

State Comptroller of Israel | Local Government Audit Report | 2024

Transparency and Privacy Protection

Operation of Surveillance Cameras by Local Authorities in Public Spaces

Operation of Surveillance Cameras by Local Authorities in Public Spaces

Background

In recent decades, the use of technological means for remote visual monitoring of public spaces, mainly through surveillance cameras, has increased in Israel and worldwide. These cameras, significantly impact public space in Israel. This impact can be positive, as they help reduce criminal behavior that harms individuals and society. However, it can also be harmful, as many of the activities captured by these digital recording devices are routine and innocuous, not the behavior society seeks to prevent. Hence, documenting these activities can infringe on the right to privacy.

Local authorities deploy surveillance cameras for various purposes, such as enhancing residents' sense of security, protecting property, detecting and preventing crimes, maintaining public order, and preventing vandalism. However, since residents in local authorities cannot avoid being photographed in public spaces, authorities must carefully balance privacy concerns with these security objectives. The audited local authorities have installed camera systems comprising numerous cameras distributed across public spaces within their jurisdictions. These systems include monitoring centers, which are used for real-time or retrospective surveillance and assistance during incidents. Funding for these systems comes from local budgets and various government programs and projects.

Key Figures

?

no public information exists on the number, types, or technological features of surveillance cameras installed by local authorities because no public entity possesses this data

111–1,354

the numbers of surveillance cameras in the audited local authorities: **Daliyat al-Karmel** (111 cameras), **Bnei Brak** (210 cameras), **Nesher** (250 cameras), **Haifa** (475 cameras), and **Rishon Lezion** (1,354 cameras) the number of audited local authorities that conducted a structured process to assess whether the conditions that originally justified the installation of surveillance cameras are still valid, as required by the Privacy Protection Authority's guidelines

0

about 40

the number of local authorities whose camera systems are constantly connected to the Israel Police, with no established conditions determining police use of the local authorities' camera control systems

25%-45%

the surveillance cameras rate (from a sample in each of the audited local authorities) capable of close-up shots of private areas, potentially infringing on residents' privacy, in violation of the Privacy Protection Law and the Privacy Protection Authority's guidelines

2-76

the number of automatic license plate recognition cameras installed without explicit legal authorization in the jurisdictions of the audited authorities is as follows: 2 in **Haifa**, 3 in **Bnei Brak**, 8 in **Daliyat al-Karmel**, 16 in **Nesher**, and 76 in **Rishon LeZion** 48%

of respondents to the resident attitude survey were unaware of the presence of surveillance cameras in public spaces the number of local authorities that held a public hearing before the installation of surveillance cameras, despite the Privacy Protection Authority's guideline

Π

| 18 |



Audit Actions

From May to September 2023, the State Comptroller's Office examined aspects regarding the operation of surveillance cameras in public spaces by local authorities, whose footage captured by these cameras was stored in databases from January 2020 until the end of June 2023. It should be noted that this report only addresses cameras installed by local authorities for security purposes, excluding those in educational institutions or used for traffic and parking enforcement. The audit was conducted in five local authorities: four municipalities (**Bnei Brak, Haifa, Nesher**, and **Rishon LeZion**) and the **Daliyat al-Karmel** local authority. Supplementary examinations were made at the Ministry of Justice (Privacy Protection Authority), the Ministry of National Security (Israel Police and National Authorities in Israel (FLAI). Among other things, the following issues were examined: the number and distribution of surveillance cameras, their installation and maintenance costs, decision-making processes regarding camera installation, transparency and privacy planning, the right to access and transfer photographed data, and assessment of the effectiveness of operating surveillance cameras.

In addition, the State Comptroller's Office used several audit tools, including a Geographic Information System (GIS) to map the distribution of surveillance cameras in the audited local authorities in 2023, a public participation survey to assess the audited authorities residents' and residents of **Be'er Sheva**, **Jerusalem**, and **Tel Aviv-Yafo** views (survey of residents' attitudes); a visit to the United Kingdom to study how local authorities operate public surveillance cameras; and a penetration test on the infrastructure and camera network of one of the local authorities in Israel.

Key Findings

Data on Surveillance Cameras in Israel – over the past two decades, local authorities' use of surveillance cameras has accelerated significantly. For example, in 2011–2024, the number of surveillance cameras in Jerusalem's public spaces increased 47-fold, from 80 cameras to 3,800; in Be'er Sheva, the number increased 271-fold, from 14 to 3,800; and in Petah Tikva – 67-fold, from 42 to 2,820. Despite this increase in the number of cameras installed by the local authorities throughout the country, no public entity in Israel holds comprehensive data on the number, types, and technological characteristics of these cameras.

| 19 |

Operation of Surveillance Cameras by Local Authorities in Public Spaces

- Use of Surveillance Cameras in Israel and Worldwide in Israel, surveillance cameras are not subject to specific statutory regulations but are instead governed by the general provisions of the Privacy Protection Law, 1981, and the guidelines of the Privacy Protection Authority. In contrast, in France, the use of surveillance cameras is regulated by dedicated primary legislation. In Israel, the law does not explicitly address the issue of installing surveillance cameras in public spaces. In contrast, in France, for example, explicit permission is required to operate cameras, along with a list of legally defined circumstances under which they can be installed.
- The State Comptroller's Office Residents Attitude Survey the survey raised the following findings: the majority of respondents (80%) believe that the local authority should install surveillance cameras in public spaces. The main reasons given were to provide security for residents (39%); to prevent crime (16%); to prevent offenses and monitor them (16%). Over 70% of respondents from Rishon LeZion, Daliyat al-Karmel, and Haifa believed that it is the local authority that operates the cameras in their town, compared to about 35% of respondents from Nesher and Bnei Brak who thought so.
- Procedures Regarding the Operation of Surveillance Cameras not in accordance with the rules of good governance, the Bnei Brak municipality has not established any procedures regarding the operation of surveillance cameras in public spaces within its jurisdiction; the Haifa municipality has not set procedures concerning the use of cameras in its surveillance cameras control center; the Nesher municipality has not created a dedicated procedure for the use of cameras in the integrated control center it manages a surveillance cameras control center operated jointly with the municipal control center; the Daliyat al-Karmel local authority has not established a procedure regarding the transfer of information to external parties. Without procedures, the public is not exposed to the guidelines that affect their rights, thus compromising their ability to make informed decisions.
- Collection of Crime Data from the Israel Police and Determining the Placement of Surveillance Cameras Based on this Data – four of the audited municipalities, Bnei Brak, Haifa, Nesher, and Rishon LeZion, failed to collect complete and detailed data from the Israel Police regarding the location of crimes within their jurisdictions over time. This data is crucial for making informed decisions about the optimal placement of surveillance cameras and prioritizing camera installation sites. The Haifa, Nesher, and Rishon LeZion municipalities have not installed surveillance cameras in neighborhoods where the crime rate was higher than the average in their other neighborhoods in 2022. Additionally, the Bnei Brak and Haifa municipalities did not place any cameras at all on streets with the highest number of crimes committed in that year, as detailed below:

| 20 |

State Comptroller of Israel | Local Government Audit Report | 2024 🛛 🌑



- Haifa municipality did not install cameras in the Kiryat Shprinzak and Neve Sha'anan neighborhoods, where the annual crime rate was about 140% of the neighborhood crime average (about 230 crimes in each neighborhood); Nor were cameras installed in the Haifa Bay industrial areas (about 600 crimes in 2022, 365% above the neighborhood crime average) and at the Krayot-Hof Shemen junction (about 325 crimes, 198% above the neighborhood crime average). Despite the high number of crimes in the Ahuza neighborhood (about 400 crimes – 243% compared to the annual neighborhood average) and Upper Hadar (about 280 crimes -170%), the municipality placed only one surveillance camera in each neighborhood. In the Kiryat Haim East neighborhood, where the crime rate was exceptionally high - about 350% compared to the annual neighborhood average in the city (577 crimes in 2022), the municipality placed around seven cameras in the northeast side of the neighborhood. However, about 71% of the crimes in the neighborhood occurred in the west and south side (about 410 crimes). The municipality did not install surveillance cameras on Histadrut Boulevard, the street with the highest number of crimes in the city, where about 570 crimes were committed in 2022.
- Nesher municipality installed cameras only in the central part of the Givat Nesher neighborhood, where 21% (161) of the city's crimes occur. Still, it did not install cameras in the north side of the neighborhood (85 crimes 53% of the neighborhood's crimes) or the south side (64 crimes about 40% of the neighborhood's crimes).
- Rishon LeZion municipality did not install cameras in the Rishonim neighborhood, where the crime rate is high – 240% compared to the average (about 480 crimes).
- Bnei Brak municipality did not install cameras on the streets of Jabotinsky (261 crimes), Rabbi Akiva (153 crimes), and Rabbi Kahanman (93 crimes), even though these are the streets with the highest number of crimes recorded in the city in 2022.

Surveillance Camera Purpose Definition – in Bnei Brak municipality, aside from a few cases raised in the steering committee, the head of the municipal camera system was the sole decision-maker regarding the placement of surveillance cameras. No other municipal officials reviewed the necessity or the objectives of these placements, contrary to the Privacy Protection Authority's guidelines, which stipulate that the purpose of a surveillance camera site must be specifically and explicitly defined before installation. The Nesher municipality only defined the purpose for installing surveillance cameras in 2023, despite having installed them since 2014. The Daliyat al-Karmel local authority established a general purpose for the cameras in 2018 and those proposed during enforcement meetings. However, contrary to the Privacy Protection Authority's guidelines, it did not explicitly define the purpose of camera placement at each site, as part of operational requirements.

| 21 |

Public Hearings – the audited local authorities – Bnei Brak, Daliyat al-Karmel, Haifa, Nesher, and Rishon Lezion – did not hold a public hearing to disclose information about the planned installation of surveillance cameras in public spaces, allowing the public to express their opinions. This is despite the Privacy Protection Authority's guidelines.

Privacy Protection – contrary to the Privacy Protection Authority's guidelines and the provisions of the Privacy Protection Law regarding the prohibition of photographing private areas, which are private domains, it was found that in all the audited local authorities, the surveillance cameras sampled could perform close-up shots of private areas, which could significantly compromise residents' privacy. The rate of such cameras ranged from 25% (11 cameras) in **Bnei Brak** to 45% (16 cameras) in **Rishon Lezion**; in **Haifa** 33% (15 cameras); in **Nesher** 43% (17 cameras); and in **Daliyat al-Karmel** 30% (6 cameras). Additionally, contrary to Privacy Protection Authority guidelines on privacy planning, the audited authorities did not assess the potential impact on privacy and ways to minimize it each time they planned to install cameras.

Masking Private Areas – contrary to the Privacy Protection Authority's guidelines, the local authorities of Bnei Brak, Daliyat al-Karmel, Haifa, and Nesher did not assess the necessity of concealing or blurring private areas that could be captured by surveillance cameras, such as residential buildings, private gardens, and balconies, before installing the cameras. The Rishon LeZion municipality partially examined the matter without conducting a formal process. 16 out of 27 cameras inspected at the municipality surveillance camera center, recorded private areas without concealing them. Thus, in the control centers of all the audited local authorities – Bnei Brak, Daliyat al-Karmel, Haifa, Nesher, and Rishon LeZion – there is the ability to focus on private areas using PTZ¹ and regular cameras², capturing them up close, sometimes allowing for the identification of people, objects, and events occurring within private property.

Monitoring and Control of Access-Authorized Users in the Camera System – none of the audited local authorities – Bnei Brak, Daliyat al-Karmel, Haifa, Nesher, and Rishon LeZion – used technological tools, such as dedicated computerized systems, to monitor and control the actions of users authorized to access the camera system. Supervising actions within local authorities' surveillance camera networks could help reduce the risk of authorized operators infringing on residents' constitutional rights to privacy.

Appointment of a Privacy Protection Officer – none of the audited local authorities – Bnei Brak, Daliyat al-Karmel, Haifa, Nesher, and Rishon LeZion – appointed

| 22 |

¹ A PTZ (Pan, Zoom, Tilt) camera is a motorized camera that can be remotely controlled and is capable of performing three actions: moving right and left (Pan), moving up and down (Tilt), and zooming in to enlarge the image (Zoom).

² Cameras that monitor a predefined area and cannot be operated remotely.



an official in charge of privacy protection. This is despite the Privacy Protection Authority recommendation published in 2022, similar to the requirement in the European Union.

- Use of License Plate Recognition (LPR) Camera although the use of LPR technology in public spaces requires explicit legal authorization due to the significant privacy impact on citizens, all the audited local authorities - Bnei Brak, Daliyat al-Karmel, Haifa, Nesher, and Rishon LeZion – installed LPR cameras in their public spaces without explicit legal authorization: **Bnei Brak** installed three cameras, **Haifa** – two cameras, **Nesher** – 16 cameras, **Rishon** LeZion – 76 cameras, and Daliyat al-Karmel – eight cameras.
- Use of Special Functions Bnei Brak and Nesher municipalities utilized special functions, specifically analytics software, which may disproportionately infringe on privacy. This software was employed to analyze real-time footage from surveillance cameras and receive alerts about unusual events in the monitored areas without evaluating the benefits of installing these cameras.
- Notifying the Public Regarding Camera Locations contrary to the Privacy Protection Authority's quidelines, the municipalities of Bnei Brak, Nesher, and the Daliyat al-Karmel's local authority did not specify the cameras' locations or the area they covered on their websites. The **Rishon Lezion** municipality did not publish the coverage area of each camera, and the Haifa municipality published a map showing the cameras' distribution in the city without providing any further details, such as their coverage area and the duration for which recordings are stored. The State Comptroller's Office survey found that most respondents in the audited authorities believed that more information is needed regarding installing surveillance cameras, their locations, and accompanying signage. Except for in Daliyat al-Karmel, where over half of the respondents felt that information about camera locations in their local authority was neither accessible nor available (ranging from 79% of respondents in **Bnei Brak** to 54% in **Nesher**).



Bournemouth, Christchurch and Poole Council (BCP Council), **United Kingdom**

Transparency and Informing the Public

To ensure public awareness, the BCP Council has published comprehensive information on its website regarding the surveillance cameras within its jurisdiction. This includes the council's procedures for cameras usage, the protection of photographic data, and how to request access to it. Additionally, the website provides list of all cameras installed in public spaces, detailing the type of camera and the streets or sites it monitors. The website also features resident satisfaction surveys and opinions results, and annual reports assessing the cameras' effectiveness.

| 23 |

Retention and Deletion of Photographic Data – contrary to the Privacy Protection Authority's guidelines, the municipalities of Bnei Brak, Haifa, and the Daliyat al-Karmel local authority did not establish a written internal procedure specifying the retention period for photographic data in their databases, nor did they consider the appropriate retention period to minimize potential infringements on residents' privacy. In Bnei Brak, photographic data were kept for about three and a half months, while in Daliyat al-Karmel, photographic data were kept for about two and a half months. In the Nesher municipality, photographic data were found to be stored for about nine weeks – exceeding the retention period defined in the municipality's procedure by about five weeks.

Transfer of Photographic Data to Private Entities – inconsistency was found among the audited authorities regarding their policies and practices for granting access and transferring surveillance camera footage to private entities. The **Bnei Brak** municipality lacks a written policy on transferring photographic data and, contrary to Privacy Protection Authority's guidelines, has transferred event footage to information requesters without blurring additional individuals captured in the recordings. The **Haifa** municipality and **Daliyat al-Karmel** local authority do not provide photographic data to residents. The **Nesher** municipality has not implemented the established procedure, and requests from residents for information from the photographic data are consistently denied. This inconsistency and the multiple approaches raise concerns that the procedures are unclear to the authorities.



Bournemouth, Christchurch and Poole Council (BCP Council), United Kingdom

Transfer of the Photographed Information to Private Entities

The council allows any resident to submit a written request, using a dedicated form on the council's website, to receive a copy of the photographic data in which they appear. Each request is thoroughly considered – the applicant's identity, the reason for the request, and the potential impact on the privacy of third parties appearing in the photographic data. Only if there is no concern for privacy infringement will the photographic data be securely provided to the applicant. If the photographic data contains images of individuals other than the requester, the latter is invited to the viewing center to watch the footage.

Transfer of Photographic Data to the Israel Police – as of June 2023, about 40 local authorities have established a direct connection between the Israel Police and their surveillance camera systems, through which the police can view footage in real-time. However, the Ministry of Interior, the Ministry of National Security, the Israel Police, and

| 24 |



the FLAI have not yet regulated the conditions for police use of the local authorities' camera control systems and their database, nor have they finalized and agreed upon a Convention defining these conditions.

Evaluating the Effectiveness of Camera Use – the audited local authorities – **Bnei** Brak, Daliyat al-Karmel, Nesher, Haifa, and Rishon LeZion - did not systematically and periodically assess whether the circumstances that initially justified the installation of surveillance cameras remain relevant and whether continued operation is necessary to achieve their purpose, as required by Privacy Protection Authority's guidelines and as is standard practice in the BCP Council in the UK. Bnei Brak municipality did not record incidents identified at the municipal control center that did not require intervention by the municipal operations center. Moreover, it did not analyze the photographic data in the municipal operations center's computerized system to conclude the benefits derived from the municipality's cameras. Nesher, Haifa, and Rishon LeZion municipalities maintained an event log but did not analyze the data to assess the benefits derived from the cameras. Although all the audited authorities had detailed information on the photographic data transferred to the Israel Police, they did not analyze the characteristics of the incidents in the photographic data provided. The absence of these actions prevented the audited authorities from assessing whether the circumstances that initially justified the installation of the cameras remain relevant and whether the cameras' effectiveness outweighs the infringement on residents' privacy rights.



Bournemouth, Christchurch and Poole Council (BCP Council), United Kingdom

Evaluating the Benefit of Surveillance Cameras

To assess the benefit derived from the cameras, the control center team is required to document every incident detected in the photographic data in the event log, whether identified by the operators in real-time or retrospectively, in response to requests for information. The council makes it a point to publish monthly reports for the public on the cameras' performance to increase residents' trust in the council and to justify the necessity of surveillance cameras in public spaces.

Penetration Test in One Local Authority – the penetration test identified 11 findings at varying risk levels: two at a critical risk level, four at a high-risk level, and five at a medium-risk level.

| 25 |

Multi-Year Plan for Camera Installation – the State Comptroller's Office commends the **Haifa** municipality for preparing a multi-year plan to install surveillance cameras in public spaces.

Event Log Management and Data Analysis – the State Comptroller's Office commends the **Daliyat al-Karmel** local authority for maintaining a detailed event log that records unusual events detected by the council's surveillance cameras.

Key Recommendations

- It is recommended that the National Authority for Community Safety, in collaboration with relevant bodies within the Ministry of Justice, including the Privacy Protection Authority, assess the necessity of collecting data on surveillance cameras within local authorities. This includes details on the number of cameras, their types, and their technological capabilities. Such data would enable the formation of a comprehensive overview, and determine supervision policy on the use of surveillance. Additionally, once the need for data collection is established, it is recommended that the National Authority for Community Safety, the Ministry of Justice, and the Privacy Protection Authority regulate the process for gathering this information from local authorities.
- Given the significant increase in the use of surveillance cameras, alongside rapid technological advancements in recent years and the potential privacy concerns it is recommended that the Ministry of Interior, in collaboration with the Ministry of Justice, the Ministry of National Security, and the police, issue a Director General's circular. This circular should consolidate all guidelines for local authorities regarding installing surveillance cameras in public spaces within their jurisdictions and provide practical guidance based on international experience. The topics to be covered should include transparency and public notification, internal audits, retention of photographic data, transfer of photographic data to private entities, evaluation of cameras' effectiveness, and supervision of cameras' use. It is also recommended that the Ministry of Justice consider enacting legislation for surveillance camera use in public spaces.
- It is recommended that the municipalities of Bnei Brak, Haifa, Nesher, and Rishon LeZion regularly collect and analyze annual crime data from the Israel Police before determining locations for installing surveillance cameras. They should consider this data when setting priorities for selecting camera installation sites within their jurisdictions, as stipulated in the Ministry of National Security guidelines for cameras installed in the ministry's programs. This ensures residents' safety and aligns with the objectives set by the municipalities for the installation of surveillance cameras. Additionally, it is recommended that the municipalities of Bnei Brak, Haifa, Nesher, and Rishon

26



LeZion assess the necessity of installing cameras in neighborhoods or streets with relatively high crime rates, in line with the priorities set by the municipalities and in consultation with the Israel Police.

It is recommended that the audited local authorities – Bnei Brak, Daliyat al-Karmel, Haifa, Nesher, and Rishon LeZion – conduct a public hearing, whenever possible, before installing surveillance cameras. In this hearing, they should publicize the relevant details regarding the planned placement of cameras in public spaces.

The local audited authorities – Bnei Brak, Daliyat al-Karmel, Haifa, Nesher, and Rishon LeZion – should examine the presence of private spaces within the cameras' coverage area. In cases where surveillance cameras are directed towards private areas, such as residential buildings, private gardens, and balconies, and where it is impossible to avoid capturing these spaces, they should use masking techniques or alternately limit the camera's ability to focus on those areas.

It is recommended that the Ministry of Interior and the Ministry of Justice consider regulating the obligation to appoint a Privacy Protection Officer, similar to the requirement in the European Union. Appointing a Privacy Protection Officer would enable local authorities to operate according to the "privacy by design" principle, including minimizing the privacy impact of the surveillance cameras installed in public spaces. Given the substantial personal information collected through the surveillance cameras installed by the **Haifa** and **Rishon Lezion** municipalities in their public spaces, it is recommended that these local authorities consider voluntarily appointing a Privacy Protection Officer until the requirement is formally regulated. This would help mitigate the risk of privacy breaches associated with the recorded data they collect.

In the absence of explicit authorization by legislation, the local authorities of **Bnei Brak**, **Daliyat al-Karmel**, **Haifa**, **Nesher**, and **Rishon LeZion** should refrain from using license plate recognition cameras in their jurisdictions and from installing additional surveillance cameras designed to identify license plates as well. The municipalities of **Bnei Brak** and **Nesher** should ensure, as a condition for using analytics software (a particular function of surveillance cameras), that their use is proportionate and that the benefits gained outweigh the privacy infringement they may cause. The Ministry of Interior, in coordination with the Ministry of Justice and the Privacy Protection Authority, should clarify to all local authorities their lack of authority, under the current legal framework, to install and use license plate recognition cameras.

The **Bnei Brak** municipality should establish a written policy for the transfer of photographic data to private entities, in line with the Freedom of Information Law provisions and the Regulations on Information Review, considering the unique characteristics of reviewing footage from surveillance cameras, as outlined in the Privacy Protection Authority's guidelines. Additionally, the municipality should refrain from providing footage in which individuals other than the requester appear and can be identified (unless they have blurred them before delivering the footage), to prevent a

| 27 |

Operation of Surveillance Cameras by Local Authorities in Public Spaces

violation of their privacy. The municipalities of **Haifa** and **Nesher**, as well as the **Daliyat al-Karmel** local authority, should enable residents to exercise their right to access photographic data about themselves in compliance with legal provisions. According to the law, they should evaluate each access request on its merits. If denying the request, they should justify their refusal and base it on well-founded reasons.

It is recommended that the municipalities of **Bnei Brak**, **Nesher**, and the **Daliyat al-Karmel** local authority publishes on their websites the list of cameras deployed throughout the city, their locations, the areas they cover, whether the footage is recorded, and for how long the photographic data are retained. It is recommended that **Haifa** municipality publish on its website the purpose of installing the surveillance cameras deployed throughout the city, the areas they cover, and the hours during which the cameras are operational, indicate whether the footage is recorded, how long the photographic data are retained that cameras, and contact details for that person. It is recommended that **Rishon LeZion** municipality update its website to include the areas covered by each camera and publish the identity of the person in charge of monitoring and maintaining the data.

It is recommended that the Ministry of Interior, the Ministry of National Security, the Israel Police, and the FLAI – involved in drafting the Convention that regulates the conditions for the connection, integration, operation, and use by the police of control systems for local authorities' cameras installed in public spaces and the databases of these systems – cooperate to finalize and agree upon the Convention as soon as possible. It is recommended that once it is approved, the Ministry of Interior and the FLAI publish the Convention to all local authorities. Until a final and agreed-upon version of the Convention is formulated and published, it is recommended that the **Rishon LeZion** municipality incorporate into a contract the terms for the connection, operation, and use of the municipality's camera system by the Israel Police, as was done by the BCP Council in the UK.

It is recommended that the audited local authorities – Bnei Brak, Daliyat al-Karmel, Haifa, Nesher, and Rishon LeZion – evaluate the cameras' effectiveness by analyzing all the data in their possession. Additionally, it is recommended that they periodically assess whether the continued use of the cameras they operate in public spaces is proportional. In case the circumstances that initially justified the installation of the cameras are no longer valid, they should consider removing or relocating the cameras according to the authority's needs. Regularly assessing the benefits of the ongoing use of surveillance cameras in public spaces and sharing this information with residents could increase public trust in the local authorities operating the cameras and reduce concerns about privacy violations due to their use.

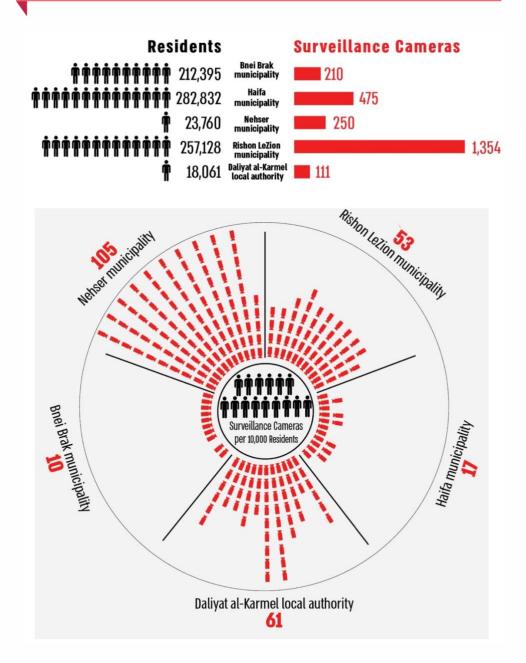
| 28 |

State Comptroller of Israel | Local Government Audit Report | 2024



Abstract | Operation of Surveillance Cameras by Local Authorities in Public Spaces

Number of Surveillance Cameras, of Residents, and of Surveillance Cameras per 10,000 Residents in the Audited Local Authorities in 2023



According to data of the audited local authorities and the Central Bureau of Statistics, processed by the State Comptroller's Office.

| 29 |

Operation of Surveillance Cameras by Local Authorities in Public Spaces

Summary

Surveillance cameras have a significant impact on the public sphere in Israel. Their influence can be positive when they help reduce criminal activity or wasteful behaviors that harm society; however, it can also be harmful when residents' privacy is compromised. The use of surveillance cameras by local authorities has accelerated over the last two decades, driven by government initiatives alongside those of the authorities themselves. The audit findings raised that the audited local authorities – **Bnei Brak**, **Daliyat al-Karmel**, **Nesher**, **Haifa**, and **Rishon LeZion** – did not fully utilize all their tools to protect residents' privacy and comply with the Privacy Protection Authority's guidelines regarding surveillance cameras. All the audited authorities installed surveillance cameras for automatic license plate recognition without explicit authorization beyond their general powers under the Municipalities Ordinance. None of them held a public hearing before installing the surveillance cameras to gather opinions from the relevant public on the matter.

The municipalities of **Bnei Brak**, **Haifa**, **Nesher**, and the **Daliyat al-Karmel** local authority did not assess the need to obscure private areas within the cameras' range before installing the cameras. The audited local authorities should rectify the deficiencies, consider the recommendations outlined in this report, and simultaneously uphold the fundamental right of residents to privacy and the principle of transparency. It is recommended that the audited authorities consider using technological tools that would enable them to monitor the operations of their camera systems and reduce the risk of misuse. Given the significant increase in the use of surveillance cameras, alongside the rapid technological advancements in recent years, and the potential harm to privacy, it is recommended that the Ministry of Justice consider regulating the use of surveillance cameras in the public sphere by local authorities through legislation.