

Safe Use of Drones Policy

UNIVERSITY OF WOLVERHAMPTON

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POLICY/PROCEDURE

1. Introduction

The University of Wolverhampton (University) has duties under the Health and Safety at Work etc. Act 1974 to ensure the health, safety and welfare of its employees and make similar provision for non-employees including students and visitors who may be affected by the University's activities.

This policy supplements the University Health and Safety Policy, setting out how the University will meet its legal duty to manage the risks from Unmanned Aerial Vehicles under the Air Navigation Order 2021 (ANO)[1], Health and Safety at Work Act 1974 (HSWA) the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulations (UK GDPR).

2. Purpose

This policy sets out the minimum requirements for Faculties/Departments wishing to undertake any type of drone operations for university activities. This document establishes the requirements for Faculties and Departments to achieve the minimum standard to ensure that drone operations are conducted in a safe and legally compliant manner. It establishes responsibilities for those undertaking drone operations on behalf or for the University.

3. Scope

This policy applies to all in the University community: including students, staff, contractors, partners, apprentice learners and visitors who use UAVs. It covers the use of drones on university campuses and offsite, both indoors and outdoors, which are used for teaching, research and commercial purposes, including but not limited to; photography; surveillance for building maintenance and data acquisition; and it applies to hobby/recreational use. It does not cover balloons, kites, or human-carrying aircraft flights.

Any member of the University community (as identified above) should ensure that their activities align with the Drone Code:

https://www.caa.co.uk/media/csmfqbs1/the-drone-code-march-2026.pdf

This policy does not cover the commercial use of UAV/SUA's or UAVS over 20kg.

This policy doesn't include within its scope, the Certified Category.

1 Specifically Articles 138, 166,167 and 225

4. Definitions

- **CAA** – Civil Aviation Authority who are the regulatory and enforcing agency for the law concerning these aircraft.
- **UAV** - Unmanned Aerial Vehicles.
- **SUA** – Small Unmanned Aircraft (any unmanned aircraft other than balloons or kites with a mass less than 20kg including any payload).
- **ANO** - Air Navigation Order.
- **Commercial Operations** - work for which valuable consideration is given or promised in respect of the purpose of the flight (i.e. commercial activity).
- **Congested Area** - Any area which is substantially used for residential, commercial, industrial, or recreational purposes.
- **PFCO** - Permission for Commercial Operations (formally known as PFAW).

5. Policy statement

The Board of Governors are ultimately responsible for the implementation of this policy, however University Executive Board and local senior managers are responsible for compliance with the policy through the implementation of local procedures in relation to the safe use of drones.

Any operator of an UAV/SUA's is responsible for the safety of that flight operation. They must ensure they are aware of and complying with the requirements of the relevant CAA guidance and local procedures.

This policy is designed to effectively manage and minimise risks to any persons or property which may be harmed by contact with UAV/SUA's and to ensure compliance with legal requirements, in particular the University commits to:

- Prevent so far as reasonably practicable, any harm occurring to persons or property through the use of SUA's by any person within the University.
- Ensure all use of SUA's complies with the requirements of ANO Articles 166 and 167 and the Data Protection Act.
- Ensure that Faculties and Service Departments that propose to use SUA's have local procedures in place for the safe use of SUA's.

Under the CAA Act 1982, the ANO is made for the purposes of regulating air navigation. Flights inside buildings have nothing to do with air navigation because they can have no effect on flights by aircraft in the open air. As a result, flights within buildings or within areas where there is no possibility for the unmanned aircraft to 'escape' into the open air (such as 'closed' netted structures) are not subject to air navigation legislation. However, flights within buildings or within areas where there is no possibility of escape, would be subject to the relevant sections of this policy.

6. Generic Health and Safety Considerations

SUAS are considered to be work equipment, as defined by the Provision and Use of Work Equipment Regulations 1998. The SUA's must therefore be:

- Suitable for the intended use.
- Safe for use, maintained in a safe condition and inspected to ensure it is correctly constructed and does not subsequently deteriorate.
- Used only by people who have received adequate information, instruction, and training.
- Accompanied by suitable health and safety measures, such as protective devices and controls.

These will normally include emergency devices, adequate means of isolation from sources of energy, clearly visible markings, and warning devices.

7. Roles and Responsibilities

7.1 Deans of Faculty and Directors of Professional Services are responsible for ensuring that:

A Faculty/Departmental standard operating procedure is established on drone use and is developed by the local subject matter specialist, to ensure that:

- The use of commercial drone operators is permitted/approved.
- Open or specific category drone use is permitted/approved.

As previously stated, Certified Category drone use is not permitted by the University.

Ensuring that all other drone operations carried out by staff or students on behalf of their faculty or Department or in connection with their work or teaching activities, comply with the requirements of the CAA and this Policy Safety Code of Practice.

Identifying if drone flying on the Faculty or Departments behalf is Open Category flying only or extends to Specific Category flying. Please see the below links for further information in identifying this:

https://www.caa.co.uk/drones/open-category/

https://www.caa.co.uk/drones/specific-category/specific-category-overview/

Ensuring Certified Category (flying an aircraft) is not permitted.

For Open Category use:

- Ensuring the classification of the devices flown has been established and meets requirements for the Open Sub-Categories A1, A2 or A3 flying being undertaken. For further advice see link above.

- Ensuring all Flyers have passed the CAA online test, have CAA issued flyer IDs and that whoever is acting for the Faculty or Function as its operator is registered as an operator with the CAA, and that the Operator-ID is displayed on each device in use.

For Specific Category use:

- Ensuring the Faculty or Function holds its own operational authorisation, issued by the CAA, supported by an operator's manual and risk assessment.

- Identifying the pilot competence required (including if the General VLOS Certificate is required).

Ensuring photo, video or audio recordings made by any drones are managed in accordance with the UK GDPR and the DPA. To ensure compliance with both legislations is met, please contact the University Data Protection Officer at dataprotection@wlv.ac.uk.

Liaising with Procurement to ensure the University's insurance arrangements cover the intended drone use (devices above 20kg always require insurance).

Seeking advance permission from Health & Safety for the use of:

- autonomous drones (not under direct operator control);
- drone swarms (multiple devices which coordinate movement and action); or
- drop-load drones (which carry and release a payload).

Ensuring any commercial drone operators used by the Faculty or Department has a current CAA operational authorisation.

Ensure that a list of drones owned by the University is shared with the Insurance Office at Insurance@wlv.ac.uk

7.2 Members of the University community planning or agreeing to drone use as part of work or teaching activities are responsible for:

- Ensuring the drone use is permitted by the Faculty or Department.
- Informing the Dean of Faculty or Director of the intention to use drones and supplying all information needed to comply with this Policy, in advance of the drone use.

7.3 Individuals selecting, purchasing, or otherwise obtaining devices for use are responsible for:

- Ensuring the device is 250g or otherwise an appropriate class of device for the Sub-Category (A1, A2 or A3), if Open Flying is intended.
- Ensuring the device does not bring the drone use into the Certified Category (see CAP722, Section 2.2.3) see link below for further advice.

  https://www.caa.co.uk/drones/open-category/moving-on-to-more-advanced-flying/introduction-to-more-advanced-flying/

- Ensuring the Dean of Faculty or Department Director is explicitly informed if a device has an autonomous, swarm or drop-load capability.

7.4 Individuals contracting commercial drone operators are responsible for:

- Ensuring the drone use is permitted by the Faculty or Department.
- Obtaining details of the commercial drone operator's current CAA operational authorisation and public liability insurance and making those available to the Dean of Faculty or Director.
- Operators (any member of the University community, or any person using drones on campus for recreational or hobby use, are responsible for.
- Ensuring they have passed the required online training or other certification required for the category of drone use intended, this will then inform the wider risk assessment process and monitored locally.
- Ensuring they comply with The Drone and Model Aircraft Code. see link below for further advice. https://register-drones.caa.co.uk/

7.5 Health & Safety Co-ordinators are responsible for:

- Drawing to the attention of Deans of Faculty or Directors, local drone flyers and local H&S Committees to this policy.

7.6 Health & Safety Services are responsible for:

- Ensuring incidents are investigated and, if necessary, reported to the CAA.

Staff and Students

Academic line managers and supervisors who use SUA's or are approached by individuals who wish to fly SUA's during their teaching, research and consultancy activities, will direct staff and students to relevant drone information sources included in the Further Information section of this policy.

In line with the CAA "Drone Code" staff and students who fly an aerial drone or SUA's are responsible for each flight. It is the responsibility at a local level that before you are allowed to fly any SUA's, you must;

- Pass an approved theory test and register with the CAA before you fly at:
- https://www.caa.co.uk/drones/open-category/getting-started-with-drones-and-model-aircraft/registering-to-fly-drones-and-model-aircraft/

- Obtain two registrations (one Flyer ID and one operator ID).
- Undertake a flight specific risk assessment for each flight. A copy of the risk assessment form can be found at https://www.wlv.ac.uk/staff/services/hsd/policies-procedures--forms/
- Understand the flight specific risk assessment conducted for each flight.
- Conduct an on-site survey prior to any flight, which also forms part of the risk assessment.
- Always keep the drone in visual line of sight.
- Never fly more than 400ft (120m) above the surface and stay well away from aircraft, airports, and airfields.
- Never fly closer than 50m to people (it is safer to avoid directly overflying them);
- Never fly closer than 50m to buildings cars, trains, or boats.
- Never fly closer than 150m to a crowd of 1,000 people or more.
- Never fly directly over a crowd.
- Never fly closer than 150m to built-up areas.
- Never fly directly over a built-up area.
- Never fly in an airport's flight restriction zone.
- It is illegal to fly a drone or model aircraft between 250g-20kg that does not show a valid operator ID.

8. Competence

All individuals seeking to fly a SUA, on behalf of the University, must pass the approved theory test and register with the CAA before you fly (see section 5 above) .

Any individual flying an SUA for commercial operations for the University must hold a CAA PFCO.

9. Insurance

Prior to flying an SUA, the individual responsible for the activity must ensure that there is adequate insurance provision. They should contact the University's Insurance Officer at Insurance@wlv.ac.uk to ensure that the University's insurers are aware and have provided cover for their activities.

10. Incident Reporting

Any accidents, incidents or near miss involving drones or drone activity should be reported via the University online accident reporting system on the following link:

University Of Wolverhampton Accident & Near-Miss REPORT FORM

Any incidents should also be reported directly to the CAA, which can be done via the following link: - http://www.aviationreporting.eu/

11. Exceptions

There are no exceptions to this policy.

Failure to comply with this policy may be referred to the relevant line manager as a disciplinary offence.

12. Amendments

The University may change this policy at any time where appropriate. Where a policy is not due for review, but is found to require updating, it will remain published, unless the reasons for review render it obsolete.

13. Further information

https://www.caa.co.uk/drones/

14. Contact

For general queries, please contact the University Health and Safety Department at HSDEmails@wlv.ac.uk

For queries in relation to compliance with this policy, please contact the Corporate Compliance Unit at compliance@wlv.ac.uk

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