# UNCREWED AERIAL SYSTEMS FOR STUDENTS

**Health Safety and Compliance Arrangement**

March 2025

Arrangement for students to fly, use footage or data obtained using uncrewed aerial systems (UAS), small uncrewed aircraft (SUA) or remotely piloted aerial system (RPAS) as part of their studies, e.g. Research, dissertations, projects and assignments.

This arrangement is applicable to CAA Open and Specific Categories

| Document title | | |
|---|---|---|
| Uncrewed Aerial Systems (UAS) Arrangement for Students | | |
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| **Approving body** | | |
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| External queries relating to the document to be referred in the first instance to Health Safety and Compliance: email hsservicedesk@port.ac.uk <br><br> If you need this document in an alternative format, please email hsservicedesk@port.ac.uk | | |

The latest version of this document is always to be found at:

# Introduction

Uncrewed Aerial Systems (UAS), Small Uncrewed Aircraft (SUA), Remotely Piloted Aircraft Systems (RPAS) or more commonly drones are an expanding area commercially and of interest in many areas of the University. Students may want to use data obtained from drones in their submissions or even construct and program their own drone. Drones are, however, potentially dangerous and there are clear data protection issues around drone data collection. Drones in the UK are regulated by the Civil Aviation Authority (CAA https://www.caa.co.uk/home/) and data collection is regulated by the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018. The University strictly adheres to applicable laws, including guidelines published by the CAA.

Under the UK's **Drone and Model Aircraft Registration and Education Scheme** anyone who owns or is responsible for a drone or unmanned aircraft (including model aircraft) weighing up to 25kg will need to register as an operator. This includes drones <250g if equipped with a camera. Remote pilots will need to take and pass an online education package (DMARES) when flying UAS above 250g. Under this arrangement the university expects all students to obtain a Flyer ID, irrespective of the drone being operated. In certain areas an A2 Certificate of Competence (A2CofC) or a General Line-Of-Sight Certificate (GVC) may be required, depending on the class of drone used.

The University of Portsmouth does not regulate private use of drones. It does, however, have a duty of care to make sure that students are acting legally and safely when flying in connection with their studies. This arrangement lays out the requirements for students to fly in connection with their studies or study-related activities.

Any questions about this arrangement should be directed to the **Health Safety and Compliance Team**, via hssservicedesk@port.ac.uk or drone@port.ac.uk

# Responsibilities

## Health Safety and Compliance

1.1.  Effectively communicating this arrangement.

1.2.  Provision of specialist knowledge and advice through the UAS Safety Officers and team.

1.3.  Monitor legislative developments to keep this arrangement up to date.

1.4.  Follow up on any Incidents or occurrences reported.

## Heads of School and Course Leaders

Heads of School and Course Leaders are responsible for ensuring they are familiar with and adhere to this arrangement and Health and Safety Executive (HSE) Guidance regarding UAS and in summary must ensure that:

1.5.  This arrangement is effectively communicated and implemented in their areas of responsibility.

1.6.  All staff are aware through the provision of suitable and sufficient information, instruction, supervision and training of the actions required to ensure safe working practices are followed.

## Course Leaders

Course Leaders are responsible to advise students of the requirements in this arrangement when students wish to operate UAS in connection with their studies.

1.7.  Follow the university risk assessment procedure for student activities.

1.8.  Support students in their application and refer any questions to health safety and compliance.

1.9.  Provide a Just Culture environment, whereby students should feel able to report their own errors or safety concerns without fear of repercussions, punishment or ridicule.

1.10.  All reports shall be treated confidentially.

1.11.  Notify health safety and compliance and heads of school of any incident or occurrence reported to them.

1.12.  Support students following an incident or occurrence and refer to wellbeing services as applicable.

1.13.  Participate in the university disciplinary procedure when being made aware of incidents or occurrences that stem from wilful behaviour or gross negligence.

## Students

All University students who plan to operate UAS in connection with their studies, must ensure that they adhere to this UAS Arrangement, specifically:

1.14.   They comply with instruction and information that is provided.

1.15.   Their own or others health and safety is not put at risk when operating a UAS and to take due care.

1.16.   Arrange any training as required by legislation for their operating category and UAS at their own cost.

1.17.   Register themselves and their UAS as required by legislation at their own cost.

1.18.   Undertake or participate in planning and risk assessment relating to UAS operations.

1.19.   Familiarise themselves with the arrangement and legislation for the safe use of UASs.

1.20.   Immediately report incidents and near misses to supervisors and health safety and compliance.

1.21.   Notifying health safety and compliance of any third party UAS flights they are involved in operated on behalf of or in partnership with their studies.

# Operating Requirements

Students may only submit drone derived data or fly self-built drones in connection with their studies under the following conditions. These conditions also apply if the student uses a third-party to derive UAS data or fly self-built drones:

1.   The student must have a relevant risk assessment (RA) approved by a competent member of staff. This is in addition to the normal departmental/school RA process for projects. Competent members of staff who can approve RAs include UAS SO and staff who have completed the UoP UAS training programme. The staff approving UAS RAs for students must have experience of UAS missions and the relevant RA process.

2.   The student must submit a UAS **declaration form** with the RA.

3.   The student cannot operate in connection with their studies unless and until the declaration form has been approved.

4.   The student must provide an Operator ID and Flyer ID from the Drone and Model Aircraft Registration and Education Scheme. This applies to all UAS and all categories (Open Category [A1 - A3], Specific Category) if a personal drone is being flown as part of a student's studies.

5.   The student must label any drone or model aircraft they are responsible for with the Operator ID.

6. The student must demonstrate to the competent member of staff that they are competent in flying drones beyond the DMARES test by providing one of the below:

    a. BMFA A Certificate or higher for the class of drone being used.

    b. General Visual Line of Sight Certificate (GVC).

    c. A2 Certificate of Competency (A2 CofC)

    d. Other relevant qualification for the drone being used.

    e. Self-certification

7. The student must provide self-certification of appropriate currency for the drone being used. Provide a statement or documentation, e.g. UAS flight logs.

8. The student must provide evidence of relevant qualification when flying in the Open Category (DMARES, A2CofC, as applicable) or in the Specific category (GVC, Operations Authorisation and Operations Manual))

9. The student must at all times comply with applicable law and be aware of the Drone Code (**https://register-drones.caa.co.uk/drone-code**).

10. The student must declare that they have appropriate insurance.

11. The student must declare they have permission from the landowner for take-off and landing and for land access.

12. The student accepts all liability arising from their use of drones.

13. The student reports all incidents and occurrences to the regulatory bodies as outlined in the legislation (MORS, VORS, AAIB, Airprox).

14. The student additionally reports any incidents or occurrences during an operation connected to their studies to the Health Safety and Compliance using the **Accident Reporting Form.**

15. If there are any ethical issues, these must be considered and an application be made to the Departmental/Faculty Ethics Committee if appropriate, e.g. to comply with the law collection of images of identifiable individuals may be subject to data protection legislation.

## Overseas

When operating a UAS overseas, students who are permitted to operate UAS in connection with their studies, i.e. have an approved application as above, must abide by local training requirements and adhere to local regulations and legislation. A starting point for this information is http://www.dronelaw.in/ and the country's aviation regulator can be consulted for further guidance. If the standards abroad are not as strict as the UK, advice can be sought from one of the University's trained drone pilots and the standards set out in the University OM should be followed as an example of good practice. This should be referred to in the Risk Assessment.

A good guide to ethical considerations is included here: **http://uaviators.org/docs**

All operations overseas are still subject to this arrangement.

Additionally, students must have completed the overseas travel procedures as required by the university.

# Insurance

The British Model Flying Association (BMFA **https://bmfa.org/**) offer civil liability insurance and personal accident insurance as part of their Membership. This covers training flights only. To be covered for data collection/testing of self-builds you will need to get the Data, Development and Demonstration Membership Extension. Check current terms and conditions before flying.

There are insurers that offer insurance products for drones, make sure they cover the intended purpose of flights.

The University will not check the insurance, it is the student's responsibility to ensure that activities are covered.

# Flying Regulations (summary only, consult CAA)

In general, UAS/SUA/RPAS/drones must only be flown:

- If reasonably satisfied that the flight can safely be made. It is the responsibility of the remote pilot to decide if it is safe to carry out the flight.
- Within direct, unaided visual line-of-sight (VLOS) of the pilot.
- No higher than 400 feet above the surface.
- Keeping to the mandated distances for the category and class of operation

- Not within 50 metres of assemblies of people.

- Not within the Flight Restriction Zone of an airport.

- Only with landowners' permission. In the case of Portsmouth City Council (PCC) contact E: **filming@portsmouthcc.gov.uk** T: 023 9268 8938)

We strongly recommend students join a local model flying club to learn to fly and practise their skills. Clubs provide training and will have a safe area to fly in. To find a local club students can consult the BMFA website (**http://www.clubmap.bmfa.org/**)

# Further Advice

Advice and guidance can be sought from the University's UAS Safety Officers using drone@port.ac.uk.