



## **DRONE (SMALL UNMANNED AIRCRAFT) POLICY**

### **Introduction**

Drone flying is an increasingly popular pastime. Conducted properly and safely, drones are valuable recreational and commercial tools.

Drones pose a significant safety risk, as well as potentially impacting on privacy.

Drone-flying may be conducted either by commercial operators, who are licensed, or for recreational use by unlicensed pilots.

This policy states the requirements for those who may fly drones over College land and for those who are to approve such flights.

Note: In this policy, references to the term 'drone' includes all small, unmanned aircraft.

### **The Law**

Flying of drones without permission over College land constitutes trespass, which is a civil offence.

All other law relating to drone flying is the responsibility of the Civil Aviation Authority (CAA) and prescribed in various Air Navigation Orders (ANO). Full details of the law and regulations relating to flying of drones can be found on the CAA's website. Relevant extracted details are included within this policy.

All flying of drones and/or unmanned aircraft over College land is at the discretion of the College and must be specifically approved by the Chief Operating Officer or the Master (or as delegated by the Chief Operating Officer or the Master to a suitably competent member of staff).

If drone flying by outsiders over College land takes place (without College approval) those involved should be asked to cease and Security should be informed at once (Security Mobile 07860 648 965). The police should be called to intervene if drone flying is considered to invade privacy or pose a safety risk to individuals on the College site.

### **Areas**

The area north of the South Circular, which borders the College main campus, is the boundary of restricted airspace, where drones may not be flown. Note that this applies also to College land north of the South Circular, i.e. Orchard, Old Blew, Chestnuts and Elm Lawn.

The CAA notes in the "Drone and Model Aircraft Code" that operators should avoid flying over or near congested areas, and should remain at least 50 meters away from vehicles, people, and property that they don't have control over.

## Commercial Use

Drones operated on/above Dulwich College land for commercial purposes, e.g. by photographers, surveyors etc, must be approved in writing by the Chief Operating Officer before they may operate. In applying for permission, the following details must be provided:

- Name of operator
- Licence details (with evidence)
- Confirmation of insurance (with evidence)
- Purpose of the flight(s)
- Date and Time
- Area of launch
- Area to be overflown
- Number of pilots/observers
- Safety precautions in the event of failure

In deciding whether to issue this permission, the following matters will be considered:

- All commercial operators must be licensed by the CAA. The College is otherwise unable to verify the competency of any external drone operator. This rule applies also to individuals who are not members of staff or pupils and who may wish to fly drones at the College for non-commercial reasons. No external person may fly drones at the College who is not licensed by the CAA.
- Each commercial drone operator who has been granted CAA permission will have a document from the CAA granting the permission and setting out conditions for its use. Any external provider requesting to use drones at the College should be asked to show their licence and evidence of valid insurance. The details should be referred to the Chief Operating Officer or other delegated authority for approval to be formally given. Details of the planned flights and proximity to people and buildings must also be provided and will be taken into account when considering grant of permission. Note: Details of current holders of the CAA permission is available on the CAA website and should be checked on each occasion.
- Reliance should not be placed solely on the claims of a potential operator within a website offering a drone-flying service.

These details should be submitted to the Chief Operating Officer's office in advance of any permission being granted.

## Recreational Use

Pupils may wish to explore drone flying through belonging to the Drone Society, and boarders may reasonably wish to fly drones over College land as part of their residential recreation. Pupils not in these categories will usually not be granted permission to fly drones at the College.

The regulations for recreational drone flights are contained within the Air Navigation Order 2016, which is the primary document for all aviation regulations within the UK. In order to keep the regulations at a proportionate level for drones, a set of specific, simpler, regulations apply to aircraft that have a mass of 7 kg (which are termed 'small unmanned aircraft' within the ANO).

In simple terms, these regulations state that the pilot of the drone:

- is responsible for flying their drone in a safe manner;
- must keep the drone in their direct sight at all times while it is flying, to ensure that it does not collide with anything;
- must not endanger anyone or anything with their drone, including any articles that may be dropped from it;
- must not fly the aircraft:
  - a) in Class A, C, D or E airspace unless the permission of the appropriate air traffic control unit has been obtained;
  - b) within an aerodrome traffic zone during the notified hours of watch of the air traffic control unit (if any) at that aerodrome unless the permission of any such air traffic control unit has been obtained;
  - c) or at a height of more than 400 ft about the surface unless it is flying in airspace described in sub-paragraph (a) or (b) and in accordance with the requirements for that airspace;
- must not overfly people.

These rules on recreational use of drones are summarised in the Drone Code, which is to be followed for all recreational drone flying at the College at all times. The only exception to observance of the Drone Code applies to commercial operators.

If a drone is fitted with a camera, there are a number of additional limitations surrounding where it can be flown, and how close to other uninvolved people or objects. In order to be able to fly within these areas, or closer than the minimum distances that are in the regulations, prior permission must be obtained from the CAA to do so. Regardless of CAA's permissions, however, final approval to fly over College land rests with the Master or the Chief Operating Officer.

## **Pupils**

Pupils who wish to fly drones at the College must be supervised by a suitably qualified member of staff or approved adult at all times, unless they have received formal training by a qualified member of staff and have been specifically approved by that member of staff to fly without supervision. This permission will be used sparingly and is likely only to apply to competent boarders who wish to fly their drones out of the school day as part of their residential life at the College. There are a variety of models on the open market, some of which pose significant risk. Any drone flown by pupils must be approved in advance by a competent member of staff as being suitable.

Approval to fly drones will be given with due caution and recorded by the Chief Operating Officer's Office and specific limitations will be applied to pupils operating drones without adult supervision, which may include defined areas of flight only (e.g. Tank Fields but not Main Campus).

Written authority to fly drones unsupervised must be carried at all times of drone operation on College land and be available for inspection.

The qualifications of any member of staff to provide these approvals will be assessed by the Chief Operating Officer or the Master.

Boarding Housemasters' permission to operate drones must also be sought on an individual basis, and Housemasters are responsible for ensuring that the boarder understands any limitations. Housemasters are not responsible for assessing technical competency and will grant permission in loco parentis, based on formal College permission and assessment of competency having already been issued. Housemasters should also take particular note of the rules concerning storage and charging of drone batteries and fire safety, included later in this policy.

## **Spotter**

There is a risk when flying drones of tunnel vision by the pilot, who may thus lack awareness of the proximity of people, buildings or of other risks. For this reason, at all times drone flying by pupils must include both a pilot and a spotter: drones may never be flown alone. The spotter's role is to maintain a line of sight to the drone, be vigilant at all times and aware of the presence of people or other risks and warn the pilot accordingly. They should be aware of their responsibilities and appropriately competent and responsible. Note: the spotter should not be in any way subordinate to the pilot: they share the responsibilities of safe flight, even though the spotter may not be trained in flying drones.

## **Safe Flying Distances**

The Drone Code defines safe flying distances as being:

- not within 150 metres of either a congested area or an organised open-air crowd of more than 1000 persons, and/or

- not within 50 metres of people or properties/objects.

These safe distances apply without exception to recreational use. Licensed commercial operators (see above) are permitted by their licence to fly within these safe limits providing that people and property are under their direct control. Regardless of the CAA's licence, commercial operators must obtain approval in advance from the College before flying within the boundaries of College land and must include details of the flight and the safety measures to be taken in the event of drone failure.

In deciding whether to give approval, particular consideration will be given to whether the people or crowd can be deemed to be under the pilot's control.

### **Fire Safety – Drone Batteries**

Drone batteries with a capacity above 3.7v 150mAh pose a significant fire risk if punctured. All drone batteries must be stored and carried in a suitable lipo safe bag. All lipo batteries must be marked with the owner's name and date of purchase.

Storage of batteries must be carefully considered, especially in boarding houses. Batteries are to be kept in fire-proof, vented containers at all times when stored and not in use. The presence of stored drone batteries should be noted in Boarding House fire risk assessments.

Lipo batteries must only be charged in a safe location. Batteries should either be supervised when being charged or charged in a safe 'bunker' facility, designated as a safe place for charging.

### **In-House Drone Expertise**

The College's in-house drone expert from time to time (as at January 2024, Nick Mair) should be consulted on technical and training matters and for advice on the detailed requirements for pupil use, storage, charging and control of batteries etc.

### **Useful References**

- CAA website: <https://www.caa.co.uk/drones/>
- Drone Code: <https://www.caa.co.uk/drones/drone-code/>

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