



Surveillance Technology in Public Housing Over-surveils but Under-protects

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Camera surveillance systems in affordable housing primarily refer to security cameras that may include facial recognition technology (FRT), artificial intelligence (AI), and occasionally other technologies that collect biometric data (e.g., fingerprints, faces, eye scans, and voice).¹ Public Housing Agencies (PHAs), the governmental entities that develop or operate public housing, increasingly use these systems to monitor activities around their complexes and also to grant access to units, citing community safety and crime deterrence as their rationale.² The Urban Institute finds that surveillance cameras have made no statistical difference in deterring crime, but they are playing a larger role in evictions and increasing tenants' interactions with the criminal legal system.³ The ever-present nature of camera surveillance systems has created a shared sentiment among residents that this technology over-surveils but under-protects.⁴

Surveillance used *against* residents

Camera surveillance in public housing exposes tenants to a plethora of risks and is being turned against tenants to evict them, often over minor lease violations (e.g., smoking in the wrong place, removing a laundry basket from a communal room, etc.) that are not crimes.⁵ One public housing development installed 107 surveillance cameras to watch 100 residents; this number of cameras (1.1 cameras per resident) is strikingly similar to that of the Rikers Island Jail Complex in New York (2 cameras per inmate).⁶

Inaccuracy and racial and gender bias

Facial recognition tools are less accurate for everyone who is not an adult, white, non-disabled gender conforming man. Using FR in public housing puts residents, especially women and people of color, at risk of misidentification, eviction, wrongful arrest, and the inability to secure housing.⁷ A National Institute of Standards and Technology study on the accuracy of facial recognition in identifying individuals found that Asian and African American people were 100 times more likely than white men to experience misidentification.⁸

Lack of transparency and control

Residents are typically unaware of how PHAs use surveillance cameras and usually do not consent to these systems collecting, using, and storing their biometric information.⁹ Camera surveillance systems in public housing are entirely in the control of governmental authorities (e.g., PHAs) who have nearly unregulated discretion in operating the technology.¹⁰

Invasion of Privacy

Camera surveillance of public housing residents can be an invasion of their privacy and increases the risk of privacy violations by third parties. Data breaches involving biometric data are

especially dangerous since biometric data (e.g., fingerprints, faces, eye scans, and voice) is irreplaceable; biometric data is also permanent and cannot be changed, unlike social security numbers or driver’s licenses.¹¹ Collecting biometric data is incredibly intrusive, and if breached, can reveal personal information with dangerous ramifications for a person’s safety and security.

Policy Recommendations

Ultimately, a combination of federal legislation and agency guidance is needed to effectively target and minimize the adverse impacts camera surveillance has on public housing residents. Although regulatory policies have stalled in Congress, federal legislation is needed to create a national standard, rather than a patchwork of regulation resulting from state or local legislation that covers some, but not all, residents negatively impacted by PHAs’ over-surveillance. In the meantime, HUD can issue agency guidance limiting the use of camera surveillance technology in public housing—these are guidelines all PHAs, regardless of what state they are in, must follow.

This memo is based on the research in [Surveillance Technology in Public Housing: Proliferation, Consequences, and Recommendations](https://stpp.fordschool.umich.edu/research/white-paper/surveillance-technology-public-housing-proliferation-consequences-and-recommendations) also by Gretchen Carr, <https://stpp.fordschool.umich.edu/research/white-paper/surveillance-technology-public-housing-proliferation-consequences-and-recommendations>.

¹ “Definition: Public Housing Agency from 42 USC § 1437a(b)(6),” *Cornell Law: Legal Information Institute*, accessed May 9, 2024, https://www.law.cornell.edu/definitions/uscode.php?width=840&height=800&iframe=true&def_id=42-USC-608738367-1141073628&term_occur=999&term_src=.

² “How Public Housing Residents Are Being Surveilled, Punished,” *PBS NewsHour*, filmed June 4, 2023, video, 6:57, <https://www.pbs.org/video/surveillance-state-1685908776/>.

³ Lisa Owens, “Notes on the Use of Surveillance in Public Housing,” last modified 2020, <https://doi.org/10.7916/D8-BEPS-HV90>.

⁴ Gillet Gardner Rosenblith, “Using Surveillance to Punish and Evict Public Housing Tenants Is Not New,” *Washington Post*, May 23, 2023, <https://www.washingtonpost.com/made-by-history/2023/05/24/public-housing-surveillance/>.

⁵ PBS NewsHour, “How Public Housing Residents Are Being Surveilled.”

⁶ Douglas MacMillan, “Eyes on the Poor: Cameras, Facial Recognition Watch over Public Housing,” *Washington Post*, May 16, 2023, <https://www.washingtonpost.com/business/2023/05/16/surveillance-cameras-public-housing/>.

⁷ Drew Harwell, “Facial-Recognition Systems Misidentified People of Color More Often than White People, According to a Federal Study,” *Washington Post*, December 19, 2019, <https://www.washingtonpost.com/technology/2019/12/19/federal-study-confirms-racial-bias-many-facial-recognition-systems-casts-doubt-their-expanding-use/>; MacMillan, “Eyes on the Poor.”

⁸ Patrick Grother, Mei Ngan, and Kayee Hanaoka, “Face Recognition Vendor Test Part 3: Demographic Effects,” *National Institute of Standards and Technology* (2019) <https://doi.org/10.6028/NIST.IR.8280>.

⁹ Michelle Y. Ewert, “The Dangers of Facial Recognition Technology in Subsidized Housing,” *Journal of Legislation and Public Policy* 25, (2023): 665–704, <https://nyujlpp.org/wp-content/uploads/2023/10/JLPP-25.3-Ewert.pdf>.

¹⁰ Owens, “Concentrated Surveillance.”; MacMillan, “Eyes on the Poor.”

¹¹ Ewert, “The Dangers of Facial Recognition Technology in Subsidized Housing.”