



Comhairle Cathrach & Contae Phort Láirge Waterford City & County Council

Policy regarding use of Drones by Water Services Department

1. Scope

- 1.1 This policy addresses the use of small unmanned aircraft (“Drones”) by Waterford City & County Council (“Council”) staff for water services investigation, survey and enforcement purposes. It should be read in conjunction with the Council’s CCTV Policy and the [Data Commissioner Guidance on the use of Drones](#) .
- 1.2 The use of Drones present the potential for property damage, personal injury, invasion of privacy and other violations of law, in addition to general safety concerns. Any Council employee using a Drone must take every precaution to avoid negative impacts and ensure compliance with legislative requirements.
- 1.3 The policy applies to a small number of named employees in the Water Services section who are authorised to use the Drone or view images/footage taken from the Drone for water services enforcement or management purposes.

2. Purchase of Drones

- 2.1 Under GDPR the Council must maintain a central register of all data processing activities; as Drones have the potential to record and capture personal data (eg. images of people /car registration numbers) they must be included on this register.
- 2.2 Any Drone purchased prior to the date of this policy must be notified to the Data Protection Officer immediately (if not already done).
- 2.3 Any future proposals regarding purchase of additional Drones must be notified in advance to the Data Protection Officer to facilitate completion of a Data Privacy Impact Assessment.

3. Data Privacy Impact Assessment (DPIA)

- 3.1 Under the GDPR, a DPIA is mandatory where data processing **“is likely to result in a high risk to the rights and freedoms of natural persons.”** This mandatory requirement covers CCTV and associated surveillance technology including Drones. Further information regarding DPIA can be obtained [here](#)

4. Registration of Drones

- 4.1 Drone use is regulated by the Irish Aviation Authority (IAA); details on registration requirements can be obtained [here](#) . Drones purchased for use for Council work related purposes must be registered in the name of the Council and should only

purchased following formal approval process within the section and engagement with the IS Dept who will maintain a central register of all Drones in use.

5. Storage and Maintenance

- 5.1 The physical storage, maintenance, and flight-readiness preparation of Drones purchased by the Water Services section will be the responsibility of that department.
- 5.2 The Drone shall be stored securely when not in use and not available for unauthorised use.

6. Records of use & Notification to public

- 6.1 The Water Services section shall ensure that a log of use is maintained indicating date of use, name of user, purpose, location etc. Ideally a sign in /sign out facility to use the drone should be in place.
- 6.2 Drones are typically flown over rural areas for water services enforcement purposes, investigation of pollution incidents, site surveys or water services infrastructure inspections . Where feasible, verbal notification should be given to adjacent landowners when a Drone is going to be used.

7. Insurance.

- 7.1 Use of the Drone is covered under the Council's insurance (Remotely Piloted Aircraft Extension under the Public Liability Policy)
- 7.2 Any incident resulting in damage/injury caused by use of a Drone by a Council employee should be notified immediately to relevant supervisor, the Council's Health & Safety Officer and Council's insurance section.

8. Download of Drone footage

- 8.1 Footage downloaded from the Drone shall be securely stored with restricted viewing access.
- 8.2 Any personal data inadvertently captured and not required for prosecution purposes should be deleted immediately.
- 8.3 Any personal data required for prosecution purposes should be retained only for as long as necessary and deleted when no longer required.
- 8.4 All other photographic or video data should be retained only as long as it is required for comparison /monitoring/legal purposes.

9. Use of Drone for Water Services purposes

- 9.1 Only nominated staff within the water Services section are authorised to use the Drone.

- 9.2 Every care should be taken by the nominated staff to operate the Drone in a safe and careful manner to ensure no danger to life or property of others.
- 9.3 All users should be familiar with the Irish Aviation Authority guidance outlined in [Drones Q&A](#)

10. Responsibilities

- 10.1 The Senior Engineer in the Water Services section is responsible for ensuring compliance with this policy
- 10.2 It is a matter for the Senior Engineer in Water Services to establish if the Drone is to be used outside the limits prescribed in the regulations; if so, application must be made for a Specific Operating Permission (SOP) from the IAA following training with one of the IAA Registered Training Facilities (RTF).

See [AERONAUTICAL NOTICE U.02](#) for further guidance.

11. Data Protection, Access Requests and Complaints

- 11.1 All staff using Drones will receive general data protection awareness training
- 11.2 At all times, employees using drones in the course of their work will take every precaution to ensure personal data of individuals is not captured.
- 11.3 Any queries/complaints in relation to personal data captured by the Drone should be referred to the Council's Data Protection Officer.

Contact details:

Data Protection Officer, Waterford City & County Council, City Hall, The Mall, Waterford. X91 PK15.

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