Health and Safety Policy
Safe Use of Unmanned Aerial Vehicles (Drones)

UHSP/SUUAV/2018
<table>
<thead>
<tr>
<th>CONTENTS</th>
<th>PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>INTRODUCTION</td>
<td>3</td>
</tr>
<tr>
<td>SCOPE OF POLICY</td>
<td>3</td>
</tr>
<tr>
<td>DEFINITIONS</td>
<td>3</td>
</tr>
<tr>
<td>Drones</td>
<td>3</td>
</tr>
<tr>
<td>Commercial Operations</td>
<td>3</td>
</tr>
<tr>
<td>Congested Area</td>
<td>4</td>
</tr>
<tr>
<td>Visual Line of Sight</td>
<td>4</td>
</tr>
<tr>
<td>First Person View</td>
<td>5</td>
</tr>
<tr>
<td>Controlled Airspace and Air Traffic Control Permissions</td>
<td>5</td>
</tr>
<tr>
<td>Persons under the control of the person in charge</td>
<td>5</td>
</tr>
<tr>
<td>LEGISLATION AND GUIDANCE</td>
<td>5</td>
</tr>
<tr>
<td>NOTIFICATION PROCEDURE</td>
<td>6</td>
</tr>
<tr>
<td>ROLES AND RESPONSIBILITIES</td>
<td>6</td>
</tr>
<tr>
<td>Heads of Colleges/Schools/Professional Services</td>
<td>6</td>
</tr>
<tr>
<td>Managers/PIs Supervising Staff/Students</td>
<td>6</td>
</tr>
<tr>
<td>Staff And Students Using Drones</td>
<td>7</td>
</tr>
<tr>
<td>Persons Other Than Staff And Students Using Drones</td>
<td>7</td>
</tr>
<tr>
<td>Safety Services</td>
<td>8</td>
</tr>
<tr>
<td>POLICY ARRANGEMENTS</td>
<td>8</td>
</tr>
<tr>
<td>Data Protection Act</td>
<td>8</td>
</tr>
<tr>
<td>Civil Aviation Authority Permissions</td>
<td>9</td>
</tr>
<tr>
<td>Landowner’s Permissions</td>
<td>9</td>
</tr>
<tr>
<td>Indoor Flights</td>
<td>9</td>
</tr>
<tr>
<td>Training and Competence</td>
<td>10</td>
</tr>
<tr>
<td>Risk Assessment</td>
<td>10</td>
</tr>
<tr>
<td>Insurance</td>
<td>10</td>
</tr>
<tr>
<td>MONITORING AND AUDITING</td>
<td>10</td>
</tr>
<tr>
<td>POLICY REVIEW</td>
<td>11</td>
</tr>
<tr>
<td>REFERENCES</td>
<td>11</td>
</tr>
<tr>
<td>APPENDIX 1: AIR NAVIGATION ORDER</td>
<td>12</td>
</tr>
<tr>
<td>APPENDIX 2: UNIVERSITY INSURANCE ARRANGEMENTS</td>
<td>14</td>
</tr>
<tr>
<td>APPENDIX 3: QUALIFICATION LEVEL REQUIREMENTS FOR PILOTS OF UAS BY RELEVANT MASS CATEGORY (TAKEN FROM CAP 722)</td>
<td>15</td>
</tr>
</tbody>
</table>
Health and Safety Policy

Use of Drones

1. Introduction
The use of drones in University activities is widespread, and constantly increasing. Their uses include aerial filming and inspection work — for example, marketing (aerial photography), surveys (building roofs, tall chimneys) — and research activities (including land and water surveys in Geography projects). These devices clearly have enormous potential, but there are a number of regulatory, safety and privacy issues that must be addressed before staff or students construct and/or operate them, or engage a third party to do so.

2. Scope of policy
This policy outlines the requirements for ensuring that drone flights are conducted in accordance with Civil Aviation Authority (CAA) and health and safety legislation, and also comply with data protection requirements. It applies to all University of Birmingham staff and students, and to third parties/contractors engaged by the University, who use drones both on campus at the University and at off-site locations. Anyone wishing to use a drone abroad should check the local regulatory requirements with the national aviation authority of the country they are visiting.

3. Definitions

3.1 Drones
Small Unmanned Aircraft: “any unmanned aircraft, other than a balloon or kite, having a mass of not more than 20kg without its fuel, but including any articles or equipment installed in, or attached to, the aircraft at the commencement of its flight”. Where a drone is fitted with batteries, these are included as part of the 20kg limit.

Small Unmanned Surveillance Aircraft: “a small unmanned aircraft which is equipped to undertake any form of surveillance or data acquisition”.

Drones are also known as ‘Unmanned Aerial Vehicles’ (UAVs), ‘Unmanned Aircraft Systems’ (UAS), and ‘Remotely Piloted Aircraft Systems’ (RPAS). Other terminology may also be used.

Unmanned aircraft with an operating mass of more than 20 kg are subject to the whole of the UK Aviation regulations (as listed within the UK Air Navigation Order - ANO), although they may be exempted from certain requirements by the CAA. Because of this, any person intending to operate an unmanned aircraft with a mass of more than 20kg within the UK must obtain a specific approval, in the form of an Exemption, before any flight can take place. Further information on large unmanned aircraft can be found at the CAA website. Any proposal to use an unmanned aircraft with an operating mass of more than 20kg should be notified to the local health and safety coordinator and the University’s Small Unmanned Aircraft Systems Flight Committee (SUAS) at the earliest opportunity.

3.2 Commercial Operations
Commercial operations: “any operation of an aircraft other than for public transport:
(a) which is available to the public; or
(b) which, when not made available to the public, is performed under a contract between an operator and a customer, where the latter has no control over the operator in return for remuneration or other valuable consideration”.

3
Valuable consideration means any gain, whether monetary or otherwise, received by the operator of the drone.

Flying operations for research or development that are conducted ‘in house’ are not generally considered to amount to commercial operations, providing there is no valuable consideration given or promised in respect of the flight. The CAA has stated that:

“Whilst every case should be judged on its own merits, some types of arrangements are not generally considered by the CAA to be Commercial Operations…

- Any other imagery or data collection task where the video, photographic stills or other data collected, are used exclusively for the drone operator’s own use.

Example: A university research team wants to use a drone to gather survey data or imagery to help with their research project. This is legitimate as long as the research project was not directly funded by a business that intends to use the results of the data for its own business purposes (including any material or research into its products or services). Clearly university research is funded through a variety of means (grants, charitable and alumni donations, etc) and for varying purposes. The exact arrangements would need to be considered in each case. Where an academic organisation is openly advertising their capabilities to external organisations and a business relationship is entered into with an external organisation, the use of a drone for that purpose is likely to be construed as Commercial Operations. In order to alleviate difficulties with varied funding models, universities and other similar organisations should consider applying for permission from the CAA so that their services can be offered without constraint...

In most cases, self-funded or research drones developed by institutions such as Universities or private businesses can be regarded as non-commercial as long as they are not employed in providing a paid service to a third party. Despite this, and depending on the application being considered, operators of such drones will still need to get the permission of the CAA if they cannot meet the limitations contained in ANO 2016 Articles 94 and 95 (See Appendix 1). This is particularly true for heavier, longer-range drones that are intended to fly beyond visual line of sight (BVLOS)”.

3.3 Congested Area

Congested Area: “in relation to a city, town or settlement... any area which is substantially used for residential, industrial, commercial or recreational purposes”.

What amounts to a congested area will depend on the circumstances in each case. An area can be congested even if parts of it are not used for residential, industrial, commercial or specified purposes. Practically speaking, the University’s campus as a whole amounts to a congested area.

3.4 Visual Line of Sight

This means the pilot of an aircraft is able to maintain direct, unaided (other than corrective lenses) visual contact with the aircraft which is sufficient to monitor its flight path in relation to other aircraft, persons, vessels, vehicles and structures for the purpose of avoiding collisions. Within the UK, visual line of sight operations are normally accepted out to a maximum distance of 500 metres (1640 feet) horizontally and 400 feet vertically from the pilot.
3.5 First Person View
The CAA states that drones that are fitted with video cameras may provide an opportunity to downlink ‘live’ video to the person flying the drone either via a mobile phone, tablet computer or other screen, or even through video goggles. This capability provides the operator with a pseudo ‘pilots eye view’ from the drone itself and is generally given the term ‘First Person View’ (FPV).

However, the law [at ANO article 94(3)] requires that the person in charge of a drone must maintain direct unaided visual contact with the aircraft which is sufficient to monitor its flight path so that collisions may be avoided. This is obviously not possible if that person is wearing video goggles or otherwise constantly monitoring a display. Therefore, FPV flight is only permitted if the activity has been approved by the CAA. A General Exemption has been issued which allows an element of ‘First Person View’ (FPV) flight to be conducted. This can be found at:

First Person View Exemption Certificate

The exemption will only apply if a number of conditions are met. These specify that a competent observer should be present in addition to the person in charge of the drone, and the drone must not weigh more than 3.5kg. The certificate should be consulted for the complete list of conditions.

3.6 Controlled Airspace and Air Traffic Control permission
The Air Navigation Order (ANO) Article 94(4) states that the person in charge of a small unmanned aircraft which has a mass of more than 7kg excluding its fuel but including any articles or equipment installed in or attached to the aircraft at the commencement of its flight, must not fly the aircraft:

(a) in controlled airspace unless the permission of the appropriate air traffic control unit has been obtained;
(b) within an aerodrome traffic zone during the notified hours of watch of the air traffic control unit (if any) at that aerodrome unless the permission of any such air traffic control unit has been obtained; or
(c) at a height of more than 400 feet above the surface unless it is flying in airspace described in sub-paragraph (a) or (b) and in accordance with the requirements for that airspace.

The CAA also states that:
In airspace control terms, operations of small drones weighing more than 7 kg are considered Unusual Aerial Activities. If the flight is to take place within controlled airspace, the person in charge of the small drone is required to seek prior approval from the relevant Air Traffic Control (ATC) unit.

The local ATC (or airport) should therefore be contacted in advance of any such flight.

3.7 Persons under the control of the person in charge of the aircraft (CAA clarification):
These are persons who are solely present for the operation of the drone, or are otherwise directly participating in the flight. They should be under the control of the pilot or a site manager and will follow directions and safety precautions. This does not generally include spectators.

4. Legislation and Guidance
The Air Navigation Order 2016 (“ANO”) is the main source of legislation regulating aviation activities within the UK, and imposes strict requirements regarding the operation of drones (see Appendix 1 for further details). Compliance with the ANO is monitored by the CAA.

The ANO is reproduced via the CAA as CAP 393. By comparison, CAP 722 is the CAA’s guidance document regarding the domestic use of drones. This should be consulted before flying drones.
The use of drones is also subject to the requirements of the Health and Safety at Work etc. Act and its statutory provisions, including the Management of Health and Safety at Work Regulations and the Provision and Use of Work Equipment Regulations.

5. Notification procedures
If a staff member or student wishes to operate a drone in connection with their employment or studies, they must notify their local health and safety co-ordinator in the first instance and complete the online notification form.

If a staff member wishes to engage a third party/contractor to operate a drone in connection with the business of the University, they must notify their local health and safety co-ordinator in the first instance and complete the online notification form.

The notification form, dealing with the matters set out in this policy, is available on the Safety Services’ website. The University Small Unmanned Aircraft Systems Flight Committee (‘SUAS Flight Committee’) will monitor these flight notifications and give advice where required.

6. Roles and responsibilities

6.1 Heads of Colleges/Schools/Professional Services must make arrangements to ensure that:

- Staff and students fulfil their duties under this policy.
- The operation of drones is monitored in accordance with this policy.
- Any permissions and/or regulatory permits for the intended use of drones are in place.
- The use of drones by or on behalf of staff and students takes place in accordance with a risk assessment, site assessment, Standard Operating Procedure(SOP)/operations manual and flight plan submitted by them as part of the notification process.
- All control measures identified by risk assessments are implemented, maintained and effective.
- Staff and students have sufficient instruction and information and are adequately trained and supervised.
- Adequate arrangements are in place where facilities are shared or where staff and students are working on premises managed by third parties.
- Adequate emergency plans and procedures are in place to deal with foreseeable adverse events.
- Sufficient resources are made available to enable compliance with this policy.

6.2 Managers and Principal Investigators supervising staff and students who operate drones must ensure that:

- Any permissions and/or regulatory permits for the intended use of drones are in place.
- Permission to fly has been obtained from any land owner/manager over whose land the flight will take place.
- The use of drones by or on behalf of staff and students under their supervision has been risk assessed and notified to their local health and safety co-ordinator.
- The use of drones by or on behalf of staff and students under their supervision has been notified to the University SUAS Committee by means of the notification form on the Safety Services website.
• The use of drones by or on behalf of staff and students under their supervision takes place in accordance with a site assessment, SOP/operations manual and flight plan submitted by them as part of the notification process.
• Staff and students have received sufficient instruction and information and are adequately trained and supervised to safely undertake the flight.
• Emergency procedures are in place to deal with any accident or adverse incident.
• Staff and students are aware of the requirement to promptly report all adverse incidents or accidents.

6.3 Staff and students who operate drones in the course of their employment or studies must ensure that:

• Any permissions and/or regulatory permits for the intended use of drones are in place.
• Permission to fly has been obtained from any land owner/manager over whose land the flight will take place.
• The flight is notified using the online form on the Safety Services website.
• Their use of drones takes place in accordance with a risk assessment submitted by them or their manager/supervisor as part of the notification process.
• Their use of drones takes place in accordance with a site assessment, SOP/operations manual and flight plan submitted by them as part of the notification process.
• They are fully conversant with the requirements of the risk assessment and the accompanying site assessment, SOP/operations manual and flight plan.
• Any control measures, including emergency procedures, identified by the risk assessment must be implemented, maintained and effective.
• Any Personal Protective Equipment (PPE) identified in the risk assessment as a control measure is worn, used and maintained in an appropriate manner.
• Any defects, errors or omissions in the procedure, PPE or equipment are reported to their manager or supervisor.
• Any accidents or near misses that occur whilst using drones are reported to their Supervisor/Manager and via the University reporting procedure to Safety Services.
• They undertake any training deemed necessary by the University.

6.4 Any person other than a staff member or student operating a drone in the course of their employment or studies, including a third party/contractor engaged by the University, must:

• Ensure that they hold any permissions/regulatory permits necessary for their intended activities, and that those activities take place in accordance with this policy.
• Ensure that permission to fly has been obtained from the University in writing.
• Provide confirmation, in such manner as may be requested, of such insurance cover as may be required, by the University from time to time. This would normally be in the form of a copy of a certificate of public liability insurance.
• Ensure the flight is notified to the University SUAS Committee using the notification form on the Safety Services website.
• Ensure that their use of drones takes place in accordance with a risk assessment submitted by them as part of the notification process.
• Implement and maintain effectively any control measures, including emergency procedures, identified by the risk assessment.
• Wear, use and maintain appropriate PPE identified in the risk assessment as a control measure.
• Report any defects, errors or omissions in the procedure, PPE or equipment to the Head of the University’s School or Professional Service which engaged them.
• Report via the University reporting procedure any accidents or near misses that occur whilst using drones.
• Provide adequate information, instruction, training and supervision to their staff thus ensuring that they are competent to work with drones and will comply with this policy.

6.5 Safety Services will:

• Provide competent and informed advice to all users regarding this policy and the safe use of drones, in association with the University SUAS Flight Committee.
• Monitor adherence to safe working practices and procedures.
• Investigate any accidents or incidents arising during the use of drones in order to identify the root cause.

7 Policy Arrangements

7.1 Data Protection
If a drone has a camera (or is otherwise equipped for surveillance or data acquisition), it poses a privacy risk to other people. Both the acquisition, and subsequent recording, of personal data are subject to the requirements of the Data Protection Act 1998. Operators of drones with cameras should comply with the University’s Data Protection Policy and CCTV Code of Practice.

The Information Commissioner’s Office’s CCTV Code of Practice contains guidance specifically directed towards the proper manner in which data may be processed using surveillance aircraft. Its recommendations include:

(i) performing a robust privacy impact assessment, addressing the suitability of drones, in advance of deploying them;
(ii) procuring a recording device which:
    (a) is able to be turned on and off remotely with the effect that, without strong justification, recordings will not be continuous; and
    (b) has restricted vision, so that its focus is only in one place.
(iii) having the operator of the drone wear high visibility clothing identifying themselves as such, and place signage nearby explaining the use of the drone and directing interested parties to a privacy notice available on a website or other similarly accessible location; and
(iv) ensuring that all ‘processing’ of data, and not just the initial recording, be carried out in accordance with the Data Protection Act 1998.

Operators of drones with cameras should also comply with the Surveillance Camera Code of Practice, issued by the Home Office.

\[2\] At https://www.gov.uk/government/publications/surveillance-camera-code-of-practice
First Person View and the Data Protection Act:
The remote viewing of footage via a tablet or other hand held device is termed ‘First Person View’, i.e. images are captured on the camera and these images are then sent straight to a device but are not saved. This means that anyone viewing the images is seeing them in real time with no option to go back and view previous images.

The definition of processing under the Act is very wide in that it is not limited to simply holding the data. In the view of the ICO, obtaining/viewing data in this way also constitutes ‘processing’. Even though the images captured on these cameras are not being saved, personal information is still being processed for the purposes of the DPA, and if individuals can be identified from the images, it will constitute processing of personal data.

It is therefore likely that the live streaming of images captured on first person view cameras will be subject to the DPA, even if they are not being recorded. This means that any organisation operating a drone/camera under these circumstances will need to comply with the usual requirements of the DPA.

The Information Commissioner’s Office (ICO) has produced specific guidance on the use of unmanned aerial systems (UAS) (page 30) which covers the use of drones. They have also issued general guidance in relation to the responsible use of drones.

7.2 Civil Aviation Authority Permissions
If you are intending to operate a drone (of less than 20kg):

(i) to undertake commercial operations; or
(ii) which is equipped to undertake any form of surveillance or data acquisition:
   (a) over or within 150 metres of any congested area or organised open-air assembly of more than 1,000 people, or within 50 metres of any person (other than the person flying the aircraft or a person under his/her control) or vessel, vehicle or structure which is not under the control of the person in charge of the aircraft; or
   (b) during take-off or landing, within 30 metres of any person (other than the person flying the aircraft or a person under his/her control).

then you will need permission from the CAA in order to do this.

If you are not intending to undertake commercial operations, or to fly a drone equipped to undertake surveillance close to people or properties, then you do not need to obtain permission from the CAA; of course, you must still comply with the other requirements of the ANO (see Appendix 1 for further details), as well as this policy.

7.3 Land owner Permissions
Permission of the landowner must be obtained before a drone is flown over private land. Permission to fly a drone over University-owned land will routinely be granted to staff and students who operate drones in the course of their employment or studies subject to compliance with the remainder of this policy.

7.4 Indoor flights
Guidance published by the CAA provides that “the Air Navigation Order makes no distinction between flights made indoors or in the open; the drone safety criteria continue to apply.”
Notwithstanding this, certain hazard factors are heavily mitigated in that the aircraft is flying in an enclosed environment and access to the venue can be controlled. Persons within the building, and who may be exposed to a hazard by the flight, should meet the criteria for ‘persons under the control of the person in charge of the aircraft’ or else have safety precautions taken on their account (e.g. safety netting, tethered drone, etc). Minor indoor recreational use of a very small and light ‘toy’ drone is not generally regarded as having the same safety implications as for larger drones used outdoors or in commercial service”.

7.5. Training and competence
Individuals must be competent to fly drones. Competence is based upon training and this ensures that individuals possess the relevant skills and knowledge to fly the drone safely and deal appropriately with any unexpected and abnormal occurrence. A training needs’ analysis will help to decide the type and level of training required. Individuals may fly drones under the supervision of an experienced pilot.

Currently there is no drone license available (for drones weighing less than 20Kg), and no legislation or specific requirement for those using small drones for non-commercial activities, or as a hobby, to have any official drone “qualification”. However, if you are intending to use a drone for commercial purposes it is a regulatory requirement to obtain CAA permissions for that work, and therefore necessary to undertake UAS/RPAS/UAV training. It is a requirement that such people will have met the requirements of the UK CAA’s CAP 722 Chapter 4: Civil UAS Remote Pilot Competency (see Appendix 3 for a summary). Any reputable course, such as those run by NATS, should be an enabler to gain permission from the CAA.

Factors such as pilot experience, aircraft mass and the conclusions of the safety assessment should be taken into consideration when determining whether a person should be permitted to act as a pilot or commander of a drone. Advice can be obtained from the University SUAS Committee. If needed, CAA-approved training providers can be found online.

7.6 Risk Assessment
A suitable and sufficient risk assessment of the flight activity must be carried out in advance. This is in addition to the generation of a site assessment, flight plan and operations manual, and should consider the hazards likely to be encountered before, during and after flight. The assessment should be reviewed and updated for each flight undertaken.

7.7 Insurance
The University’s public liability insurance provides cover in relation to the use of drones by its staff and students in the United Kingdom for purposes associated with the business of the University. Staff and students must ensure that their use of drones is covered by the University’s insurance, and must inform the University’s Insurance Office in advance of any flights planned overseas. Further information concerning the University’s public liability insurance is contained within Appendix 3.

The use of drones not covered by the University’s public liability insurance must be the subject of separately arranged public liability insurance cover.

8. Monitoring and Auditing
Compliance with this policy will be monitored by Safety Services and by the University SUAS Flight Committee, who will receive notifications of flights and flight logs. Accidents and incidents involving the use of drones will be reported to both Safety Services and the University SUAS Flight Committee
and investigated. The University’s Health and Safety Executive Group will monitor the implementation of the Policy and its effectiveness.

9. Policy Review
This policy will be reviewed at least three yearly or as circumstances dictate by legislation.

10. References
Legislation:
Air Navigation Order 2016
Management of Health and Safety at Work Regulations 1999
 Provision and Use of Work Equipment Regulations 1998
Data Protection Act 1998

University Policies:
UHSP/0/10 – University Health and Safety Policy
University Data Protection Policy
CCTV Code of Practice

Codes of Practice and Guidance:
Civil Aviation Authority CAP 722
Civil Aviation Authority CAP 398
GUIDANCE/1/EPUW/04 – University Guidance on Provision of Equipment for Use at Work
GUIDANCE/17/RA/00 – University Guidance on Risk Assessment

Data Protection – Guidance from Information Commissioner’s Office:
In the picture: A data protection code of practice for surveillance cameras and personal protection
Guidance on the responsible use of drones

University website: https://intranet.birmingham.ac.uk/hr/wellbeing/worksafe/Use-of-Drones-and-Unmanned-Aerial-Vehicles.aspx

The notification form can be found on the website. It is also possible to email the University SUAS Flight Committee on: drones@contacts.bham.ac.uk
APPENDIX 1

Air Navigation Order 2016

240 Endangering safety of an aircraft
A person must not recklessly or negligently act in a manner likely to endanger an aircraft or any person in an aircraft.

241 Endangering safety of any person or property
A person must not recklessly or negligently cause or permit an aircraft to endanger any person or property.

94 Small unmanned aircraft
(1) A person must not cause or permit any article or animal (whether or not attached to a parachute) to be dropped from a small unmanned aircraft so as to endanger persons or property.
(2) The person in charge of a small unmanned aircraft may only fly the aircraft if reasonably satisfied that the flight can be safely made.
(3) The person in charge of a small unmanned aircraft must maintain direct, unaided visual contact with the aircraft sufficient to monitor its flightpath in relation to other aircraft, persons, vehicles, vessels and structures for the purpose of avoiding collisions.
(4) The person in charge of a small unmanned aircraft which has a mass of more of 7kg excluding its fuel but including any articles or equipment installed in or attached to the aircraft at the commencement of its flight, must not fly the aircraft:
   (a) In Class A, C D or E airspace unless the permission of the appropriate air traffic control unit has been obtained.
   (b) Within an aerodrome traffic zone during the notified hours of watch of the air traffic control unit (if any) at that aerodrome unless the permission of any such air traffic control unit has been obtained; or
   (c) At a height of more than 400 feet above the surface unless it is flying in airspace described in sub-paragraph (a) or (b) and in accordance with the requirements for that airspace.
(5) The person in charge of a small unmanned aircraft must not fly the aircraft for the purposes of commercial operations except in accordance with a permission granted by the CAA.

95 Small unmanned surveillance aircraft
(1) The person in charge of a small unmanned surveillance aircraft must not fly the aircraft in any of the circumstances described in paragraph (2) except in accordance with a permission issued by the CAA.
(2) The circumstances referred to in paragraph (1) are:
   (a) Over or within 150 metres of any congested area
   (b) Over or within 150 metres of an organised open-air assembly of more than 1000 persons
   (c) Within 50 metres of any vessel, vehicle or structure which is not under the control of the person in charge of the aircraft; or
   (d) Subject to paragraphs (3) and (4), within 50 metres of any person.
(3) Subject to paragraph (4), during take-off or landing, a small unmanned surveillance aircraft must not be flown within 30 metres of any person.
(4) Paragraphs (2)(d) and (3) do not apply to the person in charge of the small unmanned surveillance aircraft or a person under the control of the person in charge of the aircraft.

(5) In this article a ‘small unmanned surveillance aircraft’ means a small unmanned aircraft which is equipped to undertake any form of surveillance or data acquisition.

265 Offences and penalties

(6) Any person who contravenes any provision specified in Part 2 of Schedule 13 [including articles 94 and 95] is guilty of an offence and liable on summary conviction to a fine not exceeding level 4 on the standard scale.

(7) Any person who contravenes any provision specified in Part 3 of Schedule 13 [including article 241] is guilty of an offence and punishable:
   (a) on summary conviction:
       (i) in England and Wales by a fine; or
       (ii) in Scotland or Northern Ireland by a fine not exceeding the statutory maximum; or
   (b) on conviction on indictment by a fine or by imprisonment for a term not exceeding two years, or to both.

(8) Any person who contravenes any provision specified in Part D of Schedule 13 [including article 242] is guilty of an offence and punishable:
   (a) on summary conviction:
       (i) in England and Wales by a fine; or
       (ii) in Scotland or Northern Ireland by a fine not exceeding the statutory maximum; or
   (b) on conviction on indictment by a fine or by imprisonment for a term not exceeding five years, or to both.
APPENDIX 2

Insurance arrangements within the University

Extract from UMAL (Universities Mutual) Part III Section (1) Public and Products Liability:

“14. Unmanned Aerial Vehicles

... Public and Products Liability is extended to include liability arising out of or from the ownership, possession or use by or on behalf of the Member (i.e. the University) of any unmanned aerial vehicle (UAV) provided that:

a) The Member (and any person acting on the Member’s behalf) complies with the operating and licensing provisions of the Civil Aviation Authority in respect of the use of the UAV in the United Kingdom, and
b) The UAV is restricted to 500m in altitude, and
c) The maximum range of the UAV is not greater than 1 kilometre from the operator, and
d) The operator of the UAV has obtained the full qualification, where required, from the local aviation authority or is specifically trained, or is being trained in the presence of a competent person, and
e) The UAV is within the airspace of the United Kingdom, and
f) The UAV is not a military vehicle, does not carry weapons of any kind and is not being used for military purposes or in any way involving military purposes”.

Cover when flying overseas

Where an employee or student of the University is using a drone outside of the UK as part of the business of the University, the University’s Public Liability cover applies where agreed in advance. It is therefore essential to inform the University’s Insurance Office of:

a) The countries where the drone is to be used;
b) The specification of the drone;
c) The name and status of the user; and
d) The purpose of the use of the drone.

If a member of staff or a student uses a drone in a personal capacity, neither the University nor UMAL will offer cover against injury or damage.
**APPENDIX 3**

Qualification level requirements for pilots of UAS by relevant mass category (taken from CAP 722)

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<th>Operating mass (maximum)</th>
<th>Pilot competency/Licensing requirements</th>
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<td>7kg or less</td>
<td>None, or NQE competency assessment or AMC*</td>
</tr>
<tr>
<td>More than 7kg – 20kg</td>
<td>None, RPL, NQE competency assessment or AMC*</td>
</tr>
<tr>
<td>More than 20kg to 150kg</td>
<td>RPL, NQE competency assessment or equivalent*</td>
</tr>
<tr>
<td>More than 150kg</td>
<td>RPL or equivalent*</td>
</tr>
</tbody>
</table>

**DEFINITIONS:**

- **NQL** = National Qualified Entity (i.e. approved by CAA to train pilots)
- **AMC** = Acceptable Means of Compliance (number of flight training hours that would satisfy the CAA that formal training isn’t required)
- **RPL** = Remote Pilot’s licence