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Small Unmanned Aircraft – Acceptable Forms of Evidence for the Grant of a CAA Permission and Changes to the Approval Requirements for UK National Qualified Entities

This Information Notice contains information that is for guidance and/or awareness.

Recipients are asked to ensure that this Information Notice is copied to all members of their staff who may have an interest in the information (including any 'in-house' or contracted maintenance organisations and relevant outside contractors).

Applicability:	
Aerodromes:	Not primarily affected
Air Traffic:	Not primarily affected
Airspace:	Not primarily affected
Airworthiness:	Not primarily affected
Flight Operations:	All Unmanned Aircraft Systems Operators
Licensed/Unlicensed Personnel:	All Unmanned Aircraft Systems Operators

1 Introduction

1.1 The purpose of this Information Notice is threefold:

- To set out acceptable evidence/alternative qualifications (critical elements) that are acceptable for the grant of Small Unmanned Aircraft (SUA) Permission under Air Navigation Order (ANO) articles 166 and 167.
- To notify changes to the application and approval process for organisations seeking approval as a UK National Qualified Entity (NQE) for SUA. In essence, these changes will institute a dual-category system of approvals for UK NQEs based on the range of pilot competency assessment activity each individual NQE can undertake.
- To notify changes to the SUA Permission document related to granting permissions for a class of SUA rather than listing individual aircraft.

1.2 SUA means any unmanned aircraft, other than a balloon or a kite, having a mass of not more than 20 kg without its fuel but including any articles or equipment installed in or attached to the aircraft at the commencement of its flight. Under certain circumstances, operators of SUA are required to obtain and fly in accordance with a Permission granted by the CAA. Examples of such operations include conducting aerial work, flying within congested areas or when flying close (within 50 m) to persons, vehicles or vessels that are not under the control of the person in charge of the aircraft. The requirement is detailed in articles 166(5) and 167(1) of the Air

Navigation Order 2009 (ANO 2009). Before granting such a Permission, the CAA needs to be presented with acceptable evidence of an applicant's pilot competency.

1.3 This IN supersedes IN-2014/044.

2 Grant of an SUA Permission – Critical Elements

2.1 The CAA has identified three critical elements which, taken together, constitute acceptable evidence of pilot competency. These three elements are:

- a) Adequate theoretical knowledge/general airmanship;
- b) Successful completion of a practical flight assessment on the class of SUA that is being applied for; and
- c) A minimum amount of recent flying experience on the class of SUA that is being applied for.

Although completion of all three elements constitutes acceptable evidence of pilot competency, the CAA also requires the submission and acceptance of an operations manual in each case before the Permission itself can be granted.

2.2 Prior to the publication of this IN, the CAA has accepted recommendations from approved NQEs in order to grant a 'standard' Permission for aerial work. The traditional NQE route allows an individual with no formal pilot qualifications or experience to undertake a course which can lead to a recommendation to the CAA for a grant of a CAA Permission. The courses cover all of the critical elements mentioned in paragraph 2.1 plus an assessment of the student's operational procedures as set out in their operations manual. Having successfully completed the course, the applicant will be granted a certificate by the NQE (typically the Basic National UAS Certificate – Small (BNUC-S™)/Remote Pilot Qualification (RPQ) etc). The Permission applicant is then able to apply through the NQE or directly to the CAA for the grant of a CAA Permission that will allow aerial work (flights for commercial purposes). The operations manual (ideally in electronic .pdf format) should accompany the formal application on form SRG 1320 www.caa.co.uk/srg1320, along with electronic copies of the critical evidence of pilot competency and the correct fee: www.caa.co.uk/uas.

2.3 As the SUA industry has developed, the CAA has been increasingly asked to accept alternative qualifications and methods of demonstrating pilot competency other than those provided through the NQE route. Many recent applicants for a Permission have formal aviation qualifications, hobbyist certificates or recent flight experience that are highly relevant for fulfilling the critical elements set out in paragraph 2.1 above. An analysis of the critical elements points towards the practical flight assessment as being the single most essential of the elements as small unmanned multirotor and fixed-wing aircraft have unique flight and control systems and characteristics. Unless an applicant has already been objectively assessed by a third-party (such as through the British Model Flying Association (BMFA) certificate system), then there still exists a need for applicants to complete this critical element through an independent assessment.

2.4 Following this recent review of operational policy, the CAA will now accept alternative methods of satisfying the critical elements in addition to completing a full NQE course. This will necessitate changes to the NQE approval system so that although a practical flight assessment will still need to be undertaken, completion of a full course will only be generally applicable to students with no existing aviation qualifications or experience. The changes to the NQE system are set out in [Changes to the NQE Application and Approval System](#) below. Acceptable alternatives to fulfil the critical elements (evidence of pilot competency) are shown at [Annex 3 Table 1](#).

3 Changes to the NQE Application and Approval System

3.1 This change will mean that NQE approvals will be assigned in one of two categories:

- **Full Category.** A Full Category NQE approval corresponds to the pre-existing, conventional approval for an NQE to assess the full range of pilot competency and to act as a 'one-stop shop' for candidates with no existing aviation qualifications or experience. In the move to the new structure, some of the more onerous NQE organisational requirements have been eliminated and a reduced annual fee structure has been introduced. A Full Category NQE must be able to provide a full course but can also choose to offer the individual critical elements to suitable applicants as required. The approval requirements for an organisation to act as a Full Category NQE are set out at [Annex 1](#).
- **Restricted Category.** The Restricted Category NQE approval has been instituted to allow existing 'standard' permission holders to act as a restricted NQE where they will only be approved to conduct practical flying assessments in addition to their general commercial activities. Restricted Category NQE organisations/individuals must have held at least a 'standard' Permission from the CAA for a minimum of one year before they can apply for NQE status. In addition, trade, industry and permission-holder membership organisations wishing to run voluntary coaching and proficiency courses may also apply for an NQE approval, as long as their members who intend carry out practical flying assessments are current permission holders in their own right. The approval requirements for an organisation to act as a Restricted Category NQE are set out at [Annex 2](#).

3.2 NQE organisations should note that Full and Restricted Category approvals granted under this process are UK National approvals only and do not confer any form of approval under European legislation. Specifically, an UK NQE is not a Qualified Entity as defined in Regulation (EC) No. 216/2008 ('The Basic Regulation').

3.3 In parallel with the change to the NQE approval system, the CAA-issued Permission for aerial work will also be updated. The current ANO Articles 166 and 167 Permission document is produced in two categories: Permission for SUA not exceeding 7 kg and Permission for SUA of greater than 7 kg but not exceeding 20 kg. Both these Permission documents list the actual type(s) (models) of aircraft that the operator intends to operate. In line with adjusting to the future structure, 'standard' permissions will not list specific types (models) but will grant permission to fly any SUA within one or more of the following classes:

- a) SUA multicopter with a maximum take-off mass (MTOM) not exceeding 7 kg.
- b) SUA multicopter with a MTOM greater than 7 kg but not exceeding 20 kg.
- c) SUA fixed-wing with a MTOM not exceeding 7 kg.
- d) SUA fixed-wing with a MTOM greater than 7 kg but not exceeding 20 kg.

Within each class, the applicant will be free to vary or add SUA as they wish without the requirement to undertake a practical flight assessment for each individual machine or when adding or changing to a new type (model). Both categories of NQE should make their recommendations to the CAA in one or more of the above classes. Existing Permissions, although currently listing individual aircraft, will automatically have the same privileges.

3.4 The CAA has not hitherto stipulated practical flight assessment standards and has allowed UK NQEs to be flexible in designing the actual test conditions. This practice is likely to continue until such time as national or European regulation defines practical test standards for SUA equivalent to those required for national or European Aviation Safety Agency (EASA) Part-FCL flight crew licences. UK NQEs should however ensure that their students are able to satisfactorily demonstrate at least the following skills during the practical flight assessment:

- a) Pre-flight actions including:
 - Mission planning, airspace considerations and site risk-assessment.
 - Aircraft pre-flight inspection and set-up (including flight controller modes and power-source hazards).
 - Knowledge of the basic actions to be taken in the event of an aircraft emergency or if a mid-air collision hazard arises during the flight.
- b) In-flight procedures including:
 - Maintaining an effective look-out and keeping the aircraft within Visual Line of Sight (VLOS) at all times.
 - Performing accurate and controlled flight manoeuvres at representative heights and distances (including flight in 'Atti' mode (non-GPS assisted) or equivalent where fitted).
 - Real-time monitoring of aircraft status and endurance limitations.
 - Demonstration of a 'return-to-home' function following deliberate control-link transmission failure. Fixed-wing aircraft may demonstrate an equivalent procedure that results in a suitable automated, low-impact descent and landing.
- c) Post-flight actions including:
 - Shutting down/making-safe the aircraft.
 - Post-flight inspection and recording of any relevant data relating to aircraft general condition, aircraft systems, aircraft components and power-sources, controller functionality and crew health and fatigue.

3.5 It is important to note that approved NQEs offering practical flight assessments must not carry out any 'on-the-job' training or assessment of students during their own normal commercial work activity. Student attendance during such events should only be in the guise of observer status, ancillary to any employee contractual obligations. Prospective NQEs should therefore carefully consider their own legal liability under the relevant commercial and private activity legislation before exposing their students to any work-place related hazard as may be found at public and private venues, building sites, film-sets etc.

4 Queries

4.1 Any queries or requests for further guidance as a result of this communication should be addressed to the UAVEnquiries@caa.co.uk e-mail address.

5 Cancellation

5.1 This Information Notice will remain in force until further notice.

Annex 1 Requirements for Approval as a Full Category UK NQE

1 Scope

- 1.1 A UK National Qualified Entity (UK NQE) for Small Unmanned Aircraft (SUA) is an organisation (person) approved by the CAA to carry out assessments of the operators of SUA not exceeding 20 kg mass, and who is authorised to submit reports and recommendations to the CAA in respect of the operator. Article 244 of the Air Navigation Order 2009 (ANO 2009) is the authority for providing for this capability. This Annex sets out the requirements to be met by organisations seeking UK national approval as a Full Category UK NQE.
- 1.2 With regard to the assessment of potential SUA operators, Full Category UK NQE applicants will be required to demonstrate their organisation's ability and procedures to assess the competence of SUA remote pilots, based on both a theoretical knowledge/general airmanship examination (subjects and areas that are to be assessed are set out at [Appendix 1](#) to this Annex) and a practical flight assessment (requirements set out a paragraph 3.4 above). In addition, Full Category UK NQE applicants are required to demonstrate that they have appropriate procedures for the assessment of a potential SUA operator's operations manual and to make recommendations for the award of a permission to operate to the CAA.

2 Eligibility

- 2.1 Any natural or legal person (organisation) shall be eligible as an applicant for an approval under these requirements.

3 Application

- 3.1 Initial applications for approval as a Full Category UK NQE are to be made in writing to uavenquiries@caa.co.uk using [Form SRG 1322](#).
- 3.2 When applying, the applicant must undertake to pay an annual charge. The initial application charge for one calendar year for a Full Category UK NQE is £1290 (to be paid on application). The application will not be processed until the initial charge has been received. The approval charge for subsequent years (renewal) will be at the lower rate of £602 per annum.
- 3.3 Amendments that result in a change to the approval of the organisation (as in [Changes to the NQE Organisation](#) below) will be subject to approval by the CAA and a variation charge of £129 will be incurred.

4 Issue of Approval

- 4.1 An organisation shall be entitled to be approved as a Full Category UK NQE by the CAA when it has demonstrated compliance with the applicable requirements.

5 Requirements for the Grant of Approval

5.1 General Requirements

- 5.1.1 Where an organisation that is seeking approval as a Full Category UK NQE is also involved in the commercial operation of SUA, or any other SUA operations for which a CAA Permission is required, there must be a distinct division between the operations and the UK NQE activities such that the objectivity of the recommendations and reports made under the UK NQE approval is not called into question.
- 5.1.2 The entity and the staff responsible for the assessment tasks must have the knowledge and competence to conduct the assessments and must be free of any pressure and incentive which could affect their judgment or the results of their investigations.

- 5.1.3 The entity must demonstrate the capability to adequately perform the technical and administrative tasks linked with the assessment process, including the use of personnel, facilities and equipment appropriate to the task.
- 5.1.4 The staff responsible for assessment must have:
- sound technical and vocational training;
 - satisfactory knowledge of the requirements for the assessment tasks they carry out and adequate experience of such processes; and
 - the ability to administer the declarations, records and reports that demonstrate that the relevant assessments have been carried out and the conclusions of those assessments.
- 5.1.5 The impartiality of the assessment staff must be guaranteed. Their remuneration must not depend on the number of assessments carried out or on the results of such assessments.
- 5.1.6 The Full Category UK NQE and the staff of the organisation shall not disclose information supplied by the operator to any person other than the UK CAA.

5.2 Specific Requirements

- 5.2.1 The organisation shall demonstrate, on the basis of the information submitted in the exposition, that it has the capability to discharge the organisations obligations:
- a) with regard to:
- general approval requirements;
 - facilities;
 - working conditions;
 - equipment and tools;
 - processes and associated materials;
 - number and competence of staff; and
 - general organisation and coordination.
- b) with regard to management and staff:
- i) an accountable manager has been nominated by the organisation, and is accountable to the CAA. The responsibility of that manager within the organisation shall consist of ensuring that all tasks are performed to the required standards and that the organisation is continuously in compliance with the data and procedures identified in the exposition;
- ii) a person or group of persons have been nominated to ensure that the organisation is in compliance with these requirements, and that they are identified, together with the extent of their authority. Such person(s) shall act under the direct authority of the accountable manager. The persons nominated shall be able to show the appropriate knowledge, background and experience to discharge their responsibilities; and
- iii) staff at all levels have been given appropriate authority to be able to discharge their allocated responsibilities and that there is full and effective coordination within the organisation in respect of the assessment of organisations that operate or intend to operate SUA.
- c) with regard to staff who make reports to the CAA and are authorised by the organisation to sign the documents issued under the privileges of the Full Category UK NQE approval: