



National Position Statement: Unmanned Aerial Systems (Drones)

July 2017

NOTE: This statement has been repealed by a subsequent statement. See NARU National Position Statement: Unmanned Aerial Systems (Drones) – January 2018.

Background

In 2014/15 a set of user requirements were developed for the replacement HART incident ground technology. These requirements were developed during several national workshops with operational practitioners, stakeholders and representatives from every English Ambulance Trust.

The user requirements included a need to 'live survey and monitor' various types of incident ground. The reasons and rationale for this form part of the change process documentation.

The user requirements were then translated into a set of technical specifications for incident ground technology (IGT) which was put out to full OJEU tender.

Drones or UAS (unmanned aerial systems) were proposed as one component of the wider IGT solution by several manufacturers bidding for the tender.

Drones are therefore being introduced as part of the HART IGT capital replacement programme. HART is a national capability with NHS contract obligations to remain interoperable (i.e. each HART Unit must be operationally consistent in terms of assets, training and procedures).

Every HART Unit in England will obtain a nationally specified drone as part of their IGT replacement.

Drones are also in use with several Police and Fire Services in England. NARU is a member of the NPCC Strategic Drones Working Group where national representatives of the Emergency Services, Government and Civil Aviation Authority (CAA) discuss common approaches to use of drones.

Concept of Operations

The drones being rolled out under this programme are principally to support HART operations. They can also be employed to support the CBRN, MTFA and mass casualty capabilities.

As with any aspect of the interoperable capabilities, local Ambulance Commanders will be able to include the utilisation of drones as part of their tactical options for any incident subject to the assets availability and operational parameters.

Envisaged Use

Support to Live Operations:

- HART initial dynamic risk assessments at an incident
- Identification and reassessment of hazards
- Survey of the incident ground / operating area
- Identification of appropriate entry control locations
- Access and egress planning
- Locating patients
- Remote monitoring of patient condition and movements
- Support the implementation of emergency rescue plans (staff rescue and evacuation)

Support to Training Activities:

- Recording and debriefing exercises
- Remote monitoring and assessment of activity by instructors

Note: the drones are part of a wider incident ground technology solution. It may be that other solutions or tactical options can facilitate the requirements set out above without the need to deploy a drone.

NARU is also scoping the feasibility of hosting alternate (higher specification) assets nationally which Trusts can 'draw down' for pre-planned or protracted deployments.

Governance

The concept of operations will require a 'Permission for Commercial Operations' (PfCO) from the Civil Aviation Authority (CAA).

NARU is currently scoping the feasibility of making a single PfCO application on behalf of the Ambulance Services in England.

The drones form part of interoperable capabilities specified and maintained nationally by NARU on behalf of NHS England. Given the way capabilities such as HART are consistently maintained under the SC30 NHS contract arrangements, it makes sense to explore having a single set of standard operating procedures for drone use within the Ambulance Service.

NARU is currently considering the feasibility of developing a single National Operations Manual and corresponding Standard Operating Procedures. Drones can therefore be included within the wider safe system of work for HART and other interoperable capabilities. The national manual may include annexes where individual Trusts can include local enhancements or specific local procedures. These would be included via our established change management process and NARU can support the Trust to obtain the relevant permissions from the CAA for any variances in their annex to the main operations manual should that be necessary.

NARU is also looking at a national asset management system for the aircraft including maintenance and servicing. This will allow national rotation of assets and increased financial efficiency through coordinated activity.

As the national coordinating body, NARU would also include the use of drones within its National Compliance and Quality Assurance Programme to ensure minimum standards are being maintained and investigate any deviations from the national standard.

NARU would seek to work closely with the CAA in this activity and could act as a national single point of contact for the CAA during any of their local investigations or reviews in relation to local Ambulance Service use of drones and any adverse incidents.

NARU will continue to represent the English Ambulance Trusts in multi-agency strategic drone forums at the national level.

The operational use of drones within Ambulance Services will be kept under continual review by the National Operations Group and National Equipment Group.

Specific insurance is required for drone assets and their operational use. NARU is currently evaluating a range of providers.

IMPORTANT NOTE:

Prior to permission being obtained from the CAA (the PfCO), no local Ambulance Trusts in England should operate drones. That includes Trusts that have already received their drones as part of the national HART IGT replacement programme. This applies to all flights regardless of purpose.

Funding

The implementation of drones under this programme is funded from the HART Incident Ground Technology Capital Replacement Programme.

The replacement IGT solution is specified nationally and adoption of the specified equipment is a mandatory contract requirement for English Ambulance Trusts (under the SC30 EPRR provisions).

The drone assets form part of a wider award made following a full OJEU tender process.

The costs of the drone assets have been capped and include part of the overall capital depreciation envelope for HART assets.

The capital replacement aspect of the funding does not include operator and training revenue costs. These will need to be met from existing HART or EPRR budget lines. The number of operators is currently a matter for Trusts (see Operators section below).

Development of the National Operations Manual and implementation of national provisions to support this implementation will be met centrally by NARU.

An annual revenue contribution from HART budgets may be required from each Trust to support a national asset management system. This will be scoped further with proposals being made to the National Operations Group and NARU Central Management Team prior to any development or commitments being made.

NARU is scoping a range of providers for the specific insurance requirements. It is likely that Trusts will be able to add this provision to their existing insurance. National insurance cover is not appropriate but NARU's Procurement Lead will work closely with Trusts to achieve this.

Operators

The current working assumption is that all drone flights will require two operators (pilot and camera systems operator).

These operators do not need to be HART staff. They could be any staff deemed appropriate by the Trust that meet the national competence requirements set (generically) by the CAA and (specifically) by NARU.

NARU is acutely aware of the balance that needs to be struck between utilising Ambulance staff to operate technology when there is also an urgent need to provide patient care. This will be carefully managed through the development of the standard operating procedures.

All pilots will be required to achieve and maintain a recognised and approved UAS pilot qualification.

The number and availability of operators will be scoped further by the National Operations Group.

Next Steps

- NARU to appoint a short-term secondment to support the development work.
- Production of a draft National Operations Manual.
- Development of draft Standard Operating Procedures for integration within the wider safe system of work. This will include risk assessments (GORA's), Equipment Data Sheets (EDS) and Training Information Sheets (TIS).
- Development meeting with the CAA scheduled in September.
- Further consultations with Trusts, via the National Operations Group.
- NARU (CMT) approval of the draft manual and submission of the PfCO.