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Submitted by: City Council Vice President Kit Collins

Subject: Community Control Over Public Surveillance Annual Public Report

Background and Purpose

In March of 2023, the Medford City Council ordained Section 50, Article III of the City of Medford's Code of Ordinances: "An Ordinance to Promote Transparency and Protect Civil Rights and Civil Liberties with Respect to Surveillance Technology." This ordinance is also referred to as the Community Control Over Public Surveillance Ordinance, or CCOPS, for short.

Section 50–78 of the Ordinance, "Annual Public Reporting," states:

"Not later than April 15 of each year, the City Council or its appointed designee shall release an annual public report, in print and on its public website, containing the following information for the preceding calendar year:

- The number of requests for approval submitted to the City Council under this Ordinance for the funding, acquisition, or new use of Surveillance Technology;*
- The number of times the City Council approved requests submitted under this Ordinance for the funding, acquisition, or new use of Surveillance Technology;*
- The number of times the City Council rejected requests submitted under this Ordinance for the funding, acquisition, or new use of Surveillance Technology;*
- The number of times the City Council requested modifications be made to Surveillance Impact Reports and Surveillance Use Policies before approving the funding, acquisition, or new use of Surveillance Technology; and*
- All Annual Surveillance Reports submitted pursuant to Section 50–77. Printed copies of the public report may contain pinpoint references to online locations where the Annual Surveillance Reports are located, in lieu of reprinting the full reports."*

The City Council's Annual Public Reporting submission arrives after the stated deadlines this year due to late submission of Annual Surveillance Reporting by Medford Police Department.

City Council Annual Public Report on Surveillance Technology

These responses are submitted pursuant to Section 50–78 of the Ordinance as cited above. This information covers the time period of January 2024 through December 2024.

1. The number of requests for approval submitted to the City Council under this Ordinance for the funding, acquisition, or new use of Surveillance Technology.

Medford Parking Department submitted a request to approve preexisting use of License Plate Readers (LPRs).

In addition, the Medford Police Department submitted reporting on their ongoing use of Body Worn Cameras. Note: Pursuant to Section 50–72 of the Ordinance, until January 1, 2028, Body Worn Cameras are exempted from mandatory City Council approval for their funding, acquisition, or use; and pursuant to Section 50–74 of the Ordinance, until January 1, 2028, Body Worn Cameras are exempted from the mandatory review and approval by City Council of preexisting uses of Surveillance Technologies already in use. Accordingly, the City Council discussed and performed oversight of the continuing use of Body Worn Cameras by Medford Police Department in the [Public Health & Community Safety Committee on May 7, 2025](#), but no votes were taken.

2. The number of times the City Council approved requests submitted under this Ordinance for the funding, acquisition, or new use of Surveillance Technology.

Prior to submission, License Plate Readers (LPRs) were in preexisting use by Medford Parking Department, in accidental violation of the Community Control over Public Surveillance ordinance. The City Council reviewed a draft Use Policy and Impact Report of License Plate Readers in [Committee of the Whole on April 8, 2025](#), requested updates to the Use Policy, and voted to approve the ongoing technology usage, pending those updates to the LPRs Use Policy. Those updates to the LPRs Use Policy were incorporated, and are reflected in the Use Policy document attached to this report. This approval enables the continued use of LPRs by Medford Parking Department.

3. The number of times the City Council rejected requests submitted under this Ordinance for the funding, acquisition, or new use of Surveillance Technology

None.

4. The number of times the City Council requested modifications be made to Surveillance Impact Reports and Surveillance Use Policies before approving the funding, acquisition, or new use of Surveillance Technology
- (1) The City Council requested the LPRs Use Policy be updated to include more details about the City's Municipal Records Retention Schedule, as it relates to how long data collected by LPRs is retained by Medford Parking Department before it is destroyed. The Use Policy was accordingly updated to include the Records Retention Schedule for:
 - (a) *Audio/Visual tape or Digital Recordings, security and surveillance tapes (1 month);*
 - (b) *Parking Tickets (refers to Retention Period sub-schedules);*
 - (c) *Paid Tickets (retained until completion of satisfactory audit);*
 - (d) *Parking Appeals (retained 1 year following resolution of appeals process).*

For the purpose of Surveillance Technology oversight, "Audio/Visual tape or Digital Recordings, security and surveillance tapes" is the data germane to this ordinance. These updates are in Section 5 of the Use Policy.

- (2) The City Council requested the LPRs Use Policy be updated to include stronger language and a clearer intent around not sharing surveillance technology or data with any other entity; and to include an oversight mechanism for confirming that software vendors of LPR technology are not sharing surveillance data collected in Medford. The language of Section 6, "Surveillance Data Sharing," originally read:

At this time, the City of Medford's Parking Department is not seeking to share access to the surveillance technology or data with any other agency, department, bureau, division, or unit.

It was updated as follows:

The City of Medford's Parking Department is not seeking to share access to the surveillance technology or data with any other agency, department, bureau, division, or unit, except as required by law. Annually, the Parking Director will verify with the applicable vendors (Gtechna and SenSen) to confirm that data captured by the City of Medford is not being shared with others.

- (3) The City Council reviewed and discussed statistics from 2024 BWCs Audit included in the Medford Police Department's Annual Report and requested, in future Annual Reporting, greater granularity and clarity on reported instances when officers failed to advise all involved that they were being recorded (which is required under the Medford Police Department's BWCs policy). In discussion, MPD officers reported that observed failures to give this alert could simply be the result of the alert already being given by other officers that were earlier to arrive at an incident. The City Council requested, for future reporting, a "spot check" of 3–5 instances appearing to be in violation of the BWCs policy to provide confirmation or greater clarity (i.e., was a verbal alert indeed skipped because it had been given previously by another officer, or was it for some other reason, or is greater training needed to ensure compliance with BWCs policy).

- (4) The City Council also advised the Medford Police Department that certain granular details included in its Annual Reporting were not required under reporting guidelines and can be omitted in future reporting (i.e. BWC Video Request log with names of individual officers; individual names of District Attorneys to request BWC footage).

5. All Annual Surveillance Reports submitted pursuant to Section 50–77

Attached:

- (1) Medford Parking Department 2024 License Plate Reader Use Policy (updated)
- (2) Medford Parking Department 2024 License Plate Reader Impact Report
- (3) Medford Police Department 2024 Annual Surveillance Report

6. Public Comment on Surveillance Technology Annual Reporting

Attached:

- (1) Written comments by Medford People Power to the Public Health and Community Safety Committee on the Community Control over Public Surveillance annual report