

Unmanned Aircraft System Operations in UK Airspace – Recognised Assessment Entity for Remote Pilot Competence RAE(PC)

CAP 722B

Fifth Edition

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Contents

Contents	3
Revision History	5
Foreword	6
Aim	6
How to use this document	6
Policy and scope	7
Transition Arrangements	8
Chapter 1	10
RAE(PC) Scheme	10
1.1 Privileges	10
1.2 Terms of approval	10
1.3 Validity	10
1.4 Transferability	11
Chapter 2	12
RAE(PC) approval requirements	12
2.1 General approval requirements	12
2.2 Entity management	13
2.3 Competence of staff – General	14
2.4 Competence of staff - Theoretical Knowledge Instructors (TKI)	14
2.5 Competence of staff - Practical Flight Instructor (PFI)	15
2.6 Competence of staff - Practical Flight Assessor (PFA)	17
2.7 Impartiality	19
2.8 Training	19
2.9 Changes to the Entity	20
Chapter 3	22
RAE(PC) application process	22
3.1 Eligibility	22
3.2 Application	22

3.3 Exposition	23
3.4 Training manuals	24
3.5 Continuous Monitoring Manual (CMM)	25
3.6 Flight Operations Manual(s) and Operational Authorisation	25
3.7 FSTD Simulator Qualification Manual (SQM)	26
Chapter 4	27
CAA oversight of the RAE(PC)	27
4.1 CAA oversight	27
Chapter 5	30
Use of Flight Simulator Training Devices (FSTD)	30
5.1 General Requirements	30
5.2 Technical Requirements	30
5.3 Instructor Station	31
5.4 Facilities	31
5.5 Simulation performance & fidelity	32
5.6 Simulation Interface & Fidelity	34
5.7 Simulator qualification and testing	35

Revision History

Fifth Edition

March 2025

This revision has been issued to introduce Entity requirements for applications in relation to the new remote pilot competence scheme introduced as AMC to Article 8 of the UK Regulation (EU) 2019/947. In addition, new requirements, and guidance material regarding the use of Flight Simulator Training Devices (FSTD) has been provided. The A2 CofC section has been removed, this is all contained within AMC1 and AMC2 to UAS.OPEN.030(2)(c), of UK Regulation (EU) 2019/947.

To improve clarity, this document has been restructured to include specific requirements, means of compliance (if applicable), and guidance material sections. As such, the use of red underline to highlight changes since the previous version has not been used.

For more information, please see the how to use this document section below.

Fourth Edition

May 2023

This revision has been issued to include amendments to the oversight process and an introduction to Performance Based Oversight Principles.

Third Edition

December 2022

This revision has been issued to include amendments following publication of the UK Acceptable Means of Compliance and Guidance Material for Regulation (EU) 2019/947 as retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018.

Second Edition

December 2022

This edition takes into account the introduction of the harmonised European Union (EU) Unmanned Aircraft Systems (UAS) Regulations, which become applicable on 1 July 2020, and adjusts the scheme accordingly in preparation for this date. In line with international developments, the naming of the National Qualified Entity (NQE) has been changed to Recognised Assessment Entity (RAE).

First Edition

May 2023

When you have done all the scoping work for your publication, please then fill in the submission form that you'll find online. Do not start writing until you have contacted the publications team as we won't publish any documents where a CAP is not the best solution, so you could be wasting time and resources. Once this is complete, we will discuss this with you, and will agree a publications schedule.

Foreword

Aim

This policy is intended for use by an Entity that is, or wishes to be approved as, an RAE(PC), to understand the requirements, administrative processes, instructions, and guidance related to the operation of an RAE(PC) within the United Kingdom. This document also describes the requirements for the use of Flight Simulator Training Devices (FSTD) for the purpose of remote pilot competence training.

How to use this document

In this policy:

An RAE(PC) may be approved in accordance with this RAE(PC) policy to carry out the training and assessment of remote pilots against the competency requirements referred to in Article 8(2) for the purpose of providing advice that the CAA may take into account when evaluating risk assessments that rely on remote pilots to whom a Remote Pilot Certificate has been issued.

'Requirements' highlighted in dark green are requirements that an Entity must comply with to obtain and maintain approval as an RAE(PC). Any individual requirement may comprise several parts (indicated by paragraphs (a, b, c, etc.) and sub-paragraphs (i, ii, iii, etc.)). Every part of a requirement must be fulfilled to comply with the requirement as a whole.

'Guidance' highlighted in light green is guidance material that is intended to help the Entity understand how to comply with the associated requirements.

The purpose of this format is to make it clear to readers: (a) what an Entity must do to obtain and maintain approval as an RAE(PC); and (b) what is guidance to which an Entity should have regard.

This document also applies the following editorial practices:

'Must' indicates a condition that the Entity is required to comply with to obtain or maintain approval as an RAE(PC). 'Should' indicates a strong recommendation: while the Entity is not required to comply with the recommendation to obtain or maintain approval as an RAE(PC), the CAA would expect it to have regard to the recommendation and provide clear and rational justification for not following it.

'May' indicates discretion.

'Must not' indicates prohibition.

Where this policy refers to 'staff' of an Entity, this means the Entity's employees and individuals with whom the Entity has a contract for services (i.e., sub-contracted workers).

Where this policy refers to a ‘person’, it means a natural person or a legal person. A natural person is an individual – a human being as opposed to a corporate entity. This may be someone operating as a sole trader, whether or not they employ or contract with others to do specific tasks. A legal person in this context is a person other than a natural person, for example a limited liability company or other type of organisation, that has legal rights and is subject to legal obligations.

A reference in this policy to a document or a piece of legislation is to that document or legislation as amended, unless expressly stated otherwise. It is an Entity’s responsibility to ensure that it is using the latest version currently in force.

Policy and scope

The RAE(PC) scheme comprises this policy together with the AMC/GM to Article 8(2) of UK Reg (EU) 2019/947, in so far as they relate to an RAE(PC).

This policy sets out:

- the minimum criteria an Entity must meet to be approved as an RAE(PC);
- the process for applying to be approved as an RAE(PC);
- the role of an approved RAE(PC);
- the impacts for a remote pilot of assessment by an RAE(PC); and
- the conditions an Entity must comply with to maintain approval as an RAE(PC), including its roles and responsibilities in relation to:
 - the assessment of remote pilot theoretical knowledge competence; and
 - the assessment of remote pilot practical flight competence.

The CAA has the function of authorising operations in the ‘Specific’ category in accordance with Article 12 UK Reg (EU) 2019/947. To carry out this function, we must evaluate the risk assessment for the proposed operation and the robustness of the mitigating measures proposed by an OA Applicant to keep the UAS operation safe in all phases of flight (Article 12(1)). This includes mitigation measures relating to the competence of the personnel involved: we must establish whether these mitigation measures are sufficiently robust to keep the operation safe in view of the identified ground and air risks (Article 12(2)(b)).

The CAA also has the function of detailing remote pilot competency requirements in an operational authorisation (Article 12(4)(b)). To fulfil this function, the CAA has specified the theoretical knowledge and practical flight skills we require a remote pilot to have in order to carry out operations with specified air and ground risks. These are linked to the UK SORA

risk assessment methodology set out in AMC to Article 11 of UK Reg (EU) 2019/947. A Remote Pilot Certificate (RPC) will serve as evidence that a remote pilot has demonstrated such theoretical knowledge and practical flight skills.

The CAA may, under point UAS.SPEC.050(1)(d)(iii) in the Annex to UK Reg (EU) 2019/947, designate an entity to conduct remote pilot training, as defined in the operational authorisation.

The CAA may also take into account advice from Entities approved under this policy to facilitate our assessment of whether mitigation measures relating to remote pilot competence are sufficiently robust for operations at a given Specific Assurance and Integrity Level (SAIL).

To be approved for the purpose of conducting such training and providing such advice, an Entity must demonstrate to our satisfaction, on a continuing basis, that it meets the criteria and complies with the conditions for approval set out in this policy, including as to the competence and expertise of its personnel and as to the appropriate processes and procedures for the assessment of remote pilot theoretical and practical competence, components and standards; in this policy, these are referred to as “requirements”.

The approval granted to an RAE(PC) under this policy will be valid only in UK airspace and will not confer any approval that is recognised outside the UK.

Transition Arrangements

Subject to the following paragraphs, where an RAE has been approved or its approval has been extended under the Fourth Edition (‘the old policy’), that approval will remain valid and in accordance with the conditions of the old policy until it expires or is otherwise terminated by the CAA. Any application for reapplication must be made and will be evaluated in accordance with the new policy; the conditions and guidance in the new policy will apply.

An RAE approved under the old policy may continue to train and assess pilots for the GVC and issue GVCs in accordance with its existing Terms of Approval until that approval expires or is otherwise terminated by the CAA. (See AMC2 to Article 8(2), as amended.)

An Entity that wishes to train and assess pilots for the new L1, L2, L3 or L4 remote pilot certificates or to be approved as an RAE for the first time, or an RAE whose approval under the old policy has expired, must apply, as an initial application, to become an RAE(PC) under this Fifth Edition of CAP 722B (‘the new policy’).

The CAA will accept applications under the new policy from the date this document is published, at fifth edition. The application fee may be found in the Scheme of Charges; until 31 March 2025, the initial fee is listed under the 2024/2025 Scheme of Charges; from 1 April 2025, the initial fee under the Scheme of Charges in force at the relevant time. An Entity may begin training and assessment under the new policy from the date of its approval under that policy.

For the avoidance of doubt, both RAEs approved under the old policy and RAE(PC)s approved under the new policy may train and assess pilots for and issue A2 Certificates of Competency in accordance with the policy under which they have been approved (see AMC1 and AMC2 to UAS.OPEN.030(2)(c) to UK Regulation (EU) 2019/947).

Chapter 1

RAE(PC) Scheme

1.1 Privileges

Requirements

An Entity that, upon application for approval as an RAE(PC) and on a continuing basis, satisfies the CAA of its ability to comply with all the requirements of the RAE(PC) scheme may, within its terms of approval:

- (a) Deliver remote pilot competence training in accordance with UK Regulation (EU) 2019/947 Article 8(2) AMC1 and point UAS.SPEC.030(1)(d)(iii) of the Annex to that Regulation.
- (b) Advise the CAA as to the competencies demonstrated by remote pilots, which advice must include as a minimum the trainee's name and CAA flyer ID, the RAE(PC) approval number, and the competence level and category satisfactorily demonstrated. A copy of this advice should be provided to the Remote Pilot, in the form of a certificate.
- (c) Deliver training and issue A2 Certificates of Competency in accordance with Appendix A, for UAS operations in subcategory A2 of the open category and as set out in point UAS.OPEN.030(2).

Guidance

- (a) By approving an Entity as an RAE(PC) in accordance with this policy, the CAA indicates that it is satisfied that the Entity has adequate processes, personnel, and experience to assess the competence of a remote pilot.
- (b) This information should be provided to the CAA in a format agreed with the CAA.

1.2 Terms of approval

Requirements

- (a) An Entity must comply with the Terms of Approval issued to it by the CAA and may only exercise the privileges under section 1.1(a) and (b) within the scope of its Terms of Approval.

1.3 Validity

Requirements

- (a) An RAE(PC) approval is valid for one year from the date of the approval but may be renewed on reapplication.

- (b) The CAA may suspend or revoke an RAE(PC) approval at any time, including but not limited to the following instances:
- (1) The Entity fails to demonstrate compliance with applicable regulations, requirements of the RAE(PC) scheme (as amended from time to time), or assessment standards relating to that scheme as published by the CAA.
 - (2) The Entity prevents the CAA from carrying out any oversight relating to the RAE(PC) scheme.
 - (3) The CAA is not satisfied that the Entity can maintain satisfactory control of the activities under their RAE(PC) approval.
 - (4) The Entity no longer meets the eligibility requirements for an RAE(PC) approval.
 - (5) The Entity surrenders their RAE(PC) approval.
 - (6) A nominated person within the Entity breaches the [CAA's fitness of character policy](#).
- (c) An Entity must not function as an RAE(PC) when their approval has expired, irrespective of whether a renewal has been applied for.
- (d) Upon surrender or revocation of an RAE(PC) approval, the original RAE(PC) approval certificate must be returned to the CAA.
- (e) The RAE(PC) scheme comprises the present policy and the provisions of the AMC to Article 8(2) in so far as they relate to an RAE(PC).

Guidance

- (a) The CAA may decide to increase the period of validity of an RAE(PC) approval in accordance with performance-based oversight (PBO) principles as the maturity of the Entity increases. More information on PBO can be found on the CAA website [here](#).
- (b) The duration of validity of the RAE(PC) approval is displayed on the approval certificate.

1.4 Transferability

Requirements

An RAE(PC) must not transfer its approval except because of a change in Entity ownership.

Guidance

A change in Entity ownership is considered a significant change and requires an application to the CAA as per section 2.9.

Chapter 2

RAE(PC) approval requirements

2.1 General approval requirements

Requirements

- (a) An Entity must demonstrate to the CAA's satisfaction that it is able to comply with the requirements of the RAE(PC) scheme on a continuing basis. This scheme comprises the present policy and the AMC to Article 8(2) in so far as it relates to an RAE(PC).
- (b) An Entity must demonstrate to the CAA's satisfaction, based on the information submitted in its exposition and during ongoing oversight, that facilities, working conditions, equipment and tools, processes, number, fitness of character and competence of personnel, general organisation and coordination are adequate to discharge the Entity's obligations under the requirements of the RAE(PC) scheme.
- (c) An Entity must hold a valid Operational Authorisation for practical flight training and assessment for all locations where this training is undertaken.
- (d) An Entity and its staff must carry out their duties with the greatest possible professional integrity and the greatest possible technical competence.
- (e) An Entity must be covered by adequate liability insurance throughout the period of its approval, which must cover the training of remote pilots. In relation to flight operations, the insurance must meet EC 785/2004.
- (f) An Entity must not disclose any confidential information acquired in the course of carrying out its obligations under the RAE(PC) scheme except to its staff, to the CAA, where required to do so by law or permitted to do so by the owner of the information, and in relation to personal data it must comply with the UK General Data Protection Regulation and the Data Protection Act 2018. The Entity must ensure that its staff comply with the obligations above.
- (g) The RAE must keep the following records for a period of five years:
 - (1) Training records, including details of any failed examination or test attempts, may include:
 - (i) Theoretical assessment;
 - (ii) Practical flight assessment;
 - (2) Full details of any remote pilot competency certificate that has been issued;
 - (3) Any recommendation made to the CAA;
 - (4) A record of each quarterly formal, periodic internal safety review/meeting and subsequent follow-up actions;

- (5) Where the scope of the RAE includes training at Level 3 RPC and above, any documentation as part of the continuous compliance monitoring system.

These records must be stored in a secure manner to ensure that no damage to, or tampering of, records can occur.

- (h) The RAE is expected to comply with requests from the Air Accident Investigation Branch, where required.

Guidance

- (b) This includes the successful completion of any audits and inspections that may be required by the CAA as part of the application process.
- (c) In the case of the RPC-L1(A) and RPC-L1(R), flight instruction and assessment may be delivered in the Open A3 category if appropriate. The Entity should continue to act as the operator following the procedures described in their training manual.

2.2 Entity management

Requirements

- (a) The Entity must nominate an accountable manager.
- (b) The accountable manager must ensure that all tasks are performed to the required standards and that the Entity, as well as its employees and individuals with whom the Entity has a contract for services (“staff”), are continuously in compliance with the data and procedures identified in the exposition in 3.3.
- (c) The Entity is always accountable for ensuring compliance with Terms of Approval and the requirements of the RAE(PC) scheme notwithstanding the nomination of an accountable manager or nominated persons in accordance with this section, or the allocation of tasks to staff or consultants.
- (d) Where a person or group of persons has been nominated to ensure the Entity complies with the requirements detailed in the exposition, they must be identified, together with the extent of their respective responsibilities. The nominated persons must act under the direct authority of the accountable manager.
- (e) The Entity must ensure that staff at all levels are given appropriate authority to be able to discharge their allocated responsibilities and there must be full and effective coordination within the Entity in respect to the tasks to be performed within the scope of this policy.
- (f) The Entity must ensure that staff at all levels, including the accountable manager, can be relied on as honest and truthful and are demonstrably consistent in applying the rules, in spirit and letter, in accordance with the CAA’s fitness of character policy.
- (g) Authorisations:

- (1) The Entity must maintain a written record of staff authorised to conduct training and assessments.
- (2) The Entity must maintain a written record of staff authorised to sign documents issued under section 1.1(b).
- (3) These records must include the name of each authorised staff member, the scope of their authorisation and the date on which it was granted.
- (4) Each authorised staff member must be provided with evidence of the scope of their authorisation and the date on which it was granted.

2.3 Competence of staff – General

Requirements

- (a) Persons responsible for ensuring that the Entity complies with the requirements detailed in the exposition must have the appropriate knowledge, background, and experience to discharge their allocated responsibilities.
- (b) The staff authorised by the Entity to sign the documents issued under the activities set out in section 1.1(b) must have the required knowledge, background (including other functions in the Entity) and experience appropriate to discharge their allocated responsibilities.

2.4 Competence of staff - Theoretical Knowledge Instructors (TKI)

Requirements

- (b) Persons who conduct theoretical knowledge instruction (“Theoretical Knowledge Instructors”) must have the appropriate knowledge, background, and experience to discharge their allocated responsibilities.
- (c) Theoretical knowledge instructors must have the following minimum knowledge, abilities, and certification in relation to the specific competence training:
 - (1) The General VLOS Certificate
 - (i) A suitable knowledge of the relevant theoretical knowledge topics.
 - (ii) Ability to teach theoretical knowledge subjects.
 - (2) The L1 Remote Pilot Certificate
 - (i) A suitable knowledge of the relevant theoretical knowledge topics.
 - (ii) Ability to teach theoretical knowledge subjects.
 - (3) The L2 Remote Pilot Certificate
 - (i) A suitable knowledge of the relevant theoretical knowledge topics.
 - (ii) Ability to teach theoretical knowledge subjects.

- (4) The L3 Remote Pilot Certificate
 - (i) A suitable knowledge of the relevant theoretical knowledge topics.
 - (ii) Ability to teach theoretical knowledge subjects.
- (5) The L4 Remote Pilot Certificate
 - (i) A suitable knowledge of the relevant theoretical knowledge topics.
 - (ii) Ability to teach theoretical knowledge subjects.
- (d) Theoretical Knowledge Instructors must be at least 18 years old.

Guidance

- (b) Suitable knowledge may be demonstrated by the TKI holding, or previously having held, a valid certificate of competence relative to the training being delivered or other relevant aviation training. Ability to teach theoretical knowledge subjects may be demonstrated by the TKI completing an on-the-job training programme, evidenced based training, or through a formal teaching qualification.

2.5 Competence of staff - Practical Flight Instructor (PFI)

Requirements

- (a) Persons who conduct practical flight instruction must have the appropriate knowledge, background, and experience to discharge their allocated responsibilities.
- (b) The Entity must develop training for Practical Flight Instructors which must as a minimum cover the following instructor competences:
 - (1) Preparing resources.
 - (2) Creating a climate conducive to learning.
 - (3) Presenting knowledge.
 - (4) Integrating Threat and Error Management (TEM) and crew resource management.
 - (5) Managing time to achieve training objectives.
 - (6) Facilitating learning.
 - (7) Assessing trainee performance.
 - (8) Monitoring and reviewing progress.
 - (9) Evaluating training sessions.
 - (10) Reporting outcomes.
- (c) Practical Flight Instructors must be at least 18 years old.
- (d) Practical Flight Instructors must meet the following additional competency training specific requirements:

- (1) The GVC – No Additional Requirements
- (2) Level 1 RPC A/R
 - (i) Hold at least a valid L1 remote pilot certificate and be current to act as remote pilot in command of the unmanned aircraft during live and simulated practical flight instruction.
 - (ii) Have completed the Practical Flight Instructor training set out in 2.5(b) and met the required competency standard to be authorised to conduct training in accordance with 2.2(e).
 - (iii) Have completed the type-specific manufacturer and operator standardisation training as described in the RAE flight operations manual.
- (3) Level 2 RPC A/R
 - (i) Hold at least a valid L2 remote pilot certificate and be current to act as remote pilot in command of the unmanned aircraft during live and simulated practical flight instruction.
 - (ii) Have completed the Practical Flight Instructor training set out in 2.5(b) and met the required competency standard to be authorised to conduct training in accordance with 2.2(e).
 - (iii) Have completed the type-specific manufacturer and operator standardisation training as described in the RAE flight operations manual.
- (4) Level 3 RPC A/R
 - (i) Hold at least a valid L3 remote pilot certificate to act as remote pilot in command of the unmanned aircraft during live and simulated practical flight instruction.
 - (ii) Have completed the Practical Flight Instructor training set out in 2.5(b) and met the required competency standard to be authorised to conduct training in accordance with 2.2(e).
 - (iii) Have completed the type-specific manufacturer and operator standardisation training as described in the RAE flight operations manual.
- (5) Level 4 RPC A/R
 - (i) Hold at least a valid L4 remote pilot certificate to act as remote pilot in command of the unmanned aircraft during live and simulated practical flight instruction.
 - (ii) Have completed the Practical Flight Instructor training set out in 2.5(b) and met the required competency standard to be authorised to conduct training in accordance with 2.2(e).

- (iii) Have completed the type-specific manufacturer and operator standardisation training as described in the RAE flight operations manual.

Guidance

- (d) During the introduction of the new remote pilot competence training framework, RAE's may not have any staff who are able to meet (2)(i), (3)(i), (4)(i), or (5)(i). The CAA may accept equivalent remote pilot experience accrued outside of the competence framework (for example commercial or military BVLOS experience). Remote pilot(s) proposed as PFI who do not meet the criteria set out above, should demonstrate their experience through a personal logbook. This provision is for the purpose of facilitating initial PFI qualification only and therefore the CAA may withdraw this provision in the future by amending this policy.

2.6 Competence of staff - Practical Flight Assessor (PFA)

Requirements

- (a) Persons who conduct practical flight assessments (Practical Flight Assessors) must have the appropriate knowledge, background, and experience to discharge their allocated responsibilities.
- (b) The Entity must develop training for Practical Flight Assessors which must as a minimum cover the following assessor competences:
 - (1) Structure of assessment.
 - (2) Competency standards.
 - (3) Assessment procedures.
- (c) Practical Flight Assessors must be at least 18 years old.
- (d) Practical Flight Assessors must meet the following additional certificate of competence requirements:
 - (1) The GVC
 - (i) Hold at least a valid GVC remote pilot certificate for the relevant UA category.
 - (2) Level 1 RPC A/R
 - (i) Hold at least a valid L1 remote pilot certificate and be current to act as remote pilot in command of the unmanned aircraft during live and simulated practical flight instruction.
 - (ii) Have completed the Practical Flight Assessors training course in 2.6(b) and met the required competency standard to be authorised to conduct training in accordance with 2.2(e).
 - (iii) Have completed at least 10 hours as an L1 instructor on the UA type used to conduct the training undertaken in the specific

category demonstrated through a personal flight log in the last 18 months.

(3) Level 2 RPC A/R

- (i) Hold at least a valid L2 remote pilot certificate and be current to act as remote pilot in command of the unmanned aircraft during live and simulated practical flight instruction.
- (ii) Have completed the Practical Flight Assessors training course in 2.6(b) and met the required competency standard to be authorised to conduct training in accordance with 2.2(e).
- (iii) Have completed at least 35 hours as an L2 instructor, of which 10 hours can be in a simulator, on the UA type used to conduct the training undertaken in the specific category demonstrated through a personal flight log in the last 18 months.

(4) Level 3 RPC A/R

- (i) Hold at least a valid L3 remote pilot certificate to act as remote pilot in command of the unmanned aircraft during live and simulated practical flight instruction.
- (ii) Have completed the Practical Flight Assessors training course in 2.6(b) and met the required competency standard to be authorised to conduct training in accordance with 2.2(e).
- (iii) Have completed at least 275 hours as an L3 instructor, of which 175 hours can be in a simulator, on the UA type used to conduct the training undertaken in the specific category demonstrated through a personal flight log in the last 18 months.
- (iv) Submit a completed training record and personal flight log to the CAA and receive authorisation prior commencing flight assessments.

(5) Level 4 RPC A/R

- (i) Hold at least a valid L4 remote pilot certificate to act as remote pilot in command of the unmanned aircraft during live and simulated practical flight instruction.
- (ii) Have completed the Practical Flight Assessors training course in 2.6(b) and met the required competency standard to be authorised to conduct training in accordance with 2.2(e).
- (iii) Have completed at least 135 hours as an L4 instructor, of which 68 hours can be in a simulator, on the UA type used to conduct the training undertaken in the specific category demonstrated through a personal flight log in the last 18 months.
- (iv) Submit a completed training record and personal flight log to the CAA and receive authorisation prior commencing flight

assessments.

Guidance

- (d) During the introduction of the new remote pilot competence training framework, RAE's may not have any staff which are able to meet (2)(i), (3)(i), (4)(i), or (5)(i) and (2)(iii), (3)(iii), 4(iii), or 5(iii). The CAA may accept equivalent remote pilot experience accrued outside of the competence framework (for example commercial or military BVLOS experience). The remote pilot(s) proposed as PFA must be able to demonstrate their experience through a personal logbook. This provision is for the purpose of facilitating initial PFA qualification only and therefore the CAA may withdraw this provision in the future by amending this policy.

2.7 Impartiality

Requirements

- (a) An Entity must take all reasonable steps to ensure impartiality and avoid conflicts of interest, including but not limited to the steps below.
- (b) Trainers and assessors must be free of any pressure and incentive of any type, in particular of a financial type, that could affect their judgement or the results of their assessments.
- (c) The remuneration of the persons involved in the assessment activities must not depend on the number of assessments carried out or on the results of such assessments.
- (d) Persons who are authorised to instruct must not conduct assessments for the same students or cohorts of students.
- (e) Persons who conduct FSTD qualification testing must be free of any pressure that could affect their judgement or the results of their assessments.

Guidance

These requirements are to ensure that the objectivity of the activities conducted under the RAE(PC) approval are not called into question.

2.8 Training

Requirements

- (a) The Entity must ensure that all staff receive sufficient training to perform their allocated tasks.
- (b) Training must be based on the authority granted to the individual, such as TKI, PFI, or PFA, and must be competency based.
- (c) The Entity must develop training material and plans, provide them to staff as needed, and review them at least annually to ensure they are kept up to the

required standards and reflect any changes in regulations and policies.

- (d) The Entity must maintain training records and review the training needs of all staff at least annually to ensure that the staff is trained to the processes and procedures relevant to their allocated tasks.
- (e) Individuals under training must be designated as such in the training record until their training is completed.

Guidance

- (a) The Entity should develop a competency-based training program proportional the authority of the specific role.
- (b) The Entity should adapt the ICAO Procedures for Air Navigation Services - Training - (Doc 9868) when conducting the training design.
- (c) New staff may be trained by existing staff who are approved signatories. Training may take the form of:
 - (1) Explanation of the processes involved.
 - (2) Demonstration of the processes involved.
 - (3) Allowing the trainee to carry out theoretical or practical training and assessment under the supervision of the approved signatory, until the trainee becomes an authorised signatory.

2.9 Changes to the Entity

Requirements

- (a) Upon issue of the RAE(PC) approval, any change to the Entity that is significant to the training or assessment of trainees, particularly changes to training manuals or the safety management system (SMS), must be approved by the CAA.
- (b) An application for a variation must be submitted to the CAA in accordance with 0(d), and the Entity must demonstrate to the CAA before implementing the change that it will continue to comply with the requirements of the RAE(PC) scheme after implementation.

Guidance

- (a) The following changes are considered significant and would require an approval by the CAA:
 - (1) Change in Entity ownership.
 - (2) Change in accountable manager.
 - (3) Change in the scope of the RAE(PC) approval.
 - (4) Change to safety management procedures.
 - (5) Addition of a new training site.

- (6) Qualification of a new FSTD.
- (b) The following changes would not typically be considered significant and would not require an approval by the CAA:
 - (1) Personnel amendments (excluding the accountable manager).
 - (2) Administrative updates to exposition and supporting documents.

Chapter 3

RAE(PC) application process

3.1 Eligibility

Requirements

- (a) Any natural or legal person is eligible for an approval under this policy.
- (b) Where the applicant for an RAE(PC) approval is an individual, they must be at least 18 years old.
- (c) The RAE(PC) approval is limited to individuals or organisations whose primary place for conducting the RAE(PC) activities defined in this policy is in the UK.
- (d) The RAE(PC) may conduct training and assessments in third countries, for example to benefit from fair weather, however, the additional cost of oversight such as audit or travel must be borne entirely by the approved entity. All location specific regulatory requirements must also be met and demonstrated to the CAA as part of an application and through ongoing oversight.

Guidance

- (d) Additional charges for overseas travel can be found on the CAA website ORS5 scheme of charges which can be accessed [here](#).

3.2 Application

Requirements

- (a) An application for approval as an RAE(PC) must be made in the form and manner established by the CAA and must include an outline of the terms of approval and associated activities requested set out under section 1.1.
- (b) Initial application for approval as an RAE(PC) must be made in writing to uavenquiries@caa.co.uk using Form SRG 1322.
- (c) Reapplication for approval as an RAE(PC) must be made in writing to uavenquiries@caa.co.uk using Form SRG 1322, up to 90 days before the date of expiry of the current approval.
- (d) Variation application must be made in writing to uavenquiries@caa.co.uk using Form SRG 1322.
- (e) The application must contain all documentation to satisfy the requirements in Chapter 2 and Chapter 3.

Guidance

- (a) The RAE(PC) application is assessed by the CAA RPAS Sector Team in the following manner:

- (1) The application forms and relevant documents are examined for completeness and correctness – also known as ‘desktop assessment’.
 - (2) Once all documents have been assessed, initial feedback is provided electronically. This feedback may also contain an oversight report that will provide any findings and/or observations with a request to address these.
 - (3) When any initial findings or observations have been addressed satisfactorily and the desktop assessment has been completed, an on-site audit may be scheduled.
 - (4) Upon approval, an RAE(PC) receives an approval.
 - (5) The Entity is notified when an application is unsuccessful with associated feedback. Should the Entity wish to apply again, a subsequent application will be presented as an initial application.
- (b) Applying for a renewal before the date of expiry of the current approval does not affect the period of validity of the current approval.
- (c) The application process will not begin until the necessary fees have been paid. The RAE(PC) should refer to the CAA Scheme of Charges in force at the time of the application for the relevant application fees. Where the CAA requires additional hours to assess an application, the Entity will be notified before any further charges are applied.

3.3 Exposition

Requirements

- (a) The Entity must submit an exposition to the CAA that contains the following minimum sections:
- (b) A statement signed by the accountable manager confirming that the exposition and any associated manuals that define the Entity’s compliance with this policy will always be complied with.
- (c) A description of the intended scope of the RAE(PC) approval.
- (d) An Entity organisation chart showing the reporting lines of the nominated persons in accordance with the requirements described in 0.
- (e) The title, name, duties, responsibilities, experience and competency of the nominated persons in accordance with requirement 0(a) and (b), including matters on which they may deal directly with the CAA on behalf of the Entity.
- (f) A list of the staff authorised by the Entity to perform duties in accordance with requirement 0(e), including a brief description of their experience and competency.
- (g) The procedures to maintain impartiality in accordance with section 2.7.
- (h) A general description of personnel and resources.
- (i) A description of the facilities and locations that will be used to perform theoretical and practical flight instruction and assessments.

- (j) The procedure for the notification of Entity changes to the CAA.
- (k) The procedures for amending and distributing the exposition internally.
- (l) A brief description of the process for formal, periodic internal safety reviews.
- (m) The exposition must be amended as necessary to remain an up-to-date description of the Entity, and copies of any amendments must be supplied to the CAA.
- (n) The exposition and the documents to which it refers must be implemented and followed by the Entity.

Guidance

The scope should include all the courses the RAE has developed for example, RPC-L1(A), RPC-L1(R), RPC-L1(A) to RPCL1(R) bridging course, RPC-L3(A) integrated course, and so on.

3.4 Training manuals

Requirements

The Entity must provide one or more training manuals which include the following processes and procedures:

- (a) The training plan for each course defined in the scope of the application including:
 - (1) The aim of the course.
 - (2) Procedures to assess trainee remote pilots meet the pre-entry requirements.
 - (3) Procedures to assess the trainee remote pilot for crediting against previous experience.
 - (4) An outline of the training programme.
 - (5) Procedures to record the trainee's progress.
 - (6) Procedures to maintain safety throughout training.
 - (7) Procedures to administer assessments.
 - (8) Procedures to monitor training effectiveness.
- (b) Details of practical and simulated flight training exercises including:
 - (1) The training design which must be competency based.
 - (2) Flight training syllabus.
- (c) Simulated flight training exercises (if applicable) including:
 - (1) The training design which must be competency based.
 - (2) Simulated flight training syllabus.

- (d) Theoretical knowledge instruction syllabus including:
 - (1) Course structure
 - (2) Instruction method
 - (3) Trainee progress monitoring
 - (4) Training aids and materials
 - (5) Assessment procedures
- (e) Forms, templates, operational authorisation(s), and certificates

Guidance

- (a) The applicant should adapt the ICAO Procedures for Air Navigation Services - Training - (Doc 9868) when conducting the training design.

3.5 Continuous Monitoring Manual (CMM)

Requirements

- (a) Where the scope of the application contains training at **level 3 RPC and above**, the Entity must implement a continuous compliance monitoring system.
- (b) The CMM system must be described in a CMM manual and must include as a minimum the following information:
 - (1) Compliance monitoring and safety management policy.
 - (2) Scope of the compliance monitoring system.
 - (3) Responsibilities.
 - (4) Compliance monitoring Entity chart.
 - (5) Procedures for internal audit scheduling.
 - (6) Procedures for conducting audits.
 - (7) Procedures to assess risk.
 - (8) Procedures to assess sub-contractors.
 - (9) Procedures to monitor training feedback.

3.6 Flight Operations Manual(s) and Operational Authorisation

Requirements

- (a) Except in the case of the GVC and L1 competencies, the RAE(PC) must have a valid operational authorisation to conduct practical flight instruction and assessments.

- (b) The Entity must present the OA as part of an initial, renewal, or variation application.
- (c) The Entity must provide a Flight Operations Manual covering the flight operations procedures for practical flight instruction and assessment.

3.7 FSTD Simulator Qualification Manual (SQM)

Requirements

- (a) The Entity must provide an FSTD Simulator Qualification Manual (SQM) for all flight simulator training devices used for training.
- (b) The Entity must present the FSTD SQM as part of an initial or renewal application.

Guidance

- (a) Chapter 5 contains details of the SQM requirements.

Chapter 4

CAA oversight of the RAE(PC)

4.1 CAA oversight

Requirements

- (a) The Entity must make arrangements to allow the CAA to undertake any oversight activities the CAA deems necessary to determine initial and continued compliance with the requirements of this scheme.
- (b) The Entity must allow the CAA to review any report, make any inspection and perform or witness any activities that the CAA deems necessary to check the validity of the Entity's compliance to the requirements of this scheme.
- (c) Upon reception of an oversight report from the CAA, the Entity must respond within the timescale set by the CAA detailing the actions it intends to take to rectify any identified issues.
- (d) Upon receipt of a notification of a finding by the CAA, the holder of the Entity approval must demonstrate corrective action to the satisfaction of the CAA within the allocated timescale.
- (e) If notified of a suspension or revocation, the Entity approval holder must provide the CAA with written confirmation of receipt of the notice of suspension or revocation within two working days of receipt.

Guidance

- (a) **Audits.** The CAA conducts a desktop audit annually when an Entity has applied to renew its approval. In addition, an on-site audit is normally programmed to be carried out at regular intervals.

Depending on the complexity and output of the Entity, performance-based oversight principles dictate that the CAA's level of oversight is varied. This may mean more frequent audits or variations in scope and manpower employed to conduct the activity.

On-site audits are scheduled with the Entity, although the CAA reserves the right to conduct audits at 'no notice' if it considers such action to be necessary. Audits are conducted by the CAA RPAS Sector Team and other specialist CAA resources as required and should be carried out at one of the primary assessment sites to facilitate inspection of the facilities.

Findings or observations are discussed during the audit and a timescale for their rectification is agreed.

- (b) **Oversight.** An oversight report is distributed to the RAE(PC) within 28 working days of completion of an audit. The RAE(PC) is expected to respond within the

allocated timescale detailing the actions it intends to take to rectify any identified issues. Further communication continues as considered necessary by the CAA until the oversight report and associated findings/observations are closed.

(c) **Findings and Observations.** When the CAA finds objective evidence during an audit or inspection that shows non-compliance with the applicable requirements, the CAA notifies a finding to the Entity approval holder. Findings are classified as follows:

- (1) Level-one finding is any non-compliance with these requirements that could lead to an effect on the safety of a UAS operation;
- (2) Level-two finding is any non-compliance with these requirements that is not classified as level-one.

The CAA may raise **observation** where it considers that there is potential for future non-compliance if no action is taken, or where the CAA wishes to indicate an opportunity for safety improvement or indicate something that is not considered good practice.

(d) **Subsequent Actions.** On receipt of a notification of a finding or an observation, the following actions are expected to be taken:

- (1) In the case of a level-one finding, the holder of the RAE(PC) approval demonstrates corrective action to the satisfaction of the CAA within a period of no more than 21 working days after written confirmation of the finding.
- (2) In the case of a level-two finding, the corrective action period granted by the CAA is appropriate to the nature of the finding but is not normally more than six months. In certain circumstances and subject to the nature of the finding, the CAA may extend the six-month period subject to a satisfactory corrective action plan.
- (3) In the case of an observation, corrective action is not obligatory, but an Entity is expected to provide a sound reasoning as to why the observation is not being followed.

(e) **Suspensions and Revocations.** In some cases, a level-one or level-two finding may result in a provisional, partial, or full suspension of the RAE(PC) approval, or a revocation.

- (1) If notified of a suspension or revocation, the RAE(PC) approval holder provides the CAA with written confirmation of receipt of the notice of suspension or revocation within two working days of receipt.
- (2) A provisional suspension means that an RAE(PC) approval is suspended pending further investigation.
- (3) A partial suspension means that only part of the RAE(PC) approval is suspended pending corrective action.
- (4) A full suspension means that the entire RAE(PC) approval is suspended pending corrective action.
- (5) A revocation means that the Entity is no longer approved as an RAE(PC)

and may no longer exercise the privileges of an RAE(PC) until a new application is made and a new RAE(PC) approval issued.

(f) **Review**

- (1) If the CAA refuses an Entity's application for approval as an RAE, the Entity may have that decision reviewed. Additionally, if the CAA proposes to revoke or suspend an RAE approval an RAE may have that proposal reviewed. [Appeal a decision the CAA has made affecting your organisation.](#)
- (2) A remote pilot who is dissatisfied with the way an RAE has conducted their competency assessment may raise that with the CAA. [Guidance for applicant: Review of conduct of test or exam.](#)

Chapter 5

Use of Flight Simulator Training Devices (FSTD)

5.1 General Requirements

Requirements

The Entity must ensure that all conditions in this chapter are complied with on an ongoing basis.

5.2 Technical Requirements

Requirements

- (a) The FSTD must be equipped with a means for quickly and effectively conducting a testing of software and hardware performance prior to use.
- (b) The computer capacity, accuracy, resolution, and dynamic response must be sufficient to fully support the overall fidelity requirements described in 5.3 and 5.5.
- (c) A technical logbook must be maintained and easily accessible for review prior to the FSTD being operated.
- (d) The FSTD must be equipped with a means to display the visual response time (ms) and frame rate (fps) of any display.
- (e) The Entity must establish procedures for the management of 5.1.

Guidance

- (a) This may be an automated test routine with corresponding report or scenario with corresponding report from the nominated person authorised to conduct the performance test. Tests, results, and defects must be recorded in the daily technical log.
- (b) A statement of compliance is sufficient to meet this requirement. The SOC should contain reference to the equipment and specification.
- (c) The Entity should follow the technical logbook specification in UAS.SPEC.050 and treat the simulator as if it were a physical aircraft (common practice in manned aviation training). In addition, any training limitations, restrictions, or work arounds should be detailed and made available at the start of the training session.
- (d) An on-screen display should be available for the purpose of checking that the FSTD is operating within the approved fidelity envelope.
- (e) Procedures should be detailed in the simulator qualification manual (SQM) and made available to the CAA on request.

5.3 Instructor Station

Requirements

- (a) The instructor station must enable the operator to control all required system variables and insert abnormal or emergency conditions into the UAS system(s).
- (b) The instructor station must be capable of loading predefined training scenarios to facilitate repeatable and timely training events in accordance with the training plan.
- (c) The UAS simulator must have a feedback tool that provides the instructor with visibility of whenever the UA limits, including crash limits, are approaching or have been exceeded.
- (d) The instructor station must be capable of controlling environmental effects as required by the training design such as:
 - (1) Wind speed and direction.
 - (2) Temperature.
 - (3) Barometric pressure.
 - (4) Turbulence.
 - (5) Other parameters dictated by the training design.
- (e) The instructor station must be equipped with a suitable operator seat that meets the relevant HSE standards.
- (f) The instructor station visual display must be positioned in a manner that obscures it from the view of the remote pilot.

Guidance

- (a) This should include the functionality to freeze the simulation (for the purpose of instructor discussion) and repositioning of the aircraft in the current scenario. A statement of compliance is sufficient to meet the requirement.
- (c) For example, an indicator displaying that Vne is approaching or has been exceeded, or that impact forces sufficient to damage the UA have been detected. Ground and aerodynamic forces should be accounted for. In the case of crash limits, freezing the session may be used as the indicator. A SOC stating the limits to be indicated and the indication method is sufficient to meet this requirement.

5.4 Facilities

Requirements

- (a) The FSTD must be suitably located to exclude distraction.

- (b) The FSTD location must consider the relevant health and safety requirements including but not limited to:
- (1) Lighting
 - (2) Heating
 - (3) Fire safety
 - (4) Electrical hazards
 - (5) Avoidance of trips and falls
 - (6) Fatigue management
 - (7) Workplace ergonomics
 - (8) The lighting environment for panels and instruments must be sufficient.

Guidance

- (a) The FSTD should be in a segregated space such as a separate room and must meet all relevant HSE at work regulations. A SOC is sufficient to meet this requirement.
- (b) A SOC confirming these considerations and how they been met is sufficient to meet this requirement.
- (c) A SOC is sufficient to meet this requirement.

5.5 Simulation performance & fidelity

Requirements

- (a) The FSTD must be equipped with a flight dynamics model that accounts for various combinations of drag and thrust normally encountered in flight corresponding to actual flight conditions, including the effect of change in aeroplane or rotorcraft attitude, sideslip, thrust, drag, altitude, temperature, weight, moments of inertia, centre of gravity location, and configuration.
- (b) The navigation system, position data, and data performance (such as latency) must replicate that of the UAS being simulated.
- (c) The FSTD must simulate applicable UAS system operation, both on the ground and in flight. Systems must be operative to the extent that all normal, abnormal, and emergency operating procedures can be accomplished.
- (d) Ground handling performance such as taxi performance must be representative of the aircraft being simulated.
- (e) Stopping and directional control forces must be representative for at least the following runway conditions based on aeroplane related data:
 - (1) Dry conditions
 - (2) Wet conditions

- (f) Modelling that includes the effects of icing, where appropriate, on the airframe, aerodynamics, and the engine(s) is representative of the UAS being simulated.
- (g) Realistic aircraft properties including, mass, centre of gravity, and moments of inertia as a function of payload and fuel loading must be implemented.
- (h) The flight dynamics model accounts for aircraft behaviour including cause and effect for at least the following conditions:
 - (1) Loss of population.
 - (2) Mechanical failures.
 - (3) Electronics failures.
 - (4) Loss of connectivity.
 - (5) Others relevant to the UAS being simulated or as dictated by the training design.
- (i) The FSTD must include accurate modelling of other air traffic behaviour and the capability for an instructor to define behaviour of simulated air users to allow simulation of air traffic interactions.
- (j) Modelling of C2 link system performance during nominal and degraded performance.
- (k) Modelling of the detect and avoid system performance during nominal and degraded performance (if fitted).
- (l) Modelling of GPS performance during nominal and degraded operation.

Guidance

- (a) The flight dynamics are tailored to the aircraft being simulated using the aircraft manufacturers data. Objective evidence maybe used to demonstrate compliance with requirement. Objective evidence may consist of correlated flight test(s) and corresponding SOC conducted by an RP with suitable experience on type. A suitably experienced Remote Pilot could be an instructor or assessor with relevant experience on type. A Statement of compliance (SOC) and relevant test report in accordance with 5.6 is sufficient to meet this requirement.
- (b) The navigation data feed performance should be representative. A SOC is sufficient to meet this requirement.
- (c) Aircraft system logic should be representative of the aircraft being simulated. Failures, including cascading failures, should be accurately modelled. A SOC covering the systems simulated is sufficient to meet this requirement.
- (d) A SOC stating that ground handling performance is representative is sufficient for this requirement.
- (e) A SOC stating that stopping performance in each condition is representative is sufficient for this requirement.
- (f) Only applicable for aircraft approved for known icing operation. A SOC is sufficient to meet this requirement.

- (g) A SOC is sufficient to meet this requirement.
- (h) The flight dynamics are tailored to the aircraft being simulated using the aircraft manufacturers data. Objective evidence maybe used to demonstrate compliance with requirement. Objective evidence may consist of correlated flight test(s) and corresponding SOC conducted by an RP with suitable experience on type. A suitably experienced RP could be an instructor or assessor with relevant experience on type. A Statement of compliance (SOC) and relevant test report in accordance with 5.6 is sufficient to meet this requirement.
- (i) A SOC is sufficient to meet this requirement. The SOC should contain reference to the sources of data for third party traffic performance. The traffic environment should be relevant to the training event including encounter types and encounter rates.
- (j) A SOC is sufficient for this requirement.
- (k) The DAA system performance (if fitted) corresponds to the UAS being simulated. Objective evidence maybe used to demonstrate compliance with requirement. Objective evidence may consist of correlated flight test(s) and corresponding SOC conducted by an RP with suitable experience on type. A suitably experienced RP could be an instructor or assessor with relevant experience on type. A Statement of compliance (SOC) and relevant test report in accordance with 5.6 is sufficient to meet this requirement.
- (l) A SOC is sufficient for this requirement.

5.6 Simulation Interface & Fidelity

Requirements

- (a) The visual system displaying external view(s) such as camera feeds (if used) must meet manufacturer recommended specifications of the UAS being simulated.
- (b) Command unit flight information displays must meet manufacturer recommended specifications or be identical to the UAS being simulated.
- (c) Significant interface sounds which result from remote pilot or system actions must correspond to those of the UAS being simulated.
- (d) Command unit switches, instruments, equipment, panels, systems, display hardware, display configuration, flight control input devices sufficient for the training events to be accomplished must be positioned in accordance with the manufacturer of the UAS being simulated.
- (e) Crew member seats must be provided with sufficient adjustment to allow the occupant to achieve the correct seating position for flight.
- (f) Control interfaces must correspond to that of the replicated UAS.
- (g) Direction of movement of controls and switches must correspond to that of the UAS being simulated.

- (h) All relevant instrument indications involved in the simulation of the applicable UAS must automatically respond to control movement by a flight crew member, environmental factors, or system automation.
- (i) Communications equipment and services must replicate those used when operating the UAS for the purpose of live flight instruction.
- (j) Third party information displays such as weather services and traffic information services must replicate those used when operating the UAS for purpose of live flight instruction.

Guidance

A SOC is sufficient to meet all requirements in 5.5.

The SOC should reference any evidence such as comparisons between the FSTD and the aircraft being simulated for example images, diagrams, or other information as appropriate.

5.7 Simulator qualification and testing

Requirements

- (a) An Entity applying to operate a FSTD must produce a Simulator Qualification Manual (SQM).
- (b) The Entity must submit the SQM to the CAA for approval prior to commencing its use for training; the SQM which must include the following:
 - (1) Title page.
 - (2) FSTD information page including:
 - (i) FSTD Manufacturer and model.
 - (ii) FSTD Configuration (SIL,HIL, or other).
 - (iii) Unmanned aircraft category and type being simulated.
 - (iv) FSTD computer identification.
 - (v) Visual system type and manufacturer (if fitted).
 - (3) Table of contents.
 - (4) List of effective pages and log of test revisions.
 - (5) Listing of all reference and source data.
 - (6) Glossary of terms and symbols used.
 - (7) Statement by the Entity accountable manager declaring that the information contained in the manual is correct and accurate.
 - (8) Procedure to periodically update the manual.
 - (9) Statements of compliance (SOC) with references to the relevant

requirements. SOC's should refer to sources of information, show compliance approach rationale to explain how the referenced material is used, and conclusions reached.

- (c) **Testing.** The Entity must include the following items in the SOC where requirement includes objective testing:
 - (1) **Test title:** this must be short and definitive and refer to the requirement.
 - (2) **Test objective:** this must be a summary of what the test is intended to demonstrate.
 - (3) **Demonstration procedure:** this must be a brief description of how the objective is to be met.
 - (4) **References:** these are the data source documents including both the document number and the page.
 - (5) **Initial conditions:** a list of the test initial conditions as required.
 - (6) **Manual test procedures:** procedures should be sufficient to enable the test to be flown by a remote pilot.
 - (7) **Evaluation criteria:** specify the main evaluation criteria.
 - (8) **Expected result(s):** the expected behaviour or cause and effect.
 - (9) **Test result:** dated FSTD result and declaration by the member of staff conducting the test.
- (d) **Configuration control.** A configuration control system must be established and maintained to ensure the continued integrity of the hardware and software as originally qualified.
- (e) A declaration that the impartiality of each test must be maintained in accordance with 2.7(d) must be included in each SOC.