

This policy applies to the use of unmanned aircraft or drones, either as an aerial camera platform to film sequences, or for any scenes depicting the use of unmanned aircraft, for example model aeroplanes.

There is no requirement on any of the Department's academic programmes to include sequences filmed using drones as camera platforms, but in the interests of supporting creativity and engaging storytelling we have produced this policy statement to enable consideration of requests to include drone footage, or other use of unmanned aircraft in student films, including screen fiction and documentary. This policy also applies to productions engaging third party operators to assist with the filming work.

In all instances, the use and operation of unmanned aircraft and drones must comply with the Civil Aviation Authority (CAA) legislation and requirements, and the relevant compliance information can be found at:

<https://www.caa.co.uk/Consumers/Unmanned-aircraft-and-drones/>

This policy is limited to Small Unmanned Aircraft (SUA), i.e. those having a mass of 20kg or less, excluding fuel but inclusive of any articles or equipment installed in or attached to the vehicle at the commencement of flight, and the Department is unable to consider requests concerning larger equipment.

It is essential that anyone planning to use an SUA complies with the relevant articles of the Air Navigation Order, specifically:

Article 241 – endangering safety of any person or property

Article 94 – small unmanned aircraft

Article 95 – small unmanned surveillance aircraft

The essential operating requirements are usefully and concisely presented in [The Drone Code](#), published by the CAA to assist drone users in flying safely.

As Royal Holloway's Egham campus and the general locality is high risk, owing to lots of air traffic and restricted zones including a substantial amount of high structures and residential accommodation, the Department's general position is that we are unable to approve the use of unmanned aircraft in the general locality.

When considering other potential film locations where it may be possible to operate such equipment, it is advised that the [Drone Assist](#) app is used to identify operating areas that pose low risk. Once chosen, a location recce should be undertaken to assess its suitability for the planned usage and indeed as a film location in general. The recce form on [Production Buddy](#) must be filled out, and the production risk assessment must include a specific work method statement covering the operation of the unmanned aircraft or drone. The work method statement must include the requirement to reassess the operating conditions using the [Drone Assist](#) app on the day of the filming, both before setting out and immediately prior to its operation.

If using a third party operator, the production risk assessment documentation must include evidence that they hold CAA permission and are currently listed in the CAA publication:

<http://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=7078>

For **indoor use**, the CAA guidance advises 'The regulations make no distinction between flights made indoors or in the open; the whole safety criteria continue to apply. Certain hazard factors are heavily mitigated by the fact that the aircraft is flying in an enclosed environment and access to the venue can be controlled. Persons within the building, and who may be exposed to a hazard by the flight, should meet the criteria for 'persons under the control of the person in charge of the aircraft' or else have safety precautions taken on their account (e.g. safety netting, tethered drone, etc). Minor indoor recreational use of a very small and light 'toy' drones is not generally regarded as having the same safety implications as for larger drones used outdoors or in commercial service.'

It should be noted that the Government is due to implement a registration scheme and mandatory competency tests for all users of drones weighing 250 grams and above, following publication of the consultation on the safe use of drones:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/631638/unlocking-the-uks-high-tech-economy-consultation-on-the-safe-use-of-drones-in-the-uk-government-response.pdf

It will therefore become necessary to include evidence of such qualification in the production risk assessment documentation.

Public liability insurance

The College Public Liability insurance policy, which expires and is due for renewal on 31st July each year, contains the following endorsement:

Drone Endorsement

Section 3, Exclusion 14 is held to be inoperative in respect of unmanned aerial vehicles up to 20kg in weight excluding fuel but inclusive of any articles or equipment installed in or attached to the vehicle at the commencement of flight. Subject to the operator complying with all legislation and licensing regulations.

In respect of any Injury, **damage** or Financial Loss sustained in connection with unmanned aerial vehicles the Limit of Indemnity is reduced to £5,000,000.

Costs and Expenses will be payable in addition to the limit of indemnity other than in respect of any claim made or bought:

- a) in the United States of America or Canada or territories under their jurisdiction
- b) under or in consequence of any judgement or order in or under the laws of the United States of America or Canada or territories under their jurisdiction

Failure to observe the requirements of this policy will be considered by the Head of Department under the College's disciplinary procedures, and any instances of suspected illegal operation will be referred to the relevant authorities.