

SURVEILLANCE TECHNOLOGY IMPACT REPORT

Department or Division:	Infrastructure and Asset Management
Compliance Officer (name and position):	Richard Raiche, Director IAM
Submitted by:	Richard Raiche
Date:	October 6, 2025
Surveillance Technology:	UAS/Drone with still image capturing technology

X	Please identify the purpose(s) of the proposed surveillance technology. Select ALL that apply by entering "X" in the left column.
X	Identifying and preventing threats to persons and property and preventing injury to persons or significant damage to property
	Identifying, apprehending, and prosecuting criminal offenders
	Gathering evidence of violations of any law in criminal, civil, and administrative proceedings
X	Providing information to emergency personnel
	Documenting and improving performance of City employees
	Executing financial transactions between the City and any individual engaged in a financial transaction with the City
	Preventing waste, fraud, and abuse of City resources
X	Maintaining the safety and security of City employees, students, customers, and City-owned or controlled buildings and property
	Enforcing obligations to the City
	Operating vehicles for City business
	Analyzing and managing service delivery
	Communicating among City employees, with citizens, or with third parties
	Surveying and gathering feedback from constituents
	Other (Describe): If the surveillance technology is used for a purpose not listed above, does the purpose comply with the surveillance use policy? ____ Yes ____ No

Complete ALL of the following items related to the proposed surveillance technology. Be as specific as possible. If an item is not applicable, enter "N/A." Do NOT leave fields blank.
1. Information describing the surveillance technology and how it works:
Unmanned Aircraft System (UAS) technology, also called a drone, is a manually operated, unmanned aircraft. A camera is equipped to capture still imagery.
a. Authorized use – the uses that are authorized, the rules and processes required before that use, and the uses that are prohibited (10.64.b.2):
The UAS/Drone is being used under the exigent circumstances provision of Code of Ordinances §10-63(c)(1). Exigent circumstances exist where in this instance, it is the Fire Chief's good faith and reasonable belief that an emergency involving danger of death, physical injury, or significant property damage or loss requires the use of the surveillance technology or surveillance data it provides.
b. Training – the training, if any, required for any individual authorized to use the surveillance technology or to access information collected by the surveillance technology, including whether there are training materials (10.64.b.9):
N/A
2. Information on the proposed purpose(s) for the surveillance technology (10.64.b.1):
The surveillance technology was utilized by City contractor, Building Enclosure Associates, to evaluate and promptly address potential falling wall tiles.
3. Information describing the kind of surveillance the surveillance technology is going to conduct and what surveillance data is going to be gathered (10.64.b.3):
The surveillance technology will be used to capture still images regarding the integrity of the wall tiles. Images captured focused exclusively on the wall tiles, avoiding the surrounding areas and activities.
a. Data access – the individuals who can access or use the collected surveillance data, and the rules and processes required before access or use of the information (10.64.b.4):
Chief of Fire, Infrastructure and Asset Management (IAM), and the Somerville High School construction team contracted to IAM.
b. Data protection – the safeguards that protect information from unauthorized access, including, but not limited to, encryption, access-control, and access-oversight mechanisms; (10.64.b.5)
The IAM network drive is limited to department staff and requires staff to be logged into the city's network environment with a username and password. The City's IT department manages the access control and security of the network drive.

c. Data retention – the time period, if any, for which information collected by the surveillance technology will be routinely retained, the reason that retention period is appropriate to further the purpose(s), the process by which the information is regularly deleted after that period has elapsed, and the conditions that must be met to retain information beyond that period (10.64.b.6):
Any surveillance data will be retained in a manner consistent with the Municipal Records Retention Schedule as maintained by the Massachusetts Supervisor of Public Records
d. Public access – if and how collected surveillance data can be accessed by members of the public, including criminal defendants (10.64.b.7):
Members of the public may request copies of surveillance data under the Public Records Law.
e. Third-party data-sharing – if and how other city or non-city entities can access or use the surveillance data, including any required justification and legal standard necessary to do so, and any obligation(s) imposed on the recipient of the surveillance data (10.64.b.8):
Contractors and consultants under the direction of IAM have access to the photos of the wall tiles for the purposes of diagnosing issues with the building’s exterior. No one has access to any images of surrounding areas or persons.
4. The location(s) it may be deployed and when:
The UAS/Drone was flown at Somerville High School on Monday, October 6, 2025 from 2:00PM to approximately 6:00PM in accordance with Federal Aviation Administration (FAA) clearance.
5. A description of the privacy and anonymity rights affected and a mitigation plan describing how the department’s use of the equipment will be regulated to protect privacy, anonymity, and limit the risk of potential abuse:
Images captured focused exclusively on the wall tiles, avoiding the surrounding areas and activities. Care was taken to only capture images of the building façade. No images of the surrounding area or persons were captured. The UAS/Drone was flown no higher than 10 feet above the roof, in part to avoid inadvertent capture of individuals in the vicinity.
6. The potential impact(s) on privacy in the city; the potential impact on the civil rights and liberties of any individuals, communities or groups, including, but not limited to, communities of color or other marginalized communities in the city, and a description of whether there is a plan to address the impact(s):
None.
7. An estimate of the fiscal costs for the surveillance technology, including initial purchase, personnel and other ongoing costs, and any current or potential sources of funding:
None. The technology is owned and operated by a subcontractor employed by Suffolk Construction (Construction Manager for the SHS project) at no cost to the City.

8. An explanation of how the surveillance use policy will apply to this surveillance technology and, if it is not applicable, a technology-specific surveillance use policy:
This technology will be operated, and data collected and accessed, in compliance with the Surveillance Technology Use Policy.
a. Oversight – the mechanisms to ensure that the surveillance use policy is followed, including, but not limited to, identifying personnel assigned to ensure compliance with the policy, internal record keeping of the use of the technology or access to information collected by the surveillance technology, technical measures to monitor for misuse, any independent person or entity with oversight authority, and the sanctions for violations of the policy (10.64.b.10):
The department will designate a Compliance Officer who will be responsible for ensuring this technology is used in compliance with the Surveillance Technology Use Policy, and that department staff receive the training required by the Policy.