

Health and Safety Code of Practice

SCP46 Drones

Responsibility for Policy:	Registrar and Chief Operating Officer
Relevant to:	LJMU Staff and Students
Approved by:	ELT 8 th January 2019
Responsibility for Document Review:	Head of Safety, Health and Environment
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RELEVANT DOCUMENTS

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Provision and Use of Work Equipment Regulations 1998
- HSG107 Maintaining portable electrical equipment (Health and Safety Executive)
- Air Navigation Order 2016
- CAP722 Unmanned Aircraft System Operations in UK Airspace – Guidance
- CAA Information Notice IN-2016/73

RELATED POLICIES & DOCUMENTS

- Liverpool John Moores University Health and Safety Policy Statement
- MCP1 Organisation for the Implementation of the Health and Safety Policy
- MCP2 Arrangements for the Implementation of the Health and Safety Policy
- Permission for Commercial Operations
- Operations Manual

THIS CODE OF PRACTICE FORMS PART OF THE UNIVERSITY'S HEALTH AND SAFETY POLICY AND REPLACES ALL PREVIOUS ISSUES

INDEX

- 1. Objective**
- 2. Background**
 - 2.1 Aviation regulation in the UK
 - 2.2 Health and Safety considerations
 - 2.3 Obligations for the University
- 3. The University's Drone Operations Manual**
 - 3.1 Management structure
 - 3.2 Operating authorisation
 - 3.3 Commissioning of equipment
 - 3.4 Record keeping
 - 3.5 International operations
 - 3.6 Indoor use
- 4. Use of personal drones**
- 5. Third party operators**
- 6. Drone Safety Board**

1. OBJECTIVE

The objective of this Code of Practice is to set out the requirements in respect of the operation of aerial drones¹, either:

- owned by the University
- on University premises
- on University business, or
- in association with a programme of study at the University by members of staff or currently enrolled students

2. BACKGROUND

2.1 Aviation regulation in the UK

The primary legislation in the UK is the Air Navigation Order (ANO) issued by the Civil Aviation Authority (CAA). Articles 94 and 95 of the ANO apply specifically to drones and set out a number of operating restrictions and requirements; however, much of the remaining document applies to all classes of aircraft including drones.

Due to the rapidly evolving nature of drone technology, the regulations surrounding their use are in a state of development, led by the European Aviation Safety Agency (EASA). Between 2018 and 2021 it is anticipated that the ANO will be revised regularly in an effort to harmonise regulations across Europe.

2.2 Health and safety considerations

Drones are work equipment, as defined by the Provision and Use of Work Equipment Regulations 1998.

Their use must be assessed for risk. This will include the risk to persons who might be affected by malfunction, as well as operators where there may be manual handling and hazardous substance hazards, for example.

2.3 Obligations of the University

As an organisation using drones, the University has an obligation to ensure that all persons involved in their operation are aware of, and operate in accordance with, the prevailing regulations. To meet this obligation the University has produced a Drone Operations Manual, approved by the CAA, which covers all its drone operations.

3. THE UNIVERSITY'S DRONE OPERATIONS MANUAL

The Operations Manual is a substantial document containing all information necessary to operate drones at or on behalf of the University. The following sections summarise the key elements.

3.1 Management structure

It is a requirement that drone operation be managed by appropriately experienced members of staff.

A nominated Accountable Manager for the entire University is responsible for ensuring that all operations are conducted in accordance with the Operations Manual.

¹ Also known Unmanned Aerial Vehicles (UAVs) or Remotely Piloted Aircraft Systems (RPASs)

Any Faculty, which undertakes drone operation, must nominate a Director of Flight Operations (DFO) who is responsible for authorising and monitoring operations and reporting to the Accountable Manager where necessary. Nominated DFOs must meet certain minimum experience requirements in order to discharge their duties safely; these requirements are outlined in the Operations Manual.

3.2 Operating authorisation

No one is permitted to undertake any drone operations without prior authorisation from their local DFO. Operating authorisations are issued in accordance with a set of criteria laid out in the Operations Manual but will include, as a minimum, an assessment of an individual's knowledge of the Operations Manual and practical flying abilities.

Prior to obtaining operational authorisation, all individuals must sign a master copy of the Operations Manual indicating that they have read, understood and agree to abide by its contents.

3.3 Commissioning of equipment

Any new drones (or associated equipment) must be commissioned in accordance with the procedures laid out in the Operations Manual, culminating in a Release To Service being issued by the local DFO.

Any drones, which are not owned by the University but are used on University business and/or premises, are subject to the same commissioning requirements as new drones.

3.4 Record keeping

The Operations Manual details a number of documents and logs which must be kept for all drones and personnel. These documents may be subject to audit by the CAA at any time and it is the responsibility of the individuals involved in drone operation to ensure that they are kept up to date.

3.5 International operations

The Operations Manual is maintained in accordance with the prevailing regulations in the UK, but includes a provision for international operations. Authorisation to operate internationally is at the discretion of the Accountable Manager or nominated DFO, but it remains the responsibility of the individual to ensure that local regulations are complied with at all times.

3.6 Indoor use

The ANO does not distinguish between indoor operations and those conducted outside. Whilst certain separation criteria may not be applicable, due to the nature of indoor operation, other provisions of the ANO regarding the safe operations of aircraft do apply. Any drones used indoors, therefore, are subject to the same commissioning and authorisation requirements as for those used outdoors.

4. USE OF PERSONAL DRONES

Any personal drones that are used on University premises, for University business or in accordance with a programme of study at the University, are subject to the requirements of the Operations Manual.

5. THIRD PARTY OPERATORS

Operation of drones on University premises, for University business, or in accordance with a programme of study at the University by third party operators or individuals is subject to approval by the Accountable Manager or a nominated DFO.

The Accountable Manager or a nominated DFO will advise Security Services of all such drone flights around University Buildings or campus areas.

6. DRONE SAFETY BOARD

The University Drone Safety Board meets quarterly to discuss matters pertaining to drone operations across the University with a focus on any issues that may have an adverse impact on safety.