somerville Mayor's office, Department of RSJ, and Police Department

We understand that the City of Somerville is pursuing the adoption of body-worn cameras (BWC) for law enforcement officers, as evident from the administration's request for funding<sup>1</sup> and the submission of a Surveillance Technology Impact Report (STIR) for BWC<sup>2</sup>, brought before the City Council less than one month ago and currently under consideration.

Body-worn cameras are described by proponents as a tool for police accountability, oversight, and transparency. Proponents argue that BWC can deter police misconduct and improve public trust in law enforcement, though the efficacy of BWC towards these goals is strongly debated. BWC are not proven to be effective and their impact depends heavily on context and implementation. Critically, **“absent transparent and effective policies, BWCs can heighten the divide between law enforcement and communities”** (American Bar Association).

Given this context, we feel it is critical to resurface minimum policy requirements for police use of BWC that are **widely recommended by prior expert guidance** from within the past six years. We draw from written guidance of external experts such as the American Bar Association, the ACLU of Massachusetts, and the State of Massachusetts' Law Enforcement Body Camera Task Force. (See Appendix A: BWC Policy Guidance Sources.)

Crucially, **we draw from written guidance originating from the City of Somerville itself**, such as City Councilor Ben Ewen-Campen's Recommendations, the SPD Staffing and Operations Analysis, and Somerville's Public Safety for All Task Force.

**We are calling upon you — legislative representatives in City Council — to require that any adoption of BWC must be preceded by a BWC policy which satisfies these minimum policy requirements and which is fully enforceable.** Somerville is fortunate to have a legal framework for City Council to exercise authority over this matter: the Surveillance Technology Use Ordinance<sup>3</sup>, which requires City Council approval of the related STIR prior to use of the technology. We appreciate your consideration and due diligence in this regard, and recognize the labor that it will require of you.

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<sup>1</sup> City Council [#26-0378](#), Mayor's Request, first before city council on 2026-03-26 “Requesting approval to accept and expend a \$231,635 grant ... for a body-worn camera program.”

<sup>2</sup> City Council [#26-0484](#), Mayor's Request, first before city council on 2026-03-26 “Requesting approval of the Surveillance Technology Impact Report for Body Worn Cameras.”

<sup>3</sup> City of Somerville Ordinance [Part II Chapter 9 Article III](#), “Public Oversight of Surveillance Technology”

The remainder of this letter is structured in the following manner:

- I. Policy Requirements, enumerating the minimum BWC policy requirements
- II. Process Considerations
  - A. Regarding sequencing of BWC policy and adoption
  - B. Regarding public engagement in BWC policy development
- III. Closing Comments
- IV. Signatures
- V. Appendix A: BWC Policy Guidance Sources
- VI. Appendix B: Collated References

## I. Policy Requirements

The ten minimum BWC policy requirements that we see as required for implementation are enumerated in this section, represented by a descriptive title, a short explanation, and a summary of the motivation for the requirement. Policy requirements are not meaningfully ordered. The order should not be taken as prioritization.

The explanation and motivational statements are adequate for an introductory understanding of the policy requirement, only. Citations and quotes from the source materials, collated by policy requirement, can be found in Appendix B: Collated References.

**A list of the policy points described in this section, by descriptive title and page number:**

- |  |      |
|--|------|
| (1) Right to access by subjects of footage and the public with clear timelines | [p3] |
| (2) Restrictions on access, limitations on acceptable law enforcement use      |      |
| (3) Prohibition of police review prior to written statements or testimony      |      |
| (4) Right to access by civilian oversight body                                 | [p4] |
| (5) Detailed BWC use policy and consequences of non-compliance                 |      |
| (6) Civilian privacy protections and rights regarding being recorded           | [p5] |
| (7) Prohibition against alternative uses of BWC                                |      |
| (8) Clear statement of purpose for police accountability                       |      |
| (9) Prohibition of any post-processing of BWC footage, including biometrics    | [p6] |
| (10) Limitations on retention of footage                                       |      |

**(1) Right to access by subjects of footage and the public with clear timelines**

The policy must clearly establish access rights for subjects of any footage (and their authorized agents), along with an explicit timeline for how quickly footage must be made available. Furthermore, the policy must explicitly state that BWC footage is considered public records subject to Massachusetts public records request law, therefore ensuring the public a legal right to access footage.

Without clear, enforceable access rights for both individuals and the public, BWC footage risks becoming a resource that only serves the police department, undermining transparency and accountability goals. Subjects of footage have a direct personal interest in reviewing recordings of their own encounters with police, including for the purpose of determining whether to file a complaint. Timely access is "critical to serving the goals of accountability and enhancing community trust." [ABA Principles p11, pdf14]

**(2) Restrictions on access, limitations on acceptable law enforcement use**

The policy must establish clear restrictions on acceptable use of BWC footage by law enforcement personnel, limiting access to official law enforcement purposes. Access must be subject to well-defined approval processes. All access and release for footage by members of the Somerville Police Department must be logged with a justification and approvals.

Clear limitations on acceptable use for BWC footage are necessary to protect the public interest and individuals civil rights. Access controls and procedures are necessary to prevent tampering or unauthorized use and to ensure transparency of legitimate use.

**(3) Prohibition of police review prior to written statements or testimony**

The policy must prohibit any officer from accessing, viewing, or receiving an account of any footage before completing any required reports, statements, or testimony.

“Permitting officers to review recordings before preparing any written reports can undermine the accuracy of those reports” including the after-the-fact manufacture of justifications for their actions and unconscious memory distortion [ABA Principles p10, pdf14].

**(4) Right to access by civilian oversight body**

The policy must explicitly grant any relevant civilian oversight body the authority to access and release footage when it determines it is necessary for and consistent with its mission and granted powers.

Establishing a Civilian Oversight Body for law enforcement has been an explicitly stated goal of the City of Somerville dating back to at least 2020. The Civilian Oversight Task Force Report cites NACOLE<sup>4</sup> recommendations, stating that unfettered access is “vitaly important” [p14, pdf15].

Additionally, The American Bar Association recommends “Jurisdictions should consider assigning independent civilian boards responsibility for retaining and controlling access to footage.” Management by a non-police body can “greatly reduce accusations of tampering or deletion, intentional or inadvertent, by police”. Doing so would require that such an oversight body must be formed and functional prior to the adoption of BWC.

**(5) Detailed BWC use policy and consequences of non-compliance**

The policy must lay out a detailed BWC use policy which specifies how and when BWC must be activated or deactivated. The details of a sufficient BWC use policy are too lengthy to recite here. Please refer to the “ACLU Model Policy” (Section 3) and “MA Recommended Regulations” (R.5) for more detail (See V. Appendix A: BWC Policy Guidance Sources). Furthermore, the policy must specify an enforcement mechanism for violations of BWC policies including the BWC use policy, i.e. clear disciplinary consequences for various levels of non-compliance.

A prescriptive BWC use policy is necessary to reduce officer discretion in BWC activation and deactivation, which threatens to undermine the primary value of BWC. Evidence shows that where officers have discretion, recording is reduced, including recording of interactions where recording was appropriate. [ABA Principles p3, pdf7]

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<sup>4</sup> National Association for Civilian Oversight of Law Enforcement, [nacole.org](http://nacole.org)

**(6) Civilian privacy protections and rights regarding being recorded**

The policy must clearly define privacy protections including (a) requiring officers to provide notice to the public that they are being recorded when feasible, (b) specifying when and how individuals can opt-out of being recorded, and (c) specific locations or situations where recording is forbidden (e.g. schools).

As with any surveillance technology, there is the potential for BWC use to infringe on the privacy of individuals. Individuals should have the opportunity to provide informed consent to being recorded, when feasible. Policies should balance privacy interests, particularly in inherently private or sensitive spaces.

**(7) Prohibition against alternative uses of BWC**

The policy must prohibit surreptitious recording, the use of BWC while not body-worn in a prominent location (e.g. handheld or placed elsewhere), and the use of BWC to record First Amendment protected events (e.g. protests, demonstrations, assemblies) unless or until there is a specific engagement with participants.

While any use of BWC that is not in alignment with STIR defined policy would already be prohibited by the terms of the Surveillance Technology Use Ordinance, it is important to explicitly enumerate those prohibited alternative uses that raise significant civil rights and privacy concerns.

**(8) Clear statement of purpose for police accountability**

The policy must explicitly state that police accountability is among its primary purposes (STIR #2). Furthermore, it must require that BWC footage be permissible for use in this regard, namely as the basis for disciplinary action when evidence of misconduct is found in relation to a complaint, investigation, or oversight by a civilian oversight body (See requirement 4).

In order for BWC to be an effective tool for police accountability, it must be permissible for BWC footage to be a basis for disciplinary action if misconduct is observed. Any binding commitment to the contrary would undermine this purpose and should therefore violate the BWC STIR policy, rendering the technology unusable.

Of note, terms of a recent agreement with the Somerville Police Employees Association state that disciplinary actions are “not the intended purpose [of BWCs]”, which is in conflict with accountability goals. See Councilor Ewen-Campen Recommendations, section 3.VII [p4].

**(9) Prohibition of any post-processing of BWC footage, including biometrics**

The policy must specify that footage may not be subject to any automated analysis or post-processing, including but not limited to processing by AI systems and biometric indicators such as voice or facial recognition.

Civil rights advocates strongly warn against privacy risks that can result from mass surveillance systems. In particular, with the significant rise of artificial intelligence systems and the associated unknown future capabilities of AI technologies, a policy should broadly prohibit automated post-processing.

**(10) Limitations on retention of footage**

The policy must specify specific retention lifetimes for footage, with a shorter retention period (e.g. 6 months) for routine footage and a longer retention period for footage flagged as pertaining to (e.g.) any complaint, investigation, detention, use of force, arrest, etc.

Over-retention of BWC footage poses privacy risks for individuals, while under-retention can undermine the accountability and transparency purposes of BWC. A dual retention policy ensures that the majority of footage is retained for only as long as necessary to determine that it is of no particular interest, while footage deemed to be of interest is retained for longer, proportional to the statute of limitations.

Note: The Massachusetts Statewide Records Retention Schedule<sup>5</sup> specifies minimum retention periods for BWC footage based on the event(s) captured. This may not be exhaustive of all retention considerations. In particular it says nothing of *maximum* retention for routine footage.

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<sup>5</sup> [https://www.sec.state.ma.us/divisions/archives/download/MA\\_Statewide\\_Records\\_Retention\\_Schedule\\_03\\_26\\_2026.pdf](https://www.sec.state.ma.us/divisions/archives/download/MA_Statewide_Records_Retention_Schedule_03_26_2026.pdf)

## II. Process Considerations

### A. Regarding sequencing of BWC policy and adoption

In addition to the specific terms of a BWC policy, the referenced source materials consistently position the development of BWC policy as a **prerequisite** to the adoption of BWC. (See VI. Appendix B: Collated References.) The American Bar Association says “Absent transparent and effective policies, BWCs can heighten the divide between law enforcement and communities” [p1, pdf5]. An iterative approach to policy development concurrent with BWC adoption would put public safety and trust at risk.

The Surveillance Technology Use Ordinance is the best and likely only legal mechanism for exercising Somerville City Council’s authority over BWC. The approval of an incomplete or imprecise STIR will be effectively surrendering authority over BWC, ceding discretion to the administration and Police Department. Critically, **allowing the STIR to delegate to SPD policies outside of the STIR would be surrendering City Council oversight powers**. We believe this would be antithetical to the intent of the Surveillance Technology Use Ordinance.

It is furthermore necessary to emphasize that any incompatibility between a BWC STIR policy and any other legal agreements, including collective bargaining agreements, would render the surveillance technology unusable. The City of Somerville’s SPD Operations Report (2023) says “it is important to first develop a proposed policy based on community priorities and best practices before entering into the negotiation process” [p35, pdf41].

Therefore, we strongly urge the City Council to insist on a thorough, detailed BWC policy, codified within the STIR, that meets all of these policy points. Collective bargaining, financing, procurement, and adoption of BWC should occur only after such a policy is codified.

### B. Regarding public engagement in BWC policy development

The source materials consistently emphasize the importance of public engagement in policy development. (See VI. Appendix B: Collated References.) The City of Somerville’s SPD Operations Report (2023) expresses this most clearly:

"Because the cameras are a tool for transparency, and because their use involves recording members of the public as well as court personnel and officials, it is also vital that a robust public engagement process be undertaken, and that this policy be shaped by community input. The engagement should be varied, including opportunities for individuals to submit comments online, listening sessions open to the public, and direct engagement with community groups." [p34, pdf40]

We are disheartened to see that the administration is pursuing funding for BWC and has proposed a BWC STIR with no evidence of a public engagement process. We have had less than a month to respond to these City Council agenda items. This continues a pattern of unmet commitments regarding police transparency, civilian oversight, and alternative public safety dating back at least as early as 2020.

We urge the city council to either directly conduct this public engagement process or to hold the administration to a high standard of public engagement. Specifically, there must be sufficient time for the public, including community organizations, to digest any proposed policy and deliver well-informed feedback. Source materials such as the SPD Operations Report provide detailed guidance on this matter.

### III. Closing Comments

In summary, we call upon the City Council to use its authority to halt any adoption of BWC by withholding the approval of a BWC STIR until it directly contains all of the minimum policy requirements outlined within this letter and there has been ample opportunity for public engagement on the policy. Furthermore, any request for funding for BWC should be kept in committee until a policy has been passed. Finally, the City Council shall strongly urge the administration to develop a policy independently from and prior to any related terms in collective bargaining agreements.

It is important that we acknowledge that these minimum policy requirements are not the totality of policy considerations. These are merely those policy requirements which are widely acknowledged by a broad set of relevant experts and the City of Somerville's own studies and task forces. There are other policy considerations worth careful consideration, such as the ACLU of MA's "No Tape, No Testimony" proposal<sup>6</sup> or decisions of cloud or on-premises storage of footage. We encourage advocates and organizers to submit supplementary written comments.

Furthermore, there are broader considerations unrelated to policy which are entirely unaddressed here: financing, public sentiment, opportunity costs, confidence of long-term efficacy, etc. These are all deserving of attention, public engagement, and careful decision making, but are beyond the scope of BWC policy.

We look forward to continuing this critical discussion with you, our elected legislators, as well as the administration of the city. Somerville has a vibrant network of community members and organizations with deep commitments to public safety. Thank you, in advance, for insisting on a process that includes the public.

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<sup>6</sup> <https://www.aclum.org/press-releases/no-tape-no-testimony-how-courts-can-ensure-responsible-use-body-cameras/>

## IV. Signatures

### Authors / Organizers

*The following individuals had a direct role in the creation of this letter or co-signer outreach.*

Derrick Rice	Somerville Resident (W3)
Daniel Wong	Somerville Resident (W2)
Alexandra Thorn	Somerville Resident (W5) and volunteer & organizer at Digital Fourth (warrantless.org)
Myles Herbert	Myles is a volunteer organizer with the Massachusetts Community Care Network. Myles was a member of the (concluded) Somerville Civilian Oversight Task Force, but is signing in a personal capacity.

### Co-Signers

Kade Crockford	Director of Technology and Justice Programs at the ACLU of MA
Gideon Epstein	Policy Counsel at the ACLU of MA
Erika Uyterhoeven	State Representatives for the 27th Middlesex
Alex Marthews o.b.o. Digital Fourth	Alex is signing on behalf of Digital Fourth (warrantless.org), where Alex serves as co-chair.
Stephanie Guirand o.b.o. The Black Response	Stephanie is signing on behalf of The Black Response ( <a href="http://theblackresponsecambridge.com">theblackresponsecambridge.com</a> ), where she is a leader.
Somerville For Palestine	
Spencer Piston	Associate Professor of Political Science at Boston University
Daanika Gordon	Associate Professor of Sociology at Tufts. Daanika was a member of the (concluded) Somerville Public Safety For All task force, but is signing in a personal capacity.
David Gibbs	David is signing in a personal capacity as a Somerville resident (W5).
Nicole Eigbrett	Co-Executive Director of the Asian American Resource Workshop (aarw.org) and Somerville resident.

Nelson Salazar	Nelson is a Somerville resident and community organizer, known for initiatives like “Just Us Somerville” (currently inactive).
Andre Green	Somerville School Committee Member, Ward 4
Elyse Best	Elise is signing in a personal capacity as a Somerville resident. Elyse is a co-chair of the Somerville Human Rights Commission.
Salma Kazmi	Salma is signing in a personal capacity as a Somerville resident. Salma is a co-chair of the Somerville Human Rights Commission.
Suelin Chen	Suelin is signing in a personal capacity. Sulein is a member of the Somerville Human Rights Commission and a board member of the Cambridge Insight Meditation Center.
Jovana Calvillo	Jovano is signing in a personal capacity. Jovano is a member of the Somerville Human Rights Commission and a community organizer with Somerville for Palestine.
Christopher Spicer Hankle	Christopher is signing in a personal capacity. Christopher is a member of the Somerville Human Rights Commission.
Lauren Leone	Lauren is signing in a personal capacity as a Somerville resident (W2) and licensed mental health counselor. Lauren is a volunteer organizer with the Massachusetts Community Care Network and a board member of Cambridge HEART.
Chris Dwan	Chris is signing in a personal capacity as a Somerville resident (W2). Chris is a citizen journalist and a community organizer with Somerville Alliance for Safe Streets (SASS).
Stephanie Galaitsi	Stephanie is signing in a personal capacity as a Somerville resident. Stephanie is a community organizer with Somerville Alliance for Safe Streets (SASS) and a co-coordinator for the Ball Square Neighborhood Association.
Crystal Huff	Crystal is signing in a personal capacity as a Somerville resident (W5). Crystal is the volunteer coordinator of Mutual Aid Medford and Somerville (MAMAS).
Presley Pizzo	Presley is signing in a personal capacity as a Somerville resident (W5). Presley is the working group coordinator of Mutual Aid Medford and Somerville (MAMAS).

*We regret that we were not able to reach out to a broader set of community members, due to time limitations. If you would like to sign on as a leader of a community organization or advocacy group, please contact [local.derrick@rice.io](mailto:local.derrick@rice.io) and we will submit a supplemental list of signatures.*

## V. Appendix A: BWC Policy Guidance Sources

In chronological order of publication.

*“ABA Principles”*

### **American Bar Association Principles on Law Enforcement Body-Worn Camera Policies**

American Bar Association, 2020

In 2020, the ABA's Working Group on Building Public Trust in the American Justice System convened a group of diverse stakeholders to review the literature on body-worn cameras, discuss the experience of different jurisdictions, and develop an appropriate ABA policy. The resulting policy, the ABA Principles on Law Enforcement Body-Worn Camera Policies, provides practice direction for government officials in jurisdictions where law enforcement use or are seeking to use body-worn cameras. The Principles were adopted by the ABA House of Delegates in August, 2021.

Source:

[https://www.americanbar.org/groups/leadership/office\\_of\\_the\\_president/publictrust/body-worn-cameras/](https://www.americanbar.org/groups/leadership/office_of_the_president/publictrust/body-worn-cameras/)

Direct URL:

[https://www.americanbar.org/content/dam/aba/administrative/legal\\_aid\\_indigent\\_defendants/ls-sclaid-604-annual-2021-cameras.pdf](https://www.americanbar.org/content/dam/aba/administrative/legal_aid_indigent_defendants/ls-sclaid-604-annual-2021-cameras.pdf)

*“ACLU Model Policy”*

### **Model Body-Worn Camera Policy, Ordinance, or Bylaw for Massachusetts Police Departments and Municipalities**

ACLU of Massachusetts, June 2020

The ACLU of Massachusetts believes that if a city or town adopts a body-worn camera program, they need to do it right. To that end, the ACLU of Massachusetts offers a model policy that follows four core principles: improving public safety, ensuring police accountability, enhancing community-police relations, and protecting privacy. This model policy also includes a “No Tape, No Testimony” proposal favoring evidentiary consequences for officers who are found to have unreasonably or in bad faith failed to record crucial incidents.

Source: <https://www.aclum.org/police-body-worn-cameras-lets-do-it-right/>

Direct URL:

[https://www.aclum.org/app/uploads/drupal/sites/default/files/field\\_documents/model\\_body-worn\\_camera\\_policy\\_2020.6.12\\_near\\_final.pdf](https://www.aclum.org/app/uploads/drupal/sites/default/files/field_documents/model_body-worn_camera_policy_2020.6.12_near_final.pdf)

*“MA Recommended Regulations”*

**Recommended Regulations for the Procurement and Use of Body Worn Cameras by Law Enforcement**

State of Massachusetts Law Enforcement Body Camera Task Force, August 2022

Pursuant to Section 104 of Chapter 253 of the Acts and Resolves of 2020, the Law Enforcement Body Camera Task Force is responsible for proposing regulations and establishing a uniform code for the procurement and use of body-worn cameras by law enforcement to promote consistency throughout the Commonwealth, should law enforcement choose to use body cameras. The Task Force must propose minimum requirements for the storage and transfer of audio and video recordings collected by body-worn cameras. To fulfill its mandate, the Task Force will be conducting public hearings to collect and consider testimony from the public regarding the use of body worn cameras by law enforcement. The Task Force has concluded its work as of August 1st, 2022 and the final report can be found on the Task Force homepage.

Source: <https://www.mass.gov/law-enforcement-body-camera-task-force>

Direct URL: <https://www.mass.gov/doc/law-enforcement-body-camera-final-report/download>

*“Councilor Ewen-Campen Recommendations”*

**Recommendations for an effective body worn camera Use Policy in Somerville**

City of Somerville Ward 3 City Councilor Ben Ewen-Campen, August 2022

The purpose of this Communication is to outline the baseline changes to Somerville’s Police Body-Worn Camera (BWC) policy and associated contractual agreements that I believe are necessary to ensure BWCs are an effective tool for police accountability, oversight, and transparency in Somerville. The City Council controls the funding for BWCs, and therefore has an important role to play in establishing an effective policy, and I respectfully urge my colleagues to use our budgetary discretion to ensure that these best practices are implemented. The policy planks that I believe are necessary are listed below in Section 3.

Source: City of Somerville Legislative Matters Committee, September 13, 2022

Direct URL:

<https://somervillema.legistar.com/LegislationDetail.aspx?ID=5770172&GUID=F72FECEA-6361-4DAA-A692-4E2C8380FA8F>

*“SPD Operations Report”*

**Police Department Staffing & Operations Analysis**

City of Somerville, Department of Racial and Social Justice via Raftelis, November 2023

The recommendations in this report are based on an analysis of police operational data, discussions with officers, City elected officials, and the public, and best practices for 21st century policing. They are intended to support the City in cultivating a police force that reflects the needs and priorities of the community it serves.

Source: <https://www.somervillema.gov/spd-updates>

Direct URL:

<https://s3.amazonaws.com/somervillema-live/s3fs-public/SPD-Staffing-and-Operations-Analysis-Final-Report-2023.pdf>

*“PSFA Task Force Report”* and *“Civilian Oversight Task Force Report”*

**Public Safety For All Task Force and Civilian Oversight Task Force 2025 Reports**

City of Somerville, Department of Racial and Social Justice, February 2025

[The Department of Racial and Social Justice] was tasked with designing and leading a multi-tiered, community-driven initiative to create and shape public safety policies and engagement that advances racial and social justice across all economic classes, ages, genders, races, ethnicities, and identities. The Public Safety for All initiative embodies the values of equity, transparency, accountability, innovation, and social justice.

Source: <https://www.somervillema.gov/psfa>

Direct URL:

<https://s3.amazonaws.com/somervillema-live/s3fs-public/PSFA-task-force-report-final.pdf>

Direct URL:

<https://s3.amazonaws.com/somervillema-live/s3fs-public/civilian-oversight-task-force-report-final.pdf>

## VI. Appendix B: Collated References

### **(1) Right to access by subjects of footage and the public with clear timelines**

#### ABA Principles

Principle 5: Access and Use, Timely access to footage (5.b.) [p8-9, pdf12-13]: “Recordings only serve the goals of a BWC program if the footage is available to appropriate individuals in a timely manner when warranted. Individuals charged with crimes and their counsel, and prosecutors and courts, should have prompt and unrestricted access to footage related to criminal charges, such as search and arrest footage, as soon as possible, usually within a day or two of arrest. For complaints regarding police behavior, including use of force, footage should be available promptly, in general within one week of a request.

“BWC programs are also intended to increase transparency and accountability. Many jurisdictions have found that these goals warrant release of certain footage to the public. ... Further, timing of release is critical to serving the goals of accountability and enhancing community trust. To this end, requests for footage should be required to be addressed within a specific, short time of the request—where feasible, within a week”

#### ACLU Model Policy

Section 4(c) [p3]: “any member of the public who is a subject of video footage ... shall be permitted to review the specific video footage in which the subject appears ... and shall be entitled to a copy of the video footage upon request.”

Section 4(g) [p4]: "Video footage shall be subject to the public inspection requirements of the Massachusetts public records law (M.G.L. c.4 s. 7 cl. 26; M.G.L. c.66)”

#### MA Recommended Regulations

[p25]: "R.9.9 - Including BWC data in a public record. The release of video recording data and metadata as a public record shall only be done in compliance with the Commonwealth's public record laws and regulations, and all applicable state and federal privacy statutes."

#### Councilor Ewen-Campen Recommendations

Section 3.VI [p4]: "The policy should clearly establish access rights for subjects of any recorded footage as well as for members of the public through public records requests."

#### SPD Operations Report

[p35, pdf41] Referring to and summarizing the ABA Principle: “Ensuring that footage can be accessed in a timely manner upon request”

## **(2) Restrictions on access, limitations on acceptable law enforcement use**

### ABA Principles

Principle 5: Access and Use, Preventing tampering (5.a) [p8, pdf12]: "Proper data security, including chain of custody and secure preservation, is necessary to prevent unauthorized access or tampering with BWC video. .... As noted below, it is advisable to assign an independent agency control over stored BWC footage. The storage system should have similar safeguards, including a mechanism for recording access and monitoring for changes, which can be compared to the access logs if a question of inappropriate access, release or editing arises"

Principle 8: Monitoring and Compliance [p13, pdf17]: "Tampering with any evidentiary recording should be grounds for disciplinary action or criminal prosecution."

### ACLU Model Policy

Section 4(e) [p4]: "Officers are prohibited from accessing, copying, or releasing body camera video footage except for official law enforcement purposes. All accessing, copying, or releasing of body camera video footage that is undertaken for official law enforcement purposes must be logged."

### MA Recommended Regulations

R.2.8 [p12] "Audit Log. Video should also be accompanied by a full audit log showing every time the event was moved, reviewed, or exported with full verification data."

R.9.3 [p23] "Every agency shall establish and maintain a system and procedures to ensure the integrity, proper handling, and storage of all BWC recordings. This system shall include provisions to: ... Prevent unauthorized access to stored BWC recordings; Document all instances where BWC recordings are accessed, viewed, copied, disseminated, or deleted; and Permit auditing of all instances where BWC recordings are accessed, viewed, copied, or deleted."

### Councilor Ewen-Campen Recommendations

Section 3.VII [p4]: "The policy should establish safeguards to prevent footage tampering and unauthorized access and require that a log of access be maintained."

### SPD Operations Report

[p35, pdf41] Referring to and summarizing the ABA Principle: "Barring unauthorized disclosure or use of footage"

### **(3) Prohibition of police review prior to written statements or testimony**

#### ABA Principles

Principle 5: Access and Use, Reviewing footage before preparing initial reports (5.d). [p10, pdf14]: “Permitting officers to review recordings before preparing any written reports can undermine the accuracy of those reports in two concerning ways. First, some officers potentially could use video to manufacture after-the-fact justifications for their actions or to engage in deception about their contemporaneous observations or motivations. ... Second, human memory is fallible; individuals can believe, in good faith, that they accurately remember an event when, in fact, their memories are inaccurate. ...

“Another consideration further supports requiring officers to prepare reports before reviewing footage: “Allowing police—but not suspects or witnesses—to view body camera footage before providing their account of an incident unfairly bolsters the officers’ account, and thus credibility, by allowing officers to recall more details seemingly more accurately than others and to conform their recollections (consciously or subconsciously) to those seemingly supported by the video.”

“The most appropriate way to balance these various considerations is to require that officers prepare reports before reviewing BWC footage, and supplement those reports if necessary following review of footage”

#### ACLU Model Policy

Section 4(d) [p4]: "No officer shall review or receive an accounting of any body camera video footage before completing any required initial reports, statements, and interviews regarding the recorded event."

#### MA Recommended Regulations

R.5.2 [p14] “It is recommended that users shall not access or view any recording of an incident involving the user before the user is required to make a statement about the incident.”

#### Councilor Ewen-Campen Recommendations

Section 3.I [p2] ““Write, then review” policy. ... SPD officers should be required to produce their written reports prior to reviewing any relevant footage. Then, if they review such footage, they should be allowed to produce a supplemental report. This would prevent police officers from accommodating their narrative to correspond with what a recording shows.”

#### SPD Operations Report

[p35, pdf41] Referring to and summarizing the ABA Principle: “Prohibiting law enforcement from viewing footage before preparing their initial reports”

#### **(4) Right to access by civilian oversight body**

##### ABA Principles

Principle 5: Access and Use, Preventing tampering (5.a) [p8, pdf12]: "It is advisable to assign an independent agency control over stored BWC footage."

Principle 5: Access and Use, Civilian control of footage disclosure decisions (5.e) [p10-11, pdf14-15]: "Decisions whether and when to release footage to the public should not be left to discretion of the law enforcement agency. Jurisdictions should consider assigning independent civilian boards responsibility for retaining and controlling access to footage. "An entity other than police retaining and controlling access to video will greatly reduce accusations of tampering or deletion, intentional or inadvertent, by police and the need for courts to have hearings and craft remedies."

##### Councilor Ewen-Campen Recommendations

Section 3.II [p3]: "There should be a civilian oversight organization to maintain footage, control access, and apply enforcement for failure to adhere to the policy. Enacting a Civilian Oversight body has been an explicitly shared goal of the City Council, Mayor's Office, and many members of the public for years, and we believe it is essential to have such a body in place in order to ensure that BWC footage can be effectively used for investigations by a non-police body."

##### SPD Operations Report

[p35, pdf41] Referring to and summarizing the ABA Principle: "Designating civilian agencies or boards ... as responsible for retaining and controlling access to footage."

##### PSFA Task Force Report

[p20, pdf21]: "Clear policies allowing BWC footage to be reviewed by the civilian oversight commission."

##### Civilian Oversight Task Force Report

[p39, pdf40]: "Unfettered access to the subject law enforcement agency's records is vitally important for effective civilian oversight."

[p18, pdf19] "If the City does adopt body-worn cameras, the Commission should share authority over management of the footage. In general, the Commission should have access to all video and audio footage obtained by the police, to the extent permitted by law and collective bargaining obligations, and have the discretion to release such footage when it determines that such disclosure is necessary for and consistent with its mission."

[p39, pdf40]: "Unfettered access to the subject law enforcement agency's records is vitally important for effective civilian oversight."

## **(5) Detailed BWC use policy and consequences of non-compliance**

### ABA Principles

Principle 3: Recording [p2-4, pdf6-8]: “Law enforcement agencies must adopt policies regarding when and under what conditions officers must record, may record, and may not record their interactions with the public. ...”

“Minimizing officer discretion is crucial. Police departments should “put in place tightly effective means of limiting officers' ability to choose which encounters to record.” One study showed that granting officers discretion to deactivate cameras whenever they deem appropriate reduced recording by as much as 42 percent, and excluded many interactions that should be recorded. Relatedly, mandatory recording policies must be enforced.”

Principle 8: Monitoring and Compliance [p12-13, pdf16-17]: “If departments allow officers to flout or disregard rules, the integrity of evidence and public trust of the department is undermined.” Tampering with any evidentiary recording should be grounds for disciplinary action or criminal prosecution. Sanctions should vary depending on the intentionality of any violations in the context of an agency’s progressive discipline framework.

### ACLU Model Policy

Section 3: Use Protocols [p1-2] outlines use policies in detail.

Section 5: Enforcement [p4]: “If any Department officer, employee or agent fails to comply with the requirements of [Use Protocols or Retention and Access], or interferes with a body camera’s ability to accurately capture video footage, then the following enforcement mechanisms shall apply unless exigent circumstances made compliance impossible: (1) Appropriate disciplinary action shall be taken against the officer, employee, or agent.”

### MA Recommended Regulations

Operations Standards are defined in section R5 [p14]. This includes detailed activation and deactivation standards.

Sanctions and Discipline are defined in Section R.6 [p15-16]. This includes “sanctions should be based on the progressive discipline model” and that “sanctions or discipline should be directly proportionate to the seriousness of the violation”, inclusive of termination (R.6.5).

### Councilor Ewen-Campen Recommendations

Section 3.IV [p3]: “Far less discretion regarding activation and deactivation of BWCs” which continues with more detail.

### SPD Operations Report

[p35, pdf41]: Referring to and summarizing the ABA Principles: “Specifying when and under what conditions officers should record, as well as what they may and may not record.” and “Detailing specific, meaningful consequences for non-compliance with the policy, as well as processes for monitoring compliance.”

## **(6) Civilian privacy protections and rights regarding being recorded**

### ABA Principles

Principle 4: Privacy [p4-5, pdf8-9]: "Although BWCs can build trust in the justice system, they also can infringe on vital privacy interests of civilians who may be recorded. Proliferation of police BWCs should not result in a mass citizen surveillance system. Ensuring that privacy interests are protected is especially important given the disproportionate presence of law enforcement in communities of color, immigrant and low-income communities, and other marginalized communities."

Principle 3: Recording [p4, pdf8]: "[Exceptions] might include not recording in schools, and/or not recording children, confidential informants, and/or crime victims without consent"

### ACLU Model Policy

Section 3(f) [p2]: "As close to the start of the encounter as is reasonably possible, an officer who is wearing a body camera shall notify the subject(s) of the recording that they are being recorded by a body camera."

Section 3(g) [p2] outlines use protocols for specific scenarios of higher privacy, including: "Before entering a private residence or location with similar expectations of privacy without a warrant or in non-exigent circumstances", "When interacting with an apparent crime victim", and "When interacting with a person seeking to anonymously report a crime."

Section 3(j) [p3]: "Officers shall not activate a body camera while on the grounds of any public, private, charter, or parochial elementary or secondary school, except when responding to an imminent threat to life or health."

### MA Recommended Regulations

R.5.4 [p14] "Following the activation of the camera a user should give verbal notice or otherwise make the individual[s] aware that the interaction is being recorded."

### Councilor Ewen-Campen Recommendations

Section 3.IV(2) [p3]: "Officers should be required to notify individuals that they are being recorded at the start of an encounter unless doing so is impossible."

### SPD Operations Report

[p33, pdf40] "There are risks and challenges associated with body cameras as well. One concern is privacy. Officers' interactions with the public often take place on private property, and the cameras can often record individuals in their most vulnerable moments."

[p35, pdf41] Referring to and summarizing the ABA Principles: "Implementing privacy protections, including: Requiring officers provide notice to the public that they are being recorded, when feasible [and] Specifying when and how individuals can opt-out of being recorded [and] Limiting the disclosure of footage of certain individuals, such as minors and those in a mental health crisis."

## **(7) Prohibition against alternative uses of BWC**

### ABA Principles

Report introduction [p1, pdf5]: "Transparent and effective policies are also necessary to address potential downsides to widespread adoption of BWCs, including a vast expansion of video surveillance of civilians, particularly communities of color and low-income communities with a disproportionate police presence."

Principle 4: Privacy [p4, pdf8]: "Proliferation of police BWCs should not result in a mass citizen surveillance system."

### ACLU Model Policy

Section 3(c) [p2]: "Body cameras shall be worn openly in a prominent location on the officer's body, uniform, or clothing, and in a manner that maximizes the camera's ability to capture video footage of the officer's activities."

Section 3(d) [p2]: "Body cameras shall not be used surreptitiously."

Section 3(i) [p2]: "Body cameras, as well as other devices that can record audio and video, shall not be used to gather intelligence information based in whole or in part on constitutionally protected speech, associations, or religion, or to record activity that does not involve a response to a call for service or a law enforcement or investigative encounter between an officer and a member of the public. For example, body cameras shall not be activated during protests or demonstrations unless and until an officer begins to engage with any individual participant or participants with regard to any alleged or suspected violation of law."

### Councilor Ewen-Campen Recommendations

Section 3.III [p3]: "Footage from one encounter may not be used for an unrelated investigation, without a warrant. Body-worn cameras should not be viewed as a general surveillance technology, and any footage captured in one context should only be used in that context, absent a warrant. This is consistent with the Massachusetts caselaw, and should be stated explicitly."

Section 3.IV(5) [p3]: "Officers should be forbidden from surreptitious use of their body-worn cameras and the cameras must always be worn openly in a prominent location."

## **(8) Clear statement of purpose for police accountability**

*Note: References to police accountability and police misconduct are found throughout most sources. They reference police behavior complaints as a core use case, therefore taking as an assumption that BWC footage would be admissible to address police misconduct.*

### ABA Principles

Report introduction [p1, pdf5]: “BWCs, when used in accordance with comprehensive and transparent policies governing the areas discussed in these Principles, can ... increase accountability”

Principle 5: Access and Use, Timely access to footage (5.b.) [p8-9, pdf12-13]: “For complaints regarding police behavior, including use of force, footage should be available promptly”

### ACLU Model Policy

Section 1: Purpose [p1]: "The purpose of this body worn camera program is to ... foster better accountability for the actions of its personnel [and] deter or document inappropriate conduct by police officers"

Section 4(d): “a supervisor may review footage when necessary to evaluate the merits of a complaint by a subject of the video footage or a specific allegation of misconduct.”

### MA Recommended Regulations

Statement of Purpose [p6]: “The purpose of body worn cameras is to: ... Foster better accountability for the actions of its personnel; Deter or document inappropriate conduct by police officers and by members of the public...”

### Councilor Ewen-Campen Recommendations

Section 3.VIII [p4]: "The policy should clearly state that one of the purposes of BWCs is to serve as a basis for disciplinary action if misconduct is observed. The current SPEA agreement states 'It is further understood that disciplinary actions and excessive monitoring is not the intended purpose of GPS monitoring or BWCs.' (Article II, Management Rights.) I believe that one of the primary purposes of BWCs is to reduce misconduct, and to serve as the basis for disciplinary action if necessary."

### SPD Operations Report

[p34, pdf40] "There is evidence that body-worn cameras can have a significant impact on accountability and transparency. Footage from body cameras has helped bring to light a number of high-profile incidents of police violence in recent years and has helped clarify how officers responded in chaotic situations like protests and active shootings."

[p35, pdf41] “It is important to note that body-worn cameras are a collective bargaining issue, and although the union has agreed to them in principle, specific aspects of the [proposed] body-worn camera policy may require negotiation.”

## **(9) Prohibition of any post-processing of BWC footage, including biometrics**

### ABA Principles

Introduction, point 4(d) [p1, pdf3]: “Not using biometric technologies (such as facial, gait, iris, or voice recognition) in connection with body-worn cameras.”

Principle 4: Privacy, Biometric recognition technologies (4.d) [p6-7, pdf10-11]: "The intrusions on civil liberties inherent in installing biometric software in BWCs or applying biometric technologies to BWC footage are too great to permit their use without a far more informed public and legislative consensus."

“This is especially important for minority and immigrant communities. After all, 'individuals who live in highly-policed neighborhoods, who are often poor and predominantly people of color, are more likely to be put in such databases.'"

### ACLU Model Policy

Section 4(f) [p4]: "Under no circumstance shall body camera video be subject to, either in real time or after the footage is captured, any technological enhancements, automated analysis, or analysis of biometric indicators, including but not limited to iris or retina patterns or facial characteristics."

### MA Recommended Regulations

R.1.24 [p10] "Facial Recognition. BWCs should not be equipped with facial recognition software, and the footage obtained from BWCs should not be subject to facial recognition technology, except as permitted and following the procedures established under state law."

### Councilor Ewen-Campen Recommendations

Section 3.IX [p4]: "The policy should prohibit the use of facial recognition or other remote biometric technologies for BWCs or any of the supporting systems and technologies which may handle the recordings. I believe this is already the case under Somerville's ban on facial recognition and our Surveillance Oversight policy, but it should be explicitly stated in the agreement."

### SPD Operations Report

[p35, pdf41] Referring to and summarizing the ABA Principles: “Not using face recognition, voice recognition, or other biometric technologies in conjunction with the cameras”

## **(10) Limitations on retention of footage**

### ABA Principles

Principle 6: Data retention [p11, pdf14]: "All BWC footage should be stored for a sufficient time to determine whether the footage is relevant to any official purpose, such as investigation, litigation or disciplinary process. At the same time, retention of BWC footage that is unnecessary to such official purposes heightens privacy and data security concerns and creates massive data storage issues."

"Policies should identify a time period for retention consistent with state law and sufficient to allow for auditing and identification of potential reasons for retention, usually between 30 and 180 days. The retention period for any footage of an interaction should be no shorter than the period an individual has to register a complaint. Policies should specify that all footage not identified for retention will be deleted at the expiration of this auditing and identification period."

### ACLU Model Policy

Section 4: Retention and Access [p3] goes into detail, including a six month limitation on retention of ordinary footage in 4(a) and requirements of longer retention of noteworthy footage 4(b), including any footage with "any use of force", arrest, "an encounter about which a complaint has been registered", or where "longer retention is requested by ... any member of the public who is a subject of the video footage."

### Councilor Ewen-Campen Recommendations

Section 3.V [p3]: "The policy should establish clear guidelines for retention of footage, with a maximum retention period of six months unless footage is flagged, and a retention period of 37 months for flagged footage. This 37 month figure was cited by the Task Force in relation to the typical Statute of Limitation, which is 36 months."

### SPD Operations Report

[p35, pdf41] Referring to and summarizing the ABA Principles: "Specifying the length of time when recordings are retained"

## **(II.A) Regarding sequencing of BWC policy and adoption**

### ABA Principles

Introduction to Report [p1, pdf5]: “BWCs, when used in accordance with comprehensive and transparent policies governing the areas discussed in these Principles, can encourage appropriate behavior, increase accountability, and improve public trust in law enforcement. But BWCs cannot by themselves ensure accountability and mend the rift between police departments and policed communities, particularly minority and other marginalized communities, and they should not inspire false confidence. Absent transparent and effective policies, BWCs can heighten the divide between law enforcement and communities, when, for example, some videos are inexplicably released and some are not. Transparent and effective policies are also necessary to address potential downsides to widespread adoption of BWCs, including a vast expansion of video surveillance of civilians, particularly communities of color and low-income communities with a disproportionate police presence, plus the cost of equipping police”

### ACLU Model Policy

Preamble [p1]: “If Massachusetts police departments or municipalities decide to initiate body worn camera programs, they should do it right. The ACLU of Massachusetts therefore presents the following model provisions for use as part of a police policy.”

### Councilor Ewen-Campen Recommendations

Quoting ACLU of MA [p1]: “If [body worn cameras are] to be effective at providing oversight, reducing police abuses, and increasing community trust, it is vital that they be deployed with good policies to ensure they accomplish those goals. Without good policies, they risk becoming just another police surveillance device—and one with very real potential to invade privacy.”

Section 2, Background [p2]: "The City Council subsequently voted to cut the proposed funding for their implementation, consisting of \$277,000 in proposed salary increases and \$127,833 in audio-visual supplies, until such time as a Use Policy could be devised that the City Council actively supported."

### SPD Operations Report

[p34, pdf40] "Before the cameras are implemented, SPD should develop and adopt a comprehensive policy.”

[p35, pdf41] “It is important to first develop a proposed policy based on community priorities and best practices before entering into the negotiation process. As part of developing the policy, the City should also consider what resources will be required to enact the policy, such as additional funding for data storage, additional administrative support, and additional funding for training, and ensure that these resources are in place before the program is implemented.”

## **(II.B) Regarding public engagement in BWC policy development**

### ABA Principles

Executive Summary [p19, pdf23]: "The proposed Principles seek to guide policymakers at all levels in creating comprehensive and considerate policies around the use of body-worn cameras that involve the community in critical decision-making."

Principle 1: Including all stakeholders [p1-2, pdf4-5]: "For BWC policies to improve public trust in our justice systems, the public must have a role in adopting, implementing, and amending them. As law enforcement officials have affirmed, the public must understand the potential uses, abuses, costs, and limitations of the technology."

"These discussions should reflect the diversity of the community, including courts, officers, prosecutors, public defenders, defense lawyers, leaders in local government, civil rights and advocacy groups and other communities, and residents."

### SPD Operations Report

[p34, pdf40] "Recommendation 12: Engage with the community to develop a policy on the use of bodyworn cameras by SPD" including: "Because the cameras are a tool for transparency, and because their use involves recording members of the public as well as court personnel and officials, it is also vital that a robust public engagement process be undertaken, and that this policy be shaped by community input. The engagement should be varied, including opportunities for individuals to submit comments online, listening sessions open to the public, and direct engagement with community groups."

## Madalyn Letellier

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**From:** A M <almajmaclellan@gmail.com>  
**Sent:** Saturday, April 25, 2026 3:05 PM  
**To:** All City Council; Public Comments  
**Subject:** Body Cameras for Police

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

This email is from an external source. Use caution responding to it, opening attachments or clicking links.

Dear members of Somerville City Council and the City Clerk,

My name is Alma, and I'm a Somerville resident living in Ward 4. I am writing to strongly oppose the deployment of body-worn cameras for police unless there are strong transparency policies in place to ensure that the cameras serve function to enhance transparency and police accountability. Although BWC are commonly perceived as improving trust in law enforcement, the American Bar Association has stated, "absent transparent and effective policies, BWCs heighten the divide between law enforcement and communities." [1]

In alignment with recommendations from the ACLU and Somerville's own previous analyses, I believe it is particularly important that these policies include prohibition of police review of footage prior to written statements or testimony, and the right to access by a civilian oversight body.

We know from deployment of body cameras in other municipalities that even where the intention of the cameras has been police accountability, police are often the ones controlling how and when cameras are used, and there are often significant barriers to the community being able to access the footage to review police behavior. Care must be taken to ensure that the cameras provide the intended benefits, and many of these considerations may influence ongoing costs to the city.

I have concerns about the financial impacts of running a BWC program. What future costs Somerville may be on the hook for in terms of training, personnel, and upkeep if we accept and expand this grant? According to an article in the Cambridge Somerville Indie, ongoing annual costs are estimated at around \$450,000 annually [2], which feels to me like a large increase during a time when other city programs are being asked to cut their budgets, including a request that the schools cut their budgets by \$1 million.

In addition to the above, I am also concerned about how the BWCs would interact with Somerville's continued participation in BRIC fusion center, and how data sharing with BRIC can be consistent with Somerville's Welcoming City policy. How can Somerville residents can be confident that recordings of the from police BWCs will not be shared with ICE and connected federal agencies?

Thank you for your attention,  
Alma MacLellan

References:

[1] [https://www.americanbar.org/content/dam/aba/administrative/legal\\_aid\\_indigent\\_defendents/lsc-laid-604-annual-2021-cameras.pdf](https://www.americanbar.org/content/dam/aba/administrative/legal_aid_indigent_defendents/lsc-laid-604-annual-2021-cameras.pdf)

[2] <https://csindie.com/body-worn-cameras-for-somerville-police-come-with-an-annual-cost-near-a-half-million-dollars/>

## Madalyn Letellier

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**From:** Alexandra Thorn [REDACTED]  
**Sent:** Monday, April 27, 2026 11:12 AM  
**To:** All City Council; Public Comments  
**Subject:** requesting common sense BWC policies for Somerville

This email is from an external source. Use caution responding to it, opening attachments or clicking links.

Dear members of Somerville City Council and the City Clerk,

My name is Alexandra Thorn, and I'm a Somerville resident living in Ward 5 [REDACTED]. I am writing to strongly oppose the deployment of body-worn cameras (BWC) for police unless there are strong policies in place to ensure that the cameras serve to enhance transparency and police accountability. I have additional concerns about the cost of a BWC program at this time, and have questions about how police BWCs would interact with Somerville's participation in BRIC and our Welcoming City status.

Common sense policies, aligning with recommendations from the ACLU and Somerville's own previous analyses, must include:

- \* A clear statement that the purpose is for police accountability
- \* Prohibition of police review of footage prior to written statements or testimony
- \* Right to access by a Civilian Oversight Body
- \* The right for subjects of footage and the general public to be able to access footage on a clear timeline
- \* Clearly defined limitations of the ways law enforcement may access and use the footage
- \* Detailed policy on BWC by the police with meaningful consequences for non-compliance
- \* Clear privacy protections and rights for civilians recorded by the cameras
- \* Prohibition against surreptitious use of BWC or the use of BWC to record First Amendment protected events unless there is specific engagement with participants
- \* Prohibition of any post-processing of footage, including biometrics
- \* Limitations on retention of footage

We know from deployment of body cameras in other municipalities that even where the intention of the cameras has been police accountability, police are often the ones controlling how and when cameras are used, and there are often significant barriers to the community being able to access the footage to review police behavior. Care must be taken to ensure that the cameras provide the intended benefits, and many of these considerations may influence ongoing costs to the city.

I'd like to particularly highlight the importance of not allowing the police to review footage before preparing their reports. Even when correctly and consistently deployed, body camera footage does not capture the full scene (notably omitting the actions of the officer wearing the camera), is difficult to interpret due to high levels of vibration, and gives a distorted sense of the proximity of people filmed on the cameras.

Extensive cognitive science research has shown human memories to be highly malleable, so even officers who are acting in good faith might unconsciously change their understanding of events based on what they see in footage. Worse, any officers with motivation to deceive the public can strengthen their incomplete or distorted reports by bringing them into alignment with the limited and distorted information captured by the cameras.

It is crucial that police reports stand as an independent line of evidence, and that versions of the reports be published before officers are able to view the footage. In cases where the footage uncovers incorrect details from the original report, it may be allowable for officers to submit a follow-up report after viewing the footage, but police testimony cannot be treated as reliable if it's only developed after having the chance to review footage.

I also have concerns about the financial impacts of running a BWC program. What future costs Somerville may be on the hook for in terms of training, personnel, and upkeep if we accept and expend this grant? According an article in the Cambridge Somerville Indie, ongoing annual costs are estimated at around \$450,000 annually [2], which feels to me like a large increase during a time when other city programs are being asked to cut their budgets, including a request that the schools cut their budgets by \$1 million.

Finally, I am also concerned about how the BWCs would interact with Somerville's continued participation in BRIC fusion center, and how data sharing with BRIC can be consistent with Somerville's Welcoming City policy. How can Somerville residents be confident that recordings of them from police BWCs will not be shared with ICE and connected federal agencies?

Thank you for your attention,  
Alexandra Thorn

## Madalyn Letellier

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**From:** Derek DuPont [REDACTED]  
**Sent:** Tuesday, April 28, 2026 7:30 AM  
**To:** All City Council; Public Comments  
**Subject:** Reject Grant Funding For Body-Worn Cameras

This email is from an external source. Use caution responding to it, opening attachments or clicking links.

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Hello City Council,

Please reject the mayor's request to accept grant funding for the integration of body-worn cameras into the police force.

Two weeks ago, you listened to the city's finance director as he detailed why we face a \$4.5m shortfall against a level services budget. As reported in the Cambridge Somerville Independent [1], body-worn cameras (BWC) will cost the city \$450k annually. Even if we assume there are benefits to BWC, we would be committing to a substantial recurring cost, funded by cuts to other city services.

We can't assume benefits though, especially without any policies in place to ensure BWC are used to hold police accountable for their actions, rather than as a tool for surveillance. Most of you were city councilors in 2022 (as was our current mayor), when the last attempt to fund BWC was rejected explicitly because there were no usage policies and no public oversight of the police. Four years later (with millions spent funding a Racial and Social Justice department and multiple "Public Safety For All" task forces come and gone), there is little change.

**A vote to accept BWC is a vote to fund the police at the expense of other city departments; a vote to accept BWC without clear usage policies contradicts the concerns you raised four years ago. If you are serious about BWC, you must first fund building systems of public accountability for the police.**

Best,  
Derek DuPont  
[REDACTED]

[1] Levy, Marc "Body-worn cameras for Somerville police come with an annual cost near a half-million dollars", *The Cambridge Somerville Independent*, 22 Apr 2026, <https://csindie.com/body-worn-cameras-for-somerville-police-come-with-an-annual-cost-near-a-half-million-dollars/>. Accessed 27 Apr 2026.