



2024 Privacy Impact Assessment

Remotely Piloted Aircraft Systems (RPAS) Operations Program

Seattle Channel



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Privacy Impact Assessment overview

What is a Privacy Impact Assessment?

A Privacy Impact Assessment (“PIA”) is a method for collecting and documenting detailed information collected in order to conduct an in-depth privacy review of a program or project. It asks questions about the collection, use, sharing, security and access controls for data that is gathered using a technology or program. It also requests information about policies, training and documentation that govern use of the technology. The PIA responses are used to determine privacy risks associated with a project and mitigations that may reduce some or all of those risks. In the interests of transparency about data collection and management, the City of Seattle has committed to publishing all PIAs on an outward facing website for public access.

When is a PIA required?

A PIA may be required in two circumstances.

- When a project, technology, or other review has been flagged as having a high privacy risk.
- When a technology is required to complete the Surveillance Impact Report process. This is one deliverable that comprises the report.

How to complete this document?

As department staff complete the document, they should keep the following in mind.

- Responses to questions should be in the text or check boxes only, all other information (questions, descriptions, etc.) should **NOT** be edited by the department staff completing this document.
- All content in this report will be available externally to the public. With this in mind, avoid using acronyms, slang, or other terms which may not be well-known to external audiences. Additionally, responses should be written using principally non-technical language to ensure they are accessible to audiences unfamiliar with the topic.

1.0 Abstract

1.1 Please provide a brief description (one paragraph) of the purpose and proposed use of the project/technology.

Remotely Piloted Aircraft Systems (RPAS) will be used for photography program development at the Seattle Channel, to include aerial video and still image capture for use in Seattle Channel programming and digital platforms. RPAS photography and videography will enable the Seattle Channel to capture aerial footage that was not previously possible and can enhance visual storytelling for public engagement and further inform the public on departmental policy plans and transparency.

1.2 Explain the reason the project/technology is being created or updated and why the PIA is required.

UAS Unmanned aircraft systems (UAS) program development, acquisition and operation of UAS for aerial photography and videography is new to the Seattle Channel and would enhance our storytelling ability for public engagement and understanding. RPAS will allow the Seattle Channel to capture aerial footage of the City of Seattle. For example, the city skyline, waterways, neighborhoods, city properties and facilities.

Seattle Channel use of UAS may raise concerns from members of the public, without awareness and transparency around the department's use of the technology, data management practices, and governing policies. This PIA aims to preemptively address those concerns and provide transparency to the constituents we serve.

2.0 Project / Technology Overview

Provide an overview of the project or technology. The overview gives the context and background necessary to understand the purpose, mission and justification for the project / technology proposed

2.1 Describe the benefits of the project/technology.

UAS photography and videography can provide unique perspectives of the city of Seattle and enhance visual storytelling for public engagement in a way that is not currently possible. Use of RPAS will allow the Seattle Channel to capture angles of the city of Seattle and other site-specific story locations not possible with ground level cameras saving the Seattle Channel time and money.

2.2 Provide any data or research demonstrating anticipated benefits.

"Unmanned Aircraft Systems (UAS) technology continues to improve rapidly, and increasingly UAS are able to perform a variety of missions with greater operational flexibility and at a lower cost than comparable manned aircraft. ..." –President Barack Obama

Voluntary Best Practices for UAS Privacy, Transparency, and Accountability
[uas_privacy_best_practices_6-21-16.pdf \(doc.gov\)](#)

Pierce County has a successful county wide drone operations program for departments such as public works, fire, law enforcement, Pierce County Television and others. They had over 700 flights in 2021.

[Pierce County Drone Program | Pierce County, WA - Official Website \(piercecountywawa.gov\)](#)
[Drones | Pierce County, WA - Official Website \(piercecountywawa.gov\)](#)

Example of RPAS footage used in a Pierce County TV Promo
[PCTV HD Promo \(30-sec\) \(youtube.com\)](#)

2.3 Describe the technology involved.

RPAS technology is an unmanned aircraft system. RPAS are also known as unmanned aerial vehicles (UAVs) or unmanned aircraft systems. Basically, a UAV is a flying robot that can be remotely controlled or fly autonomously using software-controlled flight plans that work with onboard sensors and a global positioning system (GPS). The Seattle Channel will use small quadcopter type UAVS weighing around 2lbs or less (FAA Part 107 rules allow for UAVs up to less than 55 lbs.) and will be limited to video and still image capture. All data will be stored on the UAV until transferred to secure Seattle Channel servers for post-production editing.

2.4 Describe how the project or use of technology relates to the department's mission.

The use of UAS will further enhance with aerial photography and videography the Seattle Channel mission to inform and engage citizens in the governmental, civic and cultural affairs of Seattle through compelling use of television, Internet and other media. Having the ability to capture aerial images of the city and surrounding areas will provide a new unique perspective.

2.5 Who will be involved with the deployment and use of the project / technology?

Only FAA Part 107 licensed Seattle Channel staff members will operate UAS. Trained visual observers will be partnered with pilots if needed. Seattle Channel Management will oversee operations and set standards.

3.0 Use Governance

Provide an outline of any rules that will govern the use of the project / technology. Please note: non-City entities are bound by restrictions specified in the Surveillance Ordinance and Privacy Principles and must provide written procedures for how the entity will comply with any restrictions identified.

3.1 Describe the processes that are required prior to each use, or access to/ of the project / technology, such as a notification, or check-in, check-out of equipment.

Before each UAS mission, the UAS will be checked out and assigned to the licensed pilot staff member and noted in the day planner. Prior to each flight, a preflight mission briefing will be discussed between pilot and visual observer or other pilot. This mission briefing will discuss conditions, FAA restrictions, flight path, privacy concerns and safety protocols including conducting a preflight inspection check list for aircraft integrity. The preflight mission briefing is important for safety and to make sure all deployments are aligned with City policy and other regulations as applicable. Flight data logging upload is required for all flights to maintain aircraft and pilot flight records. Basic flight information such as date, time, location and purpose will be uploaded quarterly to a public facing data portal.

3.2 List the legal standards or conditions, if any, that must be met before the project / technology is used.

A Part 107 FAA UAS license is required for city employees to operate a UAS. Any flight parameters prohibited by FAA part 107 certification rules are prohibited unless waivers through the FAA have been acquired.

[Small Unmanned Aircraft Systems \(UAS\) Regulations \(Part 107\) | Federal Aviation Administration \(faa.gov\)](#)

FAA part 107 operating requirements

- Always avoid manned aircraft.
- Never operate in a careless or reckless manner.
- Keep your drone within sight. If you use First Person View or similar technology, you must have a visual observer always keep your drone within unaided sight (for example, no binoculars).
- You cannot be a pilot or visual observer for more than one drone operation at a time.
- Do not fly a drone over people unless they are directly participating in the operation.
- Do not operate your drone from a moving aircraft.
- Do not operate your drone from a moving vehicle unless you are flying your drone over a sparsely populated area and it does not involve the transportation of property for compensation or hire.

You can fly during daylight (30 minutes before official sunrise to 30 minutes after official sunset, local time) or in twilight if your drone has anti-collision lighting. Minimum weather visibility is three miles from your control station. The maximum allowable altitude is 400 feet above the ground, higher if your drone remains within 400 feet of a structure. Maximum speed is 100 mph (87 knots).

3.3 Describe the policies and training required of all personnel operating the project / technology, and who has access to ensure compliance with use and management policies.

A current Part 107 FAA UAS license is required for Seattle Channel staff to operate a UAS. Any flight parameters prohibited by FAA part 107 certification rules are prohibited unless waivers through the FAA have been acquired.

Pilot training will be required for all Seattle Channel pilots. Internal training will include both classroom and in-field instruction on hardware, data management policies, privacy policies and software specific to City of Seattle operation requirements. The Seattle Channel RPAS program lead will oversee training and compliance.

Mission safety briefings, preflight check lists, and flight logging data must be performed for each mission/flight.

All Seattle Channel UAVs will be Remote ID compliant per FAA rules.

[Remote Identification of Drones | Federal Aviation Administration \(faa.gov\)](#)

FAA RPAS Training will also include the following resources:

[FAADroneZone](#)

[Certificated Remote Pilots including Commercial Operators | Federal Aviation Administration \(faa.gov\)](#)

[Unmanned Aircraft Systems \(UAS\) | Federal Aviation Administration \(faa.gov\)](#)

[eCFR :: 14 CFR Part 107 -- Small Unmanned Aircraft Systems](#)

4.0 Data Collection and Use

Provide information about the policies and practices around the collection and use of the data collected.

4.1 Provide details about what information is being collected from sources other than an individual, including other IT systems, systems of record, commercial data aggregators, publicly available data and/or other city departments.

Individual flight data (information about the flight) will be logged on a database spreadsheet by Seattle Channel Part 107 certified pilots after each mission. This data will include date, time, location, flight time, and altitude and will be logged for each pilot and aircraft. There are no other sources of data outside of the metadata (flight information – date, time, duration, altitude and location) and the imagery captured for Seattle Channel programming.

4.2 What measures are in place to minimize inadvertent or improper collection of data?

Data collected by UAS must be subject to existing city, state, and federal laws and regulations regarding the privacy of personal information.

Similar to the practices and procedures in use by other governmental jurisdictions, operators and observers will: Adhere to FAA altitude rules; Not intentionally record or transmit images, of any location where a person would have a reasonable expectation of privacy (e.g., residence, yard); Take reasonable precautions to avoid areas where there is a reasonable expectation of privacy by taking precautions such as deactivation or programming of imaging devices, and/or image reduction during data processing to minimize or avoid such areas and persons that are not material to the purpose for which UAS is used.

Seattle Channel employees operating UAS will undergo privacy training as part of the RPAS program training outlined in the Seattle Channel Operations Manual. Seattle Channel employees operating UAS will address privacy risks associated with each flight, and work to mitigate those risks for every flight. Before each flight, operators will evaluate potential privacy risks such as:

- Flight paths over private property

- Flights near where someone would have a reasonable expectation of privacy.

Risk mitigation options to be discussed include but are not limited to:

- Using an alternate flight route
- Not recording until over the mission area or keeping the camera angled away from potential privacy risks, or places where people have a reasonable expectation of privacy.

Raw data (video or still imagery) will be collected by FAA Licensed Seattle Channel pilots and will be accessed and reviewed by the Seattle Channel production team. Any unused footage will be deleted or if useable for other production purposes, footage will be stored as stock footage as is the current Seattle Channel procedure.

Should information be incidentally collected that could potentially pose a privacy risk, staff will delete or mask all personal identifiable information from raw video footage.

No city phones will be used as part of a flight controller, only professional controllers and monitor screens will be used.

4.3 How and when will the project / technology be deployed or used? By whom? Who will determine when the project / technology is deployed and used?

The UAS will be use on an as needed project to project basis with approval from Seattle Channel management. Seattle Channel FAA Part 107 licensed staff will operate the UAS and engage management for approval prior to each use.

4.4 How often will the technology be in operation?

Permanent operations, as needed.

4.5 What is the permanence of the installation? Is it installed permanently or temporarily?

Permanent operational program.

4.6 Is a physical object collecting data or images, visible to the public? What are the markings to indicate that it is in use? What signage is used to determine department ownership and contact information?

The UAS will be clearly labeled with a required FAA aircraft registration number and City of Seattle equipment label.

4.7 How will data that is collected be accessed and by whom?

Data will be collected by FAA Licensed Seattle Channel pilots operating the UAS and will be accessed by Seattle Channel production team. This includes the flight log data as well as the video and still imagery data.

4.8 If operated or used by another entity on behalf of the City, provide details about access, and applicable protocols. Please link memorandums of agreement, contracts, etc. that are applicable.

UAS operations will only be conducted by licensed Part 107 Seattle Channel staff.

4.9 What are acceptable reasons for access to the equipment and/or data collected?

FAA Licensed Seattle Channel pilots will operate the UAS for aerial photography and videography. The aerial images will enhance Seattle Channel programming to inform and engage citizens in the governmental, civic and cultural affairs of Seattle through compelling use of television, Internet and other media.

Seattle Channel producers and staff members will have access to the raw data collected for use in Seattle Channel programming. No one outside the Seattle Channel will have access to raw footage.

Imagery and video captured by the UAS will be reviewed and edited by Seattle Channel staff for use in various media productions.

4.10 What safeguards are in place, for protecting data from unauthorized access (encryption, access control mechanisms, etc.) and to provide an audit trail (viewer logging, modification logging, etc.)?

Raw UAS footage will be restricted to authorized Seattle Channel staff with a legitimate business need. Raw UAS footage is restricted to authorized Seattle Channel staff for the purpose of cleaning and processing data only and can only be accessed by password protected login. The Seattle Channel will not release raw, UAS-collected footage to the public except as required by law.

5.0 Data Storage, Retention and Deletion

5.1 How will data be securely stored?

Data collected using a UAS will be retained as prescribed in the established City of Seattle records retention schedule. A four-year period is required for flight, pilot, and equipment records while image data shall be retained until no longer needed for agency business

5.2 How will the owner allow for departmental and other entities, to audit for compliance with legal deletion requirements?

The Seattle Channel is responsible for ensuring compliance with data retention requirements.

5.3 What measures will be used to destroy improperly collected data?

Deletion of videos or pictures will occur through photo/video editing software.

5.4 Which specific departmental unit or individual is responsible for ensuring compliance with data retention requirements?

Seattle Channel

6.0 Data Sharing and Accuracy

6.1 Which entity or entities inside and external to the City will be data sharing partners?

Currently there is no need for sharing partners Seattle Channel staff will only have access to footage and flight metadata (flight information only).

6.2 Why is data sharing necessary?

Data sharing is necessary for flight logs, pilot logs and maintenance schedules.

6.3 Are there any restrictions on non-City data use?

Yes No

6.3.1 If you answered Yes, provide a copy of the department's procedures and policies for ensuring compliance with these restrictions.

6.4 How does the project/technology review and approve information sharing agreements, memorandums of understanding, new uses of the information, new access to the system by organizations within City of Seattle and outside agencies?

Data, video, and/or still image sharing requests are reviewed and approved/denied by Seattle Channel management.

The Seattle Channel will not share raw data, video footage and/or still images to any law enforcement agency unless by compelled by a court order.

6.5 Explain how the project/technology checks the accuracy of the information collected. If accuracy is not checked, please explain why.

No specific measures are taken, photo and video files are reviewed by Seattle Channel staff and management to validate and remediate any incidental or unintended capture of footage where there may be a privacy concern.

6.6 Describe any procedures that allow individuals to access their information and correct inaccurate or erroneous information.

Individuals may contact the Seattle Channel directly for any questions.

7.0 Legal Obligations, Risks and Compliance

7.1 What specific legal authorities and/or agreements permit and define the collection of information by the project/technology?

FAA Part 107 license is required to operate a Seattle Channel UAS. Data collected by UAS must be subject to existing city, state, and federal laws and regulations regarding the privacy of personal information.

7.2 Describe what privacy training is provided to users either generally or specifically relevant to the project/technology.

Seattle IT staff are required to take an annual Privacy and Security Awareness Training. Any additional training will be provided as necessary. Internal UAS training will include both classroom and in-field instruction on privacy policy, hardware and software specific to City of Seattle operation requirements.

7.3 Given the specific data elements collected, describe the privacy risks identified and for each risk, explain how it was mitigated. Specific risks may be inherent in the sources or methods of collection, or the quality or quantity of information included.

Risk: Recording or transmitting images, of any location where a person would have a reasonable expectation of privacy.

Mitigation: UAS licensed pilots will adhere to FAA altitude rules; not intentionally record or transmit images, of any location where a person would have a reasonable expectation of privacy.

All UAS pilots will take reasonable precautions to avoid areas where there is a reasonable expectation of privacy by taking precautions such as deactivation or programming of imaging devices, and/or image reduction during data processing to minimize or avoid such areas and persons that are not material to the purpose for which UAS is used.

Personnel operating an UAS shall be mindful of privacy rights and shall take reasonable precautions to avoid inadvertently recording or transmitting images in violation of privacy rights.

Before each flight, operators will evaluate potential privacy risks such as:

- Flight paths over private property
- Flights near where someone would have a reasonable expectation of privacy.

and develop steps to mitigate those risks such as:

- using an alternate flight route

· not recording until over the mission area or keeping the camera angled away from potential privacy risks.

Should information be incidentally collected that could potentially pose a privacy risk, staff will delete or mask all personal identifiable information from raw video footage.

As pertains to flight data, no city phones will be used as part of a flight controller, only professional controllers and monitor screens will be used. A secure mobile hotspot recommended for flight data upload for added separation.

7.4 Is there any aspect of the project/technology that might cause concern by giving the appearance to the public of privacy intrusion or misuse of personal information?

The use of UAS involves privacy considerations.

UAS (Unmanned Aircraft System) is under federal law. The UAS can fly in almost all places except prohibited ones. As per FAA, the airspace that can be used by the drone includes all the airspace except indoors. Property owners do not own the airspace. As a general rule, it is legal to fly a drone over private property if the flight rules are followed, the flight is outdoors and is not causing a nuisance or flying recklessly, as property owners do not own the airspace above their property. Exceptions include states which passed laws restricting the flying of drones in private places.

UAS licensed pilots will adhere to FAA altitude rules; not intentionally record or transmit images, of any location where a person would have a reasonable expectation of privacy (e.g., residence, yard).

All UAS pilots will take reasonable precautions to avoid areas where there is a reasonable expectation of privacy by taking precautions such as deactivation or programming of imaging devices, and/or image reduction during data processing to minimize or avoid such areas and persons that are not material to the purpose for which UAS is used. Raw footage will be stored on a separate secure server and will not be shared except as required by law.

8.0 Monitoring and Enforcement

8.1 Describe how the project/technology maintains a record of any disclosures outside of the department.

All disclosures will be maintained by Seattle Channel management.

8.2 What auditing measures are in place to safeguard the information, and policies that pertain to them, as well as who has access to the audit data? Explain whether the project/technology conducts self-audits, third party audits or reviews.

All photo/video images will be reviewed by RPAS Licensed Seattle Channel Staff any questionable images will be forwarded to management. We will conduct our own self audits and will be open to third party review as well.

UAS coordinator will:

- Maintain records relating to UAS pilot training and aircraft maintenance
- Ensure that established guidelines are followed by monitoring and providing periodic reports/audits on the program to Seattle Channel management.
- Periodically reviews state and local laws, FAA requirements and other regulations and draft updates to guidelines that conform with changes
- Coordinate FAA waivers for special flight requirements as needed