Use of Unmanned Aircraft Systems
UPR HS12 version 01.0

Policies superseded by this document

This is the first version of this document.

Summary of significant changes to the previous version

This is the first version of this document and it should be read in full.

Glossary

A glossary of approved University terminology can be found in UPR GV08.

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1 Policy Statement

1.1 The University of Hertfordshire (UH) will ensure the safe conduct of all its Unmanned Aircraft System (UAS) operations, and that UAS systems deployed are:

i. built, operated and maintained, in accordance with legal requirements, industry good practice and sector guidance, meeting national and where appropriate international standards;

ii. operated in accordance with this Policy (UPR HS12) and the University’s UAS Operational Authorisation Manual; and

iii. operated within any limitation or condition specified in any UK Civil Aviation Authority (CAA) Operational Authorisation.

1.2 This Policy (UPR HS12) should be read in conjunction with the following University Policies and Regulations (UPRs) which also apply:

- Corporate Health and Safety Policy (HS08)
- Data Protection Policy and Privacy Statement (IM08)
- Data Management Policy (IM16)
- Security and public access (HS05)
- Substance Misuse¹ – HR Policy

¹ https://herts365.sharepoint.com/sites/Health/SitePages/Substance-Misuse.aspx
2 Purpose

2.1 This Policy (UPR HS12) sets out the organisation and arrangements for the safe use of Unmanned Aircraft systems (e.g. drones or model aircraft) on the University’s campuses or as part of the University’s undertaking.

2.2 This Policy (UPR HS12) sets out how the operation of UAS by the University will be managed in accordance with:

i. UK Civil Aviation Authority Regulations²;

ii. The Health and Safety at Work etc Act and associated regulations;

iii. The General Data Protection Regulations.

2.3 The University’s commitment is to:

i. Comply with and, wherever possible, exceed legislative and regulatory requirements and standards.

ii. Minimize the risks associated with aircraft operations to a point that is as low as reasonably practicable and achievable.

iii. Ensure that sufficient skilled and trained resources are available to implement this Policy and associated management systems (e.g. University’s UAS Operational Authorisations Manual).

iv. Ensure that all relevant staff are provided with adequate and appropriate aviation safety information and training, are competent in safety matters and are only allocated tasks commensurate with their skills.

v. Establish and measure safety performance against realistic objectives and/or targets.

vi. Continually improve its safety performance by conducting safety and management reviews and ensure that relevant corrective action is taken.

2.4 This Policy (UPR HS12) is supported by the University’s UAS Operational Authorisation Manual, which sets out key data associated with the safe operation of any UA with a Maximum Take-Off Mass of up to 25 kg by University of Hertfordshire personnel.

3 Scope

3.1 This Policy applies to all operations of UAS with optical avoidance sensors up to a Maximum Take-Off Mass of 25kg undertaken by University employees and students, or on University owned land.

(Note for guidance:

² Air Navigation (Amendment) Order 2018 (also known as CAP393)
3.2 Other duty holders (e.g. Contractors, UH Subsidiary Companies, Hertfordshire Students’ Union) who wish to operate a UAS on the University’s land will need to satisfy the University that they meet CAA requirements for operations in the open or specific categories, provide a suitable and sufficient risk assessment for the activity, and demonstrate that public liability insurance is in place.

3.3 The recreational use of UAS on University land is prohibited (see UPR HS05).

4 Definitions

4.1 Unmanned Aircraft (UA):
Any aircraft operating or designed to operate autonomously or to be piloted remotely without a pilot on board. Unmanned aircraft may also be referred to as:

- drones;
- Remotely Piloted Aircraft Systems (RPAS);
- Unmanned Aerial Vehicles (UAV);
- Model Aircraft; or
- Radio Controlled Aircraft.

4.2 Unmanned Aircraft System (UAS):
An unmanned aircraft and the equipment to control it remotely.

4.3 Open Category:
A category of UAS operations that is described in Article 3 of the UAS Implementing Regulation. This covers:

- simple operations that present a low risk to other people or property;
- flights that are subject to a set of basic, pre-determined rules, within which there are further subdivisions (A1, A2, A3 categories).
- scenarios where the UAS operator needs to be registered and the remote pilot needs to pass a simple test, but apart from this there is no requirement for any authorisation from the CAA.

4.4 Specific Category:
A category of UAS operations that is described in Article 3 of the UAS Implementing Regulation. This covers medium risk operations, or operations that fall outside the boundaries of the Open category. All flights must be conducted in accordance with an operational authorisation issued by the CAA.

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3 UPR HS05 ‘Security and Public Access’
4 Commission Implementing Regulation (EU) 2019/947
4.5 **CAA Operational Authorisation:**
A document issued by the CAA that authorises the operation of an unmanned aircraft system, subject to the conditions outlined within the authorisation, having taken into account the operational risks involved.

Each Operational Authorisation is specific to the named UAS operator, and is dependent on the risk assessment and evidence supplied to the CAA by that operator.

4.6 **Specific Operations Risk Assessment (SORA):**
A risk assessment methodology intended for use in the Specific category.

4.7 **Pre-Defined Risk Assessments (PDRA):**
A PDRA is a shortened set of prescriptive conditions that must be complied with by a UAS operator in order to conduct a pre-determined type of operation.

4.8 **The General VLOS Certificate (GVC):**
A remote pilot competency certificate that satisfies the remote pilot competency requirements for VLOS operations within the Specific category. The GVC satisfies the competency requirements of any published PDRA that involves VLOS flight.

4.9 **Within the Visual Line Of Sight (VLOS) operations:**
A type of UAS operation in which the remote pilot is able to maintain continuous unaided visual contact with the unmanned aircraft, allowing the remote pilot to control the flight path of the unmanned aircraft in relation to other aircraft, people and obstacles for the purpose of avoiding collisions.

4.10 **Beyond the Visual Line of Sight (BVLOS) operations:**
A type of UAS operation which is not conducted in VLOS.

4.11 **UAS operator:**
Any person operating or intending to operate one or more UAS. The person or legal entity who has control over that aircraft and who organises how that aircraft is or may be used. The operator is legally accountable for the safe management of the UAS.

4.12 **Remote pilot:**
A person responsible for safely conducting the flight of an unmanned aircraft by operating its flight controls, either manually or, when the unmanned aircraft flies automatically, by monitoring its course and remaining able to intervene and change the course at any time.
5 CAA requirements that apply to the University

5.1 The following applies to UAS from 250g to 25kg that are used outdoors in the UK:

i Operations in the Specific category require staff and students to liaise with the University UAS coordinator and must follow the University’s UAS Operational Authorisations Manual (required due to operations in the specific category requiring an operational authorisation issued by the CAA).

ii Operations in the Open category require staff and students to contact their SBU (Strategic Business Unit or School) Local UAS Coordinator for advice (see section 6 - Roles & Responsibilities).

For further details of the permissions required please see sections 11 and 12. See section 16 for further information on indoor uses and UAS below 250g.

6 Roles and Responsibilities

6.1 Governing body

The Governing Body has strategic oversight and should seek assurance that effective arrangements are in place and are working for the management of UAS.

6.2 Secretary and Registrar (Accountable Manager)

The Secretary and Registrar is the overall Accountable Manager for the operation of UAS by the University. They are responsible for ensuring that systems and resources are available for the management of UAS in accordance with legal requirements. This includes ensuring:

i the development and maintenance of the University’s Policy on the Use of Unmanned Aircraft Systems;

ii that the University’s UAS and those flown on its land operate in accordance with regulatory requirements;

iii the maintenance of CAA Operational Authorisations;

iv the development and maintenance of the University’s UAS Operational Authorisations Manual;

v that remote pilots are suitably competent;

vi that UAS are being maintained in a safe condition;

vii that sufficient resources are provided to enable the implementation of this Policy (UPR HS12);

viii that suitable public liability insurance for the UAS activities undertaken by the University is maintained;

ix that a suitably qualified and competent person is appointed to carry out the role of UAS Operations Co-Ordinator.
6.3 University UAS Operations Co-Ordinator

The UAS Operations Co-Ordinator will provide competent advice to the University and the Secretary and Registrar on the management of UAS. They are responsible for:

i. maintaining the University’s UAS Operational Authorisations Manual and CAA Operational Authorisations;

ii. keeping aware of the law relating to safe aircraft operations, maintaining and continually develop their competence on the safe operations of UAS;

iii. supporting SBU Accountable Managers and their SBU UAS Co-ordinators, giving technical advice on risk assessment and approval of flights;

iv. advising UAS pilots as necessary regarding training, flight planning and risk assessment;

v. carrying out regular audit of UAS operations undertaken by SBUs;

vi. supporting the Local Accountable Manager and/or Health, Safety and Sustainability Office with investigation of accidents, incidents or complaints involving UAS under the University’s control, or on its grounds;

vii. supporting the Health, Safety and Sustainability Office with liaison with enforcement authorities;

viii. keeping the Secretary and Registrar and Health, Safety and Sustainability Office alert to changes in legislation and best practice relating to the operation of UAS.

6.4 Health, Safety and Sustainability Office

The Health, Safety and Sustainability Office is responsible for:

i. ensuring that the Policy on use of Unmanned Aircraft Systems (UAS) is reviewed and updated at appropriate intervals or in response to changes in legislation;

ii. investigating serious accidents, incidents and near misses;

iii. reporting incidents in accordance with the CAA Mandatory Occurrence Reporting requirements;

iv. monitoring University compliance with the Policy on use of Unmanned Aircraft Systems (UAS) (UPR HS12).

6.5 Heads of SBUs (SBU Accountable Manager)

6.5.1 Where SBUs carry out or organise UAS operations, the Dean/Head is responsible for:

i. ensuring that any UAS operations carried out in their SBU are in accordance with the University’s Policy on UAS (UPR HS12) and legislative requirements;
ii allocating sufficient resources to enable requirements to be met. This includes contribution to costs associated with obtaining operational authorisations and safe UAS operations.

6.5.2 Deans / Heads of SBUs may appoint an SBU UAS Co-ordinator to oversee and monitor UAS operations in their SBU on their behalf.

6.6 SBU UAS Co-Ordinator

The Local UAS Co-Ordinator is responsible for overseeing and monitoring UAS operations on behalf of their Dean / Head of SBU (SBU Accountable Manager). They will:

i monitor completion of maintenance of logs of aircraft and pilot hours, battery charge and condition, aircraft maintenance and incidents / accidents in accordance with the University’s UAS Operational Authorisations Manual;

ii approve flights, having satisfied themselves that suitable risk assessments are in place (seeking competent advice from the UAS Operations Co-ordinator as required);

iii investigate significant accidents, incidents and complaints involving UAS in their SBU, ensuring any that come under the Mandatory Occurrence Reporting definition are reported to the UAS Operations Co-Ordinator;

iv report any concerns regarding the safety of UAS operations to their Dean / Head of SBU, SBU Health and Safety Contact, UAS Operations Co-Ordinator and the Health, Safety and Sustainability Office via Accident/Incident and Near-Miss reporting: Online Incident Report Form5.

6.7 UAS Remote Pilots

6.7.1 Remote Pilots are responsible for the safety of UAS and flights under their control. They must:

i fly UAS in accordance with University Policy and UAS Operational Authorisations Manual and legislative requirements (including relevant local requirements where flights are undertaken off site or overseas);

ii apply Privacy Protocols (applying privacy and personal data protections) in line with the University’s Data Protection Policy and Privacy Statement (UPR IM08);

iii provide the UAS Operations Co-Ordinator with details of qualifications, flyer ID, UAS and types of flight undertaken, for inclusion in the University’s UAS Operational Authorisations Manual;

iv ensure that their UAS display the University of Hertfordshire Operator ID in accordance with CAA requirements;

v undertake CAA approved training and competency assessment, to meet CAA requirements for commercial flights and registration;

5 https://hs-system.herts.ac.uk/
vi seek approval from their SBU UAS Co-Ordinator (acting on behalf of their SBU Accountable Manager) in advance of a flight where a risk is identified;

vii undertake a risk assessment for all flight operations (this may be supported by the SBU UAS Co-Ordinator);

viii obtain landowner permission in writing. It will be necessary for flights on university grounds to provide location specific risk assessment and obtain permission from the Department of Estates (UH Landowner) prior to undertaking flight operations;

ix maintain the UAS they are responsible for in a safe condition;

x ensure accidents and incidents are logged and reported in accordance with the University’s UAS Operations Authorisations Manual;

notify their SBU UAS Co-Ordinator, UAS Co-Ordinator and the Health, Safety and Sustainability team immediately in the event of an incident that requires Mandatory Occurrence Reporting;

xi only fly if they are in a physically and mentally fit condition to participate in UAS operations (see section 10);

xii maintain logs of aircraft and pilot hours, battery charge and condition, aircraft maintenance and incidents / accidents in accordance with the University’s UAS Operational Authorisations Manual.

6.7.2 Reference should also be made to responsibilities detailed in the University’s UAS Operational Authorisations Manual.

7 Capability and Training (New Remote Pilots)

7.1 Employees wishing to fly UAS on behalf of University business (e.g. research or commercial activities) must undertake CAA approved training, a competency assessment and obtain a CAA GVC (General Visual Line of Sight Certificate) including an A2 COC certificate as well (speak to your SBU UAS Co-ordinator concerning training and competency requirements). On achieving this they will become a Remote Pilot and their details added to the University’s UAS Operational Authorisations Manual.

7.2 The University requires this level of competence whether or not the employee is:

- undertaking flight operations on behalf of University business;
- carrying out flights in the UK or overseas;
- carrying out flights as part of another organisation’s operation.

7.3 If the use of UAS forms a part of either teaching and learning or research, the student will be required to meet the same competency requirements as employees, or an authorised remote pilot may undertake flight operations on their behalf. For teaching/learning activities, this must be overseen by the academic lead for that course. For research activities, this must be overseen by a research supervisor.

7.4 See section 16 for indoor flights.
8 University of Hertfordshire UAS Operational Authorisations Manual

8.1 The University UAS Operations Co-Ordinator will co-ordinate updates to the University’s UAS Operational Authorisations Manual and will ensure that it is submitted to the CAA and renewed at the appropriate time with all relevant remote pilot logs having the hours necessary to satisfy the renewal of the manual.

8.2 Pilots must provide the University UAS Operations Co-Ordinator with relevant information about their competency and flights for incorporation into the University’s UAS Operational Authorisations Manual.

8.3 Where necessary the University UAS Operations Co-Ordinator will use the services of a competent organisation to review the University’s UAS Operations Authorisations Manual before submitting it to the CAA.

8.4 SBUs who operate UAS are expected to contribute to the cost of maintaining the University’s UAS Operational Authorisations Manual.

9 Risk assessment and approval

9.1 The CAA states that:

“At all times, the operator will be responsible for ensuring that anyone flying under their operator number is sufficiently competent to undertake the operation safely and has planned and will carry out their flight(s) accordingly. The more complex or risky a proposed operation is the more extensive and detailed the planning and oversight of the proposed operations should be.”

9.2 A system of risk assessment and approval is required for all planned flights.

9.3 Remote Pilots must undertake risk assessment for each flight in accordance with the University’s UAS Operational Authorisations Manual. A review and approval from the SBU UAS Co-Ordinator (acting on behalf of the SBU Accountable Manager) must be obtained in advance of all flights.

9.4 Operations that present a greater risk and do not meet the requirements for the Open Category will require an Operational Authorisation issued by the CAA to enable the flight to take place in the Specific Category. This is then supported by the processes included within the University’s UAS Operational Authorisations Manual.

10 Fitness to fly

10.1 It is the responsibility of the Remote Pilot to ensure they are fit to operate a UAS in accordance with the UH University’s UAS Operations Authorisations Manual and the University’s Substance Misuse Policy1 (HR Policy).

10.2 Additional advice is available from the CAA – ‘Drone Code’ and the ‘I’M SAFE’ mnemonic.
10.3 If there are any concerns regarding a remote pilot’s fitness to operate a UAS, this must be reported immediately to their line manager and made known to the SBU UAS Co-Ordinator for risk management purposes. Any planned UAS operations / flights must be postponed unless an alternative and authorised Remote Pilot can be found.

11 Use of external Pilots/UAS Operators (Contractors)

11.1 Employees who want to arrange for external pilot/UAS operator (contractor) to fly a UAS over University land should first contact the University UAS Operations Co-Ordinator to see whether the flight could be carried out by one of the University’s pilots.

11.2 If it is necessary to use an external operator, the employee responsible for the proposed UAS project will need to seek permission from the SBU’s Local UAS Co-ordinator and from Estates. For permission to be granted, the following will need to be provided:

i a copy of the operator’s / pilot’s CAA operational authorisation and General VLOS Certificate (GVC) (which should be dated within 12 months of the proposed flight date) if flying in the specific category;

ii operational and/or flyer ID issued by the CAA;

iii a copy of their public liability insurance with a minimum of £5 million in public liability cover. This should cover the flying/operation of a UAS for its intended purpose (e.g. aerial filming);

iv a location specific risk assessment and flight plan (i.e. a description and plan of what they intend to do and how it will be done safely);

iv confirmation that they will comply with the University’s requirements for ensuring privacy and data protection;

11.3 University ‘Control of Contractors Guidance’ and the ‘Permit to Work Process’ via Estates will need to be followed.

11.4 The external pilot / UAS operator will need to visit the site prior to the proposed flight in order to carry out the location specific risk assessment. Some pre-planning can be done where a site-specific risk assessment can only be provided shortly before the event, in which case, a meeting to discuss arrangements will be held in advance so that advice can be given on whether these arrangements meet the University’s requirements.

(Note for guidance: The DroneSafe Register can be used to source CAA approved and insured UAS pilots.)
12 Landlord permission

12.1 The designated Remote Pilot will obtain permission from all relevant landowners or land occupiers over which flight operations are to be conducted. Where possible, permission will be sought in writing. Where it is available in writing a copy of the permission will be carried on site. No flight operations will commence without permission, either written or verbal, from the relevant landowners or occupiers.

12.2 The person responsible for the UAS operation must check whether there are any other activities planned for the proposed flight day and time that may affect flight safety or privacy requirements and ensure these are considered in their risk assessment.

12.3 For any flights taking place on University grounds a UAS flight permissions process (see Appendix I, UPR HS12) must be completed and details provided to Estate and Security within a reasonable timeframe (at least 2-weeks) of the planned flight. Security must also be contacted on the day to confirm whether the flight is going ahead.

12.4 The permission provided by Estates will be considered to represent the Landlord’s permission for all land owned by the University. In addition, Estates may advise that additional permissions are required (e.g. from third party providers of residences).

12.5 Estate’s role is to confirm that the flight has been planned in accordance with this policy (UPR HS12). If they have concerns about the proposed flights, they can refuse permission and ask the Remote Pilot to discuss their concerns with their SBU UAS Co-ordinator and review the risk assessment.

12.6 The UAS Operations Co-ordinator can provide Estates with an up-to-date list of Remote Pilots listed in the University’s UAS Operational Authorisations Manual.

12.7 It is recognised that conditions on the day of the flight may necessitate dynamic risk assessment. Any proposed significant changes (e.g. change of location) must be discussed with the SBU UAS Co-ordinator and any changes communicated with Estates and Security. Where necessary, this may require the flight / UAS operation to be postponed.

13 Privacy

13.1 Where an UAS is used for filming, the person responsible for the flight must make sure that:
   
   i. people’s privacy and personal data is protected;
   
   ii. people who may be filmed are aware that filming is taking place;
   
   iii. if people are likely to be recognisable in the footage, they are given the opportunity to have their image removed.

13.2 People must not be recognisably filmed unless the person carrying out UAS operations has their permission.
13.3 Wherever possible, flights will be planned to avoid capturing personal data and recognisable images/recordings of people or vehicles on film. The person responsible for the flight will:

i where possible, film at a height where any people captured on film are not likely to be recognisable in any footage (filming at a minimum height of 50m without permission can help to make recognition difficult);

ii where possible, film at weekends and times when people are less likely to be on campus;

iii check whether there are any other activities taking place that may mean more people are present than expected;

iv provide general communication to let people know what the UAS is doing, when and where it will be flown and reassure people that any recognisable footage/images will not be taken;

v ensure the pilot is clearly identifiable to people when filming (through identifiable clothing, ID badge), and a notice displayed nearby highlighting that an UAS (Drone) is operating/filming in the area (including information for those who may want to object to their image being captured);

vi ensure filming does not take place through windows or in places where people might expect to be private;

vii if it is subsequently found that people or vehicles are recognisable, ensure identifiable features (faces, number plates or vehicle markings) are blurred out or removed.

13.4 If the nature of the filming project means that people or vehicles will be identifiable, the person in control of the UAS flight must store data safely and comply with the University’s requirements for ensuring privacy and data protection (see UPR IM08 ‘Data Protection Policy and Privacy Statement’). Before filming, permission must be obtained by ensuring:

i people who may be filmed are made aware of what the UAS is doing, what the images/footage will be used for and where they will be published;

ii the use of consent forms to obtain express permission for identifiable persons;

iii people are given the opportunity to have their image removed, communicating a simple process for how people can find out if their image has been captured and how they can stop their image being used;

iv the pilot is clearly identifiable to people when filming (through identifiable clothing, ID badge), and a notice displayed nearby highlighting that an UAS (Drone) is operating/filming in the area (including information for those who may want to object to their image being captured).

13.5 A Data Protection Impact Assessment (DPIA) may be required to assess the level of risk to individuals identified. The University’s Data Protection Officer can provide advice and support (dataprotection@herts.ac.uk).
13.6 The University’s ethical approval process (see UPR RE01\(^7\)) will also apply to research projects.

13.7 Further guidance is provided in the CAA ‘Drone Code’ and within the Data Protection Policy and Privacy Statement (UPR IM08).

13.8 **Filming by or for a third party**

Where the UAS is used to gather data by a third party, or the University is capturing data for a third party, this must be made clear with appropriate agreements in place to ensure the third party protects the information and only uses it for the agreed purpose. A contract between the parties must clearly set out which party owns, or may use, the data and for what purpose under data protection legislation.

14 **Insurance**

14.1 Only UAS owned and operated by the University are covered by the University’s Public Liability Insurance.

14.2 If a UAS is not owned by the University, owners / operators must provide evidence that they have public liability insurance with a minimum of £5 million public liability cover (see section 11).

14.3 SBUs must provide the University’s finance team with details of UAS owned by the University (e.g. a list of UAS, values and weights), enabling checks to the current level of cover provided by the University’s insurance policy.

14.4 The University’s current insurance certificate will be included in the appendix to its UAS Operational Authorisations Manual.

15 **University built UAS**

15.1 University built UAS must meet all health and safety regulatory requirements (e.g. the Provision and Use of Work Equipment Regulations).

15.2 Any UAS flown outside would need to be fitted with fail-safe devices so that it operates in accordance with the emergency procedures in the University’s UAS Operations Authorisations Manual.

15.3 If a self-built UAS is “supplied” to another organisation (e.g. another research establishment) it would also need to have a “declaration of conformity” following an assessment in order to comply with product safety requirements.

16 **Indoor Use**

16.1 CAA requirements do not apply to indoor flights, however health and safety and privacy regulatory requirements do. Anyone wishing to fly UAS indoors will need to carry out a risk assessment, which will need to be approved by the SBU UAS Co-Ordinator (for the SBU undertaking the flight). If it is proposed to use a location not under the control of the SBU undertaking the flight, the Senior Manager for the location where the activity will take place must also approve the flight.

\(^7\) UPR RE01 ‘Studies Involving Human Participants’
16.2 Pilots undertaking flights indoors must complete a suitable and sufficient risk assessment and be able to demonstrate sufficient competency (skills, knowledge and experience) to fly UAS safely.

16.3 UAS below 250g

The use of UAS below 250g will still be subject to health and safety arrangements including a suitable and sufficient risk assessment, pilot competencies and CAA guidance and requirements. Further guidance and support will be available from the SBU UAS Co-ordinators.

17 Flying UAS overseas

17.1 The University expects anyone piloting a UAS to undertake CAA approved training, a competency assessment and obtain a GVC certificate, wherever the flights take place.

17.2 In addition, if flying overseas, the Remote Pilot must meet the appropriate aviation authority / legal requirements for the country where they wish to operate the UAS. Remote Pilots will also ensure that they are aware of attitudes and cultural norms around photography in the location they are visiting and potential penalties for photography in sensitive areas.

17.3 The University's Travel Overseas on University Business policy (see UPR HS11⁸) applies to any work overseas.

(Note for guidance:

It is important to check whether the University's insurance policy will cover UAS operations overseas and whether any restrictions or reductions in cover will apply.)

18 Recreational use.

Recreational use of UAS on University grounds is not permitted (see UPR HS05³).

19 Mandatory Occurrence Reporting (MOR)

19.1 The UK Air Navigation Order states that “any incident which endangers or which, if not corrected, would endanger an aircraft, its occupants or any other person” is a reportable occurrence. Mandatory Occurrence Reporting (MOR) requires that a reportable occurrence is filed on the ECCAIRS European-wide reporting system on the Internet at:

http://www.aviationreporting.eu/

19.2 Incidents involving injury to a person must also be reported by the University to the Air Accident Investigation Branch by phoning +44 1252 512299.

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⁸ UPR HS11 ‘Travel Overseas on University Business’
19.3 Reporting will be carried out by Health, Safety and Sustainability, who will also notify the Accountable Manager (the University’s Secretary and Registrar). If there is a potential for reputational risk, Marketing and Communications Press Officer will also be informed.

19.4 Any incidents that occur on University premises, or incidents involving staff or students on any business or educational activity (whether on University premises or otherwise) must be reported using the [online Incident Reporting System](#). This includes any environmental incidents, near misses (where there has been no injury) or work-related ill health.

19.5 Any major incidents must be reported directly to Security on ext: 5555 or 01707 285555 (external).

20 **Performance Monitoring, Auditing and Review**

20.1 Monitoring of compliance with the University’s UAS Operations Authorisations Manual will be carried out by SBU UAS Co-ordinators and the University UAS Co-ordinator. This may, for instance, be through incident investigation or inspection of records.

20.2 The University UAS Co-ordinator will undertake an annual review of the University’s UAS Operational Authorisations Manual, in co-ordination with other University Remote Pilots. They will report outcomes to the Director of Health, Safety and Sustainability, who will advise the Secretary and Register of the outcome and action taken to address any areas of non-compliance.

20.3 The Health, Safety and Sustainability Team will review this Policy every year, in co-ordination with the University UAS Co-ordinator. Reviews will also be undertaken if there are substantive changes to CAA or other legal requirements.

21 **Sanctions and Penalties**

21.1 The University reserves the right to take disciplinary action against members of staff and students who fail to comply with the regulations and procedures set out in this document.

21.2 Breaches of discipline will be dealt with in accordance with the relevant University disciplinary procedure.

Sharon Harrison-Barker
Secretary and Registrar
Signed: 10 May 2022

*Alternative format*
If you need this document in an alternative format, please email us at governanceservices@herts.ac.uk or telephone us on +44 (0)1707 28 6006.