Unmanned Aerial Vehicles (UAVs & Drones) Procedure	
Enabling Policy Statement; Executive Owner; Approval Route:	Our Safety - Chief Operating Officer - Compliance Committee
Is the Procedure for internal use only (Non-disclosable)?	Disclosable
Associated Policy Statements:	Our Safety – Chief Operating Officer
Authorised Owner:	Director of Health and Safety
Authorised Co-ordinator:	Health and Safety Manager (Professional Services)
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Sub documentation:	UAV Registration Form Remote Pilots Registration Form UAV Operational Approval Form Unmanned Aerial Vehicles Operational Guidance

Approval History

Version	Reason for review	Approval Route	Date
1.0	Reviewed and updated (including in accordance with the PoPP Framework). Replaces the Unmanned Aerial Vehicles Policy (Version 2, dated 15th February 2019).	Compliance (Health, Safety and Wellbeing) Committee	10 June 2025

1. Purpose

This Procedure defines the University's arrangements for the management of unmanned aerial vehicles (UAVs) and their operation for commercial, academic, and recreational use. The arrangements are based on the requirements of the Air Navigation Order 2016, within the framework of UK Regulation (EU) 2018/1139 (the Basic Regulation), and other health and safety and data protection legislative standards.

The aim of this Procedure is, therefore, to provide a framework to effectively manage the risks associated with undertaking UAV flying operations and activities, thus safeguarding the health and safety of staff, students, members of the public, and others from such activities.

2. Scope and Exceptions to the Procedure

This Procedure applies to all drones or UAVs that are built, purchased or rented by the University. This includes any third-party services where UAVs and drones are used, that have been commissioned or approved by the University. This Procedure applies to any of the University's controlled premises and activities, including those conducted with its approval on land it directly manages or that are conducted on land or over property that it does not own.

Its requirements apply to all staff, students, contractors, visitors, and others. This also includes hobby and recreational use of UAVs on University property or privately owned UAVs that are used on university operations.

This Procedure also applies to Surrey Research Park, Surrey Sports Park, and the Students' Union, organising any UAV student events, clubs, or commissioning any third-party to undertake UAV activity on their behalf or on or over property that they manage.

This Procedure does not apply to any drone or UAV that is designed to be used on land or in aquatic environments, unless it is capable of flying operations.

2.1. Specific exemptions

No drone or UAV owned, built, or approved to be used on its behalf is exempt from the requirements of this Procedure. There are, however, exemptions within the legislation which the University will adhere to in respect of this equipment.

All civil aircraft, including UAVs flown outdoors are subject to the Air Navigation Order 2016 (ANO) and associated Rules of the Air Regulations. However, in accordance with its powers under Article 266 of the ANO 2016, the Civil Aviation Authority (CAA) may exempt UAV operators from some provisions of the ANO and the Rules of the Air, depending on the UAVs potential to inflict damage or injury and the proposed flight area of operation.

The level of exemption and restriction is determined by the size and use of the UAV, significant bandings being:

- 0 – 250g,
- 250g – 7kg,
- 7 – 20kg,
- 20 – 150kg,
- >150kg, commercial use (aerial work), recreational use, surveillance (equipped to undertake any form of data acquisition or surveillance).

2.1.1. **Indoor or Non-Open-Air UAV/Drone Flying**

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 a 'closed' netted structure) are not subject to air navigation legislation and CAA requirements. However, any UAVs operated in a University indoor environment must adhere to this Procedure.

2.1.2. **Exemptions for Small Unmanned Aircraft**
Unmanned aircraft with an operating mass of 20 kg or less are defined as 'Small Unmanned Aircraft' and by application of Article 23 of the ANO 2016 are exempt from most of the Regulations applicable to manned aircraft, and which are covered within Articles 94, 95 and 241 of the ANO 2016 and ANO amendments 2018.

Unmanned aircraft with an operating mass of more than 20 kg are subject to regulation as though they are manned aircraft. However, it may be possible to obtain an exemption from certain regulations with which it is impossible for unmanned aircraft to comply.

2.1.3. **Class Mark Exemption**
From 1 January 2023, UAVs with an EU or no class mark will not be recognised in the UK, meaning they will need to be flown under the transitional provisions. The transitional provisions allowed pilots who held aerial work permission issued by the CAA under Regulations 1013/2016 to continue flying their UAVs while transitioning to new permission under Regulations 785/2004. The transitional period has been extended to 1 January 2026, which means that current UAVs with no class mark (or a class mark not recognised in the UK) can be operated in accordance with transitional provisions until this date.

3. Definitions and Terminology

Unmanned Aerial Vehicles or Drones (UAVs) – any aircraft operating or designed to operate autonomously or to be piloted remotely without a pilot on board. Please refer to the University's UAV Operational Summary Guidance Document for variations of terminology used to describe UAVs.

Small Unmanned Aircraft (SUA) – A small UAV refers to any unmanned aircraft—excluding balloons and kites—that has a maximum mass of 20 kg or less, excluding fuel. This weight includes all equipment or articles installed in or attached to the aircraft at the start of its flight.

Note: For electrically powered vehicles the batteries must be included as part of the 20 kg limit. The batteries are in effect regarded as the fuel tank and electrons are regarded as the fuel.

Small Unmanned Surveillance Aircraft (SUSA) – a small, unmanned aircraft (as defined above), which is equipped to undertake any form of surveillance or data acquisition.

Civil Aviation Authority (CAA) – a national or supranational statutory authority that oversees the regulation of civil aviation, which includes the recreational and commercial use of UAVs.

Commercial Operation/Aerial Work – any operation of an aircraft which is performed under a contract between an operator and a customer in return for remuneration or other valuable consideration. Flying operations such as research or development flights conducted 'in house' are not normally considered as 'commercial operation' or 'aerial work' provided there is no valuable consideration given or promised in respect of that flight. Where an academic organisation is openly advertising their capabilities to external organisations and a business relationship is entered, the use of a UAV is likely to be considered a commercial operation.

Recreational UAV Activities – operating a UAV solely for personal enjoyment or hobby purposes, without any commercial, business, or professional intent. This kind of usage is typically non-profit and focuses on leisure activities (e.g., aerial photography/videography, drone racing, exploration and sightseeing, model aircraft flying).

Academic/Research UAV Activities – operating a UAV for the primary focus in advancing knowledge, conducting experiments, or supporting academic projects. The data collected may be used for scientific papers, theses, or educational demonstrations. This use is distinctive from both recreational and commercial applications, and only seeks to advance technological innovation, scientific discovery, or education. Self-funded or research drones developed by institutions such as universities or private businesses can be regarded as non-commercial, if they are not employed in providing a paid service to a third-party or get any monetary or other 'in-kind' gain from the UAV activity. University research is funded through a variety of means (grants, charitable and alumni donations, etc.) and for varying purposes. The exact arrangements must, therefore, be considered on a case-by-case basis.

UAV Remote Pilot –an individual who operates the flight controls of a UAV by manual use of remote controls, or when the UAV is flying automatically, monitors its course and can intervene and change its course by operating its flight controls.

Person Under Control of the Remote UAV Operator/Remote Pilot – persons solely present for the purpose of participating in the UAV flight operation and who are under the control of the event or site manager who can reasonably be expected to follow directions and safety precautions to avoid unplanned interactions with the UAV (Definition clarified by CAA). Such persons could include, third-party contractors, University staff, students or visitors; essentially any other pre-briefed or nominated individual with an essential task to perform in relation to the event.

Spectators or other persons gathered for sports or other mass public events that have not been specifically established for the purpose of the UAV operation are generally not regarded as being 'under the control of the remote pilot of the aircraft'.

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

Briefing – is informing all necessary people of relevant knowledge and information in relation to health and safety to ensure safe completion of their task.

Adverse Incident/UAV Accident – any unexpected or undesirable event that occurs during the operation of the UAV, resulting in either damage or disruption to the UAV or its operations, or a safety hazard to either operator, those under operator's control or anyone else. This can include where actual material damage occurred to the UAV or other property, injury or harm to any individual, or where it is reasonably likely that either of these events could have occurred.

Competency – a person who has the skills, knowledge, attitude, training, and experience to undertake their role and/or task effectively.

Training – is equipping staff, students (and others where the University has a duty of care) with relevant skills to deal appropriately with a given health and safety situation and to operate specialist equipment legally and safely.

Safe System of Work – a formal procedure which results from the systematic examination of a task to identify all the appropriate hazards. It defines methods to ensure that hazards are eliminated, or risks minimised too as low as reasonably practicable.

As low as Reasonably Practicable – means where the cost of the added risk control measure is not grossly disproportionate to the level of risk reduction achieved.

Pilot in Command (PIC) – the individual responsible for the safe operation of the UAV during the flight.

Visual Line of Sight (VLOS) – the operation of the UAV within the direct, unaided visual observation of the pilot or an observer.

Flyer ID – unique Pilot ID issued on completion of Drone & Model Aircraft Registration and Education Scheme (DMARES).

Operator ID – required by any person (or maybe an organisation) operating any UAV 250g and over, and any UAV with a camera (excludes UAVs classed as a toy).

Open Category – describes low risk operations (including 3 sub-categories A1, A2, A3) that, if set parameters are followed, can be safely conducted and require no specific CAA authorisation.

Specific Category – describes medium risk operations that cannot be conducted within the parameters of the Open Category. Requires proven pilot competency and clearly defined operator procedures authorised by the CAA.

Certified Category – describes higher risk UAV operations that pose a significant risk to people, property, or other airspace users. These operations require a higher level of regulatory oversight and safety assurance. The rules in this category resemble those applied to traditional manned aviation, especially concerning airworthiness, certification, and operational standards.

Operational Authorisation – CAA authorisation required before any UAV operation within the 'Specific' or 'Certified' Category takes place.

Geofencing – a technology that creates virtual boundaries around a specific geographic area, using GPS, RFID, Wi-Fi, or cellular data. When applied to drones, geofencing prevents the UAV from flying into restricted or unauthorised zones by triggering a response when the drone enters, exits, or is near a predefined area.

No-Fly Zone (NFZ) – a designated area where drones (and sometimes other aircraft) are prohibited from flying. These zones are established to ensure safety, security, and privacy. Drones are restricted from flying in these areas due to potential risks such as interference with manned aircraft, national security concerns, or protection of sensitive locations.

4. Procedural Principles

4.1. Commitments

Compliance with the requirements of this Procedure will ensure:

- The University meets its obligations in respect of legislation.
- Everyone is aware of their roles and responsibilities.
- The safety of staff and students from the risks of UAVs.
- The safety of others from UAVs (including contractors, visitors, members of the public) is not compromised whilst on University premises.
- The protection of University assets and buildings.
- That staff, students, and others are appropriately informed, instructed, and where necessary trained in UAV operations.
- No one recklessly or negligently causes or permits an aircraft to endanger any person or property or allow any article or animal (whether or not attached to a parachute) to be dropped from a UAV, so as to endanger persons or property.

4.2. Arrangements

In order to meet the above objectives, the University will:

- Clearly define the organisational arrangements for achieving compliance (see roles and responsibilities section of this Procedure).

- Ensure resources are made available to achieve compliance.
- Establish a safe system of work for UAV operations conducted directly or commissioned on its behalf, on its estates or sites that it directly manages, including documented management arrangements and an approval process in accordance with the CAA classification of UAV operations.
- Ensure all relevant permissions are obtained prior to any UAV operations being performed, both on University land and on property owned by other parties. This includes permissions from appropriate regulatory bodies, where needed.
- Ensure UAVs that are purchased, built, or approved for use, comply with relevant standards and are safe to use, including that they have a CE or UKCA mark and air worthiness certification.
- Confirm all operators are registered with the CAA and all UAVs are labelled with the appropriate Operator ID as needed, including for any third parties engaged.
- Confirm that those operating and flying UAVs have an approved current registration.
- Ensure that UAVs owned by the University are appropriately controlled to prevent unauthorised use, by both physical access to the equipment and operational controls, or via cyber security and remote access to controls or collected data.
- Check that all UAV operations have appropriate insurance coverage.
- When required by the regulatory transitional arrangements, ensure that all UAVs it owns, builds, or modifies, are class marked. Also, those used on their behalf are classed marked, as necessary.
- Consider all UAV operations to be potentially hazardous and, therefore, subject to risk assessment and the implementation of control measures prior to flight operations commencing.

Note: For 'Open Category' lower risk operations, the University risk assessment guidance and templates should be used. For more complex operations, the University will adopt CAA guidelines, with 'Specific Category' flights following either Specific Operations Risk Assessments (SORA) or the Predefined Risk Mitigation PDRA-01 Framework. For 'Certified Category' flights, a full safety case report must be completed, as per CAA requirements.

- Where practicable, conduct all UAV operations using aircraft with a mass of less than 7 kg (including any payload). Where this is not possible, any UAV operated will have management and approval processes and will comply with CAA regulations.
- Ensure that there are sufficient resources, so UAVs are maintained and inspected in line with manufacturer's instructions. This includes pre- and post-flight requirements (e.g., recording of battery logs), as per the manufacturer's instructions.
- When performing 'Specific Category' flights, confirm that the Operator has obtained and maintained CAA Operational Authorisation, with appropriate checks to ensure this.
- Ensure that all those personnel managing UAV operations, equipment, approving or conducting flying operations, are competent and qualified to, approve, supervise, perform the flight, and have a good working knowledge of the UAV being operated. This includes verifying that staff and students maintain necessary training and competency, including updating flight logbooks.
- Implement an approval process for anyone wishing to fly UAVs, including third-party operations that the University commissions or that involves 'overfly' of the University estate. This includes social or recreational flying on its estates or land, if UAV is above 250g and is not a toy.

Note: Any UAV operations involving equipment in excess of 7 kg (including any payload) is considered a high hazard activity and the risk assessment will be subject to sign-off by the Head of School/Discipline/Directorate (or equivalent) and consultation with the relevant Health and Safety Manager/Advisor. Furthermore, any intension to develop or operate a UAV in excess of

20 kg must be notified to the relevant Professional Services/Faculty Health and Safety Manager/Advisor, at the earliest opportunity.

- Establish a safe system of work for UAV operations conducted directly or commissioned on its behalf or on its estate or sites that it directly manages, including documented management arrangements and an approval process in accordance with the CAA classification of UAV operations.
- Ensure that for any UAV operations it approves or commissions, the impact on the environment or local wildlife is reduced as far as is reasonably practicable. This will form part of the risk assessment and approval process.
- Ensure any UAV-related incident is investigated and, where required, reported to relevant regulatory bodies. All incidents will be reported through the University's incident reporting system.
- Implement sufficient controls and checks on University UAVs being built, purchased, and rented, including a UAV registration form, which must be completed prior to the UAV being used on site for the first time.
- When flying with any form of surveillance system and collecting data, provide reasonable instruction to staff and those that may be impacted prior to the UAV operation. Where needed, staff will be instructed if they need to gain informed consent from any party, impacted by the collection or processing of personal data. The University will ensure the collection and management of any data complies with Our Data Policy and associated Procedures, including the completion of data impact assessments and data sharing agreements, as necessary.
- Ensure that any geofencing or no fly zones are followed, unless appropriate permissions and consents have been given (in writing) prior to the operation being performed.
- Review equipment and management arrangements periodically or whenever there are changes in relevant legislation, guidance, or to University management structures.

4.3. University Use of UAVs

4.3.1. **UAV Purchasing, Renting, Building or Modifying UAVs**

The staff member who is designated as the Operator of any UAV purchased, rented, built on site, or that is modified in any way, is required to ensure that it is safe, built to appropriate safety standards and has appropriate CE or UKCA markings. If a staff member or student is constructing or modifying a UAV, they must get approval of the appropriate Head of School/Director of Centre or Institute, the Faculty Health and Safety Manager/Advisor, and the UAV Designated Operator, prior to doing so. Any UAV that is purchased or built must be registered by its operator using the UAV Registration Form. Any UAVs that have been modified where their class or registration requirements have changed will also require the operator to complete a new registration form.

For Specified and Certified UAV operations, the staff responsible for UAV construction or modification must ensure that all appropriate assessments of air worthiness are completed prior to it being used for the first time. Any modification that impacts class rating or weight, may also impact the operational approval needed from the CAA. It may also change the training and competence needs for those conducting the flying operations.

For any UAVs rented, built, or modified post 1st of January 2026, it will be the responsibility of the Designated Operator or those constructing/modifying, to ensure the correct class markings are present.

4.3.2. **UAV Operator and Flyer Registrations**

Staff members responsible for the use and day-to-day management of the UAV must register as an Operator with the CAA if the UAV has a mass of 250g or more or if below 250 grams and is not

a toy drone with a camera or other surveillance or data gathering equipment.

Note: UAVs under 250g (without surveillance equipment) do not need to have a registered operator ID.

The Operator must have a valid registration when the UAV is flown, and the registration number must be displayed on the aircraft. A flyer or remote pilot must not fly a UAV unless they are sure that the Operator has a valid registration, and the registration number is displayed where necessary.

It is the Operators' responsibility to ensure that any staff, students, or other parties that are approved to conduct flying operations are registered with the CAA, if the UAV is 250g or above (anything, toy, drone with or without camera) you will need to have an operator and flyer id.

Prior to any flying operations, members of staff or students approved to fly a UAV on behalf of the University must also complete the University's UAV Flyer Registration Form.

4.3.3. **UAV Open Category Operation**
To operate UAVs in the Open Category, the following minimum criteria must be met:

- The flight takes place at a safe distance from persons and not above crowds.
- UAV must be operated within visual line of sight (VLOS).
- UAV must not be flown more than 120m (400ft) from the closest point of the earth.

The Open Category has 3 sub-categories that contain operational limitations (i.e. equipment used/separation distances). The Aircraft Class determines which sub-category the operation falls under, as follows:

- A1 – Close to people and potential over flight (C0 and C1 UAVs only)
- A2 – Close to people, no over flight (C0, C1 and C2 UAVs only)
- A3 – Far from people, no over flight (C0, C1, C2, C3 and C4 UAVs only).

It is envisaged that most UAV operations by staff and students will involve Class C0 in the A3 sub-category.

4.3.4. **Specific Category Operations**
Specific Category Operations (up to 25kg) typically apply to more complex higher-risk operations that do not fit within the limitations of the Open Category. Any operation that is not within the Open Category is considered by the University to be high risk and must be approved by the Central Health and Safety Team or a Faculty Health and Safety Manager/Advisor, prior to submitting it to the CAA for approval. Specific Category flights will need Operational Authorisation (OA). Any OA granted is specific to the named Operator and dependent on the operations manual, risk assessment and evidence supplied to the CAA. For this category, UAVs Class C2 and above are used.

4.3.5. **Certified Category UAV Operations**
Where activities conducted by the University fall within the Certified Category (i.e., anything that is not considered Open or Specific), the Operator must get appropriate authorisation from the CAA. Any operation should be approved by the Central Health and Safety Team or a Faculty Health and Safety Manager/Advisor, prior to submitting to the CAA for approval. Certified Category flights will need Operational Authorisation (OA). Any OA granted is specific to the named Operator and is dependent on the operations safety case report, risk assessment, and evidence supplied to the CAA. Any UAV used within the Certified Category must be registered with the CAA. For this category UAVs of class C4 and above are used.

4.3.6. **University UAV Operational Approval Process**
Any UAV operation performed by staff, students or third parties will need completion of the University's UAV Operational Approval Form, which must be completed (with all requested evidence supplied) at least three weeks before the planned flight date. This approval process applies to any staff, students, or third parties using their own UAV or equipment owned by the University. Where applicable, CAA operational approvals must be in place prior to requesting approval from the University.

Note: The approval process is not required for a UAV that is classified as a toy, and is 250g or less, which does not have any surveillance equipment installed on it and is used for recreational flights only.

For the University approval process, evidence of the following must be provided:

- Valid insurance. Any UAV used on an approved University activity or on University property, will be required to have third party insurance for recreational use, unless it is deemed to be a toy below 250g, with no surveillance equipment, and is used only recreationally. UAVs of any size and weight limit if used for commercial or educational purposes will need to have appropriate insurance. Users will need to have Personal Liability Insurance, Employer Liability Insurance or Commercial Drone Insurance, or provide confirmation they are covered by the University insurance provider.
- CAA Operational Authorisation, if needed for the UAV operation. Where Operational Authorisation is not necessary, the following will be provided as part of the approval:
- UAV Class and the sub-category of the flight.
- Confirmation that that the flight will be far from people with no overflight of uninvolved people.
- Assurance that there will be no flying over a congested area.
- Operator ID obtained and displayed on UAV.
- Adequate maintenance and checks are performed (e.g., flight logbook, pre-and-post flight inspection records).
- Those operating UAVs have the necessary qualifications and are competent, based on the type of UAV and operation being performed (e.g., flyer ID, certificates of training, flight logbooks).
- Risk assessment for the operation and category of the flight (please refer to the University's Summary Guidance for further information on UAV Operations Risk Assessment).
- Depending on the category of flight, operational method statement, flight plan, safety case report, and operator's manual.

Note: Approval of routinely performed Open Category UAV Operations can be granted indefinitely to a person, project or department provided:

1. Local records of training and competency are maintained, and
2. The operation is performed using the UAV specified in the original approval, and
3. The activity and location of the UAV operation remains unchanged.

If there are any changes to the UAV(s) being used, locations of use, or risk of the activity, then a new approval is required. Any UAV operations in the Specific or Certified Categories will need approval for each flight.

Where aerial work is around or above University buildings or property, the Operator, Designated Remote Pilot, or the staff member that engaged the UAV contractor must inform Campus Safety in advance of the flight. If the operation is likely to impact the external estate or require areas of the site to be temporarily closed, this will need to be arranged with the appropriate departments no less than 3 weeks prior to the operation. Where operations are likely to cause disruption to

University activities and or events, the relevant Faculties and Directorates must be advised in advance to agree the time for overflying that minimises such disruptions. For a summary of the approval process, please refer to the UAV operational authorisation flow chart in the UAV Summary Guidance document.

4.3.7. **External UAV Contractors and Specialists**
The University's UAV Operational Approval Process will require a third-party to provide evidence to the Central Health and Safety Team for review and approval. For a summary of the approval process, please refer to the UAV operational authorisation flow chart in the UAV Summary Guidance document.

Third-party approval must be requested for each UAV operation being performed. Such approvals will not be granted for the operation to be performed on a re-occurring basis.

Note: Any third-party engaged to supply UAV services are considered a contractor and are subject to the health and safety requirements and University processes for engaging contractors. Along with this Procedure, you must also adhere to the requirements of the Management of Contractors and Service Contracts Procedure and complete a site health and safety induction.

4.3.8. **Requirements Applicable to All Outdoor UAV Operations**
All outdoor UAV operations that constitute a 'commercial operation' or 'aerial work' shall be carried out by a CAA permitted pilot/organisation, with non 'commercial operation' or 'aerial work' also performed in accordance with ANO Regulations and CAA Guidance Document CAP 722. This includes hobby and recreational use of UAVs on University property. All outdoor UAV operations, even if below 7 kg and non-surveillance, shall be conducted in accordance with the following restrictions:

- Within direct, unaided visual line-of-sight (VLOS) of the pilot.
- No higher than 120 metres (400 feet) above the surface and no further than 500 metres from the UAV Operator.
- Outside of restricted airspace and other restricted areas over or near aerodromes (within 1 km of an aerodrome boundary), unless permission has been granted by the CAA or other relevant controlling authority.

In addition, the following limitations will be applied to all outdoor UAV operations, where practicable. Any deviation from these limitations must be justified within the risk assessment.

- 150 metres away from congested areas and not within 150 metres of an open-air assembly of 1,000 people or more.
- Not directly overhead (at any height) or within 50 metres of persons, vehicles, vessels and property, unless those persons are 'under the control' of the Remote Pilot.

4.3.9. **Outdoor Operation of Small Unmanned Surveillance Aircraft (SUSA) - Additional Requirements**
Any outdoor UAV operation that constitutes "Aerial Surveillance" shall be conducted in accordance with the following additional limitations:

- 150 metres away from congested areas and not within 150 metres of an open-air assembly of 1,000 people or more.
- Not within 50 metres of persons, vehicles, vessels and property, unless those persons are 'under the control' of the Remote Pilot of the SUSA. Unless permission has been granted by the CAA and impacted parties.

4.3.10. **Autonomous/semi-autonomous UAV operations**
Any autonomous/semi-autonomous UAV operations must be 'under the control' of a Remote Pilot, who is able to intervene and take direct control within a few seconds. The pilot must be

presented with enough information to have continuous situational awareness.

4.3.11. **Remote Pilot Competency**

4.3.11.1. Open Category

Staff and students wishing to operate a UAV in the 'Open Category' must seek prior approval, submitting the UAV Flyer Registration Form at least three weeks prior to the operation. All remote pilots of UAVs with a mass of 250g or more will be required to undertake competency testing. As part of this process, all flyers must, as a minimum:

- Complete the on-line CAA foundation course – DMARES.
- Obtain a Flyer ID on completion of the DMARES course.
- Demonstrate that they are competent before undertaking any flight.
- Fulfil any specific requirements identified during the Flyer Authorisation Process.

4.3.11.2. Specified Category

To fly in the Specific Category, all competencies stated in the above Open Category much be achieved, as well as obtaining a General Visual Line of Sight Certificate (GVC). GVC must be obtained from a CAA-approved Recognised Assessment Entity (RAE).

4.3.11.3. Certified Category

This category has the most stringent training and competency requirements, which is closely monitored by the CAA. Certified pilots will require a Remote Pilot License or certification like that of manned aircraft pilots.

Any UAV Operator must not allow the aircraft to be flown unless satisfied that the Remote Pilot has passed the appropriate competency test. Pilots must provide evidence of their ability to operate the specific type of UAV for the operation being performed (a copy of flight logbook and qualifications can be used).

Note: Additional competencies may be required depending on the UAV Class and how close the UAV will fly to uninvolved persons and built-up areas. In some instances, a practical flight assessment by the UAV Operator may be necessary.

4.3.12. **Adverse Incident/UAV Accident, Emergency Management and Statutory Reporting**

Any adverse incident involving a UAV, which includes failure or use leading to harm to an individual person or group of people, material damage to property or equipment, or that had the potential to cause such harm or damage, must be reported using the University's incident reporting system. Such incidents must be reported as soon as possible, as depending on severity, the University may have to notify regulatory bodies within 24 hours of any occurrence.

The CAA has specific reporting requirements for UAV incidents, including failures which come under the mandatory reporting scheme. If the incident is serious enough, it may need reporting to the Air Accidents Investigation Branch (AAIB) of the Department for Transport. Any incident that results in harm and injury to a member of the public or a staff member may also need reporting to the Health and Safety Executive (HSE), under the Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations (RIDDOR). Incidents may need reporting to one or all the above authorities depending on severity. A UAV emergency response and reporting flow chart can be found within the University's UAV Guidance Summary Document.

Contractors must report any incidents to their University point of contact as soon as possible, who will then be responsible for reporting the incident on the University's incident reporting system. In the event of an incident involving contractors/third parties who are not working on behalf of the University, responsibility for reporting (including statutory notifications and investigation) rests with the contractor/third party in charge of the UAV operation. To prevent re-occurrence,

the University may request a copy of such statutory notifications and investigations from the third party.

4.3.13. **Data Protection Requirements & Breaches Involving UAVs**
Images and data captured by UAVs owned by the University or used on University run and managed projects is, by default, University property, unless otherwise agreed. No film, photographs, data, sound recordings or other material captured by or gathered for the University may be used without the University's consent, in accordance with the Our Data Policy and other data management procedures. For data captured by a third party or by the University for others, the initial commissioning documents should set out clearly which party owns and/or may use the data, and specifically for what purpose. The University's Ethics for Teaching and Research Policy and an Ethical approval process may also apply.

Image capture by UAV mounted cameras, where they capture identifiable individuals will come under the requirements of the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR) and, therefore, where an individual is identifiable, written consent may be required, or notices may need to be visibly displayed so that individuals are aware that filming is taking place and/or images are being captured. It should be remembered that incidental image capture can happen when filming buildings and land. Use of UAVs to capture human behaviour, or which intentionally capture facial images for research or other projects may require ethical approval and will need to follow the requirements of the Research Data Management Procedure.

Any data collection or processing of data that comes from UAV operations may require a Data Protection Impact Assessment, or if you share data outside of the University, an appropriate Contract/Data Sharing Agreement. All relevant data protection documentation and signed agreements should be submitted as evidence as part of the UAV Operational Approval Process.

4.3.14. **Student UAV Research Projects Management & Approvals**
When students are planning their own research, learning and/or academic activities which include the operation or use of UAVs, their research supervisor or lecturer is responsible for ensuring compliance with this procedure. This may include ensuring the student undertakes a suitable and sufficient risk assessment, develops necessary flight plans, gains necessary approvals with the CAA, and any internal University approvals of the UAV operations being performed. The resulting documentation and assessment must be formally approved by the research supervisor/lecturer prior to commencement of the activity, who must also ensure all identified risk control measures are in place. Although the research supervisor or lecturer is responsible for approving the research project, they are not responsible for approving the UAV flights and may not be competent to determine the sufficiency of the documentation or help with the creation of it, therefore, other competent persons may be needed to help create any necessary documentation.

4.4. Roles and Responsibilities
All responsibilities can be delegated, unless otherwise stated, but it remains the responsibility of the named roles to ensure they are completed in accordance with this Procedure and that those they delegate any responsibility to are adequately competent to fulfil the responsibility.

4.4.1. Heads of School/Discipline/Directorate (or other Senior Managers as administratively appropriate) have overall responsibility for:
- Ensuring all UAV activities within their area of responsibility are assessed and suitable control measures implemented.
- The provision of resources to enable compliance with this Procedure.
- The provision of suitable facilities to ensure UAVs are kept secure to prevent unauthorised use.

- Where UAVs are developed, designed, built and/or modified within their area of responsibility, there is sufficient resource for the assessment of air worthiness, if required.
- Ensuring all staff and students approved to manage or perform UAV operations are trained, instructed, and supervised.
- Confirming that effective arrangements are in place where facilities are shared or where staff and students are working on premises managed by another employer.
- Implementing emergency plans and procedures to deal with foreseeable UAV adverse events and incidents.
- Implementing rules and procedures to ensure that UAVs are used responsibly and safely.
- Ensuring that where data is collected or processed, appropriate permissions from those whom the data was collected are gained. Ensuring that any data collected is protected, sufficiently controlled, and only processed in a way that meets the University's GDPR requirements.

Note: *Head of School/Discipline/Directorate is defined, for the purposes of this Procedure, as those having UAVs within or used by personnel within their area of responsibility.*

4.4.2. Designated UAV Operators are required to:

- Obtain an operator's ID prior to taking ownership of any UAV and renew this annually with the CAA.
- Ensure that all UAVs that they are responsible for are marked with their operators' ID and registered with the University.
- Confirm that anyone they allow to use their UAV equipment or conduct UAV operations has the necessary qualifications, are registered with CAA, trained to be able to fly the specific UAV, and can perform the specific type of operation. They must ensure the Flyers or Remote Pilots IDs are in-date and that they are registered with the University.
- Prior to any flight, ensure permission has been obtained from the property owner (where required), including relevant University stakeholders.
- Ensure that there is a risk assessment for regular UAV operations they perform/manage, or, where necessary, a specific risk assessment is carried out prior to operation.
- Develop safe systems of work or UAV flight plans, as appropriate, including an Operators Manuals, where specifically required.
- Ensure that no operation is performed unless it has been approved under the University UAV Operational Approval Process. That the Head of School/Discipline/Directorate has been informed of any activity where the risk assessment has indicated a high residual risk or any operations involving vehicles in excess of 7kg.
- Ensure that UAV operations do not breach or compromise any no-fly zones or restricted air spaces, and if this does occur, the operation is halted immediately and reported.
- Ensure that UAVs are adequately maintained, inspected, and checked as per manufacturers' guidelines. This includes that any security and software updates are performed as per the manufacturers or software developers' requirements.
- Ensure Flyers and Remote Pilots understand their responsibilities and follow the established rules and restrictions. Including that there is appropriate supervision and monitoring of flights and that operations are performed as per their flight plans. This may not be the Operator themselves but delegated to another competent person(s), with the suitability of supervision based on the type of UAV, classification of the UAV operation, and the risks involved.
- Confirm that there are appropriate pre-and-post flight checks and inspections performed and recorded.
- Ensure that all UAV's are kept secured at all times to prevent unauthorised use or access to the systems.

- Report any UAV-related incident on the University's incident reporting system. This includes reporting any breaches to established flight parameters that they witness or have reported to them.
- For any data collected or processed, they must ensure that appropriate permissions from those whom the data was collected are gained. Ensuring that any data is protected and sufficiently controlled and only processed in accordance with the University's GDPR requirements.
- Ensure that all flights are recorded in a flight logbook for the UAV and the Flyer.

4.4.3. University UAV Flyers & Remote Pilots (Staff, Students, & Anyone Approved to Perform UAV Operations by the University) are required to:

- Complete necessary training and hold any regulatory permits, registrations and pilot competencies necessary for the intended UAV operation, and renew the training as specified by the approved body. To complete any other training as deemed essential by the University.
- Register with the University as an approved flyer, using the Approved Flyers Registration Form.
- Check prior to flying any UAV, that it is marked with the operator ID.
- Prior to any flight, ensure permission has been obtained from the property owner (where required), including relevant University stakeholders.
- Ensure that no operation is performed unless it has been approved under the University UAV Operational Approval Process. Also, the Head of School/Discipline/Directorate has been informed where the risk assessment has indicated a high residual risk, or any operations involving vehicles in excess of 7 kg.
- Ensure that UAV operations do not breach or compromise any no-fly zones or restricted air spaces, and if this does occur, the operation is halted immediately and reported.
- For any data collected or processed, they must ensure that appropriate permissions from those whom the data was collected are gained. Ensuring that any data is protected and sufficiently controlled and only processed in accordance with the University's GDPR requirements.
- Develop a risk assessment for their UAV operations. Where a risk assessment is already in place, all Flyers and Remote Pilots must operate in accordance with its requirements and any established safe system of work.
- Not undertake any UAV activity that they have not been approved to perform and adhere to the flight restrictions.
- Complete and record any prescribed pre-and-post flight checks and inspections.
- While under their control, ensure that UAV(s) remain secured to prevent unauthorised use or access to the systems.
- To report any defects, errors or omissions in procedures, PPE or equipment, including any breaches of the agreed flight parameters to the UAV Operator or to the University Health and Safety Department.
- Report any UAV-related incidents on the University's incident reporting system.

4.4.4. Managers and Supervisors of Staff and Students (including Academic Lecturers or Research Supervisors for Student UAV projects) are responsible for:

- Ensuring compliance with this Procedure and that appropriate approvals for the UAV operation are obtained, including approval via the University's UAV Operational Approval Process.

Note: For student projects, the academic lead may give approval for the project, but this will not include approval for the operational flight(s).

- Ensuring that their Head of School/Discipline/Directorate is informed of any UAV operation that falls within the 'Specified' or 'Certified' Categories or is being performed involving vehicles in excess of 7 kg, or if a risk assessment has indicated a high residual risk associated with the flight operation.
- Ensuring project work does not commence without a risk assessment being conducted and identified control measures implemented.

Note: Manager/Supervisor must ensure their staff member or student has either carried out a risk assessment or has read and confirmed they will operate in accordance with any existing assessment/safe system of work.

- Confirming that any regulatory permits, registrations and pilot competencies necessary for the intended project work are in place. This includes ensuring that all UAV Flyers and Remote Pilots are registered with the University.
- Ensuring that adequate information, instruction, training and, where necessary, supervision is provided.
- Checking that the operations being performed and the individuals performing them are covered by insurance (University or other).
- Assuring themselves that where there is data collected or processed from UAV operations, appropriate permissions from those whom the data will be collected are gained. Ensuring that any data collected is protected and sufficiently controlled and only processed in a way that meets the University's GDPR requirements.

4.4.5. Contractors are required to:

- Comply with this Procedure and the University's Management of Health and Safety for Work and Services Contractors Procedure.
- Ensure they hold any regulatory permits, registrations and pilot competencies necessary for their UAV operations, providing evidence of this upon request.
- Ensure that their UAVs are marked as necessary, including the Operator ID.
- Ensure that during UAV operations that they authorise, there is no breach or compromise of any no-fly zones or restricted air spaces, and if this does occur, the operation is halted immediately and reported to their University contact.
- Hold necessary employer, public liability or UAV activity specific insurance, and provide evidence of this to the University prior to performing UAV activities.
- Carry out a risk assessment for any work that will require the use of UAVs prior to that work commencing, as per CAA requirements and depending on the category of the UAV operation. Anyone operating UAVs or supporting UAV operations under their management/supervision shall be informed of the risk assessment findings and other safety documentation.
- Implement any control measures, including emergency procedures, identified by the risk assessment, including the provision of any PPE.
- If needed, develop and operate in accordance with any Flight Plan, Operators Manual or Safety Case Report (as required by CAA Regulations or the University), and supply this to the University on request.
- Ensure Flyers and Remote Pilots understand their responsibilities and follow the rules and restrictions established for the UAV operation, including appropriate supervision and monitoring of flights as per their flight plans.

Note: This may not be the Operator themselves but delegated to another competent person(s), with suitability of supervision determined by the type of UAV, classification of operation, and the risks involved.

- Ensure that there are appropriate pre-and-post flight checks and that inspections are performed and recorded.

- Secure UAVs to prevent unauthorised use or access to the systems.
- Report any UAV-related incidents to their University contact. This includes reporting any breaches of established flight parameters that they witness or that are reported to them.
- Where there is data collecting and processing, appropriate permissions from those whom the data was collected are gained. Ensuring that any data collected is protected and sufficiently controlled and only processed in accordance with the agreed contract and/or data sharing agreement.
- Make certain that their UAVs are maintained and inspected in accordance with the manufacturer's instructions and that any security and software updates are performed as per the manufacturer or software developer requirements.

4.4.6. University Contact for Contractors are required to:

- Make contractors aware of this Procedure and and the University's Management of Health and Safety for Work and Services Contractors Procedure.
- Inform contractors of any factors that may affect the contractors' risk assessment relating to the site, other operations being performed, or specific events occurring during the UAV operation.
- Liaise with relevant stakeholders.
- Confirm with the contractor that approval has been obtained for the UAV activity, through the University's UAV Operational Approval Process.
- Ensure that due diligence is performed on any contractors engaged for UAV operations, confirming that they hold the necessary regulatory permits, registrations and pilot competencies for the intended work (based on UAV flight category), and that such evidence is provided and retained. They must also check the contractor's Operator ID and Flyer IDs, and that training certification is in date.
- Confirm that permission has been obtained from the property owners (where required).
- Assure themselves that where there is data collecting and processing, appropriate permissions from those whom the data was collected from are gained. Confirming that any data collected is protected and sufficiently controlled and only processed in a way that meets the University's GDPR requirements. This includes confirming that data sharing and processing arrangements are included in the contract or in a data sharing agreement.
- Complete a data impact assessment, if the UAV operation is collecting data.
- Request that a risk assessment and other key safe system of work documentation is provided for the University UAV Operational Approval Process.
- Request evidence of the UAVs maintenance and security provisions.
- Monitor that contractors are performing in accordance with the risk assessment and flight plans provided.
- Record any UAV-related incidents reported to them or witnessed by them relating to contractors, using the University's incident reporting system ensuring that an investigation is carried out by the contractor, with a copy of any findings/required actions provided to the University. This includes reporting any breaches of established flight parameters.

Note: The above responsibilities apply to any University employee who authorises and/or engages the services of a third party to conduct UAV operations on behalf of the University, on both land it owns directly, actively manages, or other land that it does not own directly but has commissioned the UAV activity. It may also include any tenants on University controlled/managed land that approves or commissions third party UAV operations.

4.4.7. Director of Health and Safety is responsible for:

- The provision of advice and guidance on the application of legislative requirements.
- Where necessary, liaising with the enforcement authorities, ensuring that UAV-related

incidents are appropriately investigated and, where necessary, reported under RIDDOR or as per CAA requirements.
- The provision of advice, training and guidance to relevant persons within the University regarding compliance with this Procedure. This advice may be given directly or through appointed competent persons.
- Monitoring compliance with the requirements of this Procedure.

4.4.8. Faculty/Professional Services Health and Safety Managers/Advisors are responsible for:
- The provision of practical advice and guidance on the safe use of UAVs.
- Advising on the training needs of those engaged in UAV activities.
- Assisting with the investigation of any incidents or accidents.
- Remaining up to date and informed regarding current best practice and legislation pertaining to the use of UAVs.
- To review submitted UAV operations and approve these operations within their area of control.

4.4.9. Compliance Management Group

The purpose of the Group is to contribute to the development and direction of health and safety compliance management across the University estate. The Group monitors health and safety performance in respect of defined compliance areas, including UAV operations, and provides a forum for obtaining input from relevant departments on such compliance matters. The Terms of Reference of the Group can be viewed here.

5. Governance Requirements

5.1. Implementation: Communication Plan

This Procedure will be available via the University Policies and Procedures webpage. This Procedure and other relevant supporting documentation are also published on the University Health and Safety intranet site.

Relevant Health and Safety Committees (including Estates & Facilities and Campus Services) will be notified, and information disseminated through their line management. The Faculty Health and Safety Committees will also be informed.

This Procedure will also be referenced and communicated through instructions and guidance supplied by the University via its Contractor Health and Safety Induction material.

This Procedure and relevant supporting documentation are also published on the University's Health and Safety intranet site.

5.2. Implementation: Training Plan

The University will ensure all Flyers, Remote Pilots, and Operators, using/managing UAVs (used or owned by the University) are appropriately trained and competent. The training, instruction and level of supervision provided will be based on the category of the UAV operation being performed and as per the findings of the risk assessments, or as per CAA authorisation for UAV operations, applicable regulations, and CAP722 guidance

The level of training will also reflect the types of UAVs, form of flying, location, complexity of the operation, and whether the operation is recreational, commercial, or research and academic.

Flyers and Remote Pilots will be required to provide evidence of their experience and competence with the type of UAV they are flying, form of flight, flight plan, and as per the flight categorisation.

The University will inform contractors of any specific procedures in relation to UAV use and will assure itself that they have the necessary training, qualifications, and competency to perform operations for which they are engaged.

5.2.1. **Flight Logbooks**

The University will require any staff member or student that is performing non-recreational UAV operations (on its behalf) to complete a flight logbook. This is a formal record of each UAV and flyer completed operation. Flight logbooks will also be used to assess competency and training provision. It is the responsibility of the UAV Operator for anyone they have authorised to ensure logbooks are completed and kept up to date.

5.2.2. **Drone & Model Aircraft Registration and Education Scheme (DMARES), Operator and Flyer ID's**

DMARES is a mandatory registration and education programme administered by the CAA. The scheme ensures that anyone flying UAVs and model aircraft in the UK adheres to safety and legal standards. Operator and Flyer ID registrations are necessary for anyone or any organisation responsible for a UAV or model aircraft that weighs over 250g, or any UAV equipped with a camera (regardless of weight). Its aim is to link a UAV or the UAV operation with an organisation or individual.

To be an Operator you must be at least 18 years of age. The Operator ID must be visible on the UAV(s) owned by that Operator, which helps with identification following an incident. Once an ID is registered, the Operator can have multiple UAVs under the same ID number. Furthermore, any UAV that is used within a Certified Category Operation must be registered with the CAA, via the CAA website.

The purpose of the flyer ID is to confirm that the flyer has the knowledge required to operate safely. This is done by performing training and an online test that covers safety guidelines and regulations. This training and test are free, is accessible via the CAA website, and you must be a minimum of 13 years old to be a registered flyer without parental approval.

Flyer IDs last for 5 years before a re-test and new registration is required. Operator ID must be refreshed annually.

5.2.3. **A2 Certificate of Competency (A2 CofC)**

The A2 CofC is for UAV flyers in the UK who want to fly certain UAVs closer to people than would typically be allowed under the 'Open Category'. It is part of the CAA framework for regulating safe UAV use in populated areas and is designed for those who want to operate more flexibly, especially in urban or suburban environments. The A2 CofC is specifically for UAVs in the 'Open Category' with a Class Mark C2. This includes drones weighing up to 4 kg.

If a UAV does not have a C2 class mark, you can still use an A2 CofC certificate, but you must maintain a minimum distance of 50 meters horizontally from uninvolved people. With an A2 CofC and a C2-marked UAV you can fly your drone up to 30 meters horizontally from uninvolved people and when using it at low speed (usually limited to 3 m/s), you can fly as close as 5 meters to people horizontally. These privileges apply only in the A2 subcategory of the 'Open Category', which is for UAVs that are lower risk to the public. This training consists of an online theoretical course with an online exam completed through a CAA approved Recognised Assessment Entity (RAE). There is no in-person practical UAV operational assessment, but you must complete self-practical training to demonstrate competency at this level. The A2 CofC is valid for five years and must be refreshed through a RAE.

5.2.4. **General Visual Line of Sight (GVC) license.**
The GVC is a UK UAV certification for operators who need to fly in the 'Specific Category'. Issued by the CAA, the GVC allows operators to apply for an Operational Authorisation to conduct more complex and higher-risk flights than are permitted in the 'Open Category'. It covers flights in populated areas, at varying altitudes, and near structures, requiring a higher level of competence than 'Open Category'.

The GVC requires completion of a course provided by a RAE. This course covers advanced safety, risk assessment, flight planning, and UK airspace regulations. It includes a theoretical exam, practical flight assessment, and completion of an Operations Manual, which outlines safety procedures, risk mitigation strategies, and operational details for how operations are conducted safely within the 'Specific Category'.

Once a pilot has obtained the GVC, they can apply for Operational Authorisation from the CAA. This authorisation specifies the conditions and limitations under which the pilot can operate within the 'Specific Category'. The GVC is valid indefinitely, but Operational Authorisation typically needs to be renewed annually, as the CAA may adjust these terms based on operational or regulatory changes.

5.2.5. **Beyond Visual Line-of-Sight (BVLOS) Training**
BVLOS training is not currently practiced at the University. It will only be performed when deemed essential and assessed on a case-by-case basis. BVLOS training is advanced UAV flyer and remote pilot training focused on flying beyond a person's visual line of sight. It covers safety, airspace integration, long-range systems, emergency planning, and normally requires CAA BVLOS authorisation in 'Specific' and 'Certified' Categories. The training must be performed by a RAE or specialist provider, but remote pilots do not necessarily need this training if they have appropriate records or experience of performing this type of operation, can demonstrate competency using BVLOS-enabled UAVs, and have a GVC, or equivalent.

All training will be completed as necessary based on the risk and category of the UAV operation. The University will ensure that training has been completed, registrations performed, and all certificates are in date prior to any UAV operation.

5.3. **Review**
The Director of Health and Safety will monitor for any required changes to this Procedure either in line with any future organisational changes, legislation, or key guidance changes. This Procedure will be reviewed every three years or in line with relevant changes, if sooner.

Minor changes will be reviewed by the Compliance Management Group and approved by the Compliance (Health, Safety and Wellbeing) Committee. Major reviews will also be reviewed by the Compliance Management Group and other key Stakeholders, prior to submission to Compliance (Health, Safety and Wellbeing) Committee for approval, and if required, noted at the Executive Board. The Health and Safety Consultative Committee will be consulted during the review process, as required.

5.4. **Legislative Context and Higher Education Sector Guidance or Requirements**
This Procedure was developed to provide guidance and ensure compliance in accordance with all relevant statutory regulations, specifically the Health and Safety at Work Act 1974, Air Navigation Order 2016, Air Navigation (Amendment) Order 2018 and 2020, and Regulations within the framework of UK Regulation (EU) 2018/1139 (the Basic Regulation).

5.4.1. **Other Applicable Legislation**
This Procedure is in accordance with the requirements of:

- The Management of Health and Safety at Work Regulations 1999.
- The Provision and Use of Work Equipment Regulations 1998.
- Civil Aviation Act 1982, amended 2012.
- UK Regulation (EU) 2019/947.
- UK Regulation (EU) 2019/945.
- Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations 2013.
- The Wildlife and Countryside Act 1981.
- Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007.
- Computer Misuse Act 1990.
- The Data Protection Act 2018 (and the General Data Protection Regulations).
- UK-GDPR (UK General Data Protection Regulation).
- UK (EU) Regulation 996/2010 on the investigation and prevention of accidents and incidents in civil aviation. Amended by UK (EU) Regulation 2018/1139 on common rules in the field of civil aviation (The Basic Regulation).
- UK (EU) Implementing Regulation 2015/1018 laying down a list of classifying occurrences in civil aviation to be mandatorily reported.
- UK Regulation (EU) 2016/679 on the protection of natural persons with regards to the processing of personal data and on the free movement of such data.

5.4.2. **Applicable Industry Guidance or Codes of Practice**

Guidance on the legislative requirements affecting commercial and non-commercial UAV operations can be found in CAA guidance document: Unmanned Aircraft System Operations in UK Airspace – Policy and Guidance CAP 722 | Ninth Edition

Other useful guidance: CAP 2320: The Drone and Model Aircraft Code

5.4.3. **Legislative Context**

This Procedure sets out to comply with the required 'duty of care' placed upon the University. Under Health and Safety Law a 'defined duty of care' is generated between organisations and individuals when carrying out activities that could foreseeably cause harm. The duty is owed through the employer-employee relationship and extends to assurance that services provided by others (like contractors) are undertaken safely. With the level of assurance provided commensurate with the risk of the activity undertaken. In addition, anyone carrying out an activity owes a 'duty of care' to anyone who may be put at risk by said activity, such as students, staff, and visitors.

This duty of care cannot be delegated; instead, the act of delegation must be accompanied by a realistic and workable system of monitoring or supervision to ensure that the delegated task has been adequately implemented (i.e., the responsibility is not met by giving directions; it is met when those directions have been confirmed as carried out). The result is a cascade of delegated accountability that runs throughout the organisation via the line management network, accompanied by a system of monitoring, supervision, and feedback.

It is a requirement of the University, as the insured body, to comply with all regulations imposed by any competent authority and take all reasonable precautions to prevent or minimise accidents, loss, injury, or damage. In addition, the University will comply with appropriate guidance and recommendations from relevant professional bodies, wherever reasonably practical.

5.5. **Sustainability**

Although this Procedure does not have a direct impact on sustainability, the use of this technology may play a vital role in the development of and research into more sustainable practices. It is recognised that the use and replacement of UAV equipment, including the charging and or replacement of battery fuel sources (the primary source of fuel for most UAV systems used by the University), may impact on the University's sustainability targets. When deciding on the

suitability for rental, purchasing or in construction or modification, those authorising procurement of UAV equipment must consider sustainability. Where practical to do so, they should consider equipment that has a lower impact regarding either power consumption or fossil fuel use, while still meeting their own objectives and safety requirements. Furthermore, end of life disposal must also be considered, especially in relation to any waste products and batteries, in line with hazardous waste requirements and recycling opportunities.

6. Stakeholder Engagement and Equality Impact Assessment

6.1. An Equality Impact Assessment was completed on **16/05/2025** and is held by the Authorised Co-ordinator.

6.2. Stakeholder Consultation was completed, as follows:

Stakeholder	**Nature of Engagement**	**Request EB Approval (Y/N)**	**Date**	**Name of Contact**
Governance	Development and creation of this Procedure v1.0.	N	13/05/2025	Kelley Padley, Governance Officer
Sustainability	Development and creation of this Procedure v1.0.	N	13/05/2025	Martin Wiles, Head of Sustainability
Academic Freedom/ Freedom of Speech	Development and creation of this Procedure v1.0.	N	13/05/2025	Abigail Bradbeer, AFFE Project Manager
Members of the Compliance Management Group	Development and creation of this Procedure v1.0.	N	13/05/2025	Group Membership
Health and Safety Managers/ Advisors	Development and creation of this Procedure v1.0.	N	13/05/2025	All University Health and Safety Managers / Advisors
Health and Safety Consultative Committee	Development and creation of this Procedure v1.0.	N	13/05/2025	Members of this Committee.
Procurement	Development and creation of this Procedure v1.0.	N	13/05/2025	James Moore, Procurement Category Manager – Built Environment
EF/CS Health and Safety	Development and creation	N	13/05/2025	Members of this Group.

Management Group	of this Procedure v1.0.			
Equality, Diversity and Inclusion	Development and creation of this Procedure v1.0.	N	13/05/2025	Jo McCarthy-Holland, Equality & Diversity Advisor.
Data Protection	Development and creation of this Procedure v1.0.	N	13/05/2025	Ewan Robson, Information Governance Manager and Data Protection