



A Cost–Benefit Analysis

By Jonathan M. Bernstein
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Police body-worn cameras have benefits, but they also present many novel legal, financial, technical, and policy-related challenges for municipalities and police departments, and attorneys advising municipalities will want to understand them thoroughly.

Is Your Police Department Ready to Implement Body Cameras?

The only certainty in an uncertain world of law enforcement and police reform is that police body-worn cameras are here to stay. Following the social unrest and protests that ensued after the deaths of Eric Garner in Staten Island,

New York, Michael Brown in Ferguson, Missouri, and Tamir Rice in Cleveland, Ohio, President Obama announced a three-year, 263 million-dollar investment effort to address the growing tensions between law enforcement officers and the communities in which they serve. *See* David Hudson, *Building Trust Between Communities and Local Police*, White House Blog (Dec. 1, 2014), <http://www.wh.gov/community-policing>. These reforms also called for the creation of a task force—The President’s Task Force on 21st Century Policing, which issued a final report in May of 2015. (This report is available at <http://www.cops.usdoj.gov/policing-taskforce>. A key component of that money includes \$75 million for the acquisition and deployment of body cameras. *See* Press Release, Dep’t of Justice, Office of Public Affairs, Justice Department Announces

\$20 Million in Funding to Support Body-Worn Camera Pilot Program (May 1, 2015), <http://www.justice.gov>. These grants require a 50 percent match by the municipalities that purchase body-worn cameras. The grants required that each applicant show a “strong plan for implementation of body-worn cameras and a robust training policy before purchasing the cameras.” *Id.* In addition, each municipal entity will bear the financial responsibilities for associated costs, such as storage and data retention. The funding plan is a part of President Obama’s 2016 budget.

The Bureau of Justice Assistance (BJA), under the U.S. Department of Justice Office of Justice Programs (OJP), recently announced the first municipalities that were recipients of grant money to purchase body cameras. According to Attorney Gen-

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eral Loretta E. Lynch, “[t]his body-worn camera pilot program is a vital part of the Justice Department’s comprehensive efforts to equip law enforcement agencies throughout the country with the tools, support, and training they need to tackle 21st century challenges.” *Id.* She further stated, “[b]ody-worn cameras hold tremendous promise for enhancing trans-

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parency, promoting accountability, and advancing public safety for law enforcement officers and the communities they serve.” *Id.*

Further demonstrating the broad consensus that body cameras are here to stay, the American Civil Liberties Union (ACLU), which is typically against various forms of surveillance, is in favor of body cameras. As stated in an ACLU report, “[c]ameras have the potential to be a win-win, helping to protect the public against police misconduct, and at the same time helping to protect police against false accusations of abuse.” See Jay Stanley, ACLU, *Police Body-Mounted Cameras: With Right Policies in Place, a Win for All 2* (Mar. 2013), <http://www.aclu.org/police-body-mounted-cameras-right-policies-place-win-all>. However, the ACLU cautioned about officers gathering video and audio footage after they enter private homes. *Id.* This caution is, in all likelihood, forecasting the potential legal battles to come with the increased use of body cameras.

Based upon this push to implement body cameras and the increased attention to police reform, alleged police misconduct, and attempts to seek solutions that benefit both the law enforcement officers and the public, many questions remain unanswered about body cameras. This article seeks to examine what is currently known about body cameras; to understand the current research, benefits, and burdens placed upon municipalities implementing body camera programs; to highlight some of the legal issues; and to provide resources to attorneys advising municipalities on this issue.

Current Research Studies on Body Cameras

There are approximately 17,895 law enforcement agencies nationwide according to the 2008 U.S. Census report. See Brian A. Reaves, U.S. Dep’t of Justice, *Census of State and Local Law Enforcement Agencies, 2008 2* (2011), <http://www.bjs.gov/content/pub/pdf/cslea08.pdf>. This number can be further broken down as 12,051 local municipal police departments, 3,063 sheriff’s departments, 50 state law enforcement agencies, 1,733 special jurisdiction agencies, and 638 other agencies. *Id.* The Police Executive Research Forum (PERF) conducted an informal survey in 2013 by distributing 500 surveys to agencies nationwide seeking to identify the number of agencies currently using body cameras and the issues that those departments had with implementation. See Lindsay Miller, Jessica Toliver, & Police Executive Research Forum, *Implementing a Body-Worn Camera Program: Recommendations and Lessons Learned 2* (Community Oriented Policing Services, U.S. Dep’t of Justice 2014), <http://ric-zai-inc.com/ric.php?page=detail&id=COPS-P296>. PERF received responses from 254 agencies, and only 63 of those agencies reported using body cameras. In other words, over 75 percent of the respondent agencies were not using body cameras. However, the limited number of police departments currently using body cameras nationwide is likely to increase with federal funding and continued calls for police accountability.

In 2014, PERF issued a report titled *Implementing a Body-Worn Camera Program: Recommendations and Lessons Learned*, which was completed after a conference of more

than 200 law enforcement officials, scholars, and other experts who met to discuss their experiences with body-worn cameras. *Id.* at vii. Notably, PERF reported that one-third of the departments using body cameras did not have a written policy in place. *Id.* at 2. When those departments were asked why, the response was a “lack of guidance as to what their policy should include.” *Id.*

This demonstrates the importance of police departments and municipal law departments communicating and working together to develop policy to ensure constitutional policing. It highlights the need for these two city departments to rethink their standard operating procedures. Police officers are tasked with applying complicated constitutional principles on a daily basis, and yet, municipal attorneys appear to be absent from policy development. Positive police reform may be as simple as increasing attorney involvement in policy development and training. In addition, the numbers quoted above highlight the need to establish a best practice model and standards for the use of body cameras. This, in turn, raises a question about control: should the local officials on the ground control the implementation and the use of body cameras, or should the federal government, particularly the Department of Justice, have federal oversight over it through a grant-funding stream? More importantly, research on any possible negative consequences of the lack of uniformity is not currently available.

Although police body-worn cameras are here to stay, these cameras present many novel legal, financial, technical, and policy-related questions and challenges for municipalities and police departments. To start, the research on the effectiveness, perceived benefits, burdens, and consequences of implementing this technology is scarce at best. A report by Dr. Michael White for the Department of Justice revealed that there are only a small number of empirical studies to examine the implementation of body cameras. See Michael White, Office of Community Orientated Policing Services, *Police Officer Body-Worn Cameras: Assessing the Evidence 9, 32* (2014), <http://www.ojpdagnosticcenter.org>. (Dr. White is a professor at Arizona State University in the School of Criminology and Criminal Justice and serves as an expert for the Bureau of Justice Smart Policing Initiative.) In Dr.

White's review, only five empirical studies have been conducted, and among those five, each used a different methodology, and the rigor among them varied in reaching the conclusion to support or to rebut the increased use of body cameras for police. *Id.* at 5–6. The five studies included three in the United States—Rialto, California, Mesa, Arizona, and Phoenix, Arizona—and two in the United Kingdom. *Id.* Despite the limited research available, as discussed below, the current research does tend to lend credence to the arguable or perceived benefits of body cameras, which supports further research and investigation.

Perceived Benefits of Body Cameras Based on Current Research

There are many perceived benefits of officer body-worn cameras. These benefits include an increase in transparency, accountability, and legitimacy of police actions. See the Constitution Project, *Safeguarding Liberty, Justice & the Rule of Law: The Use of Body-Worn Cameras by Law Enforcement*, Guidelines for Use & Background Paper (Jan. 28, 2015). Arguments that body cameras will create more accountability and transparency are meaningless if a municipality fails to review, analyze, and evaluate its use of body cameras. Police rules and regulations are only as good as the enforcement mechanism in place to ensure compliance. As such, drafted policies that exclude the requirement to review a body camera program are futile when it comes to transparency and accountability.

Cameras promote better evidence preservation for both criminal prosecutions and civil litigation. There are evidence-related benefits for both resolving civil litigation against the officers for misconduct and for criminal prosecution of those arrested. Cameras are likely to promote quicker resolution of civil litigation against police officers, in addition to speeding resolution of civilian complaints. See Int'l Ass'n of Chiefs of Police (IACP), *Body-Worn Cameras—Concepts and Issues Paper 2* (Apr. 2014).

In other words, there is the potential that citizen-based complaints may be quickly resolved without resorting to litigation. The footage will provide increased training opportunities for officers as well as an additional means for departments to evaluate officer performance. *Id.* Cameras may

have a “civilizing effect” for both an officer and for those that they encounter in the course of their duties. In other words, there is a perception that both the public and an officer are on their best behavior when they know that they are being recorded.

The benefits associated with body cameras are significant in terms of decreasing the number of complaints against police officers. In 2012, the Rialto, California, police department and the University of Cambridge-Institute of Criminology (UK) conducted a yearlong study to investigate whether body cameras had an effect on complaints lodged against officers and officers' use of force. The results of the Rialto, California, study are striking. Over the course of 988 shifts, randomly assigned frontline officers wore body cameras. See William Farrar, *Operation Candid Camera: Rialto Police Department's Body-Worn Camera Experiment*, *The Police Chief* 81 (2014) at 20-25. See also Miller, Toliver & Police Executive Research Forum, *supra*, at 5–6.

The study found that there was an 88 percent decrease in citizen complaints for the officers who wore body cameras and a 60 percent decrease in the use of force by officers wearing body cameras. *Id.* at 5–6. The shifts without body cameras experienced twice as many uses of force incidents. *Id.* According to Chief of Police William Farrar of Rialto, who oversaw the study, “whether the reduced number of complaints was because of the officers behaving better or the citizens behaving better-well, it was probably a little of both.” *Id.*

In another study, the Mesa, Arizona, police department worked with the University of Arizona to study body cameras. *Id.* Fifty officers were assigned body cameras while another fifty officers without cameras served as a control group. *Id.* The two groups were similar in age and race. Officers wearing the cameras received 40 percent less complaints overall and 75 percent less complaints for use of force. *Id.* Significantly, eight months after camera deployment, there were nearly three times more complaints against officers without cameras. *Id.*

Currently, the National Institute of Justice is conducting two more studies on the implementation of body camera programs in the Las Vegas and at the Los Angeles police departments. See *Research on Body-Worn Cameras and Law Enforcement*, Nat'l

Inst. Justice (last modified May 3, 2016), <http://www.nij.gov/topics/law-enforcement/technology/pages/body-worn-cameras.aspx>. This is particularly interesting since Las Vegas is operating under a consent decree, before which the police department was found to have a history of civil rights violations by the Department of Justice. This raises a question: how do body cameras come

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into play in assisting police departments to ensure constitutional policing? In other words, are the terms and the conditions of the consent decree, which are believed to promote constitutional policing, effective in achieving the desired police reforms and improved police techniques? New Orleans and Seattle are also in the process of implementing a body camera program, and both of these police departments are operating under consent decrees with the Department of Justice. See Miller, Toliver & Police Executive Research Forum, *supra*, at 9.

Limitations of Body Cameras

Even though body cameras permit the recording of an event from the perspective of an officer, which is vitally important considering that every citizen-police encounter in our modern culture has the potential to be recorded by the cell phones of witnesses, there are many limitations to body cameras. For example, a body camera does not follow an officer's eyes; a camera does not record 360 degrees; a camera only records in two-dimensional images; camera speed is different from the speed of life; a camera may record better in low light or low resolution than an officer; an



officer's body may block a camera's view, depending on where the camera is worn; and a camera could encourage second-guessing. See Bill Lewinski, *10 Limitations of Body Cameras You Need to Know for Your Protection*, Force Science News #265, Force Science Inst., <http://www.forcescience.org>. Stated differently, simply equipping a police officer with a body camera cannot

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and should not replace a thorough investigation nor should the public or police officers expect otherwise.

Burdens on Municipalities and Police Departments

In addition to the many potential benefits of police body-worn cameras, they place many significant burdens on municipalities and departments as well. In fact, at the outset, implementation of body camera programs may cause more problems for municipalities, especially for those municipalities that do not address the training, policy, and administrative issues before implementation. Below are some of the potential burdens and challenges to implementation.

First, municipalities should understand that body cameras are not a one-size-fits-all solution for improving community police relations or for achieving police reform. For example, when an officer goes hands-on and uses force during the course of a lawful arrest, it does not necessarily mean that the officer violated the individual's Fourth Amendment constitutional rights by using force. See *Graham v. Connor*, 490 U.S. 386 (1989). Police departments are going to

need to educate the public about when and under which circumstances an officer may resort to the use of force in the course of carrying out legitimate law enforcement duties. *Id.* Stated differently, police departments and public officials are going to need to manage the expectations of both the public and the police officers, which is not an easy task, when implementing a body camera program.

Implementing a body camera program requires a significant commitment to the proper allocation of staffing, and having the financial means to address the significant costs associated with body cameras. Each body camera device will cost somewhere between \$200 and \$1200. See Miller, Toliver & Police Executive Research Forum, *supra*, at 32. However, the acquisition stage is not the only stage that involves costs. Cash-strapped municipalities need to be cognizant of this fact and need to grasp the other associated costs before implementation or they may find themselves in a position in which they cannot comply with a simple Freedom of Information Law (FOIL) request. A simple application of the FOIL provisions demonstrates the staffing burdens associated with body cameras. When an agency receives a FOIL request for body camera audio and video footage, officers must spend time reviewing videos to find the relevant footage, determine whether an exception to the presumption of disclosure applies, identify the portions by law that must be redacted, and then perform those redactions. In Mesa, Arizona, the police department has found that it takes an officer two hours to review footage and over 10 hours to perform the redactions. *Id.* at 33.

Some additional burdens of implementing a body camera program include data storage, data access, data security, evidentiary issues such as chain of custody and categorizing the videos, maintaining the cameras, training, and additional administrative and staffing costs. The cost of storage can be astronomical. For example, New Orleans is in the process of implementing a body camera program, outfitting 350 officers with cameras, at an anticipated cost of \$1.2 million over five years, and the bulk of that money is going to storage. *Id.* at 33. Even PERF acknowledges that the cost of data storage may deter municipalities from attempting to implement a body camera program. *Id.*

Legal Issues and Legislative Activity

The technology is simply ahead of the law when it comes to body cameras, making implementation more difficult for municipalities. There is little case law or guidance in the way of best practice policies due to the relative infancy of this technology. It will take time for the legislatures and the courts to catch up. Because the courts and the legislatures have not provided guidance here, it is critical that municipal officials and police departments ensure that officers know the current law about privacy, search and seizure, consent, interrogations and interviews, and state public disclosure rules or freedom of information laws, as well as a department's rules and regulations, including any prohibitions against use of body cameras. Furthermore, it would be wise to have written policies, including training guidelines, in place before attempting an implementation. In addition, public officials should discuss and have a full grasp of the data storage, the data access, and the data security issues before a municipality implements a body-worn camera program.

Among the many legal questions involved in body cameras are questions related to privacy concerns, for both officers and citizens, including witnesses who wish to remain anonymous, crime victims, and confidential informants. Body camera footage may increase exposure to liability for privacy violations, intentional infliction of emotional distress, and public humiliation claims if uninvolved parties are caught on the footage and it becomes available publicly to their detriment. See Steve Yahn, *Capturing the Moment*, Risk and Insurance (Oct. 8, 2014), <http://www.riskandinsurance.com/> (explaining that body cameras may increase exposure to liability in some areas while decreasing liability in other areas).

As for constitutional issues, the general principle or general rule for officers is that if an officer must legally ask permission to enter the premises, the officer should also ask if the resident would allow recording. If the resident says no, simply record that oral documentation before turning the camera off. In other words, a traditional Fourth Amendment analysis for determining whether a reasonable expectation of privacy exists will be important moving forward as this technology becomes more

commonplace. To determine whether a reasonable expectation of privacy exists requires an analysis of whether the individual has a subjective or actual expectation of privacy and whether the expectation is one that society is prepared to recognize as reasonable. See *Katz v. United States*, 389 U.S. 347, 353, 357–59 (1967). There are traditional areas where an individual would have a heightened, reasonable expectation of privacy. These areas include a private residence, locker rooms, and bathrooms. Areas that are grey and likely to result in courts weighing in include hospitals or any treatment-related facility, schools, and other quasi-public-private places.

Another area of constitutional law that body cameras likely would affect includes the *Miranda* warning. Audio and video footage will provide good evidence of clear and accurate readings of *Miranda* rights to suspects and any invoking of those rights and any subsequent waivers and confessions.

Body cameras have the potential to change evidence collection, evidence preservation, and its use in criminal proceedings or criminal trials fundamentally. Body cameras have the potential not only to change the role of evidence in criminal trials, but also to define new law concerning what constitutes exculpatory evidence. *Brady v. Maryland*, 373 U.S. 83, 87 (1963) (requires and creates a duty to preserve and to disclose evidence collected). Accordingly, a good written body-worn camera policy will include consultation with the district attorney's offices.

According to the National Conference of State Legislatures, as of May 2015, as many as 34 states are considering legislation to address body-worn cameras by law enforcement. See *Body-Worn Camera Interactive Map*, Nat'l Conf. of State Legisl., <http://www.ncsl.org/research/civil-and-criminal-justice/law-enforcement>. Significantly, South Carolina is the first state to mandate all law enforcement agencies to acquire and to implement use of body cameras. *Id.* In addition, several large municipalities, including Chicago, Washington D.C., Los Angeles, New York City, and Seattle, have recently implemented body camera programs, and their experiences will likely affect body camera law and policy moving forward. *Id.*

One of the tensions that may exist in the state laws is found in the public disclosure laws and officer privacy laws. For example, under New York law, there appears to be a tension or conflict between the Freedom of Information Law and the New York Civil Rights Law §50-a. Under New York Civil Rights Law §50-a, a police officer's personnel records used to evaluate performance toward continued employment or promotion is exempt from disclosure. It is not hard to envision a scenario in which video footage from an officer's body camera is used to reprimand an officer for unprofessional or improper conduct, and a department refusing to disclose such footage in accordance with New York Civil Rights Law §50-a. This seems to cut against the presumption of open access to records under New York state's FOIL. Under New York's open records law, there is a presumption of access that requires agencies to make all records available, except to the extent that records or portions of a record fall within one or more grounds for denial appearing in Public Officers Law §§87(2) (a)–(j). The most likely New York FOIL provisions that would apply are the following: the provision preventing disclosure when there is an unwarranted invasion of personal privacy; the provision preventing disclosure when it could endanger the life or the safety of any person; and the provision permitting an agency not to disclose if it would interfere with a law enforcement investigation or a judicial proceeding, deprive a person of a fair trial, identify a confidential witness, or reveal criminal investigative techniques or procedures that are not routine. Most states have similar provisions that are likely to apply under FOIL requests or open records laws.

Another issue to consider is the consent of the parties being recorded. Many states have two-party consent statutes that prohibit audio recordings of private conversations without the consent of both parties. See the Constitution Project, *The Constitutional Implications of the Use of Police-Worn Cameras by Law Enforcement* (2015), <http://www.constitutionproject.org/wp-content/uploads/2015/02/TCP-The-Use-of-Police-Body-Worn-Cameras.pdf>. See also Miller, Toliver & Police Executive Research Forum, *supra*, at 14. At a minimum, in these states, there are statutory limitations that may pre-

clude or prevent officers from using body cameras when consent is not given. See Alexandra Mateescu, Alex Rosenblat, & Danah Boyd, *Police Body-Worn Cameras* 9 (Data & Society Research Inst. Working Paper 2015), <http://www.datasociety.net/pubs/dcr/PoliceBodyWornCameras.pdf> (identifying 10 states where two-party consent statutes will require police to obtain consent

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from individuals recording that include California, Connecticut, Florida, Illinois, Maryland, Massachusetts, Montana, New Hampshire, Pennsylvania, and Washington). These states would likely need to enact an exemption that applies to law enforcement activities if they wanted police officers to be able to utilize body cameras without first having to obtain consent.

Police Executive Research Forum Recommendations

Against this backdrop of legal and legislative uncertainty, municipalities would be wise to heed the recommendations of PERF, the Police Executive Research Forum. According to PERF, departments considering implementation of a body camera program should take a careful and thoughtful approach to body cameras in which the community, officers, and other stakeholders are consulted. PERF further recommends that departments consider a pilot program and evaluate the results of that pilot before implementing body-worn cameras department-wide.

This article only highlights some of the PERF policy recommendations. Among others, PERF recommends that the initial deployment of cameras should be in units or patrols that have the most con-



tact with the public. *See* Miller, Toliver & Police Executive Research Forum, *supra*, at 38 (PERF recommendation No. 1). Written policies should specify the locations where the cameras are to be worn. *Id.* at 39 (PERF recommendation No. 4). Officers should document in their written reports that the body cameras were used. *Id.* at 39 (PERF recommendation No. 5). Importantly, the written policy should require an officer to explain in writing why he or she did not turn on a body camera when required, and the policy should specify the consequences for such a failure if an officer deviated from acceptable policy procedures. *Id.* at 39 (PERF recommendation No. 6).

The department will need to decide whether the department will record every interaction that a police officer has in any given day or only those calls that are related to service calls, such as traffic stops, domestics, robbery, or homicide. PERF recommends that officers should be “required to activate their body-worn cameras when responding to all calls for service and during all law enforcement-related encounters and activities that occur while the officer is on duty.” *Id.* at 40 (PERF recommendation No. 7). It may be useful to list examples in the written policy.

Once a department decides what it plans to record, then the department can decide the protocols for recording. In terms of recording protocols, officers should inform the people that they encounter—whether a suspect, a witness, or a crime victim—that the officer is recording unless doing so is impractical or unsafe. *Id.* at 40 (PERF recommendation No. 8). Once activated, officers should keep the camera recording until the conclusion of the event or the incident, unless a supervisor authorizes that recording may stop. *Id.* at 41 (PERF recommendation No. 9).

Notably, PERF recommends, “Officers should have the discretion to keep their camera turned off during conversations with crime witnesses and members of the community who wish to report or discuss criminal activity in their neighborhood.” *Id.* at 41 (PERF guideline No. 11). In other words, there should be exceptions in the written policy for crime victims or witnesses who wish to remain anonymous. Adding minors to this list may be

prudent, although not currently within the recommendations. Body cameras may have a chilling effect on the willingness of witnesses and confidential informants to speak openly and freely to police due to fear that an interview will be recorded and viewed later by unintended people.

Policies should clearly state which measures a department takes to prevent data tampering, deletion, or copying. *Id.* at 43 (PERF recommendation No. 15). At the end of each shift, the camera footage should be downloaded and categorized as evidentiary or non-evidentiary. *Id.* at 43 (PERF recommendation No. 16). Non-evidentiary footage may not need to be kept as long as evidentiary footage, but officials should consult with an attorney to determine the length under the applicable state records retention statute. The evidentiary footage would require further categorization, such as robbery, traffic violation, or homicide. *Id.* at 43 (PERF recommendation No. 17). This process of categorizing the footage is important to determine the length of time that a police department is required to maintain the footage. In addition, resources may be shored up by ensuring proper tagging during the download process in that it may not take as long to locate relevant footage when requested. In terms of evidentiary value, if a municipality is looking to video camera footage to assist in litigation involving allegations against a police officer for allegations of civil rights violations or alleged improper conduct, the statute of limitations to bring a civil rights lawsuit under title 42 U.S.C. §1983 is three years. Lastly, policies should state where the camera videos are to be stored. *Id.* at 44 (PERF recommendation No. 19). This is to address potential chain of custody issues later on.

Officers should be permitted to view a video of an incident before making a statement about that incident. *Id.* at 45 (PERF recommendation No. 20). Departments should conduct periodic audits of video footage at random to ensure officer compliance with the rules and the regulations regarding cameras, but also to assess overall officer performance. *Id.* at 46 (PERF recommendation No. 22). Written policies should specifically prohibit all departmental personnel from accessing recorded data for personal use and from uploading

video onto any social media sites. *Id.* at 46 (PERF recommendation No. 23). Further, written policies should outline the specific measures taken to prevent release of recorded data or unauthorized access. *Id.* at 46 (PERF recommendation No. 24).

Training should be required for all officers before being equipped with a body camera. *Id.* at 47 (PERF guideline No. 27). This training on body cameras should be conducted annually. *Id.* at 48 (PERF recommendation No. 30). Obvious areas of training include the nomenclature of the device itself and proper functioning. As for the substantive portion of the training, it would be beneficial to include scenario-based training with difficult witnesses, minors, or confidential informants to allow officers to exercise their own judgment as to how best handle the situation in a closed environment. The more that these scenario-based training sessions emulate real world environments of policing, the better officers will be prepared to apply that training and to make sounder decisions when they are out in the community.

Conclusion

It may be difficult to balance the civil liberties of the public with the use of this new technology, but it will likely be worth it. Drafting a policy that satisfies the many competing interests, such as the right to access data, privacy, the limitations of these body cameras, and the training and data security that they require, will be a challenge. However, those municipalities in the process of deciding whether to implement a body camera program should conduct a cost-benefit analysis. They should review the current money spent on or budgeted for the litigation costs associated with alleged misconduct claims, the judgments paid or the cases pending in which settlement will likely result, and the expenses related to responding to citizen complaints. Those figures should be compared to the costs for the acquisition of cameras and related equipment, and the associated costs of training, staffing, and administrative needs, as well as data storage costs. The costs associated with deterring misconduct in the future, along with decreasing litigation costs and settlement payments, will likely outweigh the overall cost of a body-worn camera program in the long term.