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05/12/2025

FREEDOM OF INFORMATION REQUEST REFERENCE NUMBER 2609/2025

Thank you for your requests for information regarding Police UAS Safety Governance, BVLOS Trials and Isle of Sheppey Incident, which has now been considered.

Applicant Question:

Under the Freedom of Information Act 2000, I request the following information concerning police-operated unmanned aircraft systems ("UAS") managed or coordinated by the NPCC Drone Portfolio or equivalent unit:

1. Safety governance

- Copies of any policy, manual, or guidance setting out the Safety Management System (SMS), occurrence reporting, or "just-culture" arrangements for police UAS operations (current or superseded versions since 1 January 2023).
- Any risk or safety assurance framework describing how NPCC ensures equivalence with CAA safety standards for State aircraft.

2. Occurrence reporting & incident statistics

- The number of recorded police-UAS occurrences (accidents, incidents, or near-misses) between 1 January 2023 and today, broken down by severity (injury / property / airspace-infringement) and force.
- Confirmation of which body is designated the competent accident-investigation authority for police-UAS accidents.

3. Isle of Sheppey incident – 2 August 2025

- Copies of any internal notification, safety report, investigation summary, or risk-mitigation update held by NPCC relating to this incident.
- Confirmation of the date and recipient of any notification made to the AAIB, CAA, or other investigation body.

4. BVLOS / DFR trials

- The risk assessment, operational concept, or safety case summaries for BVLOS or "Drones as First Responders" trials conducted since 1 January 2024 (including London and Coventry TDAs).
- The consultation records or correspondence showing stakeholder engagement with other UAS operators prior to the establishment of each TDA.

I would prefer electronic copies (PDF or Word). If redaction is necessary under s.31 or s.40 FOIA, please apply minimal redaction and state the exemption relied upon.

NPCC Response:

Unfortunately, your request exceeds the fees limit as outlined by the Secretary of State in that to ascertain exactly what information may be held by the NPCC, would take longer than 18 hours.

This response serves as a refusal notice under Section 17 of the Freedom of Information Act 2000 (the Act). For further information relating to the legislation, please see Annex A.

In wishing to explain, it is question 4 of your request that causes the fees limit to be exceeded. Whilst you have specified the topics of information you are seeking in relation to risk assessment, operational concept, or safety case summaries for BVLOS as well as drones first responders trials and consultation/correspondence with other UAS operators prior to the establishment of each TDA, owing to the way information is held by the NPCC means that there is no automated way to retrieve this information.

The NPCC BVLOS Pathway Programme has been running for three years. The mission of the programme is to design and deliver safe and effective beyond visual line of sight flight to forces, in support of their policing priorities. A first stepping stone to this is Drone as First Responder, which has been running for two of those three years. The concept, use cases, safety cases including risk identification, mitigation, training, procurement, resting and evaluation, stakeholder engagement, data capture and recording and so on has been the core business of this programme.

There is no single repository for this information and therefore manual review of the mailboxes/folders of all individuals with the NPCC who may hold relevant information would need to be manually searched using keyword search functions and then all subsequent returns manually read to ascertain whether they are captured by the specifics of your request.

Initial searches confirmed there are at least 28 people who would need to complete these searches. As part of a dip sample exercise, one individual conducted key word search for 'BVLOS' and 'Drones as First Responders' which returned 13,003 and 10,331 results respectively.

Given the scale of the searches required, the NPCC is unable to undertake all necessary checks in establishing what information is held which is captured by your request, within 18 hours.

In wishing to assist you refine your request, I have identified below where information had been identified as being held. You may wish to resubmit a refined request for the information below, please note however that due to the nature of the information requested, exemptions under the Freedom of Information Act may be engaged.

1. The NPCC does hold documents relevant to both parts of question 1.
2. The NPCC does hold relevant data (since 01/06/2024 – when national data records began) broken down by severity (high/medium/low)

3. My colleagues have advised that this information would be held by the relevant local force. You may wish to submit this question directly to Kent Constabulary.

Yours sincerely

Freedom of Information Officer & Decision Maker

www.npcc.police.uk

COMPLAINT RIGHTS

Internal Review

Any request for an internal review will be acknowledged and responded to, based on the specific wording of your initial request only.

We ask that any rationale to request an internal review, does not include any requests for new information and ask that these be submitted by separate email. We will acknowledge as a new request and may aggregate to your initial request in compliance with the legislation.

If you are dissatisfied with the response you have been provided with in compliance with the Freedom of Information legislation, you can lodge a complaint with NPCC to have the decision reviewed within 40 working days of the date of this response.

The handling of your request will be looked at by someone independent of the original decision and a fresh response provided.

It would be helpful, if requesting a review, for you to articulate in detail the reasons you are not satisfied with this reply.

If you would like to request a review, please write or send an email to NPCC Freedom of Information, c/o PO Box 481, Fareham, Hampshire, PO14 9FS.

Annex A

Section 17 of the Freedom of Information Act 2000 requires the NPCC, when refusing to provide information by way of exemption in question and (c) states why the exemption applies. In accordance with the Freedom of Information Act 2000 this letter acts as a refusal notice to those aspects of your request.

The legislation: Section 12 – the legislation:

The provisions of section 12(1) of the Act are engaged in response to your request as the NPCC are unable to confirm what information it might hold in relation to your request because to do so would exceed the 'appropriate limit' – i.e. the cost limit. Section 12 of the Act provides:

- (1) Section 1(1) does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit.**
- (2) Subsection (1) does not exempt the public authority from its obligation to comply with paragraph (a) of section 1(1) unless the estimated cost of complying with that paragraph alone would exceed the appropriate limit.

These sections of the Act provide that the NPCC is not obliged to comply with its duties under section 1(1) of the Act – i.e. our duty to confirm or deny what information is or is not held, and to supply any information held in response to a request – if to do so would exceed the 'appropriate limit'.

The 'appropriate limit' is defined in the Freedom of Information (Appropriate Limit and Fees) Regulations 2004. Section 3 and 4 of these regulations provide that an authority can take into account the costs it reasonably expects to incur in relation to a Freedom of Information request in regards to the following four activities associated with handling that request:

- (a) Determining whether or not it holds the information
- (b) Locating that information, or document(s) which might contain the information
- (c) Retrieving the information, and
- (d) Extracting the information from a document containing it

The regulations then confirm that the appropriate limit (in the case of a body such as the NPCC) is £450 and that any work estimated or carried out in respect of the above four activities is to be estimated at a rate of £25 per hour.

Therefore, the NPCC can refuse to handle an FOI request for information under section 12 of the Act if it reasonably estimates that it would take more than 18 hours of work to carry out the above four activities in relation to that request. If the limit is exceeded, **there is no requirement for the NPCC to conduct work up to that limit – the limit applies to the whole request and there is not a requirement to answer other parts of a request even if only one area of the request on its own engages the limit.**

Legislation – Section 16

- (1) It shall be the duty of a public authority to provide advice and assistance, so far as it would be reasonable to expect the authority to do so, to persons who propose to make, or have made, requests for information to it.