



SURVEILLANCE TECHNOLOGY WORKING GROUP

April 12th, 2024

RECOMMENDATION FOR QUALIFIED APPROVAL S.T. No. 24-01 “Automated Speed & Redlight Enforcement Technology”

Mayor Ben Walsh
City of Syracuse
City Hall Room 203
233 East Washington Street
Syracuse, New York 13202-1473

RE: *Surveillance Technology Working Group*
S.T. No. 24-01 “Automated Speed & Redlight Enforcement Technology”
Summary Report and Recommendation

Dear Mayor Walsh:

In accordance with Executive Order No. 2 issued on December 1, 2020, authorizing a Surveillance Technology Working Group (“STWG”) to comprehensively evaluate surveillance technologies proposed for implementation by various City of Syracuse departments, and to seek out and consider related public input, STWG has completed its review of *S.T. No. 24-01 “Automated Speed & Redlight Enforcement Technology”* as proposed for implementation by the Department of Public Works (“DPW”) and hereby recommends **QUALIFIED APPROVAL** of *S.T. No. 24-01 “Automated Speed & Redlight Enforcement Technology”* based on the reasons and considerations as summarized within this Report and Recommendation:

S.T. NO. 24-01 “AUTOMATED SPEED & REDLIGHT ENFORCEMENT TECHNOLOGY” SUMMARY DESCRIPTION

Automated Speed & Redlight Enforcement Technology are a form of surveillance tools that capture videos of vehicles that do not stop for the stop lights around school zones and bus arm stop signs on school buses. The goal of this technology is to increase pedestrian safety near school campuses by increasing the city’s ability to enforce traffic laws and dissuade future infractions.

STWG FINDINGS

Director of Special Projects Neil Milcarek-Burke answered detailed questions from STWG



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members with regards to how the sites of the camera locations were chosen, and Director Milcarek-Burke stated that they are specifically having these near schools. STWG members also asked about how the city would minimize the amount of data collected and Director Milcarek-Burke stated that they only want the minimum amount of data necessary, and that the systems sends the information to the NYS DMV.

In accordance with the STWG policy, the STWG sought input from Syracuse residents and local stakeholders. We received 112 entries through our online form. Roughly 73% of those were in support of the technology, a few of which highlighted the need that they see to increase safety around school zones. Roughly 13% were opposed to the technology, raising concerns about privacy and asking if people living near the schools would be unfairly at risk of getting tickets running to the store.

The rest of the responses were neutral questions or comments asking if these will be enforced against school bus drivers that speed also. Another felt that using this money to hire more bus drivers would be a better use.

The STWG considered the public commentary in reaching its conclusion on DPW's Automated Speed & Redlight Enforcement Technology for implementation. There are some concerns and risks which could be ameliorated by the implementation of thorough policies regarding: use limitations, data minimization & retention, data security, audit trails, data ownership, and reporting requirements.

The STWG voted for recommendation of *S.T. No. 24-01* at its February 5, 2024 regularly scheduled meeting as follows¹:

STWG Member	Vote In Favor	In Favor w/ Stipulations	Vote Against	Abstention	Absence
Nicolas Diaz, API		X			
Chief Tim Gleeson, SFD	X				
Martha Grabowski		X			
Johannes Himmelreich		X			



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Ocesa Keaton, Research					X
Mark King		X			
Timothy Liles, Digital Services					
Sharon Owens, Deputy Mayor		X			
Jawwaad Rasheed, SPD	X				
Jason Thomas, API		X			
Daniel Schwarz				X	
Michelle Sczpanski, NBD		X			
1st DC Richard Shoff, SPD	X				
Jennifer Tifft, Strategic Initiatives				X	
Valerie Didamo, Law Department				X	
Bradford Morse					X



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STIPULATIONS AND/OR RECOMMENDATIONS FOR IMPLEMENTATION

To mitigate any potential risk of misuse of the technology under review, the STWG recommends taking the following measures:

Data security and governance considerations

1) Use limitations and avoiding mission creep.

- a) The regular use of data collected by the system should be restricted for the primary purpose identified for this technology: issuing tickets for traffic violations. Using the data to surveil individuals for other purposes is prohibited. Data collected by the system can be shared on a case-by-case basis with SPD following the usual processes (approval by Mayor). The data collected can be used for additional purposes (e.g., traffic counts) following the usual approval processes.

2) Data minimization & retention.

- a) In congruence with the previous consideration, data minimization principles should be followed to ensure that data only be captured to achieve the primary purpose of this technology.
- b) In this case, it is recommended that PII captured by the tool but not needed be removed (for example, by automatically blurring faces within the system). Additionally, footage should only be retained for as long as it is needed to pursue traffic infractions (while complying with data retention laws).

3) Data sharing, classification, stewardship and security.

- a) The use of this technology by city staff should be compliant with the city's internal policies for data management and legal requirements. ¹

4) Access to systems and audit trails.

- a) The operating department should determine a clear protocol on who can have access to the system. Additionally, the system should institute user-based access controls and a clear audit trail of who has accessed the data.

5) Data ownership, limitations of use for the technology provider and disclosure in the case of a breach.

- a) The City should establish in its contract with the technology provider that the municipality unequivocally retains ownership over the data and that the reselling of the data to third parties or its use for improving internal tools is strictly prohibited.
- b) Additionally, the vendor should notify of any data breaches within a short time frame (preferably within 72 hours).

6) Reporting requirements.

- a) Once a year, the responsible department should issue a report to the STWG that reports on key metrics: Number of infractions detected, number of infractions issued, number of users who accessed the system, as well as other details that the department feels relevant to contextualize.



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Operational considerations

1) Clear signage

- a) Deployment of the technology must be appropriately indicated. Appropriate signage should be placed at or in the vicinity of the technology to indicate location and days/hours of use.

2) Human in the loop

- a) Consider having a person always be required to review the information obtained by the cameras before sending out a citation.

3) Operating hours

- a) The system should only collect data during school hours (including buffer time before and after school starts), since additional recording would be unnecessary to pursue the system's purpose.

4) Alternative Traffic-Calming Measures

- a) Finally, it is important that non-surveillance investments in traffic calming measures are pursued.

SUPPORTING DOCUMENTATION

Affixed hereto is the public commentary feedback sought and received by STWG, as reviewed and considered in recommending *S.T. No. 24-01* with provisions. Also affixed are SWTG's meeting slides containing relevant notes and discussion points relative to *S.T. No. 24-01*.

CONCLUSION

Based on the aforementioned considerations, SWTG RECOMMENDS *S.T. No. 24-01 "Automated Speed & Redlight Enforcement Technology"* FOR **QUALIFIED APPROVAL**.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Nicolas Diaz".

Nicolas Diaz

Chair

Surveillance Technology Working Group